FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT 627

John Wayne Airport General Aviation Improvement Program

Responses to Comments
Volume 1B—Comments Received

SCH No. 2017031072

COUNTY OF ORANGE John Wayne Airport 3160 Airway Avenue Costa Mesa, California 92626

Contact: Lea Choum







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John Wayne Airport General Aviation Improvement Program (IP#16-432) SCH No. 2017031072

Responses to Comments
Volume 1B—Comments Received

May 7, 2019

Prepared for:

COUNTY OF ORANGE
John Wayne Airport
3160 Airway Avenue
Costa Mesa, California 92626

Contact: Lea Choum

Prepared by:

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Landrum & Brown
Austin Transportation Consulting
Ramboll

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ATTACHMENTS

Volume 2A

Attachment A: Health Risk Assessment

Volume 2B

APPENDICES (To the Health Risk Assessment)

Appendix

Appendix A: Aircraft Emissions

Appendix B: Air Dispersion Model Files (Electronic)

Appendix C: Speciated Chemicals of Potential Concern

Appendix D: HARP2 Model Files (Electronic)

Appendix E: Health Risk Assessment Results

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5.	City of Irvine	October 11, 2018	3-13
6.	City of Irvine	October 11, 2018	3-16
7.	City of La Habra	October 16, 2018	3-19
8.	City of Newport Beach, submitted by Remy Moose Manley	November 16, 2018	3-20
9.	City of Newport Beach, submitted by Councilmember Scott Peotter	November 21, 2018	3-38
10.	South Coast Air Quality Management District	November 6, 2018	3-40
11.	South Coast Air Quality Management District	November 6, 2018	3-44
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12.	Aircraft Owners and Pilots Association, submitted by Adam Williams	November 21, 2018	3-48
13.	AirFair, submitted by Melinda Seely	October 24, 2018	3-51
14.	Airport Working Group, submitted by Mel Beale	November 21, 2018	3-52
15.	Airport Working Group, submitted by Mel Beale	November 21, 2018	3-60
16.	Airport Working Group, submitted by Mel Beale	November 21, 2018	3-68
17.	California Cultural Resource Preservation Alliance, submitted by Patricia Martz, PhD	November 1, 2018	3-75
18.	Citizens Against Airport Noise and Pollution, submitted by Beverly Blais Moosmann	November 19, 2018	3-76
19.	Corona del Mar Residents Assn, submitted by Debbie Stevens	November 21, 2018	3-83
20.	Corona del Mar Residents Assn, submitted by Debbie Stevens	November 21, 2018	3-87
21.	Irvine Terrace Community Association, submitted by Brian Jones	November 20, 2018	3-90
22.	Juaneño Band of Mission Indians, Acjachemen Nation, submitted by Joyce Perry	November 15, 2018	3-91
23.	Southern California Pilots Association, submitted by Joe Finnell	November 7, 2018	3-92
24.	Southern California Pilots Association, submitted by Pat Prentiss	November 8, 2018	3-94
25.	Southern California Pilots Association, submitted by Fred Fourcher	November 21, 2018	3-95
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28.	ACI Jet	October 29, 2018	3-109
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30.	Joan Allison	November 20, 2018	3-112
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33.	American Aircraft Maintenance, submitted by Lina Shi	November 6, 2018	3-119
34.	American Aircraft Maintenance, submitted by Lina Shi	November 6, 2018	3-120
35.	American Aircraft Maintenance, submitted by Lina Shi	November 6, 2018	3-122
36.	Melinda Atkin	November 21, 2018	3-123
37.	Brent and Carla Anderson	November 21, 2018	3-124
38.	Lewis and Terry Becker	November 20, 2018	3-126
39.	David Benvenuti, MD	November 21, 2018	3-127
40.	Leann Benvenuti	November 21, 2018	3-128
41.	Carol Berg	November 20, 2018	3-129
42.	Marvin Blum	November 11, 2018	3-130
43.	Brandt Group, submitted by Robert B. Lange	November 5, 2018	3-131
44.	Michael Brant-Zawadzki	November 20, 2018	3-132
45.	Bob and Diana Brookes	November 21, 2018	3-133
46.	Delores and Wayne Browning	November 20, 2018	3-134
47.	Sarah Catz (1)	September 26, 2018	3-135
48.	Sarah Catz (2)	September 27, 2018	3-136
49.	Sarah Catz (3)	September 28, 2018	3-138
50.	Clay Lacy Aviation, submitted by Scott Cutshall	November 21, 2018	3-140
51.	Antoinette Cole	November 21, 2018	3-143
52.	Paul Columbus	October 17, 2018	3-144
53.	W. David Cook	November 19, 2018	3-145
54.	Todd Corbitt	November 5, 2018	3-146
55.	Andy Couch	November 21, 2018	3-147
56.	CPF Airways prepared by Matthew C. Henderson with Miller Starr Regalia (1)	October 25, 2018	3-149
57.	CPF Airways prepared by Matthew C. Henderson with Miller Starr Regalia (2)	October 29, 2018	3-152
58.	CPF Airways, prepared by Matthew C. Henderson with Miller Starr Regalia (3)	November 20, 2018	3-155
59.	CPF Airways, prepared by Matthew C. Henderson with Miller Starr Regalia (4)	November 21, 2018	3-160
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62.	Patrick Davern	November 5, 2018	3-166
63.	Cindy Dillion	November 5, 2018	3-167
64.	Jeff Dvorak	November 21, 2018	3-168
65.	Jeff Dvorak (2)	November 21, 2018	3-172
66.	Maris J. Ensing	November 8, 2018	3-175
67.	Jeanne Fobes	November 21, 2018	3-176
68.	Frederick Fong	November 21, 2018	3-177
69.	Daniel Freedman	October 25, 2018	3-183
70.	Susan Gaunt	November 19, 2018	3-184
71.	Pam and Bill Goode	November 21, 2018	3-185
72.	Peter Grant	November 13, 2018	3-186
73.	Grant Thornton, submitted by Alan Herrmann	November 5, 2018	3-187
74.	Fred Greensite	November 13, 2018	3-188
75.	Joel Hackney	November 5, 2018	3-189
76.	Kathy Harbour	November 21, 2018	3-190
77.	Bill and Cherie Hart	November 20, 2018	3-191
78.	Sandi Hill	November 21, 2018	3-192
79.	Fred Howser	November 20, 2018	3-193
80.	Libby Huyck (1)	November 20, 2018	3-194
81.	Libby Huyck (2)	November 20, 2018	3-195
82.	Libby Huyck (3)	November 20, 2018	3-196
83.	Benjamin Imai	November 20, 2018	3-198
84.	Daniel Jensen	November 5, 2018	3-199
85.	Johnson & Associates, submitted by Randal Johnson	November 6, 2018	3-200
86.	Jeanne Johnson	November 21, 2018	3-201
87.	Carol Jung	November 21, 2018	3-202
88.	Franz Kallao	November 21, 2018	3-203
89.	Nancy Kirksey	November 21, 2018	3-204
90.	Carolyn and Bill Klein	November 20, 2018	3-205
91.	Sheila Koff	November 21, 2018	3-206
92.	Wayne Lindholm	November 5, 2018	3-207
93.	Andrea Lingle	November 20, 2018	3-208
94.	Randall Lipton	November 5, 2018	3-209
95.	Stephen Livingston	October 19, 2018	3-210
96.	Thomas Logan	November 5, 2018	3-211
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98.	Peter Macdonald	November 12, 2018	3-213

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100.	Meyer Properties, submitted by James Hasty (1)	November 20, 2018	3-216
101.	Meyer Properties, submitted by James Hasty (2)	November 20, 2018	3-219
102.	Shannon and Jeff Miehe	November 21, 2018	3-221
103.	Lesley Miller	November 20, 2018	3-222
104.	Diane Myers	September 24, 2018	3-223
105.	John Nord	November 20, 2018	3-224
106.	Oceanfront Jobs submitted by Steve Bunch	November 7, 2018	3-225
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108.	William J. O'Connor	November 20, 2018	3-228
109.	Lee Pearl	November 21, 2018	3-229
110.	Sally Petersen	October 22, 2018	3-230
111.	Sandra Petty-Weeks	November 21, 2018	3-232
112.	Doug Pham	October 15, 2018	3-233
113.	Doug Pham	November 6, 2018	3-235
114.	Doug Robinett	undated	3-236
115.	Alice Rosellini	November 21, 2018	3-237
116.	Law Offices of Gary L. Schank	undated	3-238
117.	Gary Schank	September 27, 2018	3-239
118.	Law Offices of Gary L. Schank, submitted by Gary Schank	November 16, 2018	3-240
119.	Schock Boats, submitted by Steven Schock	November 5, 2018	3-242
120.	Signature Flight Support, submitted by Julie Broderick	November 6, 2018	3-243
121.	Frank Singer	November 7, 2018	3-245
122.	Susan Skinner	November 21, 2018	3-246
123.	Michael C. Smith	November 20, 2018	3-247
124.	Pauline L. Smith	November 20, 2018	3-248
125.	Triad Investment Management, submitted by David Hutchison	November 21, 2018	3-249
126.	Martha Unickel	November 21, 2018	3-250
127.	U.S. Fasteners, submitted by Kevin Halliburton	November 5, 2018	3-251
128.	Polly and David Verfaillie	November 21, 2018	3-252
129.	Dan Vogt	November 20, 2018	3-253
130.	Peggy Vombaur	November 20, 2018	3-254
131.	Grant Whitcher	November 21, 2018	3-255
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133.	Dana White	November 21, 2018	3-257
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135.	Simone Wilson	November 20, 2018	3-259

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143.	Alan Ayria	November 20, 2018	3-297
144.	Lu Baker	November 20, 2018	3-303
145.	Thomas Baker	November 20, 2018	3-310
146.	Balboa Financial, submitted by Scott Duntley	November 20, 2018	3-316
147.	Liz and Bob Barman	November 20, 2018	3-323
148.	Martha Beauchamp	November 20, 2018	3-330
149.	Robert and Linda Boyd	November 21, 2018	3-334
150.	Cynthia and David Bright	November 20, 2018	3-341
151.	Edwina Broderick	November 20, 2018	3-348
152.	Anita Brown	November 21, 2018	3-355
153.	Nancy Brown	November 21, 2018	3-362
154.	Sean and Monica Burke	November 20, 2018	3-368
155.	J. Robert Egan and Kimberly Burrows-Egan	November 20, 2018	3-375
156.	Nicolas Burtnyk	November 20, 2018	3-378
157.	Heather Carlino	November 21, 2018	3-385
158.	Astrid Carlson	November 20, 2018	3-395
159.	Kim James Charney, MD (1)	November 20, 2018	3-398
160.	Kim James Charney, MD (2)	November 21, 2018	3-404
161.	Min Chu (1)	November 21, 2018	3-411
162.	Min Chu (2)	November 21, 2018	3-418
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164.	Min Chu (4)	November 21, 2018	3-432
165.	Mary Citrano	November 21, 2018	3-439
166.	Daniel Clark	November 21, 2018	3-446
167.	Jean G. Clark	November 21, 2018	3-451
168.	Teryn Clarke, MD	November 20, 2018	3-456
169.	Paul Cohen	November 21, 2018	3-459
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177.	Mary Allyn Dexter	November 21, 2018	3-509
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180.	Marilyn Elmer	November 20, 2018	3-521
181.	Ronda Fay	November 20, 2018	3-524
182.	Marsha Ferrall	November 20, 2018	3-527
183.	Mary Finlay	November 20, 2018	3-531
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192.	Torben Frederiksen	November 20, 2018	3-581
193.	Carlita and Win Fuller	November 21, 2018	3-588
194.	Stacie Fults	November 20, 2018	3-595
195.	Matt Galt	November 20, 2018	3-599
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221.	John Meindl	November 21, 2018	3-749
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227.	Nautical Luxuries, submitted by Daisy Cathcart	November 20, 2018	3-790
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229.	Randall and Carol Nunnelly	November 20, 2018	3-801
230.	Carey L. O'Bryan IV, MD	November 20, 2018	3-808
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255.	Christina Schwindt	November 20, 2018	3-948
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257.	Matthew Shaw	November 20, 2018	3-962
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259.	Terry A. Sheward	November 21, 2018	3-976
260.	Carrie Slayback	November 21, 2018	3-982
261.	Brad Smith	November 20, 2018	3-986
262.	Gregory and Joyce Smith	November 21, 2018	3-989
263.	Marion Smith	November 20, 2018	3-996
264.	Dr. F. Soulati and Mrs. G. Soulati	November 21, 2018	3-1003
265.	Tracy Specter	November 21, 2018	3-1009
266.	Lisa Stanton	November 20, 2018	3-1014
267.	Joani Stavale	November 20, 2018	3-1019
268.	Louis J. Stavale	November 20, 2018	3-1026
269.	Julie Stephenson	November 21, 2018	3-1038
270.	Rick Strack (1)	November 20, 2018	3-1045
271.	Rick Strack (2)	November 20, 2018	3-1052
272.	Louise J. Stuart and Craig S. Davis	November 19, 2018	3-1059
273.	Vikki Swanson	November 21, 2018	3-1066
274.	Shannon Tarnutzer	November 20, 2018	3-1073
275.	Karen Taylor	November 21, 2018	3-1077
276.	Elizabeth Thamer	November 21, 2018	3-1081
277.	Laura Thomson	November 20, 2018	3-1088
278.	Shelly Trainor (1)	November 21, 2018	3-1092
279.	Shelly Trainor (2)	November 21, 2018	3-1099
280.	Fini Van Natta	November 20, 2018	3-1106
281.	Earl Votolato	November 21, 2018	3-1113
282.	Kimberly Votolato	November 21, 2018	3-1118
283.	Ronnie and Cathy Weinstein	November 20, 2018	3-1123
284.	Portia Weiss	November 20, 2018	3-1130
285.	Richard Weiss	November 21, 2018	3-1137

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		November 21, 2016	3-1152
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291.	Camille and Matthew Beehler	November 29, 2018	3-1191
292.	Matthew Christensen	November 26, 2018	3-1192
293.	CPF Airways, prepared by Matthew C. Henderson with Miller Starr Regalia (5)	February 27, 2019	3-1193
294.	CPF Airways, prepared by Matthew C. Henderson with Miller Starr Regalia (6)	February 27, 2019	3-1197
295.	Scott Fischer	November 23, 2018	3-1200
296.	Marilynn Henry	November 24, 2018	3-1207
297.	Roger Hughes	December 6, 2018	3-1208
298.	Janssen	December 5, 2018	3-1214
299.	Julie Johnson (2)	January 29, 2019	3-1221
300.	Julie Johnson (3)	January 30, 2019	3-1222
301.	Julie Johnson (4)	February 4, 2019	3-1223
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304.	Julie Johnson (7)	February 7, 2019	3-1227
305.	Julie Johnson (8)	February 27, 2019	3-1230
306.	Julie Johnson (9)	February 27, 2019	3-1231
307.	Holly Kincaid	November 24, 2018	3-1233
308.	David and Cathy Lichodziejewski	November 25, 2018	3-1237
309.	Beverly Blais Moosmann	December 5, 2018	3-1238
310.	Beverly Blais Moosmann	December 7, 2018	3-1239
311.	Christine Northridge	November 22, 2018	3-1241
312.	Bonnie and Dan O'Neil	December 13, 2018	3-1248

Letter No.	Commenter	Date of Correspondence/ Date Received	Page Number		
313.	City of Santa Ana	December 3, 2018	3-1251		
314.	SCL Equipment Finance submitted by Barbara Griffith	November 26, 2018	3-1252		
315.	Myriam Shapiro	November 23, 2018	3-1259		
316.	Veronica Sheward	November 29, 2018	3-1260		
Comments on the Draft Program EIR Submitted during the Public Review Period to Others					
317.	Andy Couch	November 21, 2018	3-1268		
Additionally assuments are used dominath mubble presentation position of the mubble presting. However, since					

^a Additionally comments were made during the public presentation portion of the public meeting. However, since these individuals did not provide their names, the responses to the comments are not attributable to a specific person. However, all comments from the public meeting have been responded to in Section 3.7.1.

Standardized Letter

3.6 STANDARDIZED LETTER

A standardized letter was submitted by 151 commenters prior to the close of the public review period on the Draft Program Environmental Impact Report ("EIR"). To avoid confusion, the numbering of the bracketed comments is not sequential. Rather the numbering of the comments, and the respective responses, corresponds to the numbering provided in the standardized letter (i.e., the comments were not renumbered as part of the bracketing process). A single copy of the standardized letter (with comments bracketed) is provided in the beginning of this section, followed by the numbered letters in alphabetical order by last name.

Some commenters provided additional comments beyond those presented in the standardized letter. For those letters, the supplemental comments are bracketed. The comments with supplemental comments are noted with a **(sc)** in the listing below. Several people submitted the standardized letter more than once. Both copies of the letter are included and there is a number next to the persons' name that indicates more than one copy of the standardized letter was submitted. The standardized letter was submitted by the following entities during the public review period:

A	C (cont.)	F	
Brian Alters and Kim BeDell	Kim James Charney, MD (1)	Ronda Fay	
Ashwill and Associates,	Kim James Charney, MD (2)	Marsha Ferrall	
submitted by Greg Ashwill	Min Chu (1)	Mary Finlay	
Marc Atkin	Min Chu (2)	Robert Finlay	
Marj Austin	Min Chu (3)	Rebecca and Jason Finney	
Alan Ayria	Min Chu (4)	Barbara Foley	
В	Mary Citrano	Dan Foley	
Lu Baker	Daniel Clark	J.D. Fox	
Thomas Baker	Jean G. Clark	Shirley Fox and Charles C.	
Balboa Financial, submitted by	Teryn Clarke, MD	Deandorff	
Scott Duntley (sc)	Paul Cohen	Alistair and Fiona Fraser	
Liz and Bob Barman	Terri Cohen	Adrienne Frederiksen (sc)	
Martha Beauchamp	Judy Cooper	Torben Frederiksen (sc)	
Robert and Linda Boyd (sc)	John Cotton	Carlita and Win Fuller	
Cynthia and David Bright(sc)	Carol and Gary Crane	Stacie Fults	
Edwina Broderick (sc)	Victoria Cubeiro	G	
Anita Brown (sc)	Tamara and Jeff Current	Matt Galt	
Nancy Brown	D	Annette Giermann (1)	
Sean and Monica Burke	Chris and Ed Danoff	Annette Giermann (2)	
J. Robert Egan and Kimberly Burrows-Egan	Mary Allyn Dexter	Kenny and Nyna Goldberg (sc)	
Nicolas Burtnyk	Е	Patrick Gormley	
С	Mary Jane Edalatpour	Barbara Griffith	
Heather Carlino	Julia Edwards	Н	
Astrid Carlson	Marilyn Elmer	Nancy Halvorsen	

H (cont.)	0	S (cont.)	
Walter Harriman	Carey L. O'Bryan IV, MD	Gregory and Joyce Smith	
Kathy Harrison (sc)	Margo O'Connor (sc)	Marion Smith (sc)	
Tabitha May Hasin	Ann O'Neil	Dr. F. Soulati and Mrs. G.	
George Hauser	Bonnie and Dan O'Neil	Soulati	
William W. Hughes Jr.	Firooz R. Oskooi, MD	Tracy Specter	
J	P	Lisa Stanton	
Carolyn G. Johnson	Peggy and Michael Palmer (sc)	Joani Stavale	
Julie Johnson	Jon B. Patton	Louis J. Stavale	
Clifton and Gail Jones	William R. Patton (1)	Julie Stephenson	
James Jordan	William R. Patton (2)	Rick Strack (1)	
K	Lorian K. Petry	Rick Strack (2)	
Marsha and Pat Kendall	Darcy Post	Louise J. Stuart and Craig S.	
Ray and Elizabeth Kennedy	Edward Post (sc)	Davis	
Linda Geller Kensey	Nrapendra Prasad	Vikki Swanson (sc)	
Mark Knaeps (sc)	Janet H. Probst (sc)	T	
Stacy Kramer and Nathanael	R	Shannon Tarnutzer	
Singer	Stephanie, Steve, Lauren, and	Karen Taylor	
L	Chase Rados	Elizabeth Thamer	
Michele Lovenduski	Dale Ransom	Laura Thomson	
M	Drs. Gail and Sorel Reisman	Shelly Trainor (1)	
Linda J. Martin	Nicole F. Reynolds	Shelly Trainor (2)	
Nicole D. Martin	Catherine Richards	V	
James E. and Alison L. McCormick III	Janni Richardson	Fini Van Natta	
McMonigle Group, submitted	Ginny Riley	Earl Votolato	
by Manal Bozarth (sc)	Vicki and Don Ronaldson	Kimberly Votolato	
John Meindl	Paul Root	W	
Susan Menning (sc)	John C. and Kristin H. Rowe (sc)	Ronnie and Cathy Weinstein	
Whitney Moad	S	Portia Weiss	
Beverly Blais Moosmann	Elisabeth and Andrew Schutz	Richard Weiss	
Bob Moosmann	Christina Schwindt (sc)	Thomas and Laura White	
Robert Murphy	Mr. and Mrs. John M. Sciarra	Kammi and Steve Wilson	
N	Matthew Shaw	Steve and Kammi Wilson	
Nautical Luxuries, submitted by	Terry P. Shea		
Daisy Cathcart	Terry A. Sheward		
David and Jan New	Carrie Slayback		
Randall and Carol Nunnelly	Brad Smith		

In addition to the commenters listed above, ten people submitted the standardized letter after the end of the public review period. These individuals are listed in Section 3.8.

1. <u>DEIR Complexity and Length Relative to Time Limitations for Comment:</u>

The DEIR was made available for public review on September 20, 2018, with comments due on November 6, 2018, with an extension until November 21, 2018.

<u>Comment</u>: This is an incredibly complex and detailed document that is over 600 pages in length, with 2,200 pages of appendices. Although members of the general public are invited to "comment" on the DEIR, it is submitted that most members of the general public are ill equipped to read through the entirety of the document, sufficiently understand it and respond to it with their comments and questions in the time allotted.

1

Question: Why can't additional time be provided for the review and comment to the DEIR?

2. Project Objectives (Section 3).

This section lists separate objectives of the GAIP, which appear only to benefit airport operations and profitability.

<u>Comment</u>: As you are surely aware, under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives clearly pertain the efficiency and economical benefits of the GAIP with no indication of concerns for the communities impacted by noise and pollution emanating from JWA.

2

Questions:

a. Is the GAIP for the benefit of nonresident corporate jet aircraft? 2-a Is the GAIP for the benefit of local corporate jet aircraft? 2-b Have local corporations been surveyed regarding their interest in housing their jets at 2-c IWA? If no, why not? If yes, what have been their responses? d. Does the GAIP benefit the exiting [sic] fleet of privately owned piston-powered driven 2-d aircraft owners who have historically based their aircraft at JWA? If yes, how? e. Will the GAIP result in a decrease of smaller privately owned piston-powered aircraft at 2-е IWA? How does a decrease in the number of smaller privately owned piston-powered aircraft based at JWA and an increase in larger GA jet aircraft, benefit Newport Beach and 2-f neighboring communities? What is the basis for the assumptions of daily departure and arrival of GA jet traffic, 2-g including larger corporate aircraft, which will be displacing smaller GA private planes? h. Has it been determined how many additional GA jet aircraft departures will occur in a 24-2-h hour period under the GAIP? If yes, how many? If no, why not? Will there be a cap or a maximum number of GA jet aircraft departures allowable during a

2-i

24-hour period? If yes, how many? If no, why not?

j.	How does the GAIP, with its goal of accommodating large corporate jet aircraft at JWA through building additional hangers, benefit Newport Beach and other neighboring communities?	2-j
k.	Will the GAIP result in an increase of international flights to JWA via GA jet aircraft?	2-k
l.	If the GAIP increases the number of international flights in and out of JWA, will there be a cap or maximum number allowed during any a 24-hour period? If yes, what will be the maximum number? If no, why not?	2-l
m.	How many international flights are anticipated to arrive at JWA on a daily or weekly basis?	2-m
n.	What type of TSA-type security screening will be conducted regarding the increasing numbers of larger international GA aircraft if the GAIP is approved? Please describe in detail.	2-n
0.	What is the predicted net average daily change in aircraft departures and arrivals if the GAIP is approved?	2-о
p.	How many GA privately owned jets will JWA be capable of handling during a 24-hour period if the GAIP is approved?	2-р
q.	How many overnight hangers or other spaces will be made available for GA privately owned jet aircraft if the GAIP is approved?	2-q
r.	What will be the economic benefit to JWA if the GAIP is approved?	2-r
S.	If the GAIP is approved, will existing flight schools be permitted to continue their operations? If not, will flight school(s) specializing in jet aircraft flight instruction replace existing flight schools?	2-s
t.	If any flight schools specializing in jet aircraft flight instruction are anticipated, will a cap or maximum number of training departures and arrivals during a 24-hour period be established? If yes, what will be the maximum number? If no, why not?	2-t
u.	If any flight schools specializing in jet aircraft flight instruction are anticipated, will hours for their operation and training flights be established? If yes, what will be the hours? If no, why not?	2-u

3. <u>DEIR Conclusions that Environmental Impacts are Insignificant (Section 4)</u>.

Comment: The DEIR conclusion that the GAIP will be not significantly cause a negative impact to the community in terms of noise, air quality, hazardous materials, etc., is unrealistic. It is submitted that there has been an insufficient consideration of the additional noise and pollution that will be created; especially considering the leaded fuel mixture used by private GA jet aircraft and their exemption from curfew hours under GA regulations. There have been numerous 3-1 studies reported in many peer-reviewed scholarly journals that airport noise and pollution have serious health impacts for neighboring communities. It is unrealistic to conclude that if the GAIP is approved that there will be no significant negative environmental impact to Newport Beach and other neighboring communities. Furthermore, the assumptions supporting the noise analysis are flawed and unrealistic. The projection that by 2016, 40% of the Boeing 737 and Airbus A320 aircraft using JWA will include 3-2 the quieter 737-MAX and Airbus A320-NEO is sheer speculation and is in conflict with the 2014 Settlement Agreement EIR noise modeling. **Ouestions:** a. As GA jet aircraft have a long history of violating noise limits, how will this be better 3-a controlled, especially given the current lack of regulation of the GA jet aircraft fleet? b. Is an increase in GA jet aircraft nighttime arrivals and departures anticipated? If yes, how 3-b many nighttime arrivals and departures are anticipated? c. Will JWA place a cap or limit on the number of nighttime arrivals and departures of GA jet 3-c aircraft? If yes, what limitations will be established? If no, why not? d. Why wasn't the negative impact of an additional 5-10% noise generating Back Bay departure pattern by the large corporate jets on the same neighborhood impacted by commercial departures considered in the Noise Impact section of the Appendix? As this 3-d would have the same impact as a net increase in commercial departures that would replace aircraft that were previously fanning after takeoff and not impacting these neighbors, why wasn't this considered? e. If the GAIP is approved, what would be the largest GA jet aircraft that would be 3-е accommodated by JWA? How would the noise from departing large GA jet aircraft compare with the noise emitted from the commercial jet fleet currently using JWA? If this analysis has been done, what is 3-f the basis for the analysis? Will there be a limitation on large GA jet departures? Will there be any such limitation specifically during the existing curfew hours? If yes, what will be the limitations? If no, 3-g why not? h. Do the GAIP conclusions of no significant noise or pollution impact take into consideration the Next-Gen satellite-precision concentrated flight paths that have clearly 3-h has a significant negative impact on Newport Beach? If yes, what conclusions have been drawn? If no, why not?

4. Health Risk Analysis (Section 4).

<u>Comment</u>: Although related to the above comment, the health risk analysis ("HRA") in Section 4 of the DEIR is extremely complicated and confusing. The DEIR also relies heavily on the EIR submitted during the 2014 Settlement Agreement ("EIR 617") for its health risk analysis ("HRA"). It is submitted that reliance on the previous EIR is misplaced. EIR 617 relied on existing 2014 flight patterns prior to the implementation of the FAA Next Gen concentrated satellite driven precision flight patterns that are flown today. Furthermore, the DEIR does not anticipate the different emissions anticipated from the expected increase in GA jet aircraft if the GAIP is approved. To suggest that there will be a minimal increase in emissions is unrealistic and unsupported by any evidence.

Comment: The DEIR is also woefully deficient in its discussion of the potential health impacts to more sensitive members of the community, especially the impact on children. The DEIR discusses "sensitive receptors" and "sensitive populations" noting only those closest to the boundary of JWA, specifically mentioning a residential development approximately 855 feet from the boundary of JWA and airport workers. In response, there have been numerous studies conducted and published in peer-reviewed scholarly journals about the serious health issues caused by airports, over flights, departures and arrivals on children and adults in communities under the flight paths. These studies have confirmed that children suffer cognitive deficits and respiratory illnesses, while the general population suffers undue stress, heart disease, high blood pressure, cognitive decline, auditory problems, heart attacks, strokes and greater cancer risk. Similarly, research studies have concluded that the adverse health affects from airport pollution are present within 10 miles of an airport. There are thousands of children in schools well within a distance of 10 miles from the JWA departure paths and thousands of people who live under the flight paths.

Questions:

- a. In arriving at the conclusion that the environmental impact of the GAIP is "less than significant," what consideration has been given to the schools, athletic fields, parks and residential areas located within a close proximity and under the flight paths of JWA? If the impact these populations have not been considered, why not?
- 4-a

4

- b. Although noise is discussed in the Sensitive Receptors section of the DEIR, including the impact to schools, why isn't there an in depth discussion of health concerns especially as they relate to children?
- 4-b
- c. Did the County in the preparation of the DEIR review and consider recent research concerning the health and welfare of populations living within a close proximity of airports? Within 10 miles of JWA?
- 4-c
- d. What is the true net increase in pollutants from the new aircraft population departures from JWA as the fuel mixture is different and heavier in carbon and particulate pollutants?
- 4-d
- e. In preparing the DEIR, was there any consideration of the added pollution that would result from the increase in GA jet aircraft combined with the existing commercial fleet? If no, why not?

4-e

f.	In preparing the DEIR, was there any consideration of the impact of increased noise levels that would result from nighttime flights of GA jet aircraft? If no, why not?	4-f
5. <u>Fl</u>	ight Patterns.	
<u>Comment</u> : Although the DEIR states there will be no change in flight patterns, it is unclear as to the flight patterns that were used for its analysis. It is also unclear what flight patterns would be followed by GA jet aircraft upon approval of the GAIP. Clarification is needed to assess the differences between GA and commercial aircraft departure patterns and how they might change upon approval of the GAIP.		
Quest	ions:	
a.	Will the GA jet aircraft added to JWA through the GAIP follow the existing flight patterns presently used by commercial jets as mandated by the SoCal Metroplex?	5-a
b.	If the GA jet aircraft added through the GAIP will follow the flight patterns mandated under the SoCal Metroplex, has there been any consideration as to the impact that will be caused by the increase in air traffic over Newport Beach? If no, why not?	5-b
C.	Will there be any changes in GA flight patterns if the GAIP is approved? If yes, what will be the changes?	5-c

From: Brian Alters <bri>Sent: Brian Alters <bri>Vovember 20, 2018 7:35 AM

To: EIR627

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program - Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

1. DEIR Complexity and Length Relative to Time Limitations for Comment:

The DEIR was made available for public review on September 20, 2018, with comments due on November 6, 2018, with an extension until November 21, 2018.

<u>Comment</u>: This is an incredibly complex and detailed document that is over 600 pages in length, with 2,200 pages of appendices. Although members of the general public are invited to "comment" on the DEIR, it is submitted that most members of the general public are ill equipped to read through the entirety of the document, sufficiently understand it and respond to it with their comments and questions in the time allotted.

Question: Why can't additional time be provided for the review and comment to the DEIR?

2. Project Objectives (Section 3).

This section lists separate objectives of the GAIP, which appear only to benefit airport operations and profitability. Comment: As you are surely aware, under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives clearly pertain the efficiency and economical benefits of the GAIP with no indication of concerns for the communities impacted by noise and pollution emanating from JWA.

1

Questions:

- a. Is the GAIP for the benefit of nonresident corporate jet aircraft?
- b. Is the GAIP for the benefit of local corporate jet aircraft?
- c. Have local corporations been surveyed regarding their interest in housing their jets at JWA? If no, why not? If yes, what have been their responses?
- d. Does the GAIP benefit the exiting fleet of privately owned piston-powered driven aircraft owners who have historically based their aircraft at JWA? If yes, how?
- e. Will the GAIP result in a decrease of smaller privately owned piston-powered aircraft at JWA?
- f. How does a decrease in the number of smaller privately owned piston- powered aircraft based at JWA and an increase in larger GA jet aircraft, benefit Newport Beach and neighboring communities?
- g. What is the basis for the assumptions of daily departure and arrival of GA jet traffic, including larger corporate aircraft, which will be displacing smaller GA private planes?
- h. Has it been determined how many additional GA jet aircraft departures will occur in a 24-hour period under the GAIP? If yes, how many? If no, why not?
- i. Will there be a cap or a maximum number of GA jet aircraft departures allowable during a 24-hour period? If yes, how many? If no, why not?
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2

Furthermore, the assumptions supporting the noise analysis are flawed and unrealistic. The projection that by 2016, 40% of the Boeing 737 and Airbus A320 aircraft using JWA will include the quieter 737-MAX and Airbus A320-Neo is sheer speculation and is in conflict with the 2014 Settlement Agreement EIR noise modeling.

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- a. As GA jet aircraft have a long history of violating noise limits, how will this be better controlled, especially given the current lack of regulation of the GA jet aircraft fleet?
- b. Is an increase in GA jet aircraft nighttime arrivals and departures anticipated? If yes, how many nighttime arrivals and departures are anticipated?
- c. Will JWA place a cap or limit on the number of nighttime arrivals and departures of GA jet aircraft? If yes, what limitations will be established? If no, why not?
- d. Why wasn't the negative impact of an additional 5-10% noise generating Back Bay departure pattern by the large corporate jets on the same neighborhood impacted by commercial departures considered in the Noise Impact section of the Appendix? As this would have the same impact as a net increase in commercial departures that would replace aircraft that were previously fanning after takeoff and not impacting these neighbors, why wasn't this considered?
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- c. Will there be any changes in GA flight patterns if the GAIP is approved? If yes, what will be the changes?

Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely,

Drs. Brian Alters and Kim BeDell 309 Signal Rd Newport Beach Sent from my iPhone **From:** Greg Ashwill < greg@ashwill.com>

Sent: Wednesday, November 21, 2018 12:27 PM

To: EIR627

Subject: Comments to General Aviation Improvement Program - Draft EIR

Attachments: SKM_C55818112113310.pdf

Dear Ms. Choum,

Please see the attached letter.

Thank you for your consideration,

Greg J. Ashwill, SIOR ASHWILL ASSOCIATES

Commercial Real Estate
21660 E. Copley Drive, Suite 195
Diamond Bar, CA 91765
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909.612.9900 main
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1

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

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2

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4 3-280

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- a. In arriving at the conclusion that the environmental impact of the GAIP is "less than significant," what consideration has been given to the schools, athletic fields, parks and residential areas located within a close proximity and under the flight paths of JWA? If the impact these populations have not been considered, why not?
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5 3-281

Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely,

____(include your name, home and email address)

Greg J. Ashwill 404 Evening Star Lane Newport Beach, CA 92660

e-mail: grageachioi. 11. Com

From: Marc Atkin <marcatkin1@gmail.com>
Sent: Wednesday, November 21, 2018 10:47 AM

To: EIR627

Subject: re: Curbing noise and pollution from John Wayne Airport

Attachments: 11.15.18 EIR Comments.docx

Ms. Choum,

Please see attached letter.

Thanks,

Marc Atkin

3-283

1

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

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3-286

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Sincerely,

Marc Atkin 431 Promontory Drive E Newport Beach Ca 92660

Marcatkin1@gmail.com

From: M AUSTIN < MARJAUSTIN@msn.com>
Sent: Wednesday, November 21, 2018 8:46 AM

To: EIR627

Subject:Scan_20181121.pngAttachments:Scan_20181121.png

Sent from Mail for Windows 10

3-290

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

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2104 MONNING STAR LANE
NEWPORT BEACH, CH, 92660 From: Alan Ayria <alan.ayria@gmail.com>
Sent: Tuesday, November 20, 2018 3:57 PM

To: EIR627 Subject: Letter

Attachments: Letter to JWA Land Use Mgr re Comments on EIR.20Nov2018.docx

Please note my letter with comments re EIR. thank you,

Alan

3-297

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1

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3-298

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<u>Comment</u>: Although related to the above comment, the health risk analysis ("HRA") in Section 4 of the DEIR is extremely complicated and confusing. The DEIR also relies heavily on the EIR submitted during the 2014 Settlement Agreement ("EIR 617") for its health risk analysis ("HRA"). It is submitted that reliance on the previous EIR is misplaced. EIR 617 relied on existing 2014 flight patterns prior to the implementation of the FAA Next Gen concentrated satellite driven precision flight patterns that are flown today. Furthermore, the DEIR does not anticipate the different emissions anticipated from the expected increase in GA jet aircraft if the GAIP is approved. To suggest that there will be a minimal increase in emissions is unrealistic and unsupported by any evidence.

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Questions:

a. In arriving at the conclusion that the environmental impact of the GAIP is "less than significant," what consideration has been given to the schools, athletic fields, parks and residential areas located within a close proximity and under the flight paths of JWA? If the impact these populations have not been considered, why not?

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Please keep me informed of any developments related to tis DEIR, including public notices in regards to GAIP and Notice of Availability of Final EIR.

Sincerely

Alan Avria

Can Canjo

2000 Vista Cajon, NB 92660; alan.ayria@gmail.com

From: TOMLU BAKER <tomlubaker@hotmail.com>
Sent: Tuesday, November 20, 2018 11:51 PM

To: EIR627

Cc: TOMLU BAKER

Subject: LARGER PRIVATE JET AIRCRAFT EXPANSION AT JWA:

Attachments: Airport2.docx

Please read attached file with letter. Lu Baker Holmwood Dr. Newport Beach 92663

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3-303

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

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I agree with the above.

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Sincerely,

Lu Baker Holmwood Drive Newport Beach 92663 From: TOMLU BAKER <tomlubaker@hotmail.com>
Sent: Tuesday, November 20, 2018 12:47 PM

To: EIR627

Cc:TOMLU BAKERSubject:Fwd: AIRPORTAttachments:AIRPORT.pdf

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From: TOMLU BAKER

Sent: Tuesday, November 20, 12:37 PM

Subject: AIRPORT

Get Outlook for Android

3-309

November 17,2018

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Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely, Thomas Baker Newport Beach, 92663 From: Scott Duntley <scott@balboafinancial.com>
Sent: Tuesday, November 20, 2018 10:37 AM

To: EIR627

Subject: JWA proposed development **Attachments:** 11.15.18 EIR Comments.pdf

I am concerned that the County, owner and operator of the JWA airport, has proposed a General Aviation Improvement Program (GAIP) which, if enacted, will allow the County to construct new hangar facilities at JWA. These new hangars will displace smaller privately owned aircraft in favor of larger privately owned jet aircraft., including corporate jet fleets, which may make international flights. I am concerned with the impact on our nighttime curfew, increased pollution from leaded jet fuel and the increase in daily departures that will be the result of the GAIP.

Only commercial jets are currently governed by curfew hours. The GAIP will lead to a new new mix of general aviation aircraft at JWA, allowing more large private and corporate jets to depart and fly overhead anytime of the day or night. While the general aviation aircraft would be subject to certain noise requirements, they would not be subject to the curfew. And, as we all know, the noise requirements currently in place have not been adequate for life quality in our city. Further, the increase in nighttime flights would set a dangerous precedent for the futuree of the JWA curfew, which will be subject to renegotiation in 2035.

BF-1

The County has already filed its Draft Environmental Impact Report for the GAIP. (See https://www.ocair.com/deir627.) I wish to make my feelings known regarding the GAIP and the negative impact this program would likely have on our quality of life.

BF-2

Attached is a letter which details questions and comments regarding the Draft EIR. Please review and respond.

_

Scott Duntley BALBOA FINANCIAL (949) 427-2680 (ph) (949) 427-2681 (fax) (949) 278-7127 (mobile) Scott@balboafinancial.com www.balboafinancial.com

Real Estate Capital Alliance Member (RECA) – Nationwide Creative Capital Solutions – Over \$3.7 billion arranged in 2017

November 20, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

I am a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

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This section lists separate objectives of the GAIP, which appear only to benefit airport operations and profitability.

<u>Comment</u>: As you are surely aware, under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives clearly pertain the efficiency and economical benefits of the GAIP with no indication of concerns for the communities impacted by noise and pollution emanating from JWA.

3-317

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- e. Will the GAIP result in a decrease of smaller privately owned piston-powered aircraft at JWA?
- f. How does a decrease in the number of smaller privately owned pistonpowered aircraft based at JWA and an increase in larger GA jet aircraft, benefit Newport Beach and neighboring communities?
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Furthermore, the assumptions supporting the noise analysis are flawed and unrealistic. The projection that by 2016, 40% of the Boeing 737 and Airbus A320 aircraft using JWA will include the quieter 737-MAX and Airbus A320-Neo is sheer speculation and is in conflict with the 2014 Settlement Agreement EIR noise modeling.

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3-319

- e. If the GAIP is approved, what would be the largest GA jet aircraft that would be accommodated by JWA?
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Comment: Although related to the above comment, the health risk analysis ("HRA") in Section 4 of the DEIR is extremely complicated and confusing. The DEIR also relies heavily on the EIR submitted during the 2014 Settlement Agreement ("EIR 617") for its health risk analysis ("HRA"). It is submitted that reliance on the previous EIR is misplaced. EIR 617 relied on existing 2014 flight patterns prior to the implementation of the FAA Next Gen concentrated satellite driven precision flight patterns that are flown today. Furthermore, the DEIR does not anticipate the different emissions anticipated from the expected increase in GA jet aircraft if the GAIP is approved. To suggest that there will be a minimal increase in emissions is unrealistic and unsupported by any evidence.

Comment: The DEIR is also woefully deficient in its discussion of the potential health impacts to more sensitive members of the community, especially the impact on children. The DEIR discusses "sensitive receptors" and "sensitive populations" noting only those closest to the boundary of JWA, specifically mentioning a residential development approximately 855 feet from the boundary of IWA and airport workers. In response, there have been numerous studies conducted and published in peer-reviewed scholarly journals about the serious health issues caused by airports, over flights, departures and arrivals on children and adults in communities under the flight paths. These studies have confirmed that children suffer cognitive deficits and respiratory illnesses, while the general population suffers undue stress, heart disease, high blood pressure, cognitive decline, auditory problems, heart attacks, strokes and greater cancer risk. Similarly, research studies have concluded that the adverse health affects from airport pollution are present within 10 miles of an airport. There are thousands of children in schools well within a distance of 10 miles from the JWA departure paths and thousands of people who live under the flight paths.

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Sincerely,

Scott Duntley

Owner

1106 Santiago Dr.,

Newport Beach, CA 92660

949-278-7127

From: Sent:

EIR627 To:

Subject:

Airport Expansion 11.15.18 EIR Comments.docx **Attachments:**

November 20, 2018

Via Electronic Mail EIR627@ocair.com

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Sincerely, Liz and Bob Barman 6 Rue Saint Cloud Newport Beach, California 92660

From: Martha Beauchamp <mimi4x@aol.com>
Sent: Tuesday, November 20, 2018 8:05 AM

To: EIR627 **Subject:** GAIP

November 17, 2018

<u>Via Electronic Mail</u> <u>EIR627@ocair.com</u>

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

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3

- a. In arriving at the conclusion that the environmental impact of the GAIP is "less than significant," what consideration has been given to the schools, athletic fields, parks and residential areas located within a close proximity and under the flight paths of JWA? If the impact these populations have not beenconsidered, why not? b. Although noise is discussed in the Sensitive Receptors section of the DEIR, including the impact to schools, why isn't there an in depth discussion of health concerns especially as they relate to children?
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Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Martha Beauchamp 83 Ocean Vista

Sincerely,

Newport Beach, CA 92990

(include your name, home and email addresses

From: Robin Boyd <rrboyd@gmail.com>

Sent: Wednesday, November 21, 2018 9:56 AM

To: EIR627

Subject: General Aviation Improvement Program-Draft Environmental Impact Report

Attachments: Questions on DEIR Changes.pdf

Dear Ms. Choum:

We are 70 year residents of Newport Beach and feel strongly that the attached summary of points and questions need to be answers prior to any approval of the DEIR. We have felt substantial impact in the quality of our lives with the continued expansion the John Wayne Airport. We are impacted daily with pollution from airplane take off and landing. Curfew hours must be maintained for all General Aviation aircraft using John Wayne Airport. Thank you for your consideration and providing support for the residents of Newport Beach regarding the impact that this DEIR as written would produce.

RLB-1

Sincerely,

Robert And Linda Boyd

348 Otero, Newport Beach, Ca 92660 949 612 6004

1. DEIR Complexity and Length Relative to Time Limitations for Comment:

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Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely,

(include your name, home and

email address)

348 OTERO, NEWPORT BEACH, CA 949-612-6004

From: Cindy Bright <cpbright@earthlink.net>
Sent: Tuesday, November 20, 2018 11:18 AM

To: EIR627

Subject: Airport ExpansionThe Airport **Attachments:** 11.15.18 EIR Comments.docx

The Airport Expansion is a terrible idea and will be very harmful for the surrounding communities.

CDB-1

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

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Sincerely,
Cynthia and David Bright
1133 Santa Barbara Drive, Newport Beach, CA 93660
cpbright@earthlink.net
hdbright@earthlink.net

From: Edwina Broderick <edwinabroderick@gmail.com>

Sent: Tuesday, November 20, 2018 8:34 PM

To: EIR627 **Subject:** DEIR

Attachments: Draft Environmental Impact Report.pdf

Dear Ms. Choum, Attached is my signed letter regarding my concerns as a homeowner under the flight path in Dover

Shores.

EB-1

Please keep me informed of all developments related to the DEIR.

Gratefully,

Edwina Broderick

November 20, 2018

Via Electronic Mail EIR627@ocair.com

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Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely, Edwina Broderick

311 Morning Star Lane, NB, CA 92660 edwinabroderick@gmail.com

____(include your name, home and email address)

From: Anita Brown <anitahbrown@gmail.com>
Sent: Wednesday, November 21, 2018 9:49 AM

To: EIR627

Cc: Steel, Michelle [HOA]; Bartlett, Lisa [HOA]; Nelson, Shawn [HOA]; Do, Andrew [HOA]; Spitzer, Todd

[HOA]

Subject: Comments to GAIP Draft EIR

Attachments: Comments on GAIP AIR ab 11.17.18.pdf

Attached are my comments on the Draft EIR. We, as citizens of the surrounding communities of JWA, are shocked that the County would be considering this expansion of JWA.

JWA adjoins many pre-existing neighborhoods who moved here with the understanding that JWA is a small local airport, NextGen with its low flying commercial planes flying in a concentrated area is ruining the quality of life for these communities - unbearable noise and much increased pollution.

AB-1

The Supervisors' plan to expand the General Aviation is short-sighted and very detrimental to the life and health of those in surrounding community.

I know money is usually the underlying factor in the Board's decisions. As such, the Board should consider these realities.

Has the Board considered that Newport Beach, Laguna and Huntington Beach are large generators of property tax income? The noise and pollution will eventually start to erode property values. People are already talking about selling their homes. What was once a high property value (=high property tax) area will eventually go the path of Playa del Rey and become blighted.

AB-2

- Tourism, a big generator of sales tax income, will diminish. No one wants to vacation or hold business conferences in resort towns with low flying noisy airplanes dumping fuel overhead all day (and with GAIP) all night.
- Lawsuits will be inevitable as cancer, high blood pressure and other illnesses inevitably begin to increase. And, God forbid, a plane goes down in one of the many family oriented neighborhoods, or pre-schools, elementary schools and high schools adjacent to JWA. Fingers will all point to those on the Board of Supervisors that voted to increase airplane departures.

AB-3

A far-sighted Board would recognize these realities, keep JWA at its current levels, work with the FAA to diminish the existing noise and pollution and begin to create efficient transportation to Ontario International for other air traffic business.

AB-4

Anita Brown 4 Crooked Stick Drive Newport Beach 92660 November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program - Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

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4 Crooked Stick Drive, Newport Beach, CA 92660

anitahbrown@gmail.com

anth Brown

RECEIVED

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Sincerely,

Many Brown

10 9 16 rown 39 a 9 mg/(.06 (include your name, home and email address)

From: Monica Burke <monicabburke@gmail.com>
Sent: Tuesday, November 20, 2018 5:22 PM

To: EIR627

Attachments: 11.15.18 EIR Comments.docx

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- l. If the GAIP increases the number of international flights in and out of JWA, will there be a cap or maximum number allowed during any a 24-hour period? If yes, what will be the maximum number? If no, why not?
- m. How many international flights are anticipated to arrive at JWA on a daily or weekly basis?
- n. What type of TSA-type security screening will be conducted regarding the increasing numbers of larger international GA aircraft if the GAIP is approved? Please describe in detail.
- o. What is the predicted net average daily change in aircraft departures and arrivals if the GAIP is approved?
- p. How many GA privately owned jets will JWA be capable of handling during a 24-hour period if the GAIP is approved?
- q. How many overnight hangers or other spaces will be made available for GA privately owned jet aircraft if the GAIP is approved?
- r. What will be the economic benefit to JWA if the GAIP is approved?
- s. If the GAIP is approved, will existing flight schools be permitted to continue their operations? If not, will flight school(s) specializing in jet aircraft flight instruction replace existing flight schools?

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- t. If any flight schools specializing in jet aircraft flight instruction are anticipated, will a cap or maximum number of training departures and arrivals during a 24-hour period be established? If yes, what will be the maximum number? If no, why not?
- u. If any flight schools specializing in jet aircraft flight instruction are anticipated, will hours for their operation and training flights be established? If yes, what will be the hours? If no, why not?

3. DEIR Conclusions that Environmental Impacts are Insignificant (Section 4).

Comment: The DEIR conclusion that the GAIP will be not significantly cause a negative impact to the community in terms of noise, air quality, hazardous materials, etc., is unrealistic. It is submitted that there has been an insufficient consideration of the additional noise and pollution that will be created; especially considering the leaded fuel mixture used by private GA jet aircraft and their exemption from curfew hours under GA regulations. There have been numerous studies reported in many peer-reviewed scholarly journals that airport noise and pollution have serious health impacts for neighboring communities. It is unrealistic to conclude that if the GAIP is approved that there will be no significant negative environmental impact to Newport Beach and other neighboring communities.

Furthermore, the assumptions supporting the noise analysis are flawed and unrealistic. The projection that by 2016, 40% of the Boeing 737 and Airbus A320 aircraft using JWA will include the quieter 737-MAX and Airbus A320-Neo is sheer speculation and is in conflict with the 2014 Settlement Agreement EIR noise modeling.

Questions:

- a. As GA jet aircraft have a long history of violating noise limits, how will this be better controlled, especially given the current lack of regulation of the GA jet aircraft fleet?
- b. Is an increase in GA jet aircraft nighttime arrivals and departures anticipated? If yes, how many nighttime arrivals and departures are anticipated?
- c. Will JWA place a cap or limit on the number of nighttime arrivals and departures of GA jet aircraft? If yes, what limitations will be established? If no, why not?
- d. Why wasn't the negative impact of an additional 5-10% noise generating Back Bay departure pattern by the large corporate jets on the same neighborhood impacted by commercial departures considered in the Noise Impact section of the Appendix? As this would have the same impact as a net increase in commercial departures that would replace aircraft that were previously fanning after takeoff and not impacting these neighbors, why wasn't this considered?

- e. If the GAIP is approved, what would be the largest GA jet aircraft that would be accommodated by JWA?
- f. How would the noise from departing large GA jet aircraft compare with the noise emitted from the commercial jet fleet currently using JWA? If this analysis has been done, what is the basis for the analysis?
- g. Will there be a limitation on large GA jet departures? Will there be any such limitation specifically during the existing curfew hours? If yes, what will be the limitations? If no, why not?
- h. Do the GAIP conclusions of no significant noise or pollution impact take into consideration the Next-Gen satellite-precision concentrated flight paths that have clearly has a significant negative impact on Newport Beach? If yes, what conclusions have been drawn? If no, why not?

4. Health Risk Analysis (Section 4).

Comment: Although related to the above comment, the health risk analysis ("HRA") in Section 4 of the DEIR is extremely complicated and confusing. The DEIR also relies heavily on the EIR submitted during the 2014 Settlement Agreement ("EIR 617") for its health risk analysis ("HRA"). It is submitted that reliance on the previous EIR is misplaced. EIR 617 relied on existing 2014 flight patterns prior to the implementation of the FAA Next Gen concentrated satellite driven precision flight patterns that are flown today. Furthermore, the DEIR does not anticipate the different emissions anticipated from the expected increase in GA jet aircraft if the GAIP is approved. To suggest that there will be a minimal increase in emissions is unrealistic and unsupported by any evidence.

Comment: The DEIR is also woefully deficient in its discussion of the potential health impacts to more sensitive members of the community, especially the impact on children. The DEIR discusses "sensitive receptors" and "sensitive populations" noting only those closest to the boundary of JWA, specifically mentioning a residential development approximately 855 feet from the boundary of IWA and airport workers. In response, there have been numerous studies conducted and published in peer-reviewed scholarly journals about the serious health issues caused by airports, over flights, departures and arrivals on children and adults in communities under the flight paths. These studies have confirmed that children suffer cognitive deficits and respiratory illnesses, while the general population suffers undue stress, heart disease, high blood pressure, cognitive decline, auditory problems, heart attacks, strokes and greater cancer risk. Similarly, research studies have concluded that the adverse health affects from airport pollution are present within 10 miles of an airport. There are thousands of children in schools well within a distance of 10 miles from the JWA departure paths and thousands of people who live under the flight paths.

Questions:

- a. In arriving at the conclusion that the environmental impact of the GAIP is "less than significant," what consideration has been given to the schools, athletic fields, parks and residential areas located within a close proximity and under the flight paths of JWA? If the impact these populations have not been considered, why not?
- b. Although noise is discussed in the Sensitive Receptors section of the DEIR, including the impact to schools, why isn't there an in depth discussion of health concerns especially as they relate to children?
- c. Did the County in the preparation of the DEIR review and consider recent research concerning the health and welfare of populations living within a close proximity of airports? Within 10 miles of JWA?
- d. What is the true net increase in pollutants from the new aircraft population departures from JWA as the fuel mixture is different and heavier in carbon and particulate pollutants?
- e. In preparing the DEIR, was there any consideration of the added pollution that would result from the increase in GA jet aircraft combined with the existing commercial fleet? If no, why not?
- f. In preparing the DEIR, was there any consideration of the impact of increased noise levels that would result from nighttime flights of GA jet aircraft? If no, why not?

5. Flight Patterns.

<u>Comment</u>: Although the DEIR states there will be no change in flight patterns, it is unclear as to the flight patterns that were used for its analysis. It is also unclear what flight patterns would be followed by GA jet aircraft upon approval of the GAIP. Clarification is needed to assess the differences between GA and commercial aircraft departure patterns and how they might change upon approval of the GAIP.

Questions:

- a. Will the GA jet aircraft added to JWA through the GAIP follow the existing flight patterns presently used by commercial jets as mandated by the SoCal Metroplex?
- b. If the GA jet aircraft added through the GAIP will follow the flight patterns mandated under the SoCal Metroplex, has there been any consideration as to the impact that will be caused by the increase in air traffic over Newport Beach? If no, why not?
- c. Will there be any changes in GA flight patterns if the GAIP is approved? If yes, what will be the changes?

Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely,

Sean and Monica Burke 413 Cabrillo Terrace Corona Del Mar, 92625

Monicaspud@roadrunner.com

Sean@Seanmburke.com

_____ (include your name, home and email

addresses

From: Kimberly Burrows-Egan <kburrows.egan@me.com>

Sent: Tuesday, November 20, 2018 1:13 PM

To: EIR627

Subject: Environmental impact by NOISE from JWA

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072) Dear Ms. Choum: As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"): 1. DEIR Complexity and Length Relative to Time Limitations for Comment: The DEIR was made available for public review on September 20, 2018, with comments due on November 6, 2018, with an extension until November 21, 2018. Comment: This is an incredibly complex and detailed document that is over 600 pages in length, with 2,200 pages of appendices. Although members of the general public are invited to "comment" on the DEIR, it is submitted that most members of the general public are ill equipped to read through the entirety of the document, sufficiently understand it and respond to it with their comments and guestions in the time allotted. Question: Why can't additional time be provided for the review and comment to the DEIR? 2. Project Objectives (Section 3). This section lists separate objectives of the GAIP, which appear only to benefit airport operations and profitability. Comment: As you are surely aware, under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives clearly pertain the efficiency and economical benefits of the GAIP with no indication of concerns for the communities impacted by noise and pollution emanating from JWA. Questions: a. Is the GAIP for the benefit of nonresident corporate jet aircraft? b. Is the GAIP for the benefit of local corporate jet aircraft? c. Have local corporations been surveyed regarding their interest in housing their jets at JWA? If no, why not? If yes, what have been their responses? d. Does the GAIP benefit the exiting fleet of privately owned piston-powered driven aircraft owners who have historically based their aircraft at JWA? If yes, how? e. Will the GAIP result in a decrease of smaller privately owned piston-powered aircraft at JWA? f. How does a decrease in the number of smaller privately owned piston-powered aircraft based at JWA and an increase in larger GA jet aircraft, benefit Newport Beach and neighboring communities? g. What is the basis for the assumptions of daily departure and arrival of GA jet traffic, including larger corporate aircraft, which will be displacing smaller GA private planes? h. Has it been determined how many additional GA jet aircraft departures will occur in a 24-hour period under the GAIP? If yes, how many? If no, why not? i. Will there be a cap or a maximum number of GA jet aircraft departures allowable during a 24-hour period? If yes, how many? If no, why not? j. How does the GAIP, with its goal of accommodating large corporate jet aircraft at JWA through building additional hangers, benefit Newport Beach and other neighboring communities? k. Will the GAIP result in an increase of international flights to JWA via GA jet aircraft? I. If the GAIP increases the number of international flights in and out of JWA, will there be a cap or maximum number allowed during any a 24-hour period? If yes, what will be the maximum number? If no, why not? m. How many international flights are anticipated to arrive at JWA on a daily or weekly basis? n. What type of TSA-type security screening will be conducted regarding the increasing numbers of larger international GA aircraft if the GAIP is approved? Please describe in detail. o. What is the predicted net average daily change in aircraft departures and arrivals if the GAIP is approved? p. How many GA privately owned jets will JWA be capable of handling during a 24-hour period if the GAIP is approved? q. How many overnight hangers or other spaces will be made available for GA privately owned jet aircraft if the GAIP is approved? r. What will be the economic benefit to JWA if the GAIP is approved? s. If the GAIP is approved, will existing flight schools be permitted to continue their operations? If not, will flight school(s) specializing in jet aircraft flight instruction replace existing flight schools? t. If any flight schools specializing in jet aircraft flight instruction are anticipated, will a cap or maximum number of training departures and arrivals during a 24-hour period be established? If yes, what will be the maximum number? If no, why not? u. If any flight schools specializing in jet aircraft flight instruction are anticipated, will hours for their operation and training flights be established? If yes, what will be the hours? If no, why not? 3. DEIR Conclusions that Environmental Impacts are Insignificant (Section 4). Comment: The DEIR conclusion that the GAIP will be not significantly cause a negative impact to the community in terms of noise, air quality,

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hazardous materials, etc., is unrealistic. It is submitted that there has been an insufficient consideration of the additional noise and pollution that will be created; especially considering the leaded fuel mixture used by private GA jet aircraft and their exemption from curfew hours under GA regulations. There have been numerous studies reported in many peer-reviewed scholarly journals that airport noise and pollution have serious health impacts for neighboring communities. It is unrealistic to conclude that if the GAIP is approved that there will be no significant negative environmental impact to Newport Beach and other neighboring communities. Furthermore, the assumptions supporting the noise analysis are flawed and unrealistic. The projection that by 2016, 40% of the Boeing 737 and Airbus A320 aircraft using JWA will include the quieter 737-MAX and Airbus A320-Neo is sheer speculation and is in conflict with the 2014 Settlement Agreement EIR noise modeling. Questions: a. As GA jet aircraft have a long history of violating noise limits, how will this be better controlled, especially given the current lack of regulation of the GA jet aircraft fleet? b. Is an increase in GA jet aircraft nighttime arrivals and departures anticipated? If yes, how many nighttime arrivals and departures are anticipated? c. Will JWA place a cap or limit on the number of nighttime arrivals and departures of GA jet aircraft? If yes, what limitations will be established? If no, why not? d. Why wasn't the negative impact of an additional 5-10% noise generating Back Bay departure pattern by the large corporate jets on the same neighborhood impacted by commercial departures considered in the Noise Impact section of the Appendix? As this would have the same impact as a net increase in commercial departures that would replace aircraft that were previously fanning after takeoff and not impacting these neighbors, why wasn't this considered? e. If the GAIP is approved, what would be the largest GA jet aircraft that would be accommodated by JWA? f. How would the noise from departing large GA jet aircraft compare with the noise emitted from the commercial iet fleet currently using JWA? If this analysis has been done, what is the basis for the analysis? q. Will there be a limitation on large GA jet departures? Will there be any such limitation specifically during the existing curfew hours? If yes, what will be the limitations? If no, why not? h. Do the GAIP conclusions of no significant noise or pollution impact take into consideration the Next-Gen satellite-precision concentrated flight paths that have clearly has a significant negative impact on Newport Beach? If yes, what conclusions have been drawn? If no, why not? 4. Health Risk Analysis (Section 4). Comment: Although related to the above comment, the health risk analysis ("HRA") in Section 4 of the DEIR is extremely complicated and confusing. The DEIR also relies heavily on the EIR submitted during the 2014 Settlement Agreement ("EIR 617") for its health risk analysis ("HRA"). It is submitted that reliance on the previous EIR is misplaced. EIR 617 relied on existing 2014 flight patterns prior to the implementation of the FAA Next Gen concentrated satellite driven precision flight patterns that are flown today. Furthermore, the DEIR does not anticipate the different emissions anticipated from the expected increase in GA jet aircraft if the GAIP is approved. To suggest that there will be a minimal increase in emissions is unrealistic and unsupported by any evidence. Comment: The DEIR is also woefully deficient in its discussion of the potential health impacts to more sensitive members of the community, especially the impact on children. The DEIR discusses "sensitive receptors" and "sensitive populations" noting only those closest to the boundary of JWA, specifically mentioning a residential development approximately 855 feet from the boundary of JWA and airport workers. In response, there have been numerous studies conducted and published in peer-reviewed scholarly journals about the serious health issues caused by airports, over flights, departures and arrivals on children and adults in communities under the flight paths. These studies have confirmed that children suffer cognitive deficits and respiratory illnesses, while the general population suffers undue stress, heart disease, high blood pressure, cognitive decline, auditory problems, heart attacks, strokes and greater cancer risk. Similarly, research studies have concluded that the adverse health affects from airport pollution are present within 10 miles of an airport. 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What is the true net increase in pollutants from the new aircraft population departures from JWA as the fuel mixture is different and heavier in carbon and particulate pollutants? e. In preparing the DEIR, was there any consideration of the added pollution that would result from the increase in GA jet aircraft combined with the existing commercial fleet? If no, why not? f. In preparing the DEIR, was there any consideration of the impact of increased noise levels that would result from nighttime flights of GA jet aircraft? If no, why not? 5. Flight Patterns. Comment: Although the DEIR states there will be no change in flight patterns, it is unclear as to the flight patterns that were used for its analysis. It is also unclear what flight patterns would be followed by GA jet aircraft upon approval of the GAIP. Clarification is needed to assess the differences between GA and commercial aircraft departure patterns and how they might change upon approval of the GAIP. Questions: a. Will the GA jet aircraft added to JWA through the GAIP follow the existing flight patterns presently

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used by commercial jets as mandated by the SoCal Metroplex? b. If the GA jet aircraft added through the GAIP will follow the flight patterns mandated under the SoCal Metroplex, has there been any consideration as to the impact that will be caused by the increase in air traffic over Newport Beach? If no, why not? c. Will there be any changes in GA flight patterns if the GAIP is approved? If yes, what will be the changes? I am concerned about the potential decrease in quality of life by noise and increase of jet fuel rain on property and human beings. Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR. Sincerely, J Robert Egan, MD

Kimberly Burrows-Egan, RN, NP

1418 Lincoln Lane Newport Beach, CA 92660

eganjr@icloud.com kburrows.egan@me.com 949-466-4826

From: Nicolas Burtnyk <burtnyk@gmail.com>
Sent: Tuesday, November 20, 2018 12:39 PM

To: EIR627

Subject: EIR Comments

Attachments: 11.15.18 EIR Comments.docx

Dear Ms. Choum,

My comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP") are attached.

Sincerely,

Nicolas Burtnyk

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

1. DEIR Complexity and Length Relative to Time Limitations for Comment:

The DEIR was made available for public review on September 20, 2018, with comments due on November 6, 2018, with an extension until November 21, 2018. Comment: This is an incredibly complex and detailed document that is over 600 pages in length, with 2,200 pages of appendices. Although members of the general public are invited to "comment" on the DEIR, it is submitted that most members of the general public are ill equipped to read through the entirety of the document, sufficiently understand it and respond to it with their comments and questions in the time allotted.

<u>Question</u>: Why can't additional time be provided for the review and comment to the DEIR?

2. Project Objectives (Section 3).

This section lists separate objectives of the GAIP, which appear only to benefit airport operations and profitability.

<u>Comment</u>: As you are surely aware, under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives clearly pertain the efficiency and economical benefits of the GAIP with no indication of concerns for the communities impacted by noise and pollution emanating from JWA.

Questions:

- a. Is the GAIP for the benefit of nonresident corporate jet aircraft?
- b. Is the GAIP for the benefit of local corporate jet aircraft?
- c. Have local corporations been surveyed regarding their interest in housing their jets at JWA? If no, why not? If yes, what have been their responses?
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- e. Will the GAIP result in a decrease of smaller privately owned piston-powered aircraft at JWA?
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Questions:

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Questions:

- a. In arriving at the conclusion that the environmental impact of the GAIP is "less than significant," what consideration has been given to the schools, athletic fields, parks and residential areas located within a close proximity and under the flight paths of JWA? If the impact these populations have not been considered, why not?
- b. Although noise is discussed in the Sensitive Receptors section of the DEIR, including the impact to schools, why isn't there an in depth discussion of health concerns especially as they relate to children?
- c. Did the County in the preparation of the DEIR review and consider recent research concerning the health and welfare of populations living within a close proximity of airports? Within 10 miles of JWA?
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Questions:

- a. Will the GA jet aircraft added to JWA through the GAIP follow the existing flight patterns presently used by commercial jets as mandated by the SoCal Metroplex?
- b. If the GA jet aircraft added through the GAIP will follow the flight patterns mandated under the SoCal Metroplex, has there been any consideration as to the impact that will be caused by the increase in air traffic over Newport Beach? If no, why not?
- c. Will there be any changes in GA flight patterns if the GAIP is approved? If yes, what will be the changes?

Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely,

Nicolas Burtnyk burtnyk@gmail.com 1504 E Ocean Blvd., Newport Beach, CA 92661

From: Heather Carlino <hcarlino@hotmail.com>
Sent: Wednesday, November 21, 2018 8:52 AM

To: EIR627

Subject: Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No.

2017031072)

Attachments: 11.21.18 EIR Comments.docx

November 21, 2018

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Dear Ms. Choum:

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

1. DEIR Complexity and Length Relative to Time Limitations for Comment:

The DEIR was made available for public review on September 20, 2018, with comments due on November 6, 2018, with an extension until November 21, 2018.

<u>Comment</u>: This is an incredibly complex and detailed document that is over 600 pages in length, with 2,200 pages of appendices. Although members of the general public are invited to "comment" on the DEIR, it is submitted that most members of the general public are ill equipped to read through the entirety of the document, sufficiently understand it and respond to it with their comments and questions in the time allotted.

Question: Why can't additional time be provided for the review and comment to the DEIR?

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This section lists separate objectives of the GAIP, which appear only to benefit airport operations and profitability.

<u>Comment</u>: As you are surely aware, under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives clearly pertain the efficiency and economical benefits of the GAIP with no indication of concerns for the communities impacted by noise and pollution emanating from JWA. <u>Ouestions</u>:

- 1. Is the GAIP for the benefit of nonresident corporate jet aircraft?
- 2. Is the GAIP for the benefit of local corporate jet aircraft?
- 3. Have local corporations been surveyed regarding their interest in housing their jets at JWA? If no, why not? If yes, what have been their responses?
- 4. Does the GAIP benefit the exiting fleet of privately owned piston-powered driven aircraft owners who have historically based their aircraft at JWA? If yes, how?

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5. Will the GAIP result in a decrease of smaller privately owned piston-powered aircraft at JWA?

- 6. How does a decrease in the number of smaller privately owned piston- powered aircraft based at JWA and an increase in larger GA jet aircraft, benefit Newport Beach and neighboring communities?
- 7. What is the basis for the assumptions of daily departure and arrival of GA jet traffic, including larger corporate aircraft, which will be displacing smaller GA private planes?
- 8. Has it been determined how many additional GA jet aircraft departures will occur in a 24-hour period under the GAIP? If yes, how many? If no, why not?
- 9. Will there be a cap or a maximum number of GA jet aircraft departures allowable during a 24-hour period? If yes, how many? If no, why not?
- 10. How does the GAIP, with its goal of accommodating large corporate jet aircraft at JWA through building additional hangers, benefit Newport Beach and other neighboring communities?
- 11. Will the GAIP result in an increase of international flights to JWA via GA jet aircraft?
- 12. If the GAIP increases the number of international flights in and out of JWA, will there be a cap or maximum number allowed during any a 24-hour period? If yes, what will be the maximum number? If no, why not?
- 13. How many international flights are anticipated to arrive at JWA on a daily or weekly basis?
- 14. What type of TSA-type security screening will be conducted regarding the increasing numbers of larger international GA aircraft if the GAIP is approved? Please describe in detail.
- 15. What is the predicted net average daily change in aircraft departures and arrivals if the GAIP is approved?
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- 18. What will be the economic benefit to JWA if the GAIP is approved?
- 19. If the GAIP is approved, will existing flight schools be permitted to continue their operations? If not, will flight school(s) specializing in jet aircraft flight instruction replace existing flight schools?
- 20. If any flight schools specializing in jet aircraft flight instruction are anticipated, will a cap or maximum number of training departures and arrivals during a 24-hour period be established? If yes, what will be the maximum number? If no, why not?
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3. DEIR Conclusions that Environmental Impacts are Insignificant (Section 4).

Comment: The DEIR conclusion that the GAIP will be not significantly cause a negative impact to the community in terms of noise, air quality, hazardous materials, etc., is unrealistic. It is submitted that there has been an insufficient consideration of the additional noise and pollution that will be created; especially considering the leaded fuel mixture used by private GA jet aircraft and their exemption from curfew hours under GA regulations. There have been numerous studies reported in many peer-reviewed scholarly journals that airport noise and pollution have serious health impacts for neighboring communities. It is unrealistic to conclude that if the GAIP is approved that there will be no significant negative environmental impact to Newport Beach and other neighboring communities. Furthermore, the assumptions supporting the noise analysis are flawed and unrealistic. The projection that by 2016, 40% of the Boeing 737 and Airbus A320 aircraft using JWA will include the quieter 737-MAX and Airbus A320-Neo is sheer speculation and is in conflict with the 2014 Settlement Agreement EIR noise modeling.

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Questions:

- 1. As GA jet aircraft have a long history of violating noise limits, how will this be better controlled, especially given the current lack of regulation of the GA jet aircraft fleet?
- 2. Is an increase in GA jet aircraft nighttime arrivals and departures anticipated? If yes, how many nighttime arrivals and departures are anticipated?
- 3. Will JWA place a cap or limit on the number of nighttime arrivals and departures of GA jet aircraft? If yes, what limitations will be established? If no, why not?
- 4. Why wasn't the negative impact of an additional 5-10% noise generating Back Bay departure pattern by the large corporate jets on the same neighborhood impacted by commercial departures considered in the Noise Impact section of the Appendix? As this would have the same impact as a net increase in commercial departures that would replace aircraft that were previously fanning after takeoff and not impacting these neighbors, why wasn't this considered?
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- 8. Do the GAIP conclusions of no significant noise or pollution impact take into consideration the Next-Gen satellite-precision concentrated flight paths that have clearly has a significant negative impact on Newport Beach? If yes, what conclusions have been drawn? If no, why not?

4. Health Risk Analysis (Section 4).

Comment: Although related to the above comment, the health risk analysis ("HRA") in Section 4 of the DEIR is extremely complicated and confusing. The DEIR also relies heavily on the EIR submitted during the 2014 Settlement Agreement ("EIR 617") for its health risk analysis ("HRA"). It is submitted that reliance on the previous EIR is misplaced. EIR 617 relied on existing 2014 flight patterns prior to the implementation of the FAA Next Gen concentrated satellite driven precision flight patterns that are flown today. Furthermore, the DEIR does not anticipate the different emissions anticipated from the expected increase in GA jet aircraft if the GAIP is approved. To suggest that there will be a minimal increase in emissions is unrealistic and unsupported by any evidence.

Comment: The DEIR is also woefully deficient in its discussion of the potential health impacts to more sensitive members of the community, especially the impact on children. The DEIR discusses "sensitive receptors" and "sensitive populations" noting only those closest to the boundary of JWA, specifically mentioning a residential development approximately 855 feet from the boundary of JWA and airport workers. In response, there have been numerous studies conducted and published in peer-reviewed scholarly journals about the serious health issues caused by airports, over flights, departures and arrivals on children and adults in communities under the flight paths. These studies have confirmed that children suffer cognitive deficits and respiratory illnesses, while the general population suffers undue stress, heart disease, high blood pressure, cognitive decline, auditory problems, heart attacks, strokes and greater cancer risk. Similarly, research studies have concluded that the adverse health affects from airport pollution are present within 10 miles of an airport. There are thousands of children in schools well within a distance of 10 miles from the JWA departure paths and thousands of people who live under the flight paths.

Questions:

1. In arriving at the conclusion that the environmental impact of the GAIP is "less than significant," what consideration has been given to the schools, athletic fields, parks and residential areas located within a

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- close proximity and under the flight paths of JWA? If the impact these populations have not been considered, why not?
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- 6. In preparing the DEIR, was there any consideration of the impact of increased noise levels that would result from nighttime flights of GA jet aircraft? If no, why not?

5. Flight Patterns.

<u>Comment</u>: Although the DEIR states there will be no change in flight patterns, it is unclear as to the flight patterns that were used for its analysis. It is also unclear what flight patterns would be followed by GA jet aircraft upon approval of the GAIP. Clarification is needed to assess the differences between GA and commercial aircraft departure patterns and how they might change upon approval of the GAIP. <u>Questions</u>:

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Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely, Heather Carlino 279 W Wilson St. APT B Costa Mesa, CA 92627 hcarlino@hotmail.com

November 21, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

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The DEIR was made available for public review on September 20, 2018, with comments due on November 6, 2018, with an extension until November 21, 2018. Comment: This is an incredibly complex and detailed document that is over 600 pages in length, with 2,200 pages of appendices. Although members of the general public are invited to "comment" on the DEIR, it is submitted that most members of the general public are ill equipped to read through the entirety of the document, sufficiently understand it and respond to it with their comments and questions in the time allotted.

<u>Question</u>: Why can't additional time be provided for the review and comment to the DEIR?

2. Project Objectives (Section 3).

This section lists separate objectives of the GAIP, which appear only to benefit airport operations and profitability.

<u>Comment</u>: As you are surely aware, under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives clearly pertain the efficiency and economical benefits of the GAIP with no indication of concerns for the communities impacted by noise and pollution emanating from JWA.

Questions:

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Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely,

Heather Carlino 279 W Wilson St. APT B Costa Mesa, CA 92627 https://doi.org/10.2016/j.jch/

_____ (include your name, home and email

addresses

From: Astrid Carlson <acarlson2300@gmail.com>
Sent: Tuesday, November 20, 2018 3:55 PM

To: EIR627

Subject: John Wayne Airport

November 17, 2018 Via Electronic Mail EIR627@ocair.com Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626 Re: General Aviation Improvement Program - Draft Environmental Impact Report (SCH No. 2017031072) Dear Ms. Choum: As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"): 1. DEIR Complexity and Length Relative to Time Limitations for Comment: The DEIR was made available for public review on September 20, 2018, with comments due on November 6, 2018, with an extension until November 21, 2018. Comment: This is an incredibly complex and detailed document that is over 600 pages in length, with 2,200 pages of appendices. Although members of the general public are invited to "comment" on the DEIR, it is submitted that most members of the general public are ill equipped to read through the entirety of the document, sufficiently understand it and respond to it with their comments and questions in the time allotted. Question: Why can't additional time be provided for the review and comment to the DEIR? 2. Project Objectives (Section 3). This section lists separate objectives of the GAIP, which appear only to benefit airport operations and profitability. Comment: As you are surely aware, under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives clearly pertain the efficiency and economical benefits of the GAIP with no indication of concerns for the communities impacted by noise and pollution emanating from JWA. Questions: a. 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Newport Beach, CA 92663

949.631.3182

acarlson2300@gmail.com

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From:	Kim Charney <bidvesi@aoi.com></bidvesi@aoi.com>		
Sent:	Tuesday, November 20, 2018 3:50 PM		
To:	EIR627		
Subject:	General Aviation Improvement Program		
November 17, 2018			
<u>Via Electronic Mail</u>			
EIR627@ocair.com			
Ms. Lea Choum			
Land Use Manager a	t JWA		
3160 Airway Avenue			
Costa Mesa, CA 9262	26		
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Sincerely,
Kim James Charney M.D.
214 Evening Star Lane
Newport Beach, CA 92660

a.

b.

c.

From: Sent:	Kim Charney <bldvesl@aol.com> Wednesday, November 21, 2018 7:55 AM</bldvesl@aol.com>
To: Subject:	EIR627 General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)
Attachments:	PastedGraphic-3.tiff; Scan 3.tiff
Navarah an 17, 2010	
November 17, 2018	
Via Electronic Mail	
via Electronic ivian	
EIR627@ocair.com	
Ma Laa Chausa	
Ms. Lea Choum	
Land Use Manager a	at JWA
3160 Airway Avenue	
•	
Costa Mesa, CA 926	26
Day Camaral Aviatia	In Jacobs Control December - Dece
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1

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Sincerely,

Kim James Charney M.D. 214 Evening Star Lane

Newport Beach, CA 92660

From: mchu11583@aol.com

Sent: Wednesday, November 21, 2018 11:36 AM

To: EIR627

Subject: GAIP and DEIR

Attachments: 2018_11_21_11_26_03.pdf

See Attachment

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

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Min Open	(include your name, home and email
addresses	
38 CORMORANT	Circub
KIEMPORT BEACH,	CA 92660

mchu11583 @ aol. com

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From: mchu11583@aol.com

Sent: Wednesday, November 21, 2018 11:37 AM

To: EIR627 **Subject:** Deir and Gaip

Attachments: 2018_11_21_11_28_02.pdf

See Attached

3-418

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As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

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Furthermore, the assumptions supporting the noise analysis are flawed and unrealistic. The projection that by 2016, 40% of the Boeing 737 and Airbus A320 aircraft using JWA will include the quieter 737-MAX and Airbus A320-Neo is sheer speculation and is in conflict with the 2014 Settlement Agreement EIR noise modeling.

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Comment: Although related to the above comment, the health risk analysis ("HRA") in Section 4 of the DEIR is extremely complicated and confusing. The DEIR also relies heavily on the EIR submitted during the 2014 Settlement Agreement ("EIR 617") for its health risk analysis ("HRA"). It is submitted that reliance on the previous EIR is misplaced. EIR 617 relied on existing 2014 flight patterns prior to the implementation of the FAA Next Gen concentrated satellite driven precision flight patterns that are flown today. Furthermore, the DEIR does not anticipate the different emissions anticipated from the expected increase in GA jet aircraft if the GAIP is approved. To suggest that there will be a minimal increase in emissions is unrealistic and unsupported by any evidence.

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1991	VISTA	CAUGAL
Noup	ORY HEA	xCH, CF 92660
mchi	111583 (@ aol. com

From: mchu11583@aol.com

Sent: Wednesday, November 21, 2018 11:39 AM

To: EIR627

Subject: GAIP and DEIR

Attachments: 2018_11_21_11_29_43.pdf

See Attached

3-425

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November 17, 2018

Via Electronic Mail EIR627@ocair.com

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Min CHY (include your name, home and email addresses

42 Hillspace DR

NEMPORT BEACH, CA 92660

From: mchu11583@aol.com

Sent: Wednesday, November 21, 2018 11:40 AM

To: EIR627

Subject: GAIP and DEIR

Attachments: 2018_11_21_11_31_38.pdf

See Attachment

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Sincerely,

MiCHAEL CHY (include your name, home and email addresses

22 CORMORANT CIRCLE NEWPORT BEACH CA 92660 WICHUB WESTOFHOUSE. COM From: Mary Citrano <marycitrano@gmail.com>
Sent: Wednesday, November 21, 2018 3:20 PM

To: EIR627

Subject: 11.15.18 EIR Comments (003).docx **Attachments:** 11.15.18 EIR Comments (003).docx

Please see attachment. Thank you, Mary Citrano



Virus-free. www.avast.com

3-439

1

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

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Mary Citrano
5509 Seashore Dr.
Newport Beach, Ca. 92663

_______ (include your name, home and email addresses

Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in

From: Dan Clark <dcpcgm@gmail.com>

Sent: Wednesday, November 21, 2018 2:58 PM

To: EIR627

Subject: Re:General Aviation Program-DEIR Report 2017031072

November 21, 2018

Via Electronic Mail

EIR627@ocair.com

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Daniel Clark

415 San Bernardino Ave.
NEWPORT Beach CA 92663
dcpcgm@gmail.com
Sent from my iPhone

From: Dan Clark <dcpcgm@gmail.com>

Sent: Wednesday, November 21, 2018 2:57 PM

To: EIR627

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Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely,

Jean G. Clark

415 San Bernardino Avenue Newport Beach, CA 92663 dcpcgm@gmail.com

Sent from my iPhone

From: Teryn Clarke <terynclarke@yahoo.com>
Sent: Tuesday, November 20, 2018 12:05 PM

To: EIR627

Subject: Private jet noise and no curfew

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program - Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

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3

Sincerely,

Teryn Clarke 1309 Mariners Dr Newport Beach CA 92660 949-701-2811

Best, Teryn

Teryn Clarke, M.D. Neurology

From: Paul M. Cohen <pmcohen@ccacpas.com>
Sent: Wednesday, November 21, 2018 10:15 AM

To: EIR627

Cc: Bonnie O'Neil **Subject:** John Wayne Airport

Attachments: 11.15.18 EIR Comments.docx

Please see the attached correspondence.

Thank you

Paul M. Cohen

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

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Newport Beach CA 92660

paul.cohen06@gmail.com

From: Terri Cohen <terriaco@gmail.com>
Sent: Wednesday, November 21, 2018 3:41 PM

To: EIR627

Subject: General Aviation Improvement Program

November 21, 2018

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that the adverse health affects from airport pollution are present within 10 miles of an airport. There are thousands of children in schools well within a distance of 10 miles from the JWA departure paths and thousands of people who live under the flight paths.

Questions:

- a. In arriving at the conclusion that the environmental impact of the GAIP is "less than significant," what consideration has been given to the schools, athletic fields, parks and residential areas located within a close proximity and under the flight paths of JWA? If the impact these populations have not been considered, why not?
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- f. In preparing the DEIR, was there any consideration of the impact of increased noise levels that would result from nighttime flights of GA jet aircraft? If no, why not?

5. Flight Patterns.

<u>Comment</u>: Although the DEIR states there will be no change in flight patterns, it is unclear as to the flight patterns that were used for its analysis. It is also unclear what flight patterns would be followed by GA jet aircraft upon approval of the GAIP. Clarification is needed to assess the differences between GA and commercial aircraft departure patterns and how they might change upon approval of the GAIP.

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Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely,

Terri Cohen, 1226 Polaris Drive, Newport Beach, CA 92660



Virus-free. <u>www.avast.com</u>

From:

Judy Cooper <jcpr@pacbell.net> Tuesday, November 20, 2018 11:18 PM Sent:

EIR627 To:

Subject: Letter to Ms. Choum

Attachments: airport EIR.pdf; ATT00001.txt

Sent from the PDF Converter

3-471

1

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

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Comment: This is an incredibly complex and detailed document that is over 600 pages in length, with 2,200 pages of appendices. Although members of the general public are invited to "comment" on the DEIR, it is submitted that most members of the general public are ill equipped to read through the entirety of the document, sufficiently understand it and respond to it with their comments and questions in the time allotted.

Question: Why can't additional time be provided for the review and comment to the DEIR?

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This section lists separate objectives of the GAIP, which appear only to benefit airport operations and profitability. Comment: As you are surely aware, under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives clearly pertain the efficiency and economical benefits of the GAIP with no indication of concerns for the communities impacted by noise and pollution emanating from JWA.

Questions:

- a. Is the GAIP for the benefit of nonresident corporate jet aircraft?
- b. Is the GAIP for the benefit of local corporate jet aircraft?
- c. Have local corporations been surveyed regarding their interest in housing their jets at JWA? If no, why not? If yes, what have been their responses?
- d. Does the GAIP benefit the exiting fleet of privately owned piston-powered driven aircraft owners who have historically based their aircraft at JWA? If yes, how?
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- f. How does a decrease in the number of smaller privately owned piston- powered aircraft based at JWA and an increase in larger GA jet aircraft, benefit Newport Beach and neighboring communities?
- g. What is the basis for the assumptions of daily departure and arrival of GA jet traffic, including larger corporate aircraft, which will be displacing smaller GA private planes?
- h. Has it been determined how many additional GA jet aircraft departures will occur in a 24-hour period under the GAIP? If yes, how many? If no, why not?
- i. Will there be a cap or a maximum number of GA jet aircraft departures allowable during a 24-hour period? If yes, how many? If no, why not?
- j. How does the GAIP, with its goal of accommodating large corporate jet aircraft at JWA through building additional hangers, benefit Newport Beach and other neighboring communities?

- k. Will the GAIP result in an increase of international flights to JWA via GA jet aircraft?
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3. <u>DEIR Conclusions that Environmental Impacts are Insignificant (Section 4)</u>.

<u>Comment</u>: The DEIR conclusion that the GAIP will be not significantly cause a negative impact to the community in terms of noise, air quality, hazardous materials, etc., is unrealistic. It is submitted that there has been an

insufficient consideration of the additional noise and pollution that will be created; especially considering the leaded fuel mixture used by private GA jet aircraft and their exemption from curfew hours under GA regulations. There have been numerous studies reported in many peer-reviewed scholarly journals that airport noise and pollution have serious health impacts for neighboring communities. It is unrealistic to conclude that if the GAIP is approved that there will be no significant negative environmental impact to Newport Beach and other neighboring communities.

Furthermore, the assumptions supporting the noise analysis are flawed and unrealistic. The projection that by 2016, 40% of the Boeing 737 and Airbus A320 aircraft using JWA will include the quieter 737-MAX and Airbus A320-Neo is sheer speculation and is in conflict with the 2014 Settlement Agreement EIR noise modeling.

Questions:

- a. As GA jet aircraft have a long history of violating noise limits, how will this be better controlled, especially given the current lack of regulation of the GA jet aircraft fleet?
- b. Is an increase in GA jet aircraft nighttime arrivals and departures anticipated? If yes, how many nighttime arrivals and departures are anticipated?
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- d. Why wasn't the negative impact of an additional 5-10% noise generating Back Bay departure pattern by the large corporate jets on the same neighborhood impacted by commercial departures considered in the Noise Impact section of the Appendix? As this would have the same impact as a net increase in commercial departures that would replace aircraft that were previously fanning after takeoff and not impacting these neighbors, why wasn't this considered?
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- g. Will there be a limitation on large GA jet departures? Will there be any such limitation specifically during the existing curfew hours? If yes, what will be the limitations? If no, why not?
- h. Do the GAIP conclusions of no significant noise or pollution impact take into consideration the Next-Gen satellite-precision concentrated flight paths that have clearly has a significant negative impact on Newport Beach? If yes, what conclusions have been drawn? If no, why not?

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Comment: Although related to the above comment, the health risk analysis ("HRA") in Section 4 of the DEIR is extremely complicated and confusing. The DEIR also relies heavily on the EIR submitted during the 2014 Settlement Agreement ("EIR 617") for its health risk analysis ("HRA"). It is submitted that reliance on the previous EIR is misplaced. EIR 617 relied on existing 2014 flight patterns prior to the implementation of the FAA Next Gen concentrated satellite driven precision flight patterns that are flown today. Furthermore, the DEIR does not anticipate the different emissions anticipated from the expected increase in GA jet aircraft if the GAIP is approved. To suggest that there will be a minimal increase in emissions is unrealistic and unsupported by any evidence.

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Sincerely

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Sincerery,	
(include your name, home and email addresses	
(merade your name, nome and eman addresses	
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From: John Cotton <qtipnb@aol.com>

Sent: Wednesday, November 21, 2018 2:59 PM

To: EIR627 **Subject:** GAIP EIR

November 21, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

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<u>Comment</u>: As you are surely aware, under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives

1

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for neighboring communities. It is unrealistic to conclude that if the GAIP is approved that there will be no significant negative environmental impact to Newport Beach and other neighboring communities.

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Sincerely,

John Cotton

2123 Granada Ave.

Balboa, CA 92661

qtipnb@aol.com

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From: Carol Crane <cranos98@gmail.com>
Sent: Tuesday, November 20, 2018 3:17 PM

To: EIR627 Cc: Carol Crane

Subject: JWA- LARGER JET AIRCRAFT EXPANSION

November 17, 2018

Via Electronic Mail

EIR627@ocair.com

Ms. Lea Choum

Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

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Sincerely,

Carol Crane and Gary Crane. 921 ALEPPO STREET Newport Beach, CA 92660

Victoria Cubeiro <mammacub2@reagan.com> Tuesday, November 20, 2018 10:46 AM From:

Sent:

EIR627 To:

Subject: JW Airport EIR

Attachments: 11.15.18 EIR Comments.pages

3-490

1

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

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Sincerely,

Victoria Cubeiro 531 Harbor Island Drive Newport Beach, ca. 92660 mammacub2@reagan.com

From: Tamara Current <tamaracurrent@mac.com>
Sent: Tuesday, November 20, 2018 1:39 PM

To: EIR627

Subject: Excessive noise - private Jets

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

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Sincerely,

Tamara and Jeff Current 111 Via Zurich Newport Beach CA 92663

tamaracurrent@ mac.com

~Sent remotely via iphone. Please forgive typos and dictation errors.

Tamara Current

Current Management Inc. 160 W Santa Clara St #900 San Jose, CA 95113 Sent from my iPhone

5 3-501

From: Ed Danoff <eddanoff@msn.com>

Sent: Wednesday, November 21, 2018 11:15 AM

To: EIR627

Subject: AIRPORT LETTER **Attachments:** AIRPORT LETTER.pdf

Dear Ms. Choum,

Please see my attached letter pertaining to the proposed changes at John Wayne Airport.

Sincerely, Ed Danoff

Ed Danoff, Attorney at Law
Law Offices of Edward R. Danoff, Jr.
1323 N. Broadway
Santa Ana, CA 92706
714/ 972-8355
eddanoff@msn.com e-mail
www.eddanoff.com website
Practice includes Personal Injuries. Divo

Practice includes Personal Injuries, Divorce/Family Law,

Bankruptcy, Real Estate & Criminal Law



Virus-free. www.avg.com

November 20, 2018

Via Electronic Mail EIR627@ocair.com

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- and under the flight paths of JWA? If the impact these populations have not been considered, why not?
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Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely,

Chris and Ed Danoff

55 Balboa Coves Newport Beach, CA 92663 (949) 631-3727

Christ & Baroff

From: Mary Allyn Dexter <maryallyn.dexter@gmail.com>

Sent: Wednesday, November 21, 2018 8:08 AM

To: EIR627 **Subject:** DEIR

November 21, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program - Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

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The DEIR was made available for public review on September 20, 2018, with comments due on November 6, 2018, with an extension until November 21, 2018.

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This section lists separate objectives of the GAIP, which appear only to benefit airport operations and profitability.

<u>Comment</u>: As you are surely aware, under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives clearly pertain the efficiency and economical benefits of the GAIP with no indication of concerns for the communities impacted by noise and pollution emanating from JWA.

Questions:

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Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DETK, including
public notices in regards to the GAIP and the Notice of Availability of the Final EIR.
Sincerely,

 (include your name, home and email addresses

From: Mary Jane Edalatpour <maryjaneedalatpour@me.com>

Sent: Tuesday, November 20, 2018 3:10 PM

To: EIR627

Subject: Orange County Airport - Improvement Program

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

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Sincerely,	
Mary Jane Edalatpour	
501 Morning Star Lane	
Newport Beach, CA. 92660	
maryjaneedalatpour@me.com_	(include your name, home and email
address)	· · · · · · · · · · · · · · · · · · ·

4

From: Julia Edwards <julia_macmillan@yahoo.com>

Sent: Tuesday, November 20, 2018 7:52 AM

To: EIR627

Subject: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

November 20, 2018

<u>Via Electronic Mail</u> <u>EIR627@ocair.com</u>

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- p. How many GA privately owned jets will JWA be capable of handling during a 24-hour period if the GAIP is approved?
- q. How many overnight hangers or other spaces will be made available for GA privately owned jet aircraft if the GAIP is approved?
- r. What will be the economic benefit to JWA if the GAIP is approved?
- s. If the GAIP is approved, will existing flight schools be permitted to continue their operations? If not, will flight school(s) specializing in jet aircraft flight instruction replace existing flight schools?
- t. If any flight schools specializing in jet aircraft flight instruction are anticipated, will a cap or maximum number of training departures and arrivals during a 24-hour period be established? If yes, what will be the maximum number? If no, why not?
- u. If any flight schools specializing in jet aircraft flight instruction are anticipated, will hours for their operation and training flights be established? If yes, what will be the hours? If no, why not?

3. DEIR Conclusions that Environmental Impacts are Insignificant(Section 4).

<u>Comment</u>: The DEIR conclusion that the GAIP will be not significantly cause a negative impact to the community in terms of noise, air quality, hazardous materials, etc., is unrealistic. It is submitted that there has been an insufficient consideration of the additional noise and pollution that will be created; especially considering the leaded fuel mixture used by private GA jet aircraft and their exemption from curfew hours under GA regulations. There have been numerous studies reported in many peer-reviewed scholarly journals that airport noise and pollution have serious health impacts for neighboring communities. It is unrealistic to conclude that if the GAIP is approved that there will be no significant negative environmental impact to Newport Beach and other neighboring communities.

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Furthermore, the assumptions supporting the noise analysis are flawed and unrealistic. The projection that by 2016, 40% of the Boeing 737 and Airbus A320 aircraft using JWA will include the quieter 737-MAX and Airbus A320-Neo is sheer speculation and is in conflict with the 2014 Settlement Agreement EIR noise modeling.

Questions:

- a. As GA jet aircraft have a long history of violating noise limits, how will this be better controlled, especially given the current lack of regulation of the GA jet aircraft fleet?
- b. Is an increase in GA jet aircraft nighttime arrivals and departures anticipated? If yes, how many nighttime arrivals and departures are anticipated?
- c. Will JWA place a cap or limit on the number of nighttime arrivals and departures of GA jet aircraft? If yes, what limitations will be established? If no, why not?
- d. Why wasn't the negative impact of an additional 5-10% noise generating Back Bay departure pattern by the large corporate jets on the same neighborhood impacted by commercial departures considered in the Noise Impact section of the Appendix? As this would have the same impact as a net increase in commercial departures that would replace aircraft that were previously fanning after takeoff and not impacting these neighbors, why wasn't this considered?
- e. If the GAIP is approved, what would be the largest GA jet aircraftthat would be accommodated by JWA?
- f. How would the noise from departing large GA jet aircraft compare with the noise emitted from the commercial jet fleet currently using JWA? If this analysis has been done, what is the basis for the analysis?
- g. Will there be a limitation on large GA jet departures? Will there be any such limitation specifically during the existing curfew hours? If yes, what will be the limitations? If no, why not?
- h. Do the GAIP conclusions of no significant noise or pollution impacttake into consideration the Next-Gen satellite-precision concentrated flight paths that have clearly has a significant negative impact onNewport Beach? If yes, what conclusions have been drawn? If no, why not?

4. Health Risk Analysis (Section 4).

<u>Comment</u>: Although related to the above comment, the health risk analysis ("HRA") in Section 4 of the DEIR is extremely complicated and confusing. The DEIR also relies heavily on the EIR submitted during the 2014 Settlement Agreement ("EIR 617") for its health risk analysis ("HRA"). It is submitted that reliance on the previous EIR is misplaced. EIR 617 relied on existing 2014 flight patterns prior to the implementation of the FAA Next Gen concentrated satellite driven precision flight patterns that are flown today. Furthermore, the DEIR does not anticipate the different emissions anticipated from the expected increase in GA jet aircraft if the GAIP is approved. To suggest that there will be a minimal increase in emissions is unrealistic and unsupported by any evidence.

Comment: The DEIR is also woefully deficient in its discussion of the potential health impacts to more sensitive members of the community, especially the impact on children. The DEIR discusses "sensitive receptors" and "sensitive populations" noting only those closest to the boundary of JWA, specifically mentioning a residential development approximately 855 feet from the boundary of JWA and airport workers. In response, there have been numerous studies conducted and published in peer-reviewed scholarly journals about the serious health issues caused by airports, over flights, departures and arrivals on children and adults in communities under the flight paths. These studies have confirmed that children suffer cognitive deficits and respiratory illnesses, while the general population suffers undue stress, heart disease, high blood pressure, cognitive decline, auditory problems, heart attacks, strokes and greater cancer risk. Similarly, research studies have concluded that the adverse health affects from airport pollution are present within 10 miles of an airport. There are thousands of children in schools well within a distance of 10 miles from the JWA departure paths and thousands of people who live under the flight paths.

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Questions:

- a. In arriving at the conclusion that the environmental impact of the GAIP is "less than significant," what consideration has been given to the schools, athletic fields, parks and residential areas located within a close proximity and under the flight paths of JWA? If the impact these populations have not been considered, why not? b. Although noise is discussed in the Sensitive Receptors section of the DEIR, including the impact to schools, why isn't there an in depth discussion of health concerns especially as they relate to children?
- c. Did the County in the preparation of the DEIR review and consider recent research concerning the health and welfare of populations living within a close proximity of airports? Within 10 miles of JWA?
- d. What is the true net increase in pollutants from the new aircraft population departures from JWA as the fuel mixture is different and heavier in carbon and particulate pollutants?
- e. In preparing the DEIR, was there any consideration of the added pollution that would result from the increase in GA jet aircraft combined with the existing commercial fleet? If no, why not?
- f. In preparing the DEIR, was there any consideration of the impact of increased noise levels that would result from nighttime flights of GA jet aircraft? If no, why not?

5. Flight Patterns.

<u>Comment</u>: Although the DEIR states there will be no change in flight patterns, it is unclear as to the flight patterns that were used for its analysis. It is also unclear what flight patterns would be followed by GA jet aircraft upon approval of the GAIP. Clarification is needed to assess the differences between GA and commercial aircraft departure patterns and how they might change upon approval of the GAIP.

Questions:

- a. Will the GA jet aircraft added to JWA through the GAIP follow the existing flight patterns presently used by commercial jets as mandated by the SoCal Metroplex?
- b. If the GA jet aircraft added through the GAIP will follow the flight patterns mandated under the SoCal Metroplex, has there been any consideration as to the impact that will be caused by the increase in air traffic over Newport Beach? If no, why not?
- c. Will there be any changes in GA flight patterns if the GAIP is approved? If yes, what will be the changes?

Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

4

Sincerely,

Julia Edwards
2121 Aralia Street
Newport Beach, CA 92660
julia macmillan@yahoo.com

Sent from my iPhone

5 3-520

From: Marilyn Elmer <marelmer@cox.net>
Sent: Tuesday, November 20, 2018 9:32 PM

To: EIR627

Subject: Orange County Airport

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program - Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

• DEIR Complexity and Length Relative to Time Limitations for Comment:

The DEIR was made available for public review on September 20, 2018, with comments due on November 6, 2018, with an extension until November 21, 2018.

Comment: This is an incredibly complex and detailed document that is over 600 pages in length, with 2,200 pages of appendices. Although members of the general public are invited to "comment" on the DEIR, it is submitted that most members of the general public are ill equipped to read through the entirety of the document, sufficiently understand it and respond to it with their comments and questions in the time allotted.

Question: Why can't additional time be provided for the review and comment to the DEIR?

• Project Objectives (Section 3).

This section lists separate objectives of the GAIP, which appear only to benefit airport operations and profitability.

<u>Comment</u>: As you are surely aware, under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives clearly pertain the efficiency and economical benefits of the GAIP with no indication of concerns for the communities impacted by noise and pollution emanating from JWA.

Questions:

- Is the GAIP for the benefit of nonresident corporate jet aircraft?
- Is the GAIP for the benefit of local corporate jet aircraft?
- Have local corporations been surveyed regarding their interest in housing their jets at JWA? If no, why not? If yes, what have been their responses?
- Does the GAIP benefit the exiting fleet of privately owned piston-powered driven aircraft owners who have historically based their aircraft at JWA? If yes, how?
- Will the GAIP result in a decrease of smaller privately owned piston-powered aircraft at JWA?
- How does a decrease in the number of smaller privately owned piston- powered aircraft based at JWA and an increase in larger GA jet aircraft, benefit Newport Beach and neighboring communities?
- What is the basis for the assumptions of daily departure and arrival of GA jet traffic, including larger corporate aircraft, which will be displacing smaller GA private planes?
- Has it been determined how many additional GA jet aircraft departures will occur in a 24-hour period under the GAIP? If yes, how many? If no, why not?
- Will there be a cap or a maximum number of GA jet aircraft departures allowable during a 24-hour period? If yes, how many? If no, why not?
- How does the GAIP, with its goal of accommodating large corporate jet aircraft at JWA through building additional hangers, benefit Newport Beach and other neighboring communities?
- Will the GAIP result in an increase of international flights to JWA via GA jet aircraft?

- If the GAIP increases the number of international flights in and out of JWA, will there be a cap or maximum number allowed during any a 24-hour period? If yes, what will be the maximum number? If no, why not?
- How many international flights are anticipated to arrive at JWA on a daily or weekly basis?
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• DEIR Conclusions that Environmental Impacts are Insignificant (Section 4).

Comment: The DEIR conclusion that the GAIP will be not significantly cause a negative impact to the community in terms of noise, air quality, hazardous materials, etc., is unrealistic. It is submitted that there has been an insufficient consideration of the additional noise and pollution that will be created; especially considering the leaded fuel mixture used by private GA jet aircraft and their exemption from curfew hours under GA regulations. There have been numerous studies reported in many peer-reviewed scholarly journals that airport noise and pollution have serious health impacts for neighboring communities. It is unrealistic to conclude that if the GAIP is approved that there will be no significant negative environmental impact to Newport Beach and other neighboring communities.

Furthermore, the assumptions supporting the noise analysis are flawed and unrealistic. The projection that by 2016, 40% of the Boeing 737 and Airbus A320 aircraft using JWA will include the quieter 737-MAX and Airbus A320-Neo is sheer speculation and is in conflict with the 2014 Settlement Agreement EIR noise modeling.

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- Do the GAIP conclusions of no significant noise or pollution impact take into consideration the Next-Gen satellite-precision concentrated flight paths that have clearly has a significant negative impact on Newport Beach? If yes, what conclusions have been drawn? If no, why not?

• Health Risk Analysis (Section 4).

Comment: Although related to the above comment, the health risk analysis ("HRA") in Section 4 of the DEIR is extremely complicated and confusing. The DEIR also relies heavily on the EIR submitted during the 2014 Settlement Agreement ("EIR 617") for its health risk analysis ("HRA"). It is submitted that reliance on the previous EIR is misplaced. EIR 617 relied on existing 2014 flight patterns prior to the implementation of the FAA Next Gen concentrated satellite driven precision flight patterns that are flown today. Furthermore, the DEIR does not anticipate the different emissions anticipated from the expected increase in GA jet aircraft if the GAIP is approved. To suggest that there will be a minimal increase in emissions is unrealistic and unsupported by any evidence.

Comment: The DEIR is also woefully deficient in its discussion of the potential health impacts to more sensitive members of the community, especially the impact on children. The DEIR discusses "sensitive receptors" and "sensitive populations" noting only those closest to the boundary of JWA, specifically mentioning a residential development approximately 855 feet from the boundary of JWA and airport workers. In response, there have been numerous studies conducted and published in peer-reviewed scholarly journals about the serious health issues caused by airports, over flights, departures and arrivals on children and adults in communities under the flight paths. These studies have confirmed that children suffer cognitive deficits and respiratory illnesses, while the general population suffers undue stress, heart disease, high blood pressure, cognitive decline,

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auditory problems, heart attacks, strokes and greater cancer risk. Similarly, research studies have concluded that the adverse health affects from airport pollution are present within 10 miles of an airport. There are thousands of children in schools well within a distance of 10 miles from the JWA departure paths and thousands of people who live under the flight paths.

Questions:

- In arriving at the conclusion that the environmental impact of the GAIP is "less than significant," what consideration has been given to the schools, athletic fields, parks and residential areas located within a close proximity and under the flight paths of JWA? If the impact these populations have not been considered, why not?
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Questions:

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- Will there be any changes in GA flight patterns if the GAIP is approved? If yes, what will be the changes?

Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

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Sincerely,

Marilyn Elmer, mar	<u>elmer@cox.net</u> , 2 Overlook Dri	ve Newport Beach, Ca. 920	55/
		(include your name,	home and email addresses

From: Ronda Fay <rondajanefay@icloud.com>
Sent: Tuesday, November 20, 2018 10:38 PM

To: EIR627

Subject: Proposed John Wayne Airport General Aviation Project

Dear Ms. Choum: As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"): 1. DEIR Complexity and Length Relative to Time Limitations for Comment: The DEIR was made available for public review on September 20, 2018, with comments due on November 6, 2018, with an extension until November 21, 2018. Comment: This is an incredibly complex and detailed document that is over 600 pages in length, with 2,200 pages of appendices. Although members of the general public are invited to "comment" on the DEIR, it is submitted that most members of the general public are ill equipped to read through the entirety of the document, sufficiently understand it and respond to it with their comments and questions in the time allotted. Question: Why can't additional time be provided for the review and comment to the DEIR? 2. Project Objectives (Section 3). This section lists separate objectives of the GAIP, which appear only to benefit airport operations and profitability. Comment: As you are surely aware, under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives clearly pertain the efficiency and economical benefits of the GAIP with no indication of concerns for the communities impacted by noise and pollution emanating from JWA. Questions: a. Is the GAIP for the benefit of nonresident corporate jet aircraft? b. Is the GAIP for the benefit of local corporate jet aircraft? c. Have local corporations been surveyed regarding their interest in housing their jets at JWA? If no, why not? If yes, what have been their responses? d. Does the GAIP benefit the exiting fleet of privately owned pistonpowered driven aircraft owners who have historically based their aircraft at JWA? If yes, how? e. Will the GAIP result in a decrease of smaller privately owned piston-powered aircraft at JWA? f. How does a decrease in the number of smaller privately owned piston-powered aircraft based at JWA and an increase in larger GA jet aircraft, benefit Newport Beach and neighboring communities? g. What is the basis for the assumptions of daily departure and arrival of GA jet traffic, including larger corporate aircraft, which will be displacing smaller GA private planes? h. Has it been determined how many additional GA jet aircraft departures will occur in a 24-hour period under the GAIP? If yes, how many? If no, why not? i. Will there be a cap or a maximum number of GA jet aircraft departures allowable during a 24-hour period? If yes, how many? If no, why not? j. How does the GAIP, with its goal of accommodating large corporate jet aircraft at JWA through building additional hangers, benefit Newport Beach and other neighboring communities? k. Will the GAIP result in an increase of international flights to JWA via GA jet aircraft? I. If the GAIP increases the number of international flights in and out of JWA, will there be a cap or maximum number allowed during any a 24-hour period? If yes, what will be the maximum number? If no, why not? m. How many international flights are anticipated to arrive at JWA on a daily or weekly basis? n. What type of TSA-type security screening will be conducted regarding the increasing numbers of larger international GA aircraft if the GAIP is approved? Please describe in detail. o. What is the predicted net average daily change in aircraft departures and arrivals if the GAIP is approved? p. How many GA privately owned jets will JWA be capable of handling during a 24-hour period if the GAIP is approved? q. How many overnight hangers or other spaces will be made available for GA privately owned jet aircraft if the GAIP is approved? r. What will be the economic benefit to JWA if the GAIP is approved? s. If the GAIP is approved, will existing flight schools be permitted to continue their operations? If not, will flight school(s) specializing in jet aircraft flight instruction replace existing flight schools? t. If any flight schools specializing in jet aircraft flight instruction are anticipated, will a cap or maximum number of training departures and arrivals during a 24-hour period be established? If yes, what will be the maximum number? If no, why not? u. If any

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3 Thanks



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From: Marsha Ferrall <marshaferrall@gmail.com>
Sent: Tuesday, November 20, 2018 12:35 PM

To: EIR627 **Subject:** GAIP

november 17, 2018

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program - Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

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Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

4

Sincerely,

marsha ferrall 107 via ravenna newport beach, ca 92663 marshaferrall@gmail.com

From: T. Robert Finlay <rfinlay@wrightlegal.net>
Sent: Tuesday, November 20, 2018 12:58 PM

To: EIR627

Subject: Airport Expansion **Attachments:** --airport letter--.pdf

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

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<u>Comment</u>: This is an incredibly complex and detailed document that is over 600 pages in length, with 2,200 pages of appendices. Although members of the general public are invited to "comment" on the DEIR, it is submitted that most members of the general public are ill equipped to read through the entirety of the document, sufficiently understand it and respond to it with their comments and questions in the time allotted.

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This section lists separate objectives of the GAIP, which appear only to benefit airport operations and profitability.

<u>Comment</u>: As you are surely aware, under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives clearly pertain the efficiency and economical benefits of the GAIP with no indication of concerns for the communities impacted by noise and pollution emanating from JWA.

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400 Morning Star, Newport Beach 92660

From: Rebecca Finney <rebecca.finney@yahoo.com>
Sent: Wednesday, November 21, 2018 3:24 PM

To: EIR627
Cc: Jason Finney

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As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"): 1. DEIR Complexity and Length Relative to Time Limitations for Comment: The DEIR was made available for public review on September 20, 2018, with comments due on November 6, 2018, with an extension until November 21, 2018. Comment: This is an incredibly complex and detailed document that is over 600 pages in length, with 2,200 pages of appendices. Although members of the general public are invited to "comment" on the DEIR, it is submitted that most members of the general public are ill equipped to read through the entirety of the document, sufficiently understand it and respond to it with their comments and questions in the time allotted. Question: Why can't additional time be provided for the review and comment to the DEIR? 2. Project Objectives (Section 3). This section lists separate objectives of the GAIP, which appear only to benefit airport operations and profitability. Comment: As you are surely aware, under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives clearly pertain the efficiency and economical benefits of the GAIP with no indication of concerns for the communities impacted by noise and pollution emanating from JWA. Questions: a. Is the GAIP for the benefit of nonresident corporate jet aircraft? b. Is the GAIP for the benefit of local corporate jet aircraft? c. Have local corporations been surveyed regarding their interest in housing their jets at JWA? If no, why not? If yes, what have been their responses? d. Does the GAIP benefit the exiting fleet of privately owned pistonpowered driven aircraft owners who have historically based their aircraft at JWA? If yes, how? e. Will the GAIP result in a decrease of smaller privately owned piston-powered aircraft at JWA? f. How does a decrease in the number of smaller privately owned piston- powered aircraft based at JWA and an increase in larger GA jet aircraft, benefit Newport Beach and neighboring communities? g. What is the basis for the assumptions of daily departure and arrival of GA jet traffic, including larger corporate aircraft, which will be displacing smaller GA private planes? h. Has it been determined how many additional GA jet aircraft departures will occur in a 24-hour period under the GAIP? If yes, how many? If no, why not? i. Will there be a cap or a maximum number of GA jet aircraft departures allowable during a 24-hour period? If yes, how many? If no, why not? j. How does the GAIP, with its goal of accommodating large corporate jet aircraft at JWA through building additional hangers, benefit Newport Beach and other neighboring communities? k. Will the GAIP result in an increase of international flights to JWA via GA jet aircraft? I. If the GAIP increases the number of international flights in and out of JWA, will there be a cap or maximum number allowed during any a 24-hour period? If yes, what will be the maximum number? If no, why not? m. How many international flights are anticipated to arrive at JWA on a daily or weekly basis? n. What type of TSAtype security screening will be conducted regarding the increasing numbers of larger international GA aircraft if the GAIP is approved? Please describe in detail. o. What is the predicted net average daily change in aircraft departures and arrivals if the GAIP is approved? p. How many GA privately owned jets will JWA be capable of handling during a 24-hour period if the GAIP is approved? q. How many overnight hangers or other spaces will be made available for GA privately owned jet aircraft if the GAIP is approved? r. What will be the economic benefit to JWA if the GAIP is approved? s. If the GAIP is approved, will existing flight schools be permitted to continue their operations? If not, will flight school(s) specializing in jet aircraft flight instruction replace existing flight schools? t. If any flight schools specializing in jet aircraft flight instruction are anticipated, will a cap or maximum number of

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There have been numerous studies reported in many peer-reviewed scholarly journals that airport noise and pollution have serious health impacts for neighboring communities. It is unrealistic to conclude that if the GAIP is approved that there will be no significant negative environmental impact to Newport Beach and other neighboring communities. Furthermore, the assumptions supporting the noise analysis are flawed and unrealistic. The projection that by 2016, 40% of the Boeing 737 and Airbus A320 aircraft using JWA will include the quieter 737-MAX and Airbus A320-Neo is sheer speculation and is in conflict with the 2014 Settlement Agreement EIR noise modeling, Questions: a. As GA jet aircraft have a long history of violating noise limits, how will this be better controlled, especially given the current lack of regulation of the GA jet aircraft fleet? b. Is an increase in GA jet aircraft nighttime arrivals and departures anticipated? 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EIR 617 relied on existing 2014 flight patterns prior to the implementation of the FAA Next Gen concentrated satellite driven precision flight patterns that are flown today. Furthermore, the DEIR does not anticipate the different emissions anticipated from the expected increase in GA jet aircraft if the GAIP is approved. To suggest that there will be a minimal increase in emissions is unrealistic and unsupported by any evidence. Comment: The DEIR is also woefully deficient in its discussion of the potential health impacts to more sensitive members of the community, especially the impact on children. The DEIR discusses "sensitive receptors" and "sensitive populations" noting only those closest to the boundary of JWA, specifically mentioning a residential development approximately 855 feet from the boundary of JWA and airport workers. 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Sincerely,

Rebecca & Jason Finney (Newport Beach resident for 47 years)

Rebecca.finney@yahoo.com

3011 Cliff Drive Newport Beach, CA 92663

From: Dan Foley <danf@shewards.net>

Sent: Wednesday, November 21, 2018 7:11 AM

To: EIR627

Subject: 11.15.18 EIR Comments **Attachments:** 11.15.18 EIR Comments.docx

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

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Sincerely, Barbara Foley / barbifoley@hotmail.com

1124 Somerset Lane, Newport Beach, CA	
92660	(include your name, home and email
addresses	

From: Dan Foley <danf@shewards.net>

Sent: Wednesday, November 21, 2018 7:08 AM

To: EIR627

Subject: 11.15.18 EIR Comments **Attachments:** 11.15.18 EIR Comments.docx

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1124 Somerset Lane, Newport Beach, CA	
92660	(include your name, home and email
addresses	-

From: JD Fox <jdfox@roadrunner.com>

Sent: Wednesday, November 21, 2018 8:46 AM

To: EIR627

Subject: General Aviation Improvement Program - Draft Environmental Impact Report (SCH No. 2017031072)

Importance: High

November 21, 2018

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

1. DEIR Complexity and Length Relative to Time Limitations for Comment:

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Comment: This is an incredibly complex and detailed document that is over 600 pages in length, with 2,200 pages of appendices. Although members of the general public are invited to "comment" on the DEIR, it is submitted that most members of the general public are ill equipped to read through the entirety of the document, sufficiently understand it and respond to it with their comments and questions in the time allotted.

Question: Why can't additional time be provided for the review and comment to the DEIR?

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This section lists separate objectives of the GAIP, which appear only to benefit airport operations and profitability.

Comment: As you are surely aware, under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives clearly pertain the efficiency and economical benefits of the GAIP with no indication of concerns for the communities impacted by noise and pollution emanating from JWA.

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- a. Is the GAIP for the benefit of nonresident corporate jet aircraft?
- b. Is the GAIP for the benefit of local corporate jet aircraft?
- c. Have local corporations been surveyed regarding their interest in housing their jets at JWA? If no, why not? If yes, what have been their responses?
- d. Does the GAIP benefit the exiting fleet of privately owned piston-powered driven aircraft owners who have historically based their aircraft at JWA? If yes, how?
- e. Will the GAIP result in a decrease of smaller privately owned piston-powered aircraft at JWA?
- f. How does a decrease in the number of smaller privately owned piston- powered aircraft based at JWA and an increase in larger GA jet aircraft, benefit Newport Beach and neighboring communities?
- g. What is the basis for the assumptions of daily departure and arrival of GA jet traffic, including larger corporate aircraft, which will be displacing smaller GA private planes?
- h. Has it been determined how many additional GA jet aircraft departures will occur in a 24-hour period under the GAIP? If yes, how many? If no, why not?
- i. Will there be a cap or a maximum number of GA jet aircraft departures allowable during a 24-hour period? If yes, how many? If no, why not?
- j. How does the GAIP, with its goal of accommodating large corporate jet aircraft at JWA through building additional hangers, benefit Newport Beach and other neighboring communities?
- k. Will the GAIP result in an increase of international flights to JWA via GA jet aircraft?
- I. If the GAIP increases the number of international flights in and out of JWA, will there be a cap or maximum number allowed during any a 24-hour period? If yes, what will be the maximum number? If no, why not?
- m. How many international flights are anticipated to arrive at JWA on a daily or weekly basis?
- n. What type of TSA-type security screening will be conducted regarding the increasing numbers of larger international GA aircraft if the GAIP is approved? Please describe in detail.
- o. What is the predicted net average daily change in aircraft departures and arrivals if the GAIP is approved?
- p. How many GA privately owned jets will JWA be capable of handling during a 24-hour period if the GAIP is approved?
- q. How many overnight hangers or other spaces will be made available for GA privately owned jet aircraft if the GAIP is approved?

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- t. If any flight schools specializing in jet aircraft flight instruction are anticipated, will a cap or maximum number of training departures and arrivals during a 24-hour period be established? If yes, what will be the maximum number? If no, why not?
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3. DEIR Conclusions that Environmental Impacts are Insignificant (Section 4).

Comment: The DEIR conclusion that the GAIP will be not significantly cause a negative impact to the community in terms of noise, air quality, hazardous materials, etc., is unrealistic. It is submitted that there has been an insufficient consideration of the additional noise and pollution that will be created; especially considering the leaded fuel mixture used by private GA jet aircraft and their exemption from curfew hours under GA regulations. There have been numerous studies reported in many peer-reviewed scholarly journals that airport noise and pollution have serious health impacts for neighboring communities. It is unrealistic to conclude that if the GAIP is approved that there will be no significant negative environmental impact to Newport Beach and other neighboring communities.

Furthermore, the assumptions supporting the noise analysis are flawed and unrealistic. The projection that by 2016, 40% of the Boeing 737 and Airbus A320 aircraft using JWA will include the quieter 737-MAX and Airbus A320-Neo is sheer speculation and is in conflict with the 2014 Settlement Agreement EIR noise modeling.

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- a. As GA jet aircraft have a long history of violating noise limits, how will this be better controlled, especially given the current lack of regulation of the GA jet aircraft fleet?
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- e. If the GAIP is approved, what would be the largest GA jet aircraft that would be accommodated by JWA?
- f. How would the noise from departing large GA jet aircraft compare with the noise emitted from the commercial jet fleet currently using JWA? If this analysis has been done, what is the basis for the analysis?
- g. Will there be a limitation on large GA jet departures? Will there be any such limitation specifically

during the existing curfew hours? If yes, what will be the limitations? If no, why not?

h. Do the GAIP conclusions of no significant noise or pollution impact take into consideration the Next-Gen satellite-precision concentrated flight paths that have clearly has a significant negative impact on Newport Beach? If yes, what conclusions have been drawn? If no, why not?

4. Health Risk Analysis (Section 4).

Comment: Although related to the above comment, the health risk analysis ("HRA") in Section 4 of the DEIR is extremely complicated and confusing. The DEIR also relies heavily on the EIR submitted during the 2014 Settlement Agreement ("EIR 617") for its health risk analysis ("HRA"). It is submitted that reliance on the previous EIR is misplaced. EIR 617 relied on existing 2014 flight patterns prior to the implementation of the FAA Next Gen concentrated satellite driven precision flight patterns that are flown today. Furthermore, the DEIR does not anticipate the different emissions anticipated from the expected increase in GA jet aircraft if the GAIP is approved. To suggest that there will be a minimal increase in emissions is unrealistic and unsupported by any evidence.

Comment: The DEIR is also woefully deficient in its discussion of the potential health impacts to more sensitive members of the community, especially the impact on children. The DEIR discusses "sensitive receptors" and "sensitive populations" noting only those closest to the boundary of JWA, specifically mentioning a residential development approximately 855 feet from the boundary of JWA and airport workers. In response, there have been numerous studies conducted and published in peer-reviewed scholarly journals about the serious health issues caused by airports, over flights, departures and arrivals on children and adults in communities under the flight paths. These studies have confirmed that children suffer cognitive deficits and respiratory illnesses, while the general population suffers undue stress, heart disease, high blood pressure, cognitive decline, auditory problems, heart attacks, strokes and greater cancer risk. Similarly, research studies have concluded that the adverse health affects from airport pollution are present within 10 miles of an airport. There are thousands of children in schools well within a distance of 10 miles from the JWA departure paths and thousands of people who live under the flight paths.

Questions:

- In arriving at the conclusion that the environmental impact of the GAIP is "less than significant," a. what consideration has been given to the schools, athletic fields, parks and residential areas located within a close proximity and under the flight paths of JWA? If the impact these populations have not been considered, why not?
- Although noise is discussed in the Sensitive Receptors section of the DEIR, including the impact to schools, why isn't there an in depth discussion of health concerns especially as they relate to children?
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Comment: Although the DEIR states there will be no change in flight patterns, it is unclear as to the flight patterns that were used for its analysis. It is also unclear what flight patterns would be followed by GA jet aircraft upon approval of the GAIP. Clarification is needed to assess the differences between GA and commercial aircraft departure patterns and how they might change upon approval of the GAIP.

Questions:

- a. Will the GA jet aircraft added to JWA through the GAIP follow the existing flight patterns presently used by commercial jets as mandated by the SoCal Metroplex?
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Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

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Sincerely,

J. D. Fox 509 Ventaja Newport Beach, CA 92660



Virus-free, www.avast.com

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Sincerely,

Thirty Jox (include your name, home and email address)
2640 Vesta Ornada
Newport Beach, Ca 92660
SJFOXNB & gmail. com

Charles G. Deardortt

2640 VISTE OFNEDE Newport Beach, Ca 92660 CDCDEARDORFF @ GMOIL. COM

From: Alastair Fraser <acsfraser@yahoo.com>
Sent: Tuesday, November 20, 2018 11:18 AM

To: EIR627

Cc: acsfraser@yahoo.com; 'Fiona Fraser'

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Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

3

Sincerely,

Alastair & Fiona Fraser acsfraser@yahoo.com fifraser@yahoo.com 838 Via Lido Soud Newport Beach CA 92663

From: Torben Frederiksen <tfrederiksen@bigtsfreightliner.net>

Sent: Tuesday, November 20, 2018 2:11 PM

To: EIR627

Subject: GAIP Draft EIR JWA **Attachments:** CCF11202018.pdf

Importance: High

Dear Ms. Choun,

Attached please find a letter stating some of my many concerns regarding this potential change at JWA. We are already exposed to significant health risks with the changes in flight patterns and altitudes as a result of the FAA's NEXTGEN So. Cal. Metroplex. I find it, at a minimum, irresponsible to even consider locating more and larger private jets at JWA.

1

AF-1

Sincerely,

Adrienne Frederiksen

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

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Furthermore, the assumptions supporting the noise analysis are flawed and unrealistic. The projection that by 2016, 40% of the Boeing 737 and Airbus A320 aircraft using JWA will include the quieter 737-MAX and Airbus A320-Neo is sheer speculation and is in conflict with the 2014 Settlement Agreement EIR noise modeling.

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4

- a. In arriving at the conclusion that the environmental impact of the GAIP is "less than significant," what consideration has been given to the schools, athletic fields, parks and residential areas located within a close proximity and under the flight paths of JWA? If the impact these populations have not been considered, why not?
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Adrienne Frederiksen 312 Evening Star Lane

Newport Beach, CA 92660

From: Torben Frederiksen <tfrederiksen@bigtsfreightliner.net>

Sent: Tuesday, November 20, 2018 2:33 PM

To: EIR627

Cc: jetshooter@aol.com

Subject: JWA EIR627

Attachments: airport11202018.pdf

Dear Ms. Choun,

The letter attached represents some of the many issues with the changes at JWA. We are being exposed to pollutants, carcinogens, specifically. After implementation of the NEXTGEN departure procedure those pollutants became much more serious and more concentrated. The noise pollution has dramatically changed with the abandonment of the "up and over" departure procedure. Clearly no one involved has given a thought to the impacts on the residents. To even consider locating more and larger private aircraft to the departure and arrival schedule is insane. If this continues, the already disproportionate number of resident cancer victims will escallate and a study will be done to show a direct correlation to the concentration of aviation fuel pollutants spewed on homeowners and residents, including children.

TF-1

Sincerely,

Torben Frederiksen 312 Evening Star Lane November 17, 2018

Via Electronic Mail EIR627@ocair.com

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Torben Frederiksen

312 Evening Star Lane

Newport Beach, CA 92660

From: Carlita Fuller <carlitafuller@gmail.com>
Sent: Wednesday, November 21, 2018 2:27 PM

To: EIR627

Subject: John Wayne Airport

Attachments: 11.15.18 EIR Comments.docx

Attention Ms. Choun

3-588

1

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

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Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely,

Carlita and Win Fuller
carlitafuller@gmail.com
Wfuller1@pacbell.net

_ (include your name, home and email

addresses

From: Stacie Fults <stacie.fults@gmail.com>
Sent: Tuesday, November 20, 2018 9:29 PM

To: EIR627

Subject: NO MORE: GAIP Concerns and Questions- Action Requested

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. <u>2017031072</u>)

Dear Ms. Choum:

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4

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Stacie Fults 519 Fullerton Avenue Newport Beach, CA 92663 949-300-2060 Stacie.fults@gmail.com

Stacie Fults | stacie.fults@gmail.com | 949.300.2060

From: Matt Galt <mattgalt@roadrunner.com>
Sent: Tuesday, November 20, 2018 5:03 PM

To: EIR627

Subject: See letter below

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

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211 Via Koron Newport Beach, CA 92663 949.554.4499 mattgalt@roadrunner.com

From: Annette Giermann <balboalover@gmail.com>

Sent: Tuesday, November 20, 2018 5:18 PM

To: EIR627

Subject: General Aviation Improvement Program

Attachments: Scan 2018-11-20 17.16.22.pdf

3-602

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November 17, 2018

Via Electronic Mail EIR627@ocair.com

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Sincerely,

Amethe Giermann (include your name, home and email addresses
1609 Balba Ave

Balboa Island, CA 92662

balboalover@gnail.com

949-673-5523



November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

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Sincerely,

Amethe B. GIETWOOM (include your name, home and email

addresses

Balboa Island, CA 92662

balboalover@amail.com

949-673-5525

From: Kenny Goldberg <kenny@kennygoldberg.com>

Sent: Tuesday, November 20, 2018 8:09 AM

To: EIR627

Subject: New JWA Flights

Attachments: 11.15.18 EIR Comments.docx

Hello,

I have been a Back Bay residence since 1987 and the noise pollution from JWA is getting worse and worse to the point I have to pause my TV every few minutes sometimes to wait until plane fly's over.

KNG-1

I am attaching letter asking not to pass new changes.

Thank You,

Kenny

Kenny Goldberg Photography
www.kennygoldberg.com
www.instagram.com/kennygoldberg
www.facebook.com/kennygoldbergphotography
https://www.thumbtack.com/-Costa-Mesa-CA/service/2876368

November 17, 2018

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356 Lourdes Lane, Costa Mesa CA 92627
kennygoldberg@aol.com
_______(include your name, home and email addresses

Letter 199

From: Patrick Gormley <pfg1941@gmail.com>
Sent: Tuesday, November 20, 2018 1:42 PM

To: EIR627

Subject: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Attachments: 11.15.18 EIR Comments.pages

Attention: Ms. Lea Choum, Land Use Manager at JWA

3-622

1

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Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely,

Patrick Gormley, 2441 Marino Drive, Newport Beach, Ca. 92663 pfg1941@gmail.com

__ (include your name, home and email

addresses



November 17, 2018

Via Electronic Mail EIR627@oçair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program - Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

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The DEIR was made available for public review on September 20, 2018, with comments due on November 6, 2018, with an extension until November 21, 2018. Comment: This is an incredibly complex and detailed document that is over 600 pages in length, with 2,200 pages of appendices. Although members of the general public are invited to "comment" on the DEIR, it is submitted that most members of the general public are ill equipped to read through the entirety of the document, sufficiently understand it and respond to it with their comments and questions in the time allotted.

Question: Why can't additional time be provided for the review and comment to the DEIR?

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This section lists separate objectives of the GAIP, which appear only to benefit airport operations and profitability.

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Ouestions:

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Sincerely,	weeld	<u></u>				
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From: Nancy Halvorsen <nhalvo@gmail.com>
Sent: Tuesday, November 20, 2018 12:37 PM

To: EIR627

Subject: Fwd: IMMEDIATE RESPONSE NEEDED - BY TOMORROW!

Sent from my iPad

Begin forwarded message:

From: Lido Isle Community Association < webmaster@lidoisle.org>

Date: November 20, 2018 at 10:10:55 AM PST

To: nhalvo@gmail.com

Subject: IMMEDIATE RESPONSE NEEDED - BY TOMORROW!

Reply-To: webmaster@lidoisle.org

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

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Nancy Halvorsen 125 Via Yella, Newport Beach, CA92663 Nhalvo@gmail.com

_____ (include your name, home and email addresses

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Lido Isle Community Association | 701 Via Lido Soud, Editor, Lido Islander, Newport Beach, CA 92663

Unsubscribe nhalvo@gmail.com

Update Profile | About our service provider

Sent by webmaster@lidoisle.org in collaboration with



4

From: Jan Harriman <jfmck@aol.com>

Sent: Wednesday, November 21, 2018 1:42 PM

To: EIR627
Subject: EIR627 -Attachments: EIR 627.pdf

Please find attached signed.. Walter Harriman, 24 Cormorant Circle, Newport Beach, CA 92660 949 322 0068

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The DEIR was made available for public review on September 20, 2018, with comments due on November 6, 2018, with an extension until November 21, 2018. Comment: This is an incredibly complex and detailed document that is over 600 pages in length, with 2,200 pages of appendices. Although members of the general public are invited to "comment" on the DEIR, it is submitted that most members of the general public are ill equipped to read through the entirety of the document, sufficiently understand it and respond to it with their comments and questions in the time allotted.

Question: Why can't additional time be provided for the review and comment to the DEIR?

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This section lists separate objectives of the GAIP, which appear only to benefit airport operations and profitability.

Comment: As you are surely aware, under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives clearly pertain the efficiency and economical benefits of the GAIP with no indication of concerns for the communities impacted by noise and pollution emanating from JWA.

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- a. Is the GAIP for the benefit of nonresident corporate jet aircraft?
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- f. How does a decrease in the number of smaller privately owned piston-powered aircraft based at JWA and an increase in larger GA jet aircraft, benefit Newport Beach and neighboring communities?
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 If yes, what will be the hours? If no, why not?

3. DEIR Conclusions that Environmental Impacts are Insignificant (Section 4).

<u>Comment</u>: The DEIR conclusion that the GAIP will be not significantly cause a negative impact to the community in terms of noise, air quality, hazardous materials, etc., is unrealistic. It is submitted that there has been an insufficient consideration of the additional noise and pollution that will be created; especially considering the leaded fuel mixture used by private GA jet aircraft and their exemption from curfew hours under GA regulations. There have been numerous studies reported in many peer-reviewed scholarly journals that airport noise and pollution have serious health impacts for neighboring communities. It is unrealistic to conclude that if the GAIP is approved that there will be no significant negative environmental impact to Newport Beach and other neighboring communities.

Furthermore, the assumptions supporting the noise analysis are flawed and unrealistic. The projection that by 2016, 40% of the Boeing 737 and Airbus A320 aircraft using JWA will include the quieter 737-MAX and Airbus A320-Neo is sheer speculation and is in conflict with the 2014 Settlement Agreement EIR noise modeling.

Questions:

- a. As GA jet aircraft have a long history of violating noise limits, how will this be better controlled, especially given the current lack of regulation of the GA jet aircraft fleet?
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<u>Comment</u>: Although related to the above comment, the health risk analysis ("HRA") in Section 4 of the DEIR is extremely complicated and confusing. The DEIR also relies heavily on the EIR submitted during the 2014 Settlement Agreement ("EIR 617") for its health risk analysis ("HRA"). It is submitted that reliance on the previous EIR is misplaced. EIR 617 relied on existing 2014 flight patterns prior to the implementation of the FAA Next Gen concentrated satellite driven precision flight patterns that are flown today. Furthermore, the DEIR does not anticipate the different emissions anticipated from the expected increase in GA jet aircraft if the GAIP is approved. To suggest that there will be a minimal increase in emissions is unrealistic and unsupported by any evidence.

Comment: The DEIR is also woefully deficient in its discussion of the potential health impacts to more sensitive members of the community, especially the impact on children. The DEIR discusses "sensitive receptors" and "sensitive populations" noting only those closest to the boundary of JWA, specifically mentioning a residential development approximately 855 feet from the boundary of JWA and airport workers. In response, there have been numerous studies conducted and published in peer-reviewed scholarly journals about the serious health issues caused by airports, over flights, departures and arrivals on children and adults in communities under the flight paths. These studies have confirmed that children suffer cognitive deficits and respiratory illnesses, while the general population suffers undue stress, heart disease, high blood pressure, cognitive decline, auditory problems, heart attacks, strokes and greater cancer risk. Similarly, research studies have concluded that the adverse health affects from airport pollution are present within 10 miles of an airport. There are thousands of children in schools well within a distance of 10 miles from the JWA departure paths and thousands of people who live under the flight paths.

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<u>Comment</u>: Although the DEIR states there will be no change in flight patterns, it is unclear as to the flight patterns that were used for its analysis. It is also unclear what flight patterns would be followed by GA jet aircraft upon approval of the GAIP. Clarification is needed to assess the differences between GA and commercial aircraft departure patterns and how they might change upon approval of the GAIP.

Questions:

- a. Will the GA jet aircraft added to JWA through the GAIP follow the existing flight patterns presently used by commercial jets as mandated by the SoCal Metroplex?
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- c. Will there be any changes in GA flight patterns if the GAIP is approved? If yes, what will be the changes?

Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely, Walter Harrim 24 CORMORANT CIR (include your name, home and email addresses
NEWPORT BEACH, CA 92660
Wharriman@aol. com

From: Kathy Harrison < kathyharrison1621@gmail.com>

Sent: Wednesday, November 21, 2018 7:25 AM

To: EIR627

Subject: Fwd: New Development at John Wayne Airport 11.15.18 EIR Comments.docx; ATT00001.htm

From Kathy Harrison. 1621 Lincoln Lane, NB 92660

Begin forwarded message:

From: Melinda Patton < melindapatton 6@gmail.com >

Date: November 20, 2018 at 10:57:11 PM PST

To: Phyllis Christensen pwchristensen@sbcglobal.net>, Carolyn Johnson qcarolee@cox.net>, Carolyn Johnson qcarolynholder@msn.com, Tim Carr tim@timcarrgroup.com>,

"heidihall@sbcglobal.net" < heidihall@sbcglobal.net >, Julie Jenkins < idfritz@aol.com >, Andy Cies

<<u>seeize@gmail.com</u>>, Betsy Schutz <<u>schutz@sbcglobal.net</u>>, Maureen Lenihan

<<u>maureenlenihan@msn.com</u>>, "<u>maureenacole@gmail.com</u>" <<u>maureenacole@gmail.com</u>>,

"judylipton483@gmail.com" < judylipton483@gmail.com >, Linda Hughes

< lindahughes@hughesinv.com >, Linda Laugharn < lindalaugharn@gmail.com >, Robyn Hamilton

<robyn.hamilton15@gmail.com>, Sue Robben <suerobben@yahoo.com>, Brooke Booth

<brookebooth@sbcglobal.net>, Bonnie O'Neil
boneilseven@gmail.com>, Bonnie and Gus Ganotis

< Bonnie FMarshall@aol.com >, "Mr. and Mrs. Jeff Diercksmeier" < diercksmeier@ca.rr.com >, "Mr. and

Mrs. Travis Winsor" < travisw@raymond-co.com>, Kay Lea Turbeville Polovina kpolovina@aol.com>,

Kay Polovina < kpolovina@arborrealestate.com >, kathy harrison < kathyharrison1621@gmail.com >,

Kathy Robinson < kathy@todd-rothgeb.com>, Kathryn Smith < ksdesignmail@gmail.com>, Kathy Schwarz

<schwarz.kathy@gmail.com>, "Dr. and Mrs. Richard Agnew" <KathAgnew@aol.com>, Margie Bill

<margiebill@cox.net>, maryallyn Dexter <maryallyn.dexter@gmail.com>, Mary Coates

<mbcusclady@gmail.com>, Melanie Fitch <irrelevantweek@aol.com>, Melinda Williams

<okasan4@gmail.com>, Melissa Martin <pasthat@aol.com>, "Mr. and Mrs. Ned Kriz"

<nancyrkriz@gmail.com>, pat smith <itsmepat@pacbell.net>, Setsuko Krickl <skrickl@yahoo.com>,

Sheila Collins <sheila@tccollins.com>, Cindy Cotton <ctc2123@aol.com>, Cindy Hollern

<cmhollern@aol.com>, marlene chumo <marnmavis@redlancemail.com>, lurlinetwist5050@aol.com,

Adrienne Garrison ahgarrison@gmail.com, "Mr. and Mrs. Jason Cox" jmhansen@gmail.com,

Billpatton < Billpatton@aol.com >, bill hughes < whughes@hughesinv.com >, Patrick Patton

<patpatton86@gmail.com>, Heather Carlino <hcarlino@hotmail.com>, susan perry

<psalmsofpraise@aol.com>, Anne Morrow <annemor20@gmail.com>, Ann Herberts

herbertshome@sbcglobal.net, Cecile Going csginteriordesign@hotmail.com

Subject: New Development at John Wayne Airport

Hi ALL! I received this letter today and was dismayed at the prospect of larger private jets flying at all hours from John Wayne Airport. Please read below and if you can send the letter to the email address highlighted below. The letter needs your name, address and email and MUST be sent Wednesday 11/21. Please send to as many people as you can think of to do the same. Of course, you probably have not heard about this like me and have to deal with it at the last minute!!!! So appreciate you sending the letter on.

1

Happy Thanksgiving!

KH-1

Begin forwarded message:

From: Anita Brown anitahbrown@gmail.com>
Subject: New Development at John Wayne Airport

Date: November 19, 2018 at 7:51:25 PM PST To: Anita Brown anitahbrown@gmail.com>

As you may know, Citizens Against Airport Noise and Pollution (CAANP) is an organization dedicated to a reduction in the noise and pollution generated from John Wayne Airport.

We want to make you aware that the County, owner and operator of the JWA airport, has proposed a General Aviation Improvement Program (GAIP) which, if enacted, will allow the County to construct new hangar facilities at JWA. These new hangars will displace smaller privately owned aircraft in favor of larger privately owned jet aircraft., including corporate jet fleets, which may make international flights. CAANP is concerned about the impact on our nighttime curfew, increased pollution from leaded jet fuel and increases in daily departures. that will be the result of the GAIP.

Only commercial jets are currently governed by curfew hours. The GAIP will lead to a new mix of general aviation aircraft at JWA, allowing more large private and corporate jets to depart and fly overhead anytime of the day or night. While the general aviation aircraft would be subject to certain noise requirements, they would not be subject to the curfew. And, as we all know, the noise requirements currently in place have not been adequate for the quality of life in our communities. Further, the increase in nighttime flights would set a dangerous precedent for the future of the JWA curfew, which will be subject to renegotiation in 2035.

The County has already filed its Draft Environmental Impact Report for the GAIP. (See https://www.ocair.com/deir627). It is important that residents of Newport Beach respond to the draft EIR and make our feelings known regarding the negative impact the GAIP program could have on our quality of life.

For your convenience, attached is a letter prepared by one of our members which details questions and comments regarding the Draft EIR. Feel free to sign and email the attached letter (or any other you may want to write) to **Ms. Choum at**EIR627@ocair.com. Be sure to include to include your own name, address, etc. at the bottom of the letter. The letter must be received no later than Wednesday,

November 21st to be considered.

Thank you for your help. It will make a great impact on the County to receive many emails in opposition to their planned GAIP.

KH-1 cont.

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

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<u>Comment</u>: As you are surely aware, under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives clearly pertain the efficiency and economical benefits of the GAIP with no indication of concerns for the communities impacted by noise and pollution emanating from JWA.

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addresses
(include your name, home and email
Sincerely,
regards to the GAIP and the Notice of Availability of the Final EIR.

Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in

From: Tabitha Hasin <tmhwriter@sbcglobal.net>
Sent: Tuesday, November 20, 2018 6:02 PM

To: EIR627

Subject: John Wayne Airport

November 20, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program - Draft Environmental Impact Report (SCH No. 2017031072)

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Sincerely,

Tabitha May Hasin

Home: 1101 Estelle Lane, Newport Beach, CA 92660

Email: tmhwriter@sbcglobal.net

From: ghauser@roadrunner.com

Sent: Tuesday, November 20, 2018 5:22 PM

To: EIR627 **Subject:** Aisrport

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

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From: Bill Hughes <whughes@hughesinv.com>
Sent: Wednesday, November 21, 2018 9:12 AM

To: EIR627

Subject: GAIP - OC airport

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Sincerely,

William W. Hughes Jr. 66 Linda Isle Newport Beach, CA 92660 whughes@hughesinv.

From: Carolee Johnson <4carolee@cox.net>
Sent: Wednesday, November 21, 2018 12:16 PM

To: EIR627

Subject: Emailing: airport letter-1.docx

Attachments: airport letter-1.docx

Your message is ready to be sent with the following file or link attachments: airport letter-1.docx

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

November 17, 2018

Via Electronic Mail EIR627@ocair.com

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Carolyn G. Johnson	
400 Villa Point Drive	
Newport Beach, CA 92660	
4carolee@cox.net	
	(include your name, home and email
addresses	,

From: Julie Johnson < juliestewartjohnson@gmail.com>

Sent: Tuesday, November 20, 2018 7:01 PM

To: EIR627

Cc: Gaskins, Nikolas [JWA] **Subject:** GA EIR Comments to answer

November 20, 2018

Via Electronic Mail EIR627@ocair.com

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Julie Johnson 1424 serenade terrace cdm ca 92625

5 3-684

From: Gail Jones <gail@jonesindustry.com>
Sent: Wednesday, November 21, 2018 1:14 PM

To: EIR627
Subject: Airport

Attachments: Scan_0006.pdf

Please find attached our signed letter.

Thank you,

Clifton and Gail Jones

3-685

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- h. Has it been determined how many additional GA jet aircraft departures will occur in a 24-hour period under the GAIP? If yes, how many? If no, why not?
- i. Will there be a cap or a maximum number of GA jet aircraft departures allowable during a 24-hour period? If yes, how many? If no, why not?
- j. How does the GAIP, with its goal of accommodating large corporate jet aircraft at JWA through building additional hangers, benefit Newport Beach and other neighboring communities?
- k. Will the GAIP result in an increase of international flights to JWA via GA jet aircraft?
- l. If the GAIP increases the number of international flights in and out of JWA, will there be a cap or maximum number allowed during any a 24-hour period? If yes, what will be the maximum number? If no, why not?
- m. How many international flights are anticipated to arrive at JWA on a daily or weekly basis?
- n. What type of TSA-type security screening will be conducted regarding the increasing numbers of larger international GA aircraft if the GAIP is approved? Please describe in detail.
- o. What is the predicted net average daily change in aircraft departures and arrivals if the GAIP is approved?
- p. How many GA privately owned jets will JWA be capable of handling during a 24-hour period if the GAIP is approved?
- q. How many overnight hangers or other spaces will be made available for GA privately owned jet aircraft if the GAIP is approved?
- r. What will be the economic benefit to JWA if the GAIP is approved?
- s. If the GAIP is approved, will existing flight schools be permitted to continue their operations? If not, will flight school(s) specializing in jet aircraft flight instruction replace existing flight schools?

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- t. If any flight schools specializing in jet aircraft flight instruction are anticipated, will a cap or maximum number of training departures and arrivals during a 24-hour period be established? If yes, what will be the maximum number? If no, why not?
- u. If any flight schools specializing in jet aircraft flight instruction are anticipated, will hours for their operation and training flights be established? If yes, what will be the hours? If no, why not?

3. DEIR Conclusions that Environmental Impacts are Insignificant (Section 4).

<u>Comment</u>: The DEIR conclusion that the GAIP will be not significantly cause a negative impact to the community in terms of noise, air quality, hazardous materials, etc., is unrealistic. It is submitted that there has been an insufficient consideration of the additional noise and pollution that will be created; especially considering the leaded fuel mixture used by private GA jet aircraft and their exemption from curfew hours under GA regulations. There have been numerous studies reported in many peer-reviewed scholarly journals that airport noise and pollution have serious health impacts for neighboring communities. It is unrealistic to conclude that if the GAIP is approved that there will be no significant negative environmental impact to Newport Beach and other neighboring communities.

Furthermore, the assumptions supporting the noise analysis are flawed and unrealistic. The projection that by 2016, 40% of the Boeing 737 and Airbus A320 aircraft using JWA will include the quieter 737-MAX and Airbus A320-Neo is sheer speculation and is in conflict with the 2014 Settlement Agreement EIR noise modeling.

Questions:

- a. As GA jet aircraft have a long history of violating noise limits, how will this be better controlled, especially given the current lack of regulation of the GA jet aircraft fleet?
- b. Is an increase in GA jet aircraft nighttime arrivals and departures anticipated? If yes, how many nighttime arrivals and departures are anticipated?
- c. Will JWA place a cap or limit on the number of nighttime arrivals and departures of GA jet aircraft? If yes, what limitations will be established? If no, why not?
- d. Why wasn't the negative impact of an additional 5-10% noise generating Back Bay departure pattern by the large corporate jets on the same neighborhood impacted by commercial departures considered in the Noise Impact section of the Appendix? As this would have the same impact as a net increase in commercial departures that would replace aircraft that were previously fanning after takeoff and not impacting these neighbors, why wasn't this considered?

- e. If the GAIP is approved, what would be the largest GA jet aircraft that would be accommodated by JWA?
- f. How would the noise from departing large GA jet aircraft compare with the noise emitted from the commercial jet fleet currently using JWA? If this analysis has been done, what is the basis for the analysis?
- g. Will there be a limitation on large GA jet departures? Will there be any such limitation specifically during the existing curfew hours? If yes, what will be the limitations? If no, why not?
- h. Do the GAIP conclusions of no significant noise or pollution impact take into consideration the Next-Gen satellite-precision concentrated flight paths that have clearly has a significant negative impact on Newport Beach? If yes, what conclusions have been drawn? If no, why not?

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<u>Comment</u>: Although related to the above comment, the health risk analysis ("HRA") in Section 4 of the DEIR is extremely complicated and confusing. The DEIR also relies heavily on the EIR submitted during the 2014 Settlement Agreement ("EIR 617") for its health risk analysis ("HRA"). It is submitted that reliance on the previous EIR is misplaced. EIR 617 relied on existing 2014 flight patterns prior to the implementation of the FAA Next Gen concentrated satellite driven precision flight patterns that are flown today. Furthermore, the DEIR does not anticipate the different emissions anticipated from the expected increase in GA jet aircraft if the GAIP is approved. To suggest that there will be a minimal increase in emissions is unrealistic and unsupported by any evidence.

Comment: The DEIR is also woefully deficient in its discussion of the potential health impacts to more sensitive members of the community, especially the impact on children. The DEIR discusses "sensitive receptors" and "sensitive populations" noting only those closest to the boundary of JWA, specifically mentioning a residential development approximately 855 feet from the boundary of JWA and airport workers. In response, there have been numerous studies conducted and published in peer-reviewed scholarly journals about the serious health issues caused by airports, over flights, departures and arrivals on children and adults in communities under the flight paths. These studies have confirmed that children suffer cognitive deficits and respiratory illnesses, while the general population suffers undue stress, heart disease, high blood pressure, cognitive decline, auditory problems, heart attacks, strokes and greater cancer risk. Similarly, research studies have concluded that the adverse health affects from airport pollution are present within 10 miles of an airport. There are thousands of children in schools well within a distance of 10 miles from the JWA departure paths and thousands of people who live under the flight paths.

Questions:

- a. In arriving at the conclusion that the environmental impact of the GAIP is "less than significant," what consideration has been given to the schools, athletic fields, parks and residential areas located within a close proximity and under the flight paths of JWA? If the impact these populations have not been considered, why not?
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5. Flight Patterns.

<u>Comment</u>: Although the DEIR states there will be no change in flight patterns, it is unclear as to the flight patterns that were used for its analysis. It is also unclear what flight patterns would be followed by GA jet aircraft upon approval of the GAIP. Clarification is needed to assess the differences between GA and commercial aircraft departure patterns and how they might change upon approval of the GAIP.

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- a. Will the GA jet aircraft added to JWA through the GAIP follow the existing flight patterns presently used by commercial jets as mandated by the SoCal Metroplex?
- b. If the GA jet aircraft added through the GAIP will follow the flight patterns mandated under the SoCal Metroplex, has there been any consideration as to the impact that will be caused by the increase in air traffic over Newport Beach? If no, why not?
- c. Will there be any changes in GA flight patterns if the GAIP is approved? If yes, what will be the changes?

Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely,

(include your name, home and email address)

XAILO JUNESMOUSTRY, COM

219 EVENING STAR NEWPORT BEACH, CA 92660 From: Jim Jordan <jimcjordan@gmail.com>
Sent: Monday, November 19, 2018 10:14 PM

To: EIR627

Subject: Concerns about increased traffic

November 19, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

I had initially planned to write a letter to you in my own words, but could not improve on the letter below. It states my questions and concerns quite explicitly!

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

1. DEIR Complexity and Length Relative to Time Limitations for Comment:

The DEIR was made available for public review on September 20, 2018, with comments due on November 6, 2018, with an extension until November 21, 2018.

<u>Comment</u>: This is an incredibly complex and detailed document that is over 600 pages in length, with 2,200 pages of appendices. Although members of the general public are invited to "comment" on the DEIR, it is submitted that most members of the general public are ill equipped to read through the entirety of the document, sufficiently understand it and respond to it with their comments and questions in the time allotted.

Question: Why can't additional time be provided for the review and comment to the DEIR?

2. Project Objectives (Section 3).

This section lists separate objectives of the GAIP, which appear only to benefit airport operations and profitability.

<u>Comment</u>: As you are surely aware, under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives clearly pertain the efficiency and economical benefits of the GAIP with no indication of concerns for the communities impacted by noise and pollution emanating from JWA.

Questions:

- a. Is the GAIP for the benefit of nonresident corporate jet aircraft?
- b. Is the GAIP for the benefit of local corporate jet aircraft?
- c. Have local corporations been surveyed regarding their interest in housing their jets at JWA? If no, why not? If yes, what have been their responses?
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under GA regulations. There have been numerous studies reported in many peer-reviewed scholarly journals that airport noise and pollution have serious health impacts for neighboring communities. It is unrealistic to conclude that if the GAIP is approved that there will be no significant negative environmental impact to Newport Beach and other neighboring communities.

Furthermore, the assumptions supporting the noise analysis are flawed and unrealistic. The projection that by 2016, 40% of the Boeing 737 and Airbus A320 aircraft using JWA will include the quieter 737-MAX and Airbus A320-Neo is sheer speculation and is in conflict with the 2014 Settlement Agreement EIR noise modeling.

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<u>Comment</u>: The DEIR is also woefully deficient in its discussion of the potential health impacts to more sensitive members of the community, especially the impact on children. The DEIR discusses "sensitive receptors" and "sensitive populations" noting only those closest to the boundary of JWA, specifically mentioning a residential development approximately 855 feet from the boundary of JWA and airport workers. In response, there have

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c. Will there be any changes in GA flight patterns if the GAIP is approved? If yes, what will be the changes?

Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regard to the GAIP and the Notice of Availability of the Final EIR.

Sincerely,

James Jordan 85 Linda Isle Newport Beach, CA 92660 jimcjordan@gmail.com

From: Marsha Kendall <pmd81@icloud.com>
Sent: Tuesday, November 20, 2018 6:23 PM

To: EIR627

Subject: General Aviation Program for JWA

November 20, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

First, why can't additional time be provided for the review and comment to the DEIR?

Is the GAIP for the benefit of non resident corporate jets?

Will the GAIP result in a decrease of smaller privately owned piston-powered aircraft at JWA?

How does a decrease in the number of smaller privately owned piston-powered aircraft based at JWA and an increase in larger GA jet aircraft, benefit Newport Beach and neighboring communities?

Will the GAIP result in an increase of international flights to JWA via GA jet aircraft? What type of TSA-type security screening will be conducted regarding the increasing numbers of larger international GA aircraft if the GAIP is approved? Please describe in detail.

How many GA privately owned jets will JWA be capable of handling during a 24-hour period if the GAIP is approved? What will be the economic benefit to JWA if the GAIP is approved?-hour period be established?

Comment: The DEIR conclusion that the GAIP will be not significantly cause a negative impact to the community in terms of noise, air quality, hazardous materials, etc., is unrealistic. It is submitted that there has been an insufficient consideration of the additional noise and pollution that will be created; especially considering the leaded fuel mixture used by private GA jet aircraft and their exemption from curfew hours under GA regulations. There have been numerous studies reported in many peer-reviewed scholarly journals that airport noise and pollution have serious health impacts for neighboring communities. It is unrealistic to conclude that if the GAIP is approved that there will be no significant negative environmental impact to Newport Beach and other neighboring communities.

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As GA jet aircraft have a long history of violating noise limits, how will this be better controlled, especially given the current lack of regulation of the GA jet aircraft fleet?

Is an increase in GA jet aircraft nighttime arrivals and departures anticipated? If yes, how many nighttime arrivals and departures are anticipated?\

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Will JWA place a cap or limit on the number of nighttime arrivals and departures of GA jet aircraft? If yes, what limitations will be established? If no, why not?

Why wasn't the negative impact of an additional 5-10% noise generating Back Bay departure pattern by the large corporate jets on the same neighborhood impacted by commercial departures considered in the Noise Impact section of the Appendix? As this would have the same impact as a net increase in commercial departures that would replace aircraft that were previously fanning after takeoff and not impacting these neighbors, why wasn't this considered?

Do the GAIP conclusions of no significant noise or pollution impact take into consideration the Next-Gen satellite-precision concentrated flight paths that have clearly has a significant negative impact on Newport Beach? If yes, what conclusions have been drawn? If no, why not?

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Comment: Although related to the above comment, the health risk analysis ("HRA") in Section 4 of the DEIR is extremely complicated and confusing. The DEIR also relies heavily on the EIR submitted during the 2014 Settlement Agreement ("EIR 617") for its health risk analysis ("HRA"). It is submitted that reliance on the previous EIR is misplaced. EIR 617 relied on existing 2014 flight patterns prior to the implementation of the FAA Next Gen concentrated satellite driven precision flight patterns that are flown today. Furthermore, the DEIR does not anticipate the different emissions anticipated from the expected increase in GA jet aircraft if the GAIP is approved. To suggest that there will be a minimal increase in emissions is unrealistic and unsupported by any evidence.

The DEIR is also woefully deficient in its discussion of the potential health impacts to more sensitive members of the community, especially the impact on children. The DEIR discusses "sensitive receptors" and "sensitive populations" noting only those closest to the boundary of JWA, specifically mentioning a residential development approximately 855 feet from the boundary of JWA and airport workers. In response, there have been numerous studies conducted and published in peer-reviewed scholarly journals about the serious health issues caused by airports, over flights, departures and arrivals on children and adults in communities under the flight paths. These studies have confirmed that children suffer cognitive deficits and respiratory illnesses, while the general population suffers undue stress, heart disease, high blood pressure, cognitive decline, auditory problems, heart attacks, strokes and greater cancer risk. Similarly, research studies have concluded that the adverse health affects from airport pollution are present within 10 miles of an airport. There are thousands of children in schools well within a distance of 10 miles from the JWA departure paths and thousands of people who live under the flight paths.

What consideration has been given to the schools, athletic fields, parks and residential areas located within a close proximity and under the flight paths of JWA? If the impact these populations have not been considered, why not? Although noise is discussed in the Sensitive Receptors section of the DEIR, including the impact to schools, why isn't there an in depth discussion of health concerns especially as they relate to children?

Did the County in the preparation of the DEIR review and consider recent research concerning the health and welfare of populations living within a close proximity of airports? Within 10 miles of JWA?

What is the true net increase in pollutants from the new aircraft population departures from JWA as the fuel mixture is different and heavier in carbon and particulate pollutants?

In preparing the DEIR, was there any consideration of the added pollution that would result from the increase in GA jet aircraft combined with the existing commercial fleet? If no, why not?

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If the GA jet aircraft added through the GAIP will follow the flight patterns mandated under the SoCal Metroplex, has there been any consideration as to the impact that will be caused by the increase in air traffic over Newport Beach? If no, why not?

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Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely,

Marsha and Pat Kendall

From:	Liz Kennedy <lizkennedynb@gmail.com></lizkennedynb@gmail.com>
Sent:	Tuesday, November 20, 2018 3:28 PM
To:	EIR627
Subject:	GA Improvement Program Concerns.
November 17, 2018	
Via Electronic Mail	
EIR627@ocair.com	
Ms. Lea Choum	
Land Use Manager a	t JWA
3160 Airway Avenue	
Costa Mesa, CA 9262	26
Re: General Aviation	n Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)
Dear Ms. Choum:	
	general public and a concerned resident of Newport Beach, the following are my comments Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General nt Project ("GAIP"):

1. <u>DEIR Complexity and Length Relative to Time Limitations for Comment:</u>

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<u>Comment</u>: This is an incredibly complex and detailed document that is over 600 pages in length, with 2,200 pages of appendices. Although members of the general public are invited to "comment" on the DEIR, it is submitted that most members of the general public are ill equipped to read through the entirety of the document, sufficiently understand it and respond to it with their comments and questions in the time allotted.

Question: Why can't additional time be provided for the review and comment to the DEIR?

2. Project Objectives (Section 3).

This section lists separate objectives of the GAIP, which appear only to benefit airport operations and profitability.

<u>Comment</u>: As you are surely aware, under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives clearly pertain the efficiency and economical benefits of the GAIP with no indication of concerns for the communities impacted by noise and pollution emanating from JWA.

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3

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Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely,

Ray and Elizabeth Kennedy

lizkennedynb@gmail.com

1717 Bayadere Terrace Corona del Mar

6 3-705

From: LInda Geller < linda@avacap.com>
Sent: Tuesday, November 20, 2018 12:25 PM

To: EIR627

Subject: Regarding the General Aviation Improvement Program, for Ms. Lea Choum.

Attachments: Airport Matter.pdf

From: Linda Geller Kensey 305 East Bay Front Balboa Island, CA 92662-1317

linda@avacap.com

3-706

1

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

1. DEIR Complexity and Length Relative to Time Limitations for Comment:

The DEIR was made available for public review on September 20, 2018, with comments due on November 6, 2018, with an extension until November 21, 2018. Comment: This is an incredibly complex and detailed document that is over 600 pages in length, with 2,200 pages of appendices. Although members of the general public are invited to "comment" on the DEIR, it is submitted that most members of the general public are ill equipped to read through the entirety of the document, sufficiently understand it and respond to it with their comments and questions in the time allotted.

Question: Why can't additional time be provided for the review and comment to the DEIR?

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This section lists separate objectives of the GAIP, which appear only to benefit airport operations and profitability.

<u>Comment</u>: As you are surely aware, under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives clearly pertain the efficiency and economical benefits of the GAIP with no indication of concerns for the communities impacted by noise and pollution emanating from JWA.

1

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2 3-708

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4 3-710

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5 3-711

Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely,

include your name, home and email addresses

305 East Pay Front

8-16-12-lond, CA 92662

lindae avacap. com

From: Mark Knaeps <mknaeps@sbcglobal.net>
Sent: Tuesday, November 20, 2018 4:17 PM

To: EIR627 Subject: GAIP

Attachments: 11.15.18 EIR Comments.pdf

Dear Ms. Choum.

Please, read the attached.

We are very concerned about the health impacts of your GAIP.

We have lived in Dover Shores for about 30 years and feel that these type of programs violate our rights we obtained when purchasing our house.

MK-1

Regards,

Mark Knaeps 1127 Berkshire Lane Newport Beach, CA 92660 November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

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Sincerely,

Mark Knaeps

1127 Berkshire Lane Newport Beach, CA 92660 mknaeps@sbcglobal.net

From: Stacy Kramer <stacyjkramer@yahoo.com>
Sent: Wednesday, November 21, 2018 4:12 PM

To: EIR627

Subject: NO Airport NOISE increase over our homes PLEASE!!!

November 21, 2018 Via Electronic Mail EIR627@ocair.com Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626 Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072) Dear Ms. Choum: As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"): 1. DEIR Complexity and Length Relative to Time Limitations for Comment: The DEIR was made available for public review on September 20, 2018, with comments due on November 6, 2018, with an extension until November 21, 2018. Comment: This is an incredibly complex and detailed document that is over 600 pages in length, with 2,200 pages of appendices. 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that will be caused by the increase in air traffic over Newport Beach? If no, why not? c. Will there be any changes in GA flight patterns if the GAIP is approved? If yes, what will be the changes? Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

******I write you this with dark circles under my eyes and a splitting headache due to increased air traffic. We have tried earplugs, windows closed, increased insulation - but to no avail. The overhead planes vibrate our home at all hours. A decent night sleep is something we should be able to reasonably expect for our family and neighbors. Please help reduce the noise - NOT increase it. Sincerely, Stacy Kramer and Nathanael Singer 54 Crooked Stick Newport Beach CA 92660 stacyjkramer@yahoo.com

From: Michele Lovenduski <mloven4u@gmail.com>

Sent: Monday, November 19, 2018 8:56 PM

To: EIR627

Subject: Citizen Input to DEIR 627

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

1. DEIR Complexity and Length Relative to Time Limitations for Comment:

The DEIR was made available for public review on September 20, 2018, with comments due on November 6, 2018, with an extension until November 21, 2018.

<u>Comment</u>: This is an incredibly complex and detailed document that is over 600 pages in length, with 2,200 pages of appendices. Although members of the general public are invited to "comment" on the DEIR, it is submitted that most members of the general public are ill equipped to read through the entirety of the document, sufficiently understand it and respond to it with their comments and questions in the time allotted.

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This section lists separate objectives of the GAIP, which appear only to benefit airport operations and profitability.

<u>Comment</u>: As you are surely aware, under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives

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clearly pertain the efficiency and economical benefits of the GAIP with no indication of concerns for the communities impacted by noise and pollution emanating from JWA.

Questions:

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Furthermore, the assumptions supporting the noise analysis are flawed and unrealistic. The projection that by 2016, 40% of the Boeing 737 and Airbus A320 aircraft using JWA will include the quieter 737-MAX and Airbus A320-Neo is sheer speculation and is in conflict with the 2014 Settlement Agreement EIR noise modeling.

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Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely,

Michele Lovenduski 207 Topaz Ave Newport Beach CA 92662 Mloven4u@gmail.com

Sent from my iPhone

From: Linda <queenmom1@gmail.com>
Sent: Tuesday, November 20, 2018 6:38 AM

To: EIR627

Subject: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Attachments: 11.15.18 EIR Comments LJM 11-20-18.pdf; 11.15.18 EIR Comments NDM 11-20-18.pdf

Please see attached letters from my daughter and myself.

Sincerely,

Linda Martin

Linda J. Martin 1312 S. Bayfront Balboa Island, California 92662

November 20, 2018

Via Electronic Mail EIR627@ocair.com

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Linda J. Martin 1312 S. Bayfront

Balboa Island, CA 92662 Queenmom1@gmail.com

Letter 218

Nicole D. Martin 1312 S. Bayfront Balboa Island, California 92662

November 20, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

1. DEIR Complexity and Length Relative to Time Limitations for Comment:

The DEIR was made available for public review on September 20, 2018, with comments due on November 6, 2018, with an extension until November 21, 2018. Comment: This is an incredibly complex and detailed document that is over 600 pages in length, with 2,200 pages of appendices. Although members of the general public are invited to "comment" on the DEIR, it is submitted that most members of the general public are ill equipped to read through the entirety of the document, sufficiently understand it and respond to it with their comments and questions in the time allotted.

Question: Why can't additional time be provided for the review and comment to the DEIR?

2. Project Objectives (Section 3).

This section lists separate objectives of the GAIP, which appear only to benefit airport operations and profitability.

<u>Comment</u>: As you are surely aware, under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns

regarding the impact of noise and pollution on health. The Project Objectives clearly pertain the efficiency and economical benefits of the GAIP with no indication of concerns for the communities impacted by noise and pollution emanating from JWA.

Questions:

- a. Is the GAIP for the benefit of nonresident corporate jet aircraft?
- b. Is the GAIP for the benefit of local corporate jet aircraft?
- c. Have local corporations been surveyed regarding their interest in housing their jets at JWA? If no, why not? If yes, what have been their responses?
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- f. How does a decrease in the number of smaller privately owned pistonpowered aircraft based at JWA and an increase in larger GA jet aircraft, benefit Newport Beach and neighboring communities?
- g. What is the basis for the assumptions of daily departure and arrival of GA jet traffic, including larger corporate aircraft, which will be displacing smaller GA private planes?
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- j. How does the GAIP, with its goal of accommodating large corporate jet aircraft at JWA through building additional hangers, benefit Newport Beach and other neighboring communities?
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3. <u>DEIR Conclusions that Environmental Impacts are Insignificant (Section 4)</u>.

Comment: The DEIR conclusion that the GAIP will be not significantly cause a negative impact to the community in terms of noise, air quality, hazardous materials, etc., is unrealistic. It is submitted that there has been an insufficient consideration of the additional noise and pollution that will be created; especially considering the leaded fuel mixture used by private GA jet aircraft and their exemption from curfew hours under GA regulations. There have been numerous studies reported in many peer-reviewed scholarly journals that airport noise and pollution have serious health impacts for neighboring communities. It is unrealistic to conclude that if the GAIP is approved that there will be no significant negative environmental impact to Newport Beach and other neighboring communities.

Furthermore, the assumptions supporting the noise analysis are flawed and unrealistic. The projection that by 2016, 40% of the Boeing 737 and Airbus A320 aircraft using JWA will include the quieter 737-MAX and Airbus A320-Neo is sheer speculation and is in conflict with the 2014 Settlement Agreement EIR noise modeling.

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- h. Do the GAIP conclusions of no significant noise or pollution impact take into consideration the Next-Gen satellite-precision concentrated flight paths that have clearly has a significant negative impact on Newport Beach? If yes, what conclusions have been drawn? If no, why not?

4. Health Risk Analysis (Section 4).

Comment: Although related to the above comment, the health risk analysis ("HRA") in Section 4 of the DEIR is extremely complicated and confusing. The DEIR also relies heavily on the EIR submitted during the 2014 Settlement Agreement ("EIR 617") for its health risk analysis ("HRA"). It is submitted that reliance on the previous EIR is misplaced. EIR 617 relied on existing 2014 flight patterns prior to the implementation of the FAA Next Gen concentrated satellite driven precision flight patterns that are flown today. Furthermore, the DEIR does not anticipate the different emissions anticipated from the expected increase in GA jet aircraft if the GAIP is approved. To suggest that there will be a minimal increase in emissions is unrealistic and unsupported by any evidence.

<u>Comment</u>: The DEIR is also woefully deficient in its discussion of the potential health impacts to more sensitive members of the community, especially the impact on children. The DEIR discusses "sensitive receptors" and "sensitive populations" noting only those closest to the boundary of JWA, specifically mentioning a residential development approximately 855 feet from the boundary of JWA and airport workers. In response, there have been numerous studies conducted and published in peer-reviewed scholarly journals about the serious health issues caused by airports, over flights, departures and arrivals on children and adults in communities under the flight paths. These studies have confirmed that children suffer cognitive deficits and respiratory illnesses, while the general population suffers undue stress, heart disease, high blood pressure, cognitive decline, auditory problems, heart attacks, strokes and greater cancer risk. Similarly, research studies have concluded that the adverse health affects from airport pollution are present within 10 miles of an airport. There are thousands of children in schools well within a distance of 10 miles from the JWA departure paths and thousands of people who live under the flight paths.

Questions:

- a. In arriving at the conclusion that the environmental impact of the GAIP is "less than significant," what consideration has been given to the schools, athletic fields, parks and residential areas located within a close proximity and under the flight paths of JWA? If the impact these populations have not been considered, why not?
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Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely,

Nícole D. Martín

Nicole D. Martin 1312 S. Bayfront Balboa Island, CA 92662 Queenmom1@gmail.com

From: James E. McCormick < kmccormick@kimolaw.com>

Sent: Tuesday, November 20, 2018 10:32 AM

To: EIR627

Cc: James E. McCormick III; Alison L. McCormick; webmaster@lidoisle.org

Subject: General Aviation Improvement Program--Draft Environmental Impact Rerport (SCH No. 2017031072)

November 17, 2018

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For your information, the flight path for commercial aviation jets (and for GA flights, if the same) in Santa Ana conditions is directly over our property. Any increase in flights, commercial or GA, will directly affect us and our property in terms of noise and environmental quality of life and cannot possibly be viewed as an "improvement.".

Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely,

James E. and Alison L. McCormick III 808 Via Lido Soud Newport Beach, CA 92663 kmccormick@kimolaw.com Alison.mccormick@elliman.com

From: Manal Real Estate <manal@manalre.com>
Sent: Tuesday, November 20, 2018 6:06 PM

To: webmaster@lidoisle.org

Cc: EIR627

Subject: Re: IMMEDIATE RESPONSE NEEDED - BY TOMORROW!

Please answer this email (below), and keep me informed on the answers.

Note as a homeowner in Newport Beach, I do not agree with increased (or current) airport traffic. It is not right for the El Toro marine base that was planned to be an international airport to be used as a "great park" while more pressure is put on SNA....stop.

MG-1

Please re-read:

"...These studies have confirmed that children suffer cognitive deficits and respiratory illnesses, while the general population suffers undue stress, heart disease, high blood pressure, cognitive decline, auditory problems, heart attacks, strokes and greater cancer risk. Similarly, research studies have concluded that the adverse health affects from airport pollution are present within 10 miles of an airport. There are thousands of children in schools well within a distance of 10 miles from the JWA departure paths and thousands of people who live under the flight paths."

MG-2

Any questions, feel free to contact me.

Manal Bozarth | Senior Associate Broker McMonigle Group | Results Matter tel 949.412.3699 | BRE#01029319 M Group | M Mag | Meet Manal

What is my Home Worth?

On Nov 20, 2018, at 10:10 AM, Lido Isle Community Association <webmaster@lidoisle.org> wrote:

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Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely,	
	(include your name, home and email
addresses	•

Lido Isle Community Association | 701 Via Lido Soud, Editor, Lido Islander, Newport Beach, CA 92663

4

<u>Unsubscribe manal@manalre.com</u> <u>Update Profile | About our service provider</u>

Sent by webmaster@lidoisle.org in collaboration with



Try it free today

From: John Meindl <jmeindl@meindllaw.com>
Sent: Wednesday, November 21, 2018 12:24 PM

To: EIR627 Subject: GAIP

Attachments: 2018-11-21 121927.pdf

Ms Choum – Please see attached public comment.

John M. Meindl

Law Office of John M. Meindl 4675 MacArthur Court Suite 550 Newport Beach, CA 92660 949-679-8370 jmeindl@meindllaw.com

3-749

1

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

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As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

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Sincerely,

(include your name, home and email addresses

John Geradi 1957 Vista Caudai

Newpo+ Beach CA 92660 jmeindle meindllaw.com

From: Susan Lee <susanlee404@gmail.com>
Sent: Tuesday, November 20, 2018 10:57 AM

To: EIR627

Subject: comments on GAIP

Attachments: 11.15.18 EIR Comments.pages

the attached letter represents my thoughts/comments on GAIP.

as a 30-year resident of the bluffs, which is directly under the departure path, we have already experienced a drastic increase in noise and pollution due to implementation of NextGen. these concerns have not yet been addressed. please DO NOT inflict any more noise or health/safety issues on residents of newport beach in the interest of generating more income for JWA.

SM-1

thank you,

susan menning

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

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Sincerely,

Susan Menning 404 Vista Flora (right under the departure path) NB 92660 (949) 640-1516

From: Whitney Moad <whitneymcgovern@gmail.com>

Sent: Tuesday, November 20, 2018 1:20 PM

To: EIR627

Subject: Draft Environmental Impact Report

Attachments: EIR.pdf

Hello,

Please see the attached correspondence.

Best,

Whitney Moad

3-764

1

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Ouestions:

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Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely,

Whitney Moad

4316 Shorecrest Lane

Corona del Mar, CA 92625

619-587-4826

whitneymcgovern@gmail.com

From: Beverly Blais <bblaisesq@gmail.com>
Sent: Monday, November 19, 2018 5:37 PM

To: EIR627

Subject: Comments to General Aviation Improvement Plan Draft EIR

Attachments: 11.15.18 EIR Comments.docx

Dear Ms. Lea Choum:

Attached please find my comments to the GAIP Draft EIR.

Sincerely, Beverly Blais Moosmann

BEVERLY BLAIS MOOSMANN 544 Vista Grande Newport Beach, CA 92660 bblaisesq@gmail.com

November 19, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

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This section lists separate objectives of the GAIP, which appear only to benefit airport operations and profitability.

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Sincerely,

Beverly Moosmann

From: Robert Moosmann

bobmoosmann@yahoo.com>

Sent: Tuesday, November 20, 2018 10:02 AM

To: EIR627

Subject: EIR Question regarding GAIP

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

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Bob Moosmann 544 Vista Grande Newport Beach, CA 92660

Bobmoosmann@yahoo.com

From: Robert Murphy <robertmurphe@aol.com>
Sent: Tuesday, November 20, 2018 10:32 AM

To: EIR627

Subject: 11.15.18 EIR Comments.docx

Attachments: 11.15.18 EIR Comments.docx; ATT00001.txt

Please consider the attached comments and questions.

Respectively

Home Owner: Robert H. Murphy 1014 Polaris Drive Newport Beach, Ca 92660

November 17, 2018

Via Electronic Mail EIR627@ocair.com

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4

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Sincerely,
(include your name, home and email address)

Thank you for your consideration of my comments and questions. Please keep me

6 3-789

From: sales@nauticalluxuries.com

Sent: Tuesday, November 20, 2018 11:11 AM

To: EIR627

Subject: Draft Environmental Impact Report (SCH No. 2017031072)

November 20, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

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Sincerely,

Daisy Cathcart 101 Via Lido Nord Newport Beach, CA 92663 chasingjones@gmail.com

Nautical Luxuries ~ Equine Luxuries

151 Shipyard Way Suite A Newport Beach, CA 92663 TEL: (949)419-6686 FAX: (949)419-6641 EMAIL: Sales@NauticalLuxuries.com www.NauticalLuxuries.com www.EquineLuxuries.com

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4

From: Dave New <dave1@basinmarine.com>
Sent: Thursday, November 22, 2018 8:30 AM

To: EIR627
Cc: 'Jan New'
Subject: DEIR
Attachments: GAIP.pdf

Dear Ms. Choum:

Please see attached, thank you very much

Dave & Jan New

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304 Morning Star Low

Newart Beach CA 92660

949-722-1700

Dave I (3 Basinmarine. com Jan E New 123 (2) q mail. com From: Randall Nunnelly <nunnelly1817@gmail.com>

Sent: Tuesday, November 20, 2018 8:22 AM

To: EIR627

Subject: General Aviation Improvement Program

Attachments: Gen Aviation Imp.pdf

Ms. Choum:

Please see the attached letter.

3-801

1

November 17, 2018

Via Electronic Mail EIR627@ocair.com

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- n. What type of TSA-type security screening will be conducted regarding the increasing numbers of larger international GA aircraft if the GAIP is approved? Please describe in detail.
- o. What is the predicted net average daily change in aircraft departures and arrivals if the GAIP is approved?
- p. How many GA privately owned jets will JWA be capable of handling during a 24-hour period if the GAIP is approved?
- q. How many overnight hangers or other spaces will be made available for GA privately owned jet aircraft if the GAIP is approved?
- r. What will be the economic benefit to JWA if the GAIP is approved?
- s. If the GAIP is approved, will existing flight schools be permitted to continue their operations? If not, will flight school(s) specializing in jet aircraft flight instruction replace existing flight schools?

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- t. If any flight schools specializing in jet aircraft flight instruction are anticipated, will a cap or maximum number of training departures and arrivals during a 24-hour period be established? If yes, what will be the maximum number? If no, why not?
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Comment: The DEIR conclusion that the GAIP will be not significantly cause a negative impact to the community in terms of noise, air quality, hazardous materials, etc., is unrealistic. It is submitted that there has been an insufficient consideration of the additional noise and pollution that will be created; especially considering the leaded fuel mixture used by private GA jet aircraft and their exemption from curfew hours under GA regulations. There have been numerous studies reported in many peer-reviewed scholarly journals that airport noise and pollution have serious health impacts for neighboring communities. It is unrealistic to conclude that if the GAIP is approved that there will be no significant negative environmental impact to Newport Beach and other neighboring communities.

Furthermore, the assumptions supporting the noise analysis are flawed and unrealistic. The projection that by 2016, 40% of the Boeing 737 and Airbus A320 aircraft using JWA will include the quieter 737-MAX and Airbus A320-Neo is sheer speculation and is in conflict with the 2014 Settlement Agreement EIR noise modeling.

Questions:

- a. As GA jet aircraft have a long history of violating noise limits, how will this be better controlled, especially given the current lack of regulation of the GA jet aircraft fleet?
- b. Is an increase in GA jet aircraft nighttime arrivals and departures anticipated? If yes, how many nighttime arrivals and departures are anticipated?
- c. Will JWA place a cap or limit on the number of nighttime arrivals and departures of GA jet aircraft? If yes, what limitations will be established? If no, why not?
- d. Why wasn't the negative impact of an additional 5-10% noise generating Back Bay departure pattern by the large corporate jets on the same neighborhood impacted by commercial departures considered in the Noise Impact section of the Appendix? As this would have the same impact as a net increase in commercial departures that would replace aircraft that were previously fanning after takeoff and not impacting these neighbors, why wasn't this considered?

- e. If the GAIP is approved, what would be the largest GA jet aircraft that would be accommodated by JWA?
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Comment: Although related to the above comment, the health risk analysis ("HRA") in Section 4 of the DEIR is extremely complicated and confusing. The DEIR also relies heavily on the EIR submitted during the 2014 Settlement Agreement ("EIR 617") for its health risk analysis ("HRA"). It is submitted that reliance on the previous EIR is misplaced. EIR 617 relied on existing 2014 flight patterns prior to the implementation of the FAA Next Gen concentrated satellite driven precision flight patterns that are flown today. Furthermore, the DEIR does not anticipate the different emissions anticipated from the expected increase in GA jet aircraft if the GAIP is approved. To suggest that there will be a minimal increase in emissions is unrealistic and unsupported by any evidence.

Comment: The DEIR is also woefully deficient in its discussion of the potential health impacts to more sensitive members of the community, especially the impact on children. The DEIR discusses "sensitive receptors" and "sensitive populations" noting only those closest to the boundary of JWA, specifically mentioning a residential development approximately 855 feet from the boundary of JWA and airport workers. In response, there have been numerous studies conducted and published in peer-reviewed scholarly journals about the serious health issues caused by airports, over flights, departures and arrivals on children and adults in communities under the flight paths. These studies have confirmed that children suffer cognitive deficits and respiratory illnesses, while the general population suffers undue stress, heart disease, high blood pressure, cognitive decline, auditory problems, heart attacks, strokes and greater cancer risk. Similarly, research studies have concluded that the adverse health affects from airport pollution are present within 10 miles of an airport. There are thousands of children in schools well within a distance of 10 miles from the JWA departure paths and thousands of people who live under the flight paths.

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Questions:

- a. In arriving at the conclusion that the environmental impact of the GAIP is "less than significant," what consideration has been given to the schools, athletic fields, parks and residential areas located within a close proximity and under the flight paths of JWA? If the impact these populations have not been considered, why not?
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- e. In preparing the DEIR, was there any consideration of the added pollution that would result from the increase in GA jet aircraft combined with the existing commercial fleet? If no, why not?
- f. In preparing the DEIR, was there any consideration of the impact of increased noise levels that would result from nighttime flights of GA jet aircraft? If no, why not?

5. Flight Patterns.

<u>Comment</u>: Although the DEIR states there will be no change in flight patterns, it is unclear as to the flight patterns that were used for its analysis. It is also unclear what flight patterns would be followed by GA jet aircraft upon approval of the GAIP. Clarification is needed to assess the differences between GA and commercial aircraft departure patterns and how they might change upon approval of the GAIP.

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Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Carol Runnery

Sincerely,

Randall Nunnelly Carol Nunnelly

1100 Santiago Dr.

Newport Beach, CA 92660

From: Carey O'Bryan <careyobryan@newportheart.com>

Sent: Tuesday, November 20, 2018 1:17 PM

To: EIR627 **Subject:** Concerns

November 17, 2018 Via Electronic Mail EIR627@ocair.com Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626 Re: General Aviation Improvement Program - Draft Environmental Impact Report (SCH No. 2017031072) Dear Ms. Choum: As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"): 1. DEIR Complexity and Length Relative to Time Limitations for Comment: The DEIR was made available for public review on September 20, 2018, with comments due on November 6, 2018, with an extension until November 21, 2018. Comment: This is an incredibly complex and detailed document that is over 600 pages in length, with 2,200 pages of appendices. Although members of the general public are invited to "comment" on the DEIR, it is submitted that most members of the general public are ill equipped to read through the entirety of the document, sufficiently understand it and respond to it with their comments and questions in the time allotted. Question: Why can't additional time be provided for the review and comment to the DEIR? 2. Project Objectives (Section 3). This section lists separate objectives of the GAIP, which appear only to benefit airport operations and profitability. Comment: As you are surely aware, under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives clearly pertain the efficiency and economical benefits of the GAIP with no indication of concerns for the communities impacted by noise and pollution emanating from JWA. Questions: a. 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GA flight patterns if the GAIP is approved? If yes, what will be the changes? Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR. Sincerely,

Carey L. O'Bryan IV, MD

Newport Heart Medical Group
415 Old Newport Blvd, Suite 200

Newport Beach, CA 92663

Phone: (949) 548-9611

Fax: (949) 548-9958

careyobryan@newportheart.com

www.newportheart.com

From: Margo O'Connor <margo949@icloud.com>
Sent: Tuesday, November 20, 2018 11:23 AM

To: EIR627

Subject: Increased Noise and Air Pollution **Attachments:** 11.15.18 EIR Comments.docx

Dear Ms. Choum:

I have been a resident of Newport Beach for more than 20 years and I am very concerned about the ever increasing Noise and Pollution from jet aircraft flying over my residence. The proposed GAIP is no "improvement" to those of us residing in this city as the larger private aircraft would not be subject to the present curfew. It makes a bad situation worse!!

MO-1

I agree with all the concerns voiced in the attached letter sent to you by another concerned citizen. Please keep me informed as to future developments.

Thank you,
Margo O'Connor
90 Linda Isle
Newport Beach, CA 92660
moconn949@gmail.com

Sent from my iPad

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

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Questions:

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addresses
(include your name, home and email
Sincerely,
regards to the GAIP and the Notice of Availability of the Final EIR.

Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in

6 3-817

From: annhafeyo@aol.com

Sent: Wednesday, November 21, 2018 4:24 PM

To: EIR627

Subject: GAIP-DEIR SCH#2017031072

Please consider my letter as it relates to the GAIP-DEIR.

November 20, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

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Comment: The DEIR is also woefully deficient in its discussion of the potential health impacts to more sensitive members of the community, especially the impact on children. The DEIR discusses "sensitive receptors" and "sensitive populations" noting only those closest to the boundary of JWA, specifically mentioning a residential development approximately 855 feet from the boundary of JWA and airport workers. In response, there have been numerous studies conducted and published in peer-reviewed scholarly journals about the serious health issues caused by airports, over flights, departures and arrivals on children and adults in communities under the flight paths. These studies have confirmed that children suffer cognitive deficits and respiratory illnesses, while the general population suffers undue stress, heart disease, high blood pressure, cognitive decline, auditory problems, heart attacks, strokes and elevated cancer risk. Similarly, research studies have concluded that the adverse health effects from airport pollution are present within 10 miles of an airport. There are thousands of children in schools within 10 miles from the JWA departure paths and thousands of people who live under the flight paths.

-Questions:

- a. In arriving at the conclusion that the environmental impact of the GAIP is "less than significant," what consideration has been given to the schools, athletic fields, parks and residential areas located in close proximity and under the flight paths of JWA? If the impact on these populations has not been considered, why not?
- b. Although noise is discussed in the Sensitive Receptors section of the DEIR and its impact on schools, why isn't an in-depth discussion of health concerns, especially as they relate to children, included?
- c. Did the County in the preparation of the DEIR review and consider recent research concerning the health and welfare of populations living within close proximity of airports? With the eight communities located within 10 miles of JWA? What were the findings on the specific communities?
- d. What is the true net increase in pollutants from the new aircraft population departures from JWA as the fuel mix is different and heavier in carbon and particulate pollutants?
- e. In preparing the DEIR, was there any consideration of the added pollution that would result from the increase in GA jet aircraft combined with the existing commercial fleet? If no, why not?

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<u>Comment</u>: Although the DEIR states there will be no change in flight patterns, it is unclear as to the flight patterns that were used for its analysis. It is also unclear what flight patterns would be followed by GA jet aircraft upon approval of the GAIP. Clarification is needed to assess the differences between GA and commercial aircraft departure patterns and how they might change upon approval of the GAIP.

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Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices regarding the GAIP and the Notice of Availability of the Final EIR.

5

Sincerely,

Ann O'Neil 1101 Granville Drive Newport Beach, CA 92660

From: Bonnie O'Neil <boneilseven@gmail.com>
Sent: Tuesday, November 20, 2018 11:51 AM

To: EIR627

Subject: Aviation Improvement Program

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program - Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

1. DEIR Complexity and Length Relative to Time Limitations for Comment:

The DEIR was made available for public review on September 20, 2018, with comments due on November 6, 2018, with an extension until November 21, 2018.

Comment: This is an incredibly complex and detailed document that is over 600 pages in length, with 2,200 pages of appendices. Although members of the general public are invited to "comment" on the DEIR, it is submitted that most members of the general public are ill equipped to read through the entirety of the document, sufficiently understand it and respond to it with their comments and questions in the time allotted.

Question: Why can't additional time be provided for the review and comment to the DEIR?

2. Project Objectives (Section 3).

This section lists separate objectives of the GAIP, which appear only to benefit airport operations and profitability.

Comment: As you are surely aware, under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives clearly pertain the efficiency and economical benefits of the GAIP with no indication of concerns for the communities impacted by noise and pollution emanating from JWA.

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3

Sincerely,

Bonnie and Dan O'Neil	
314 Morning Star	
Newport Beach	
boneil@me.com and dan@oneilstorage.com	
	(include your name, home and email addresses

From: Firooz Oskooi <froskooi@att.net> Sent: Wednesday, November 21, 2018 10:51 AM To: **EIR627** Subject: John Wayne Airport November21, 2018 Via Electronic Mail EIR627@ocair.com Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626 Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072) Dear Ms. Choum:

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Sincerely,

Firooz R Oskooi, M.D.

1945 Santiago Dr., Newport Beach, CA
92660______ (include your name, home and email addresses

7 3-832

From: Peggy Palmer <pvpalmer@icloud.com>
Sent: Tuesday, November 20, 2018 12:07 PM

To: EIR627

Subject: JWA Expansion - Two Signatures Opposing Plan

Attachments: Scan 2018-11-20 12.04.29.pdf

Ms. Lea Choum,

Peggy & Michael Palmer oppose the expansion of larger aircraft, we can no tolerate any more noise, pollution and health issues impacting our children, schools and neighborhoods.

PMP-1

Thank you for your time,

Peggy & Michael Palmer 1701 Kings Road Newport Beach, CA 92663 Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely, PEGGY V. Falmer

1701 Kings Rd. (include your name, home and email addresses

New port Beach, CA 92663

Prpalmer O icloud. com

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170/16/1992 D. (include your name, home and email addresses

Newport Beach, CA

92663

MC Palmer OME, COM

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

1. DEIR Complexity and Length Relative to Time Limitations for Comment:

The DEIR was made available for public review on September 20, 2018, with comments due on November 6, 2018, with an extension until November 21, 2018. Comment: This is an incredibly complex and detailed document that is over 600 pages in length, with 2,200 pages of appendices. Although members of the general public are invited to "comment" on the DEIR, it is submitted that most members of the general public are ill equipped to read through the entirety of the document, sufficiently understand it and respond to it with their comments and questions in the time allotted.

Question: Why can't additional time be provided for the review and comment to the DEIR?

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This section lists separate objectives of the GAIP, which appear only to benefit airport operations and profitability.

<u>Comment</u>: As you are surely aware, under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives clearly pertain the efficiency and economical benefits of the GAIP with no indication of concerns for the communities impacted by noise and pollution emanating from JWA.

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- b. Is the GAIP for the benefit of local corporate jet aircraft?
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- g. What is the basis for the assumptions of daily departure and arrival of GA jet traffic, including larger corporate aircraft, which will be displacing smaller GA private planes?
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3. DEIR Conclusions that Environmental Impacts are Insignificant (Section 4).

<u>Comment</u>: The DEIR conclusion that the GAIP will be not significantly cause a negative impact to the community in terms of noise, air quality, hazardous materials, etc., is unrealistic. It is submitted that there has been an insufficient consideration of the additional noise and pollution that will be created; especially considering the leaded fuel mixture used by private GA jet aircraft and their exemption from curfew hours under GA regulations. There have been numerous studies reported in many peer-reviewed scholarly journals that airport noise and pollution have serious health impacts for neighboring communities. It is unrealistic to conclude that if the GAIP is approved that there will be no significant negative environmental impact to Newport Beach and other neighboring communities.

Furthermore, the assumptions supporting the noise analysis are flawed and unrealistic. The projection that by 2016, 40% of the Boeing 737 and Airbus A320 aircraft using JWA will include the quieter 737-MAX and Airbus A320-Neo is sheer speculation and is in conflict with the 2014 Settlement Agreement EIR noise modeling.

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Comment: Although related to the above comment, the health risk analysis ("HRA") in Section 4 of the DEIR is extremely complicated and confusing. The DEIR also relies heavily on the EIR submitted during the 2014 Settlement Agreement ("EIR 617") for its health risk analysis ("HRA"). It is submitted that reliance on the previous EIR is misplaced. EIR 617 relied on existing 2014 flight patterns prior to the implementation of the FAA Next Gen concentrated satellite driven precision flight patterns that are flown today. Furthermore, the DEIR does not anticipate the different emissions anticipated from the expected increase in GA jet aircraft if the GAIP is approved. To suggest that there will be a minimal increase in emissions is unrealistic and unsupported by any evidence.

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From: Jon B. Patton <jonbpatton@gmail.com>
Sent: Tuesday, November 20, 2018 11:07 PM

To: EIR627

Subject: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

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Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

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Sincerely,

Jon B. Patton 36 Cormorant Circle Newport Beach, CA 92660

From: William Patton < WRPatton@pacificnewport.com>

Sent: Wednesday, November 21, 2018 2:40 PM

To: EIR627

Subject: Proposed New Development at John Wayne Airport

Attachments: WRP North Star.doc

Dear Ms. Ms. Choum:

Please see the attached signed letter.

Thank you,

William R. Patton

Bill Patton

301 North Star Lane Newport Beach, CA 92660

Email: billpatton@aol.com Cell: 714.321.0000

3-846

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William R. Patton

301 North Star Lane Newport Beach, CA 92660

November 21, 2018 Page 1 of 4

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Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely,

William R. Patton 301 North Star Lane, Newport Beach, CA 92660 billpatton@aol.com From: William Patton < WRPatton@pacificnewport.com>

Sent: Wednesday, November 21, 2018 2:45 PM

To: EIR627

Subject: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Attachments: Patton Airport Letter 11-21-18.pdf

Dear Ms. Ms. Choum:

Please see the attached signed letter.

Thank you,

William R. Patton

Bill Patton

301 North Star Lane Newport Beach, CA 92660

Email: billpatton@aol.com
Cell: 714.321.0000

William R. Patton

301 North Star Lane Newport Beach, CA 92660

November 21, 2018

Page 1 of 4

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

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301 North Star Lane, Newport Beach, CA 92660 Cell: 714-321-0000; email: billpatton@aol.com

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Furthermore, the assumptions supporting the noise analysis are flawed and unrealistic. The projection that by 2016, 40% of the Boeing 737 and Airbus A320 aircraft using JWA will include the quieter 737-MAX and Airbus A320-Neo is sheer speculation and is in conflict with the 2014 Settlement Agreement EIR noise modeling.

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Questions:

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301 North Star Lane, Newport Beach, CA 92660

billpatton@aol.com

From: Lorian Petry <lorianpetry@hotmail.com>
Sent: Tuesday, November 20, 2018 4:49 PM

To: EIR627

Subject: GAIP-DEIR SCH#2017031072

Attachments: 11-20-18 EIR Comments - Corporate Jet Hangars.docx

Dear Ms. Choum,

Please consider my letter (attached) as it relates to the GAIP-DEIR.

Thank you,

Lorian Petry

November 20, 2018

Via Electronic Mail EIR627@ocair.com

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5 3-861

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Sincerely,

Lorian K. Petry 1239 Bayside Drive Corona del Mar, CA 92625 949-721-1922

6 3-862

From: Darcy Post <darcypost@gmail.com> Sent: Tuesday, November 20, 2018 7:29 AM

EIR627 To:

Subject: JWA proposal

Attachments: 11.15.18 EIR Comment Letter.pdf

Hello Ms. Choum.

Please see the attached letter as a response to your Nov 21 deadline.

Thank you, Darcy Post

Darcy Post newport beach, california 949.395.9566

3-863

1

November 20, 2018

Via Electronic Mail EIR627@ocair.com

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Questions:

- a. In arriving at the conclusion that the environmental impact of the GAIP is "less than significant," what consideration has been given to the schools, athletic fields, parks and residential areas located within a close proximity and under the flight paths of JWA? If the impact these populations have not been considered, why not?
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Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely,

Name: Darcy Post E-mail: darcypost@gmail.com Home Address: 2 Hampshire Court, Newport Beach, CA 92660

3-867

2 Post

From: Ned Post <ned@nedtpost.com>
Sent: Tuesday, November 20, 2018 11:44 AM

To: EIR627

Subject: Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No.

2017031072)

November 20, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program - Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

When is the greed going to stop. JWA should serve the residents of Orange County in a non-intrusive manner that preserves the lifestyle, health and comfort the residents expect and deserve. JWA should serve the residents who live here and not the companies or corporate entities based here. We, the residents, are already paying a small fortune for this privilege by way of, what all believe to be, outrageous county taxes.

ETP-1

As a member of the general public and a **concerned resident of Newport Beach**, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

1. <u>DEIR Complexity and Length Relative to Time Limitations for Comment:</u>

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1

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2

consideration of the additional noise and pollution that will be created; especially considering the leaded fuel mixture used by private GA jet aircraft and their exemption from curfew hours under GA regulations. There have been numerous studies reported in many peer-reviewed scholarly journals that airport noise and pollution have serious health impacts for neighboring communities. It is unrealistic to conclude that if the GAIP is approved that there will be no significant negative environmental impact to Newport Beach and other neighboring communities.

Furthermore, the assumptions supporting the noise analysis are flawed and unrealistic. The projection that by 2016, 40% of the Boeing 737 and Airbus A320 aircraft using JWA will include the quieter 737-MAX and Airbus A320-Neo is sheer speculation and is in conflict with the 2014 Settlement Agreement EIR noise modeling.

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Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices regarding the GAIP and the Notice of Availability of the Final EIR. Thank you.

Sincerely,

Edward T. Post 2 Hampshire Ct. Newport Beach, CA 92660

ned@nedTpost.com cell: 208-720-0695

5 3-872

Sent: Tuesday, November 20, 2018 1:50 PM

To: EIR627

Subject: John Wayne Airport

November 20, 2018

Ms. Lea Choum

Land Use Manager at JWA

3160 Airway Avenue

Costa Mesa, CA 92626

Re: General Aviation Improvement Program - Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

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	Warmly,

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Nrapendra Prasad

340 Cherry Tree Lane,

Newport Beach, CA 92660

info@prasadphoto.com

6 3-878

From: Janet Probst <janethprobst@gmail.com>
Sent: Tuesday, November 20, 2018 2:14 PM

To: EIR627

Subject: GAIP Draft EIR - SCH No. 2017031072

Attachments: img203.pdf

Dear Ms. Choum,

Attached is a detailed list of concerns and questions regarding the GAIP EIR draft. The contents of this letter are of major concern to the residence who live under current JWA fight pattern and live in close proximity to the airport and need to be addressed by the County.

It appears from the EIR that the County is completely ignoring the noise, health, and safety of the residence who live under and near the flights taking-off from and landing at JWA. This cannot happen.

JP-1

Looking forward to hearing from you.

Sincerely, Janet H. Prost 1984 Vista Caudal Newport Beach. CA 92660 November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

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Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regard to the GAIP and the Notice of Availability of the Final EIR.

Sincerely,

Janet H. Probst, Esq. 1984 Vista Caudal

Newport Beach, CA 92660

From: Stephanie Rados < 18bloomr@roadrunner.com>

Sent: Tuesday, November 20, 2018 7:32 PM

To: EIR627

Subject: SCH No.2017031072

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

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Sincerely,

Stephanie, Steve, Lauren and Chase Rados 661 Via Lido Soud Newport Beach, CA 92663

Lido Isle Community Association | 701 Via Lido Soud, Editor, Lido Islander, Newport Beach, CA 92663

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<u>Update Profile</u> | <u>About our service provider</u>

Sent by webmaster@lidoisle.org in collaboration with



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From: RG ltd <rg@ransomgroupltd.com>

Sent: Wednesday, November 21, 2018 12:55 PM

To: EIR627

Subject: New EIR Changes-John Wayne Airport re: Private aircraft flight restrictions, pollution, noise

Attachments: Ms Lea Choum-John Wayne Airport EIR Comments.docx

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November 21, 2018

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

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Dale Ransom
Board of Directors, Bayview Terrace
Chair, Architectural Review Committee, Bayview Terrace
62 Cormorant Circle
Newport Beach, CA. 92660
rg@ransomgroupltd.com

From: Gail Reisman < gailreisman@hotmail.com>
Sent: Tuesday, November 20, 2018 5:00 PM

To: EIR627

Subject: Aviation Improvement Peogram

November 17, 2018

Via Electronic Mail EIR627@ocair.com

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5

Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely, Drs. Gail and Sorel Reisman 112 Via Havre Lido Isle

From: Nicole Reynolds < nfreynolds@yahoo.com>
Sent: Tuesday, November 20, 2018 7:43 AM

To: EIR627

Subject: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

November 20, 2018

Via Electronic Mail

EIR627@ocair.com

Ms. Lea Choum

Land Use Manager at JWA

3160 Airway Avenue

Costa Mesa, CA 92626

Re: General Aviation Improvement Program - Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

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Sincerely,

Nicole F Reynolds

1509 Dolphin Terrace

Corona del Mar, CA 92625

(949) 466-9551

From: Gmail <catherinerichards234@gmail.com>
Sent: Tuesday, November 20, 2018 12:51 PM

To: EIR627

Subject: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

November 20, 2018

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Sincerely,

Catherine Richards 2562 Fairway Drive Costa Mesa, CA 92627 Richardsclan@sbcglobal.net

Sent from my iPhone

From: Janni Richardson <jsrv@sbcglobal.net>
Sent: Tuesday, November 20, 2018 3:45 PM

To: EIR627

Subject: Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No.

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2

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- h. Do the GAIP conclusions of no significant noise or pollution impact take into consideration the Next-Gen satellite-precision concentrated flight paths that have clearly has a significant negative impact on Costa Mesa and surroundings? If yes, what conclusions have been drawn? If no, why not?

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Comment: Although related to the above comment, the health risk analysis ("HRA") in Section 4 of the DEIR is extremely complicated and confusing. The DEIR also relies heavily on the EIR submitted during the 2014 Settlement Agreement ("EIR 617") for its health risk analysis ("HRA"). It is submitted that reliance on the previous EIR is misplaced. EIR 617 relied on existing 2014 flight patterns prior to the implementation of the FAA Next Gen concentrated satellite driven precision flight patterns that are flown today. Furthermore, the DEIR does not anticipate the different emissions anticipated from the expected increase in GA jet aircraft if the GAIP is approved. To suggest that there will be a minimal increase in emissions is unrealistic and unsupported by any evidence.

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Questions:

a. In arriving at the conclusion that the environmental impact of the GAIP is "less than significant," what consideration has been given to the schools, athletic fields, parks and residential areas located within a close proximity and under the flight paths of JWA? If the impact these populations have not been considered, why not?

3

- b. Although noise is discussed in the Sensitive Receptors section of the DEIR, including the impact to schools, why isn't there an in depth discussion of health concerns especially as they relate to children?
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- d. What is the true net increase in pollutants from the new aircraft population departures from JWA as the fuel mixture is different and heavier in carbon and particulate pollutants?
- e. In preparing the DEIR, was there any consideration of the added pollution that would result from the increase in GA jet aircraft combined with the existing commercial fleet? If no, why not?
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5. Flight Patterns.

Comment: Although the DEIR states there will be no change in flight patterns, it is unclear as to the flight patterns that were used for its analysis. It is also unclear what flight patterns would be followed by GA jet aircraft upon approval of the GAIP. Clarification is needed to assess the differences between GA and commercial aircraft departure patterns and how they might change upon approval of the GAIP.

Questions:

- a. Will the GA jet aircraft added to JWA through the GAIP follow the existing flight patterns presently used by commercial jets as mandated by the SoCal Metroplex?
- b. If the GA jet aircraft added through the GAIP will follow the flight patterns mandated under the SoCal Metroplex, has there been any consideration as to the impact that will be caused by the increase in air traffic over surrounding area? If no, why not?
- c. Will there be any changes in GA flight patterns if the GAIP is approved? If yes, what will be the changes?

Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR; I await your response!

4

Sincerely,

Janni Richardson 714.310.4664

GINNY RILEY < griley145@yahoo.com> Tuesday, November 20, 2018 11:34 AM EIR627 From: Sent:

To: Subject: Airport

Attachments: 11.15.18 EIR Comments.docx

3-915

1

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

1. DEIR Complexity and Length Relative to Time Limitations for Comment:

The DEIR was made available for public review on September 20, 2018, with comments due on November 6, 2018, with an extension until November 21, 2018. Comment: This is an incredibly complex and detailed document that is over 600 pages in length, with 2,200 pages of appendices. Although members of the general public are invited to "comment" on the DEIR, it is submitted that most members of the general public are ill equipped to read through the entirety of the document, sufficiently understand it and respond to it with their comments and questions in the time allotted.

<u>Question</u>: Why can't additional time be provided for the review and comment to the DEIR?

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This section lists separate objectives of the GAIP, which appear only to benefit airport operations and profitability.

<u>Comment</u>: As you are surely aware, under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives clearly pertain the efficiency and economical benefits of the GAIP with no indication of concerns for the communities impacted by noise and pollution emanating from JWA.

Questions:

- a. Is the GAIP for the benefit of nonresident corporate jet aircraft?
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Sincerely,

Ginny Riley
1529 Dolphin Terrace
Corona del Mar, CA 92625
_griley145@yahoo.com_______(include your name, home and email addresses

From: Vicki Ronaldson <v.ronaldson@gmail.com>
Sent: Wednesday, November 21, 2018 8:30 AM

To: EIR627

Subject: my comments

November 21, 2018

Via Electronic Mail

EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

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If no, why not?

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Sincerely,

Vicki and Don Ronaldson 506 San Bernardino Ave NB CA 92663

v.ronaldson@gmail.com sallybeardog@gmail.com

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vicki 949-933-2332c

From: Paul Root <paul@madisonstreetpartners.net>
Sent: Wednesday, November 21, 2018 10:45 AM

To: EIR627
Subject: JWA
Attachments: JWA.pdf

Dear Ms. Choum-

Please see the attached letter in reference to the recent proposition regarding JWA.

Thank you,

Paul

Paul Root Partner Lic. 01250765

MADISON STREET PARTNERS Broker Lic. 01478228

4100 MacArthur Boulevard, Suite 350 | Newport Beach, CA 92660
T 949 468 2243 | F 949 585 9866 | C 949 874 5698

paul@mspcre.com | www.mspcre.com

3-927

1

November 17, 2018

Via Electronic Mail EIR627@ocair.com

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The DEIR was made available for public review on September 20, 2018, with comments due on November 6, 2018, with an extension until November 21, 2018. Comment: This is an incredibly complex and detailed document that is over 600 pages in length, with 2,200 pages of appendices. Although members of the general public are invited to "comment" on the DEIR, it is submitted that most members of the general public are ill equipped to read through the entirety of the document, sufficiently understand it and respond to it with their comments and questions in the time allotted.

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This section lists separate objectives of the GAIP, which appear only to benefit airport operations and profitability.

<u>Comment</u>: As you are surely aware, under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives clearly pertain the efficiency and economical benefits of the GAIP with no indication of concerns for the communities impacted by noise and pollution emanating from JWA.

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- e. If the GAIP is approved, what would be the largest GA jet aircraft that would be accommodated by JWA?
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Comment: Although related to the above comment, the health risk analysis ("HRA") in Section 4 of the DEIR is extremely complicated and confusing. The DEIR also relies heavily on the EIR submitted during the 2014 Settlement Agreement ("EIR 617") for its health risk analysis ("HRA"). It is submitted that reliance on the previous EIR is misplaced. EIR 617 relied on existing 2014 flight patterns prior to the implementation of the FAA Next Gen concentrated satellite driven precision flight patterns that are flown today. Furthermore, the DEIR does not anticipate the different emissions anticipated from the expected increase in GA jet aircraft if the GAIP is approved. To suggest that there will be a minimal increase in emissions is unrealistic and unsupported by any evidence.

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Questions:

- a. In arriving at the conclusion that the environmental impact of the GAIP is "less than significant," what consideration has been given to the schools, athletic fields, parks and residential areas located within a close proximity and under the flight paths of JWA? If the impact these populations have not been considered, why not?
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Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely,

Paul Root

341 Riviera Drive

Costa Mesa, CA 92627

From: John Carlos Rowe <johnrowe@usc.edu>
Sent: Tuesday, November 20, 2018 4:21 PM

To: EIR627

Subject: Letter concerning General Aviation Plan at JWA

Attachments: 11 15 18 EIR Comments.docx

Our letter protesting the draft EIR and the General Aviation Plan is attached. Please take special note of the first paragraph, which differs from the other letters you will receive. Thank you, John and Kristin Rowe, 700 Kings Rd., Newport Beach, CA 92663.

JKR-1

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

We are sharing a letter drafted on behalf of our community in protest of the proposed General Aviation Improvement Program, but we want to add personal observations about the air pollution in our neighborhood, Kings Road, Newport Beach 92663. As residents on this street for fourteen years, we have observed regular pollution from jet fuel that adheres to our decks, driveways, and other outdoor surfaces. This pollution is not the same as what is associated with automobile and truck traffic. It is a sticky substance that adheres to surfaces, rather than the black, carbon-like material identifiable with the exhaust from vehicles. Never does this form of air pollution get recognized in Environmental Impact Reports, and every effort we have made to bring such pollution to the attention of the local press and governments have been ignored. It is real, and we are sure it is a carcinogen. We wish to add our voices to our neighbors' protests of this hastily drafted and incomplete EIR, and we want to note specifically the importance of considering the direct pollution of incomplete jet fuel combustion and its negative impact on the lives of residents living in the paths of commercial airliners arriving and departing JWA. Please take this complaint seriously; the pollution is real and specific to the operation of airplanes.

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

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Sincerely,

John C. and Kristin H. Rowe 700 Kings Rd. Newport Beach, CA 92663

From: Elisabeth Schutz <esopbetsy@gmail.com>
Sent: Wednesday, November 21, 2018 6:18 PM

To: EIR627

Subject: 11.15.18 EIR Comments.docx

Attachments: 11.15.18 EIR Comments.docx; ATT00001.txt

Hello, Anita

My husband and I approve of this letter. We are out of town and unable to sign it, but please consider this message our approval.

1

Thank you,

Elisabeth and Andrew Schutz 69 Old Course Drive Newport Beach, CA 92660 949 219-0093 schutz@sbcglobal.net

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

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addresses	
(include your name, home and email	
Sincerely,	
regards to the GAIP and the Notice of Availability of the Final EIR.	

Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in

Letter 255

From: Christina Schwindt <christina.schwindt@yahoo.com>

Sent: Tuesday, November 20, 2018 10:53 AM

To: EIR627

Subject: Opposition to Airport Expansion **Attachments:** Opposition to Airport Expansion.pdf

Dear Ms. Choum,

Please find attached my letter opposing the expansion of John Wayne Airport.

CS-1

Sincerely,

Christina Schwindt

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

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<u>Comment</u>: As you are surely aware, under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives clearly pertain the efficiency and economical benefits of the GAIP with no indication of concerns for the communities impacted by noise and pollution emanating from JWA.

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Christina Schwindt
Christina Schwindt
629 Vista Bonita
Newport Beach, CA 92660
(949) 903-9089
Christina.Schwindt@yahoo.com

From: John Sciarra <johnsciarraca@gmail.com>
Sent: Tuesday, November 20, 2018 10:51 AM

To: EIR627 **Subject:** JWA / Airport

Attachments: Ronnie Airport.jpg; Ronnie Airport1.jpg; Ronnie Airport2.jpg; Ronnie Air.jpg; Ronnie Air1.jpg; Ronnie

Air2.jpg

Dear Ms. Choum: Please see very import attachments. Thank you.

Sincerely,

John M. Sciarra

3-955

1

November 17, 2018

Via Electronic Mail EIR627@ocair.com

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2104 MONNING STAR LANE
NEWPORT BEACH, CH, 92660 From: Matthew Shaw <mjshaw07@gmail.com>
Sent: Tuesday, November 20, 2018 10:35 AM

To: EIR627 **Subject:** EIR - JWA

Attachments: 11.15.18 EIR Comments letter.docx

Dear Ms. Choum - please see the attached letter.

Matthew Shaw Newport Beach, CA

3-962

1

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

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Sincerely,

Matthew Shaw, 1600 Anita Lane, Newport Beach - mjshaw07@gmail.com

From: Terry Shea <ctsoilandgas@earthlink.net>
Sent: Tuesday, November 20, 2018 4:25 PM

To: EIR627

Attachments: 11.15.18 EIR Comments.docx

See attached,

Thanks, Terry P Shea

Coastal Technical Sales, LLC Office Phone # 949-515-9101 Cell Phone # 714-299-8210 Fax # 949-515-9123

www.coastaltechsales.com

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November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

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1	(include your name, home and emai

Terry. Patrick Shea

Addresses: 471 Walnut Place, Costa Mesa, Ca. 92627

Email: ctsoilandgas@earthlink.net

RECEIVED
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JWA

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Terry A Sheward (include your name, home and email

1 my askeward

1231 Bayside Dr Corone del Mar, Ca 92625

terrysæshewards. com

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From: Carrie Slayback <carrieslayback@gmail.com>
Sent: Wednesday, November 21, 2018 12:19 PM

To: EIR627

Subject: General Aviation Improvement Program

November 21, 2018

Via Electronic Mail EIR627@ocair.com

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2

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Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely, Carrie Slayback	
carrieslayback@gmail.com	(include your name, home and email addresses

From: Brad Smith <bradsmith406@outlook.com>
Sent: Tuesday, November 20, 2018 10:44 AM

To: EIR627

Subject: RE: GAIP-Draft Environmental Impact Report (SCH No. 2017031072)

November 17, 2018 Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum

Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

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Sincerely,

Brad Smith, 132 Via Waziers, Newport Beach, CA 92663

From: Greg Smith < gmsmith10@gmail.com>
Sent: Wednesday, November 21, 2018 11:13 AM

To: EIR627

Subject: 11.15.18 EIR Comments **Attachments:** 11.15.18 EIR Comments.pdf

Hello Ms Choum,

We are located in East Bluff and are significantly impacted by the aircraft noise... Unfairly I/we might add as they continue to fly either far to one side of the bay or, recently, overhead directly.

Please review my document and comment

Best Regards, Gregory M Smith

3-989

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November 17, 2018

Via Electronic Mail EIR627@ocair.com

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Gregory & Joyce Smith

2142 Vista Dorado

Newport Beach, CA 92660

Gmsmith10@gmail.com

714-743-2438

From: Marion Smith <newportmarion@hotmail.com>

Sent: Tuesday, November 20, 2018 8:13 PM

To: EIR627

Subject:John Wayne Airport Aviation studyAttachments:John Wayne Airport Aviation study.docx

Letting non commercial flights/ general aviation utilize JWA at any time of the day and night will impact the neighborhoods.

We are NOT in agreement for this to be approved in the city of Newport Beach or flying over residential properties.

Please do more study on this. Kindly, Ms Smith

MS-1

November 17, 2018

Via Electronic Mail EIR627@ocair.com

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Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely, Marion Smith

110 Via Quito, Newport Beach, Lido Isle	
92663	
	(include your name, home and email
addresses	

From: Alan Ayria <alanayria@yahoo.com>
Sent: Wednesday, November 21, 2018 8:49 AM

To: EIR627

Cc: Goli Soulati; Fraidoun Soulati

Subject: JWA EIR commnets

Attachments: Letter to JWA Land Use Mgr re Comments on EIR.21Nov2018.docx

Please see attached letter

3-1003

1

November 20, 2018

Via Electronic Mail to: EIR627@ocair.com

Ms. Lea Choum, Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft EIR (SCH No. 2017031072)

Dear Ms. Choum,

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

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Dr. F Soulati and Mrs. G. Soulati 328 Vista Trucha, 000 Vista Cajon, NB 92660; gsoulati@yahoo.com

From: Tracy Specter <tracyelmer@yahoo.com>
Sent: Wednesday, November 21, 2018 5:40 AM

To: EIR627

Subject: Airplane noise, curfew, pollution

November 17, 2018

<u>Via Electronic Mail</u> <u>EIR627@ocair.com</u>

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program - Draft Environmental Impact Report (SCH No. 2017031072)

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Tracy Specter

2515 Blackthorn St. Newport Beach, CA 92660

tracyelmer@yahoo.com

Sent from my iPhone

From: Lisa Stanton < lisabstanton@gmail.com>
Sent: Tuesday, November 20, 2018 1:28 PM

To: EIR627

Subject: Resident Comments, DEIR, GAIP

November 20, 2018

Via Electronic Mail EIR627@ocair.com

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Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely,

 2692 Circle Drive

Newport Beach, CA 92663

Sent from my iPhone

From: jpstavale@aol.com

Sent: Tuesday, November 20, 2018 7:38 AM

To: EIR627

Subject: JWA - Airport Noise **Attachments:** Aviation Letter.pdf

Please read attached and respond.

Thank you, Joani Stavale 23 Canyon Crest Dr. 92625

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

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The DEIR was made available for public review on September 20, 2018, with comments due on November 6, 2018, with an extension until November 21, 2018. Comment: This is an incredibly complex and detailed document that is over 600 pages in length, with 2,200 pages of appendices. Although members of the general public are invited to "comment" on the DEIR, it is submitted that most members of the general public are ill equipped to read through the entirety of the document, sufficiently understand it and respond to it with their comments and questions in the time allotted.

<u>Question</u>: Why can't additional time be provided for the review and comment to the DEIR?

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This section lists separate objectives of the GAIP, which appear only to benefit airport operations and profitability.

<u>Comment</u>: As you are surely aware, under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives clearly pertain the efficiency and economical benefits of the GAIP with no indication of concerns for the communities impacted by noise and pollution emanating from JWA.

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Sincerely,	
JOAN 7. STAVACE	
PStovole (i	nclude your name, home and email
addresses 23 Canuar Cact	Da
Corona del Mar	e, CA
92625	
épstavale	@aol.com
1/00.00	2018

To: Cc: Subject:	EIR627 William O'Neill Please Listen
Attachments:	scan.pdf
November 20, 2018	
Ms. Lea Choum	
Land Use Manager a	at JWA
3160 Airway Avenue	
Costa Mesa, CA 926	26
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Louis Stavale < ljstavale@aol.com>

Tuesday, November 20, 2018 9:07 AM

From: Sent:

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ljstavale@aol.com

Corona Del Mar, CA 92625

(949) 355-1992

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

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Sincerely,

Louis J Stavale 23 Canyon Crest Drive Corona Del Mar, CA 92625 <u>lstavale@cox.net</u> (949) 355-1992

3-1037

6

From: Julie Stephenson <julie4re@roadrunner.com>
Sent: Wednesday, November 21, 2018 3:02 PM

To: EIR627

Subject: Fw: New Development at John Wayne Airport

Attachments: 11.15.18 EIR Comments.docx

See attached signed petition



This email has been checked for viruses by Avast antivirus software. www.avast.com

3-1038

1

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

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From: Rick Strack < rick.strack@gmail.com>
Sent: Tuesday, November 20, 2018 11:09 AM

To: EIR627

Subject: Environmental Impact Report **Attachments:** 11.15.18 EIR Comments (1).docx

Please see attached letter.

Thank You Rick Strack 949/ 697-2610 rick.strack@gmail.com

3-1045

1

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Comment: The DEIR conclusion that the GAIP will be not significantly cause a negative impact to the community in terms of noise, air quality, hazardous materials, etc., is unrealistic. It is submitted that there has been an insufficient consideration of the additional noise and pollution that will be created; especially considering the leaded fuel mixture used by private GA jet aircraft and their exemption from curfew hours under GA regulations. There have been numerous studies reported in many peer-reviewed scholarly journals that airport noise and pollution have serious health impacts for neighboring communities. It is unrealistic to conclude that if the GAIP is approved that there will be no significant negative environmental impact to Newport Beach and other neighboring communities.

Furthermore, the assumptions supporting the noise analysis are flawed and unrealistic. The projection that by 2016, 40% of the Boeing 737 and Airbus A320 aircraft using JWA will include the quieter 737-MAX and Airbus A320-Neo is sheer speculation and is in conflict with the 2014 Settlement Agreement EIR noise modeling.

Questions:

- a. As GA jet aircraft have a long history of violating noise limits, how will this be better controlled, especially given the current lack of regulation of the GA jet aircraft fleet?
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- d. Why wasn't the negative impact of an additional 5-10% noise generating Back Bay departure pattern by the large corporate jets on the same neighborhood impacted by commercial departures considered in the Noise Impact section of the Appendix? As this would have the same impact as a net increase in commercial departures that would replace aircraft that were previously fanning after takeoff and not impacting these neighbors, why wasn't this considered?

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Comment: Although related to the above comment, the health risk analysis ("HRA") in Section 4 of the DEIR is extremely complicated and confusing. The DEIR also relies heavily on the EIR submitted during the 2014 Settlement Agreement ("EIR 617") for its health risk analysis ("HRA"). It is submitted that reliance on the previous EIR is misplaced. EIR 617 relied on existing 2014 flight patterns prior to the implementation of the FAA Next Gen concentrated satellite driven precision flight patterns that are flown today. Furthermore, the DEIR does not anticipate the different emissions anticipated from the expected increase in GA jet aircraft if the GAIP is approved. To suggest that there will be a minimal increase in emissions is unrealistic and unsupported by any evidence.

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- a. In arriving at the conclusion that the environmental impact of the GAIP is "less than significant," what consideration has been given to the schools, athletic fields, parks and residential areas located within a close proximity and under the flight paths of JWA? If the impact these populations have not been considered, why not?
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<u>Comment</u>: Although the DEIR states there will be no change in flight patterns, it is unclear as to the flight patterns that were used for its analysis. It is also unclear what flight patterns would be followed by GA jet aircraft upon approval of the GAIP. Clarification is needed to assess the differences between GA and commercial aircraft departure patterns and how they might change upon approval of the GAIP.

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Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely,

Richard D. Strack 2005 Baja Newport Beach, CA 92660

rick.strack@gmail.com

From: Louise Stuart <lstuart@stuart-davis.net>
Sent: Monday, November 19, 2018 8:35 PM

To: EIR627

Subject: Draft Environmental Impact Report 627 for the GAIP

Attachments: 11.15.18 EIR Comments.pdf

Please see attached regarding our concerns in connection with the Draft Environmental Impact Report 627 for the GAIP.

1

Thank you for your consideration.

Louise J. Stuart Craig S. Davis

November 19, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

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Louise J. Stuart Craig S. Davis 554 Vista Flora Newport Beach CA 92660 lstuart@stuart-davis.net

From: Vikki Swanson < vikki@vikkiswanson.com> Sent: Wednesday, November 21, 2018 1:56 PM

EIR627 To:

Subject: JWA Private Jet craft EIR comments **Attachments:** Swanson 11 15 18 EIR Comments.docx

Please see attached comments re: the EIR regarding the proposed changes to the rules pertaining to private jets at JWA.

VS-1

-Vikki Swanson

419 Marguerite Ave Corona del Mar, CA 92625

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

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- c. Will there be any changes in GA flight patterns if the GAIP is approved? If yes, what will be the changes?

Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Obviously this is a pre-written letter. I have read the letter above and while I have not taken the time to read the EIR in its entirety, I can say that the letter echos my sentiments on this issue.

Sincerely,

Víkkí Swanson

vikki@vikkiswanson.com

From: Shannon Tarnutzer <smtarnutzer@gmail.com>

Sent: Tuesday, November 20, 2018 4:29 PM

To: EIR627

Cc: Pfg1941@gmail.com **Subject:** JWA Aircraft Noise Letter

Attachments: OC Airport.pdf

Dear Ms. Choum,

Attached please find a letter regarding the airport noise.

Shannon Tarnutzer <u>smtarnutzer@gmail.com</u> 949-939-1557 cell

3-1073

1

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program - Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

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The DEIR was made available for public review on September 20, 2018, with comments due on November 6, 2018, with an extension until November 21, 2018. Comment: This is an incredibly complex and detailed document that is over 600 pages in length, with 2,200 pages of appendices. Although members of the general public are invited to "comment" on the DEIR, it is submitted that most members of the general public are ill equipped to read through the entirety of the document, sufficiently understand it and respond to it with their comments and questions in the time allotted.

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Furthermore, the assumptions supporting the noise analysis are flawed and unrealistic. The projection that by 2016, 40% of the Boeing 737 and Airbus A320 aircraft using JWA will include the quieter 737-MAX and Airbus A320-Neo is sheer speculation and is in conflict with the 2014 Settlement Agreement EIR noise modeling.

Questions:

- a. As GA jet aircraft have a long history of violating noise limits, how will this be better controlled, especially given the current lack of regulation of the GA jet aircraft fleet?
- b. Is an increase in GA jet aircraft nighttime arrivals and departures anticipated? If yes, how many nighttime arrivals and departures are anticipated?
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<u>Comment</u>: Although the DEIR states there will be no change in flight patterns, it is unclear as to the flight patterns that were used for its analysis. It is also unclear what flight patterns would be followed by GA jet aircraft upon approval of the GAIP. Clarification is needed to assess the differences between GA and commercial aircraft departure patterns and how they might change upon approval of the GAIP.

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5

From: Karen Taylor < ktaylor01@roadrunner.com>
Sent: Wednesday, November 21, 2018 2:50 PM

To: EIR627

Subject: General Aviation Improvement Program

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

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1

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2

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Comment: Although related to the above comment, the health risk analysis ("HRA") in Section 4 of the DEIR is extremely complicated and confusing. The DEIR also relies heavily on the EIR submitted during the 2014 Settlement Agreement ("EIR 617") for its health risk analysis ("HRA"). It is submitted that reliance on the previous EIR is misplaced. EIR 617 relied on existing 2014 flight patterns prior to the implementation of the FAA Next Gen concentrated satellite driven precision flight patterns that are flown today. Furthermore, the DEIR does not anticipate the different emissions anticipated from the expected increase in GA jet aircraft if the GAIP is approved. To suggest that there will be a minimal increase in emissions is unrealistic and unsupported by any evidence.

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Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

4

Sincerely,

Karen Taylor 1100 Devon Lane Newport Beach, CA 92660 ktaylor01@roadrunner.com

From: Elizabeth Thamer <elizabeth.thamer@gmail.com>

Sent: Wednesday, November 21, 2018 7:14 PM

To: EIR627

Subject: John Wayne Airport Proposed Changes

Attachments: 11.15.18 EIR Comments.pdf

For your consideration!

Elizabeth Thamer

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Elizabeth Thamer REAL ESTATE PROFESSIONAL <u>elizabeth.thamer@gmail.com</u> M. 949.433.5011 T. 949.698.1323 F. 949.698.1322 VILLA REAL ESTATE 450 NEWPORT CENTER DRIVE, SUITE 100 NEWPORT BEACH, CA 92660 <u>VILLAREALESTATE.COM</u> CAL BRE No. 01169245

1

November 17, 2018

Via Electronic Mail EIR627@ocair.com

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Sincerely,

_(include your name, home and email address)

Elizabeth Thamer 351 Vista Madera Newport Beach, CA 92660

From: Laura Thomson <Nbjacks@aol.com>
Sent: Tuesday, November 20, 2018 1:13 PM

To: EIR627 **Subject:** DEIR

Sent from my iPhone Laura

November 17, 2018

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Sincerely,

Laura Thomson Nbjacks@aol.com 853 Via Lido Soud Newport Beach, CA 92663

From: Shelly Trainor (via Google Docs) <mathtrainor@gmail.com>

Sent: Wednesday, November 21, 2018 11:06 AM

To: EIR627

Subject: 11.15.18 EIR Comments

mathtrainor@gmail.com has shared a link to the following document:



11.15.18 EIR Comments

Open in Docs

Google Docs: Create and edit documents online.

Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA

You have received this email because someone shared a document with you from Google Docs.

1



November 21, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

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S Trainor <d4md4m@gmail.com> From:

Wednesday, November 21, 2018 11:06 AM Sent:

To: EIR627

Subject: **EIR Comments**

11.15.18 EIR Comments

3-1099

1

November 21, 2018

Via Electronic Mail EIR627@ocair.com

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Sent: Tuesday, November 20, 2018 6:45 AM

To: EIR627

Subject: Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No.

2017031072)

Attachments: 11.15.18 EIR Comments FV 11-20-18.pdf

Please see attached letter.

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Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely,

Fini Van Natta

902 S. Bayfront

Balboa Island, CA 92662

Queenmom@the-castle.net

Fini Van Natta

From: Earl Votolato <earlv@spellboundinc.com>
Sent: Wednesday, November 21, 2018 8:22 AM

To: EIR627

Subject: EIR627 letter- please respond

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

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Earl Votolato.	2908 Cliff Dr, Newport Beach, Ca 92663.	Earljv@sbcglobal.net <mailto:earljv@sbcglobal.net> (include your name, home and email addresses</mailto:earljv@sbcglobal.net>	

From: Kimberly Votolato <votolato01@sbcglobal.net>
Sent: Wednesday, November 21, 2018 8:55 AM

To: EIR627

Subject: EIR627 please address all questions

Ms. Lea Choum

Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

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Sincerely
Kimberly Votolato
Email me or send answers via mail. votolato01@sbcglobal.net
Address
2908 Cliff Dr
Newport Beach, Ca 92663

3-1122

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From: Ronnie Weinstein <ronnie_weinstein@comcast.net>

Sent: Tuesday, November 20, 2018 10:28 PM

To: EIR627 Subject: GAIP

Attachments: 11.15.18 EIR Comments.docx

3-1123

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November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

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The DEIR was made available for public review on September 20, 2018, with comments due on November 6, 2018, with an extension until November 21, 2018. Comment: This is an incredibly complex and detailed document that is over 600 pages in length, with 2,200 pages of appendices. Although members of the general public are invited to "comment" on the DEIR, it is submitted that most members of the general public are ill equipped to read through the entirety of the document, sufficiently understand it and respond to it with their comments and questions in the time allotted.

<u>Question</u>: Why can't additional time be provided for the review and comment to the DEIR?

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This section lists separate objectives of the GAIP, which appear only to benefit airport operations and profitability.

<u>Comment</u>: As you are surely aware, under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives clearly pertain the efficiency and economical benefits of the GAIP with no indication of concerns for the communities impacted by noise and pollution emanating from JWA.

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- b. Is the GAIP for the benefit of local corporate jet aircraft?
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Comment: The DEIR conclusion that the GAIP will be not significantly cause a negative impact to the community in terms of noise, air quality, hazardous materials, etc., is unrealistic. It is submitted that there has been an insufficient consideration of the additional noise and pollution that will be created; especially considering the leaded fuel mixture used by private GA jet aircraft and their exemption from curfew hours under GA regulations. There have been numerous studies reported in many peer-reviewed scholarly journals that airport noise and pollution have serious health impacts for neighboring communities. It is unrealistic to conclude that if the GAIP is approved that there will be no significant negative environmental impact to Newport Beach and other neighboring communities.

Furthermore, the assumptions supporting the noise analysis are flawed and unrealistic. The projection that by 2016, 40% of the Boeing 737 and Airbus A320 aircraft using JWA will include the quieter 737-MAX and Airbus A320-Neo is sheer speculation and is in conflict with the 2014 Settlement Agreement EIR noise modeling.

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Comment: Although related to the above comment, the health risk analysis ("HRA") in Section 4 of the DEIR is extremely complicated and confusing. The DEIR also relies heavily on the EIR submitted during the 2014 Settlement Agreement ("EIR 617") for its health risk analysis ("HRA"). It is submitted that reliance on the previous EIR is misplaced. EIR 617 relied on existing 2014 flight patterns prior to the implementation of the FAA Next Gen concentrated satellite driven precision flight patterns that are flown today. Furthermore, the DEIR does not anticipate the different emissions anticipated from the expected increase in GA jet aircraft if the GAIP is approved. To suggest that there will be a minimal increase in emissions is unrealistic and unsupported by any evidence.

Comment: The DEIR is also woefully deficient in its discussion of the potential health impacts to more sensitive members of the community, especially the impact on children. The DEIR discusses "sensitive receptors" and "sensitive populations" noting only those closest to the boundary of JWA, specifically mentioning a residential development approximately 855 feet from the boundary of IWA and airport workers. In response, there have been numerous studies conducted and published in peer-reviewed scholarly journals about the serious health issues caused by airports, over flights, departures and arrivals on children and adults in communities under the flight paths. These studies have confirmed that children suffer cognitive deficits and respiratory illnesses, while the general population suffers undue stress, heart disease, high blood pressure, cognitive decline, auditory problems, heart attacks, strokes and greater cancer risk. Similarly, research studies have concluded that the adverse health affects from airport pollution are present within 10 miles of an airport. There are thousands of children in schools well within a distance of 10 miles from the JWA departure paths and thousands of people who live under the flight paths.

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Questions:

- a. In arriving at the conclusion that the environmental impact of the GAIP is "less than significant," what consideration has been given to the schools, athletic fields, parks and residential areas located within a close proximity and under the flight paths of JWA? If the impact these populations have not been considered, why not?
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<u>Comment</u>: Although the DEIR states there will be no change in flight patterns, it is unclear as to the flight patterns that were used for its analysis. It is also unclear what flight patterns would be followed by GA jet aircraft upon approval of the GAIP. Clarification is needed to assess the differences between GA and commercial aircraft departure patterns and how they might change upon approval of the GAIP.

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Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely,

Ronnie & Cathy Weinstein 505 Evening Star Lane Newport Beach, CA 92660

Ronnie_weinstein@comcast.net

From: Portia Weiss < portiaweiss@gmail.com>
Sent: Tuesday, November 20, 2018 9:34 PM

To: EIR627

Subject: General Aviation Improvement Program

Attachments: 11.15.18 EIR Comments.pdf

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November 20, 2018

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Sincerely,

Portia Weiss

portiaweiss@gmail.com 421 San Bernardino Avenue Newport Beach, CA 92663

From: Richard Weiss <rickweissmd@gmail.com> on behalf of Richard Weiss <drweiss@drweiss.com>

Sent: Wednesday, November 21, 2018 8:41 AM

To: EIR627

Subject: Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No.

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4

c.	Will there be any changes in GA flight patterns if the GAIP is approved? If yes, what will be the changes?
	ank you for your consideration of my comments and questions. Please keep me informed of all developments related this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.
Sin	cerely,
Ric	hard Weiss
421	veiss@drweiss.com L San Bernardino Avenue wport Beach, CA 092663
	(include your name, home and email addresses

If no, why not?

From: Laura White <lalakwhite@gmail.com>
Sent: Wednesday, November 21, 2018 2:56 PM

To: EIR627

Subject: General Aviation Improvement Program - signed copies

Attachments: Doc.pdf; ATT00001.htm

Lea,

This is in regards to the General Aviation Improvement Program. I have attached my husband and my signed copy. TLW-1

Thanks,

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

1. **DEIR Complexity and Length Relative to Time Limitations for Comment:**

The DEIR was made available for public review on September 20, 2018, with comments due on November 6, 2018, with an extension until November 21, 2018.

Comment: This is an incredibly complex and detailed document that is over 600 pages in length, with 2,200 pages of appendices. Although members of the general public are invited to "comment" on the DEIR, it is submitted that most members of the general public are ill equipped to read through the entirety of the document, sufficiently understand it and respond to it with their comments and questions in the time allotted.

TLW-2

Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely,

(inclu

de your name, home and email address)

1 400 Lucheng Ster La
Neuport Grain ca. 92660

Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely,

Alua Wolle (include your name, home and email address)

1 400 EVENING STAR LW Neuport Beach, Ca 92460

[alakwhite@g mail. com

November 21, 2018

Via Electronic Mail EIR627@ocair.com

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Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

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<u>Question</u>: Why can't additional time be provided for the review and comment to the DEIR?

2. Project Objectives (Section 3).

This section lists separate objectives of the GAIP, which appear only to benefit airport operations and profitability.

<u>Comment</u>: As you are surely aware, under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives clearly pertain the efficiency and economical benefits of the GAIP with no indication of concerns for the communities impacted by noise and pollution emanating from JWA.

Questions:

- a. Is the GAIP for the benefit of nonresident corporate jet aircraft?
- b. Is the GAIP for the benefit of local corporate jet aircraft?
- c. Have local corporations been surveyed regarding their interest in housing their jets at JWA? If no, why not? If yes, what have been their responses?
- d. Does the GAIP benefit the exiting fleet of privately owned piston-powered driven aircraft owners who have historically based their aircraft at JWA? If yes, how?
- e. Will the GAIP result in a decrease of smaller privately owned piston-powered aircraft at JWA?
- f. How does a decrease in the number of smaller privately owned pistonpowered aircraft based at JWA and an increase in larger GA jet aircraft, benefit Newport Beach and neighboring communities?
- g. What is the basis for the assumptions of daily departure and arrival of GA jet traffic, including larger corporate aircraft, which will be displacing smaller GA private planes?
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- i. Will there be a cap or a maximum number of GA jet aircraft departures allowable during a 24-hour period? If yes, how many? If no, why not?
- j. How does the GAIP, with its goal of accommodating large corporate jet aircraft at JWA through building additional hangers, benefit Newport Beach and other neighboring communities?
- k. Will the GAIP result in an increase of international flights to JWA via GA jet aircraft?
- l. If the GAIP increases the number of international flights in and out of JWA, will there be a cap or maximum number allowed during any a 24-hour period? If yes, what will be the maximum number? If no, why not?
- m. How many international flights are anticipated to arrive at JWA on a daily or weekly basis?
- n. What type of TSA-type security screening will be conducted regarding the increasing numbers of larger international GA aircraft if the GAIP is approved? Please describe in detail.
- o. What is the predicted net average daily change in aircraft departures and arrivals if the GAIP is approved?
- p. How many GA privately owned jets will JWA be capable of handling during a 24-hour period if the GAIP is approved?
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3. DEIR Conclusions that Environmental Impacts are Insignificant (Section 4).

<u>Comment</u>: The DEIR conclusion that the GAIP will be not significantly cause a negative impact to the community in terms of noise, air quality, hazardous materials, etc., is unrealistic. It is submitted that there has been an insufficient consideration of the additional noise and pollution that will be created; especially considering the leaded fuel mixture used by private GA jet aircraft and their exemption from curfew hours under GA regulations. There have been numerous studies reported in many peer-reviewed scholarly journals that airport noise and pollution have serious health impacts for neighboring communities. It is unrealistic to conclude that if the GAIP is approved that there will be no significant negative environmental impact to Newport Beach and other neighboring communities.

Furthermore, the assumptions supporting the noise analysis are flawed and unrealistic. The projection that by 2016, 40% of the Boeing 737 and Airbus A320 aircraft using JWA will include the quieter 737-MAX and Airbus A320-Neo is sheer speculation and is in conflict with the 2014 Settlement Agreement EIR noise modeling.

Questions:

- a. As GA jet aircraft have a long history of violating noise limits, how will this be better controlled, especially given the current lack of regulation of the GA jet aircraft fleet?
- b. Is an increase in GA jet aircraft nighttime arrivals and departures anticipated? If yes, how many nighttime arrivals and departures are anticipated?
- c. Will JWA place a cap or limit on the number of nighttime arrivals and departures of GA jet aircraft? If yes, what limitations will be established? If no, why not?
- d. Why wasn't the negative impact of an additional 5-10% noise generating Back Bay departure pattern by the large corporate jets on the same neighborhood impacted by commercial departures considered in the Noise Impact section of the Appendix? As this would have the same impact as a net increase in commercial departures that would replace aircraft that were previously fanning after takeoff and not impacting these neighbors, why wasn't this considered?

- e. If the GAIP is approved, what would be the largest GA jet aircraft that would be accommodated by JWA?
- f. How would the noise from departing large GA jet aircraft compare with the noise emitted from the commercial jet fleet currently using JWA? If this analysis has been done, what is the basis for the analysis?
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- h. Do the GAIP conclusions of no significant noise or pollution impact take into consideration the Next-Gen satellite-precision concentrated flight paths that have clearly has a significant negative impact on Newport Beach? If yes, what conclusions have been drawn? If no, why not?

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Comment: Although related to the above comment, the health risk analysis ("HRA") in Section 4 of the DEIR is extremely complicated and confusing. The DEIR also relies heavily on the EIR submitted during the 2014 Settlement Agreement ("EIR 617") for its health risk analysis ("HRA"). It is submitted that reliance on the previous EIR is misplaced. EIR 617 relied on existing 2014 flight patterns prior to the implementation of the FAA Next Gen concentrated satellite driven precision flight patterns that are flown today. Furthermore, the DEIR does not anticipate the different emissions anticipated from the expected increase in GA jet aircraft if the GAIP is approved. To suggest that there will be a minimal increase in emissions is unrealistic and unsupported by any evidence.

Comment: The DEIR is also woefully deficient in its discussion of the potential health impacts to more sensitive members of the community, especially the impact on children. The DEIR discusses "sensitive receptors" and "sensitive populations" noting only those closest to the boundary of JWA, specifically mentioning a residential development approximately 855 feet from the boundary of IWA and airport workers. In response, there have been numerous studies conducted and published in peer-reviewed scholarly journals about the serious health issues caused by airports, over flights, departures and arrivals on children and adults in communities under the flight paths. These studies have confirmed that children suffer cognitive deficits and respiratory illnesses, while the general population suffers undue stress, heart disease, high blood pressure, cognitive decline, auditory problems, heart attacks, strokes and greater cancer risk. Similarly, research studies have concluded that the adverse health affects from airport pollution are present within 10 miles of an airport. There are thousands of children in schools well within a distance of 10 miles from the JWA departure paths and thousands of people who live under the flight paths.

4 3-1149

Questions:

- a. In arriving at the conclusion that the environmental impact of the GAIP is "less than significant," what consideration has been given to the schools, athletic fields, parks and residential areas located within a close proximity and under the flight paths of JWA? If the impact these populations have not been considered, why not?
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- c. Did the County in the preparation of the DEIR review and consider recent research concerning the health and welfare of populations living within a close proximity of airports? Within 10 miles of JWA?
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<u>Comment</u>: Although the DEIR states there will be no change in flight patterns, it is unclear as to the flight patterns that were used for its analysis. It is also unclear what flight patterns would be followed by GA jet aircraft upon approval of the GAIP. Clarification is needed to assess the differences between GA and commercial aircraft departure patterns and how they might change upon approval of the GAIP.

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5 3-1150

Thank you for your consideration of my comments and questions. Please keep us informed of all developments related to this DEIR, including public notices with regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely,

Kammi & Steve Wilson 1532 Highland Drive

Newport Beach CA 92660 kgenova@hotmail.com

6 3-1151

From: Kammi Wilson <kgenova@hotmail.com>
Sent: Wednesday, November 21, 2018 12:53 PM

To: EIR627 **Subject:** GAIP

Attachments: 11-21-18 EIR Comments.pdf

November 17, 2018

Dear Ms. Choum:

Please see the attached letter, copied within the body of this email for your convenience.

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3

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Thank you for your consideration of my comments and questions. Please keep us informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

4

Sincerely, Steve & Kammi Wilson 152 Highland Drive Newport Beach CA 92660

Comments Made at the September 26, 2018 Public Meeting

3.7 COMMENTS MADE AT THE SEPTEMBER 26, 2018 PUBLIC MEETING

The County of Orange conducted a public meeting during the public review period on the Draft Program Environmental Impact Report ("EIR"). The meeting was held on September 26, 2018, in the City of Costa Mesa at the John Wayne Airport Commission Hearing Room. There were a total of 8 speakers who made a total of 28 comments during the comment period of the public meeting. In addition, 18 comments were made by members of the audience during the public presentation portion of the meeting, for a total of 46 comments. The meeting was recorded and a transcript made, including the recorded comments provided by the public at the meeting. As with the comment letters, the transcript is bracketed and numbered to identify each comment, with the corresponding responses provided after the transcript.

For those comments made during the formal comment period of the public meeting (Responses 19 through 47), the name of the speaker is listed under the response number. For those comments made during the public presentation portion of the meeting, the names of the commenters are not known because it was not the designated portion of the meeting for making comments. As a result, these speakers did not introduce themselves.

John Wayne Airport Public Meeting Public meeting on:) Draft Program Environmental Impact Report 627) JWA Draft EIR) Meeting Recording for John Wayne Airport General Aviation Improvement Program) 09/26/18 Transcription of digitally recorded public meeting on Draft Program Environmental Impact Report No. 627 for the John Wayne Airport General Aviation Improvement Program (PUBLIC COMMENTS SECTION) Transcribed by Martha McCool

John Wayne Airport

Public Meeting

JWA Draft Program EIR 627 Meeting Recording 09/26/18

LEA CHOUM: The easiest way out is the way you came in, through the doors or through the kitchen.

At the back table where you came in there is a sign in sheet. If you haven't signed it, please do so before you leave. We are also providing some handouts at the back table. There are comment cards if you'd like to write your comments and leave them in the box in the back tonight, which is fine. Or you can take the comment cards with you and send them in later. Ok, comment cards, we also have some handouts on the back table as well. There are some exhibits and some general information on the EIR, so go ahead and take those with you and they will be helpful for you as Kathleen goes through her presentation, and I think with that let's get started.

KATHLEEN BRADY: Thank you, Lea. As Lea indicated, my name is Kathleen Brady, I am with Psomas and we are a consulting firm and I am in the Environmental Group, and so also working on this project was Landrum and Brown, providing technical studies and is actually the prime consultant and then AECOM, that did a lot of the engineering concept plans and the aviation component of the project.

So we tested this earlier and the little buttons, As far as what we are going to talk about tonight, I figured I'd just give you a quick run through as to what the topics that we are going to be addressing and that we're going to be reviewing as Lea indicated, the EIR, which was prepared consistent with the California Environmental Quality Act, or CEQA. We are going to be discussing the development of the General

Aviation Improvement Program or GAIP for short and that includes the process and the objectives that were developed, the findings of the EIR and then how to review and provide comments on the document.

So here is the Airport, the image, is basically owned and operated by the County of Orange. It's on a total of 503 acres, approximately 400 of those are dedicated to the airfield area. There is areas for parking north of the freeway and also a component of the golf course south of the Airport and it is bordered by the cities of Costa Mesa, Irvine and Newport Beach and two runways, one for commercial and one for general aviation.

The, just an overview of the General Aviation facilities that are out there now. There is capacity for 596 general aviation aircraft and it is home base to about 400. There are others that come in as transient, they are here just for a few days or a few hours even and the general aviation has consistently represented the majority of the operations at the Airport.

In 2016, which is our base year, because when we started this study that was the first year with full data and so general aviation represented 67 percent of the total operations out of the Airport. So general aviation is a big component here at John Wayne Airport and so the general aviation services that are offered at the Airport are listed up here, the aircraft storage and fueling, charter services, aircraft rental, maintenance, flying lessons, sales and aviation related supplies and then ground transportation and catering may also be available through some of the fixed based operators.

The reasons for the GAIP, is this is the first time since 1990 that a comprehensive study of the general aviation facilities has been conducted and as I will show you in a few minutes, the general aviation

takes up a good part of the geography of the Airport as well. Since 1990, there has been a lot of changes in the GA operations, communities, the type of aircraft that are out there, and the fleet mix being used out of the Airport, and then also the advanced age of the facilities - a lot of these are quite old and have reached the end of their useful life and so they need to be replaced. Some of the old hangars and such. And then a component of the project also is to comply with the FAA standards related to proximity of buildings to runways. There is like four improvements that are proposed that are non-standard features now. Also, the general aviation, a lot of the long term leases are up or going to be up and this is a great opportunity to do a comprehensive look so that it can be the most long-range looking study that they can, as far as what the real needs are rather than trying to piecemeal things together.

So the study started in 2015 and Airport staff conducted a series of meetings with the general aviation tenants and stakeholders, to identify what the general aviation community wanted to see at the Airport and what the issues are that should be addressed in the GAIP. And that actually as I get into some of the common elements, you will see that those are the things that were identified and then alternatives were developed and a consultant team was brought in and then coordinated with the stakeholders on the development of those alternatives. And then the EIR process started in 2017 with the release of the Notice of Preparation and I will get into that a little bit later.

So these are the objectives that were development for the project and to ensure that the facilities were safe and secure and to enhance that, given how small the Airport is, as Airports go, this is a postage

stamp size Airport. And so, a lot of demands on the Airport for various uses and desires and so to most efficiently accommodate those uses and to have a compatibility between the general aviation and the commercial aviation components of the operations that are out at the Airport and to embrace flexibility as a lot of things have changed since 1990, the last time that the comprehensive study was done. And, there will be continued changes in the future, so to try to have it as flexible as possible. And to recognize what the market trends are, and to be sure that the plan is economic and self-sustaining for the Airport from a revenue perspective. And to assess the ability of the existing infrastructure to support the general aviation facilities.

The preliminary review as I indicated that came up with the number of alternatives, the preliminary review was in conformance with FAA standards, pretty self-explanatory to be sure that any of the improvements and such were meeting FAA standards. To be sure that the operational characteristics such as the ground taxi flows and such like that, and the impacts for air traffic controllers and then to be sure that the layouts of the facilities were going to be effective for the FBO and I will get to that in a minute, it is fixed base operators, they are the people that have the leases out at the Airport for providing some of the services and so to be sure that what was planned also works for the people who would be using it.

So as I said, I will show you the physical areas of the Airport. So what you see there is the outline of the Airport and the area shaded in yellow is the portion that we've studied in our GAIP. This is the area that is focused for general aviation, there is two little cutouts one at the southeastern corner of the Airport and that's the fuel farm area and we are not doing anything to the fuel farms, and then over at

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the Lyon Air Museum area the Lyon, or the Martin Aviation leasehold area that has a lease until 2036, so that was excluded from the study as well.

And so now, the fun part, CEQA. So we have prepared a Program EIR and what a Program EIR is, it addresses a larger scale component of a project where there is multiple aspects of it and when we are looking at it as a whole. We are looking at it at the 30,000 foot level - of what the impacts of the GAIP would be. And, CEQA encourages you to do a Program EIR when the projects are all part of a larger component so you are not piecemealing the project, because you can take one little aspect and you can start doing all these little projects, but you have never looked at the comprehensive plan as a whole. So, what this project is doing is looking at the comprehensive plan and it allows you to look at those cumulative impacts which are added all up together. It may be more than the parts than looked at individually, and then to avoid duplication of effort and to reduce paperwork so that if there is 14 or 15 phases on a project and various aspects being implemented, that you are not doing 14 or 15 Environmental Impact Reports. I do Environmental Impact Reports, you don't want to do them, 14 or 15 of them.

As far as what the project description is, this EIR, CEQA lots of times has you look at the project, or proposed project and then there is an alternatives section. This EIR is a little different, in that we took two alternatives, one called the Proposed Project and one called Alternative One. We looked at them at equal level of consideration. So, as you go through each of the technical topics, we address Proposed Project and Alternative One all at an equivalent level. But there is a number of, excuse me, of common components of them and they both have

provisions of full service and limited service fixed base operators.

And, as I said, an FBO is a business that has a grant by the Airport to operate aeronautical services, for the fueling, hangar, tie down parking, aircraft rental, aircraft maintenance and flight instruction and a full service one offers a wider range, where a limited services is going to be more focused.

And both of the projects have a place for the flight schools, which are out there now and their use would continue. They both correct the four nonstandard features that are currently out there, that I mentioned earlier. They are both proposing that there will be a general aviation terminal, which would be at one of the FBO's but shared by all of them and this would be a place for pilots to come or for people who are going to be on a charter flight or something to meet. And then also have a general aviation facility which is for customs, for a general aviation plane coming in from out of the country, so right now what those planes need to do is, they need to land somewhere else like Brown Field and go through customs, and then fly up here. And this way they would be able to fly in directly from out of the country. And, they all would have a facility for self-service fueling at the Airport, right now the Airport does not have the capacity for self-service fueling.

PUBLIC QUESTION DURING PRESENTATION: So customs cannot be called out?

KATHLEEN BRADY: I do not believe that they do that for general aviation.

So as far as what we are calling the Proposed Project and I am, you know what did, nope I got them right here, I'm going to point to some of the handouts. Some of this stuff is in the 11x17 handout and then the one that is stapled does have a, shows exhibits of each of these alternatives, which I have been presenting there as well as a

table in the back that does a comparison of the key features and that will be a handy reference if you want it. It's all in one place and as the handout indicates, the exhibit numbers and the table numbers are the references of the EIR, because these are directly from the EIR.

So the Proposed Project has a full service west FBO and a full service east FBO and so there is a total of two which is basically what is operating at the Airport now. There would be one limited service FBO and that is in addition to the Martin Aviation, that I mentioned earlier that there lease extends to 2036. And the total aircraft storage capacity would be reduced to 354 aircraft and because of the reduction in number of aircraft that could be based here there would also be a reduction in the number of general aviation flights. So it shows that the projections which came from AECOM, they did that aspect of the project as well, 167,900 annual flights compared to the 192,800 in 2016. And this would be completed in 14 primary phases, and construction would be expected to be completed by 2026, and there is the exhibit and as I said from the size.

18	PUBLIC QUESTION DURING PRESENTATION: Yes, (inaudible questions)	2
19	KATHLEEN BRADY: There is a capacity for 596, there's 480 that are out	
20	there right now. So it would be a reduction from not only of capacity	
_ 21	but from compared to what is actually out there now.	
22	PUBLIC QUESTION DURING PRESENTATION: You said a consultant did the	3
23	preliminary with the GA community, so 200 aircraft.	3
24	KATHLEEN BRADY: I think for the type of facilities, in order to fit in	
25	the facilities. The type of facilities that the demand is, I personally	
- 26	was not involved in these meetings.	
27	PUBLIC QUESTION DURING PRESENTATION: That was in the introduction that	4
	you consulted?	4
20		4

KATHLEEN BRADY: That the Airport and the consultant AECOM did consult 1 2 with them and. 5 PUBLIC QUESTION DURING PRESENTATION: Somehow that came up as desirable? 3 KATHLEEN BRADY: I believe it was so they can have the type of facility 4 the hangars and such as requested. 5 Yes, so and then Alternative One, has three full service FBO's. 6 One would be on the west side, and two would be on the east side and 7 there will still be the one limited service FBO in addition to Martin 8 Aviation and that would be on the southwest side of the Airport. The 9 total aircraft storage capacity here would be 356 aircraft and the 10 number of flights would be 168,600. 11 PUBLIC QUESTION DURING PRESENTATION: What is the difference between a 12 6 full service FBO and a limited service FBO? 13 KATHLEEN BRADY: Like Jay's aircraft is out there and is limited service 14 and they do maintenance and they are much more focused as opposed to 15 having a lot more services for the pilots and giving the whole suite of 16 services. 17 And this would all be implemented in 15 primary phases, and some 18 of the phasing is because it is so small and needing to be moving 19 aircraft around. So as they are doing construction of one area, 20 recognizing that they are not going to be able do everything on the 21 west side because there is not capacity to move the people around and 22 the exhibit, which as I said is in the handout, which is probably the 23 easiest one to look at. 24 So what have we done so far, for as far as outreach for the 25 public. We had a what is called the scoping meeting. We sent out a 26 Notice of Preparation which was an initial study that goes through all 27 the topics on the CEQA checklist. There are 18 topical areas and I want 28

to say it is 86 questions and where there could potentially be impacts. That was distributed, CEQA actually calls for you to send them to public agencies, the Airport actually elected to send them to, provide them to, a much larger circulation and have them on their website and such. And we had a scoping meeting right here in this room, back in April of last year. And there was, they received 13 letters, and the distribution are there - some from state agencies, three from regional agencies, five from local agencies, one from an organization and two from individuals. And so those letters are all in the, included in the EIR as part of Appendix A as is the Notice of Preparation. Based on that analysis, the EIR addressed the 11 topical areas as well as the cumulative and long term implications of the project and the alternatives. In addition to the Proposed Project and Alternative One, there was still an alternatives section in the EIR.

So as a result of that, one of the big things to remember when assessing the impacts, is that a lot of this stuff is happening out there now, so it's basically replacing facilities. It's not like we are going in and taking areas that have never been developed with aviation uses and putting them on there. So we are going to be taking down old hangars and be putting up new hangars and a lot of that there's not a lot of impacts.

One of the only significant unavoidable impacts was tied to land use compatibility and I will get to that as I go through all the topical areas, and it was tied to homes that are, would be exposed to the 65 CNEL that have not taken advantage of the sound insulation program and there is no avigation easement. The only other impacts could be reduced to insignificant.

	PUBLIC QUESTION DURING PRESENTATION: Those two programs, were upgrading	
2	the housing for noise impact with windows?	7
3	KATHLEEN BRADY: Yes, and so as far as the topical areas for Aesthetics,	
	it was basically found that construction activities would have a short	
	term visual impact and there could also be some nighttime construction	
	which would result in the need for lighting, night lighting and those	
	impacts were the same for both alternatives. And then we also	
	identified that if one of the projects came in and proposed solar	
	panels that there could be glint and glare which is a big deal when it	
	is at an Airport.	
	So associated with that we have measures addressing both of those	
	things. As far as for the staging areas, put in visual screening and	
	that they have to do the solar studies pursuant to the FAA	
	requirements. So based on that, the impacts would be less than	
	significant.	
	PUBLIC QUESTION DURING PRESENTATION: Just to be clear your document	
	indicates you did not consider Aesthetics?	8
	KATHLEEN BRADY: Well we evaluated Aesthetics	
	PUBLIC QUESTION DURING PRESENTATION: But you did not provide an	0
	Aesthetics study?	9
	KATHLEEN BRADY: There is not a separate technical study, the analysis	
	is in the EIR.	
	PUBLIC QUESTION DURING PRESENTATION: There is general confusion.	10
	KATHLEEN BRADY: If you look at the document, there is a fair amount in	
	there, we talk about. I don't have a design of the projects so at this	
	point it is program level, so I can't tell you that the.	
	PUBLIC QUESTION DURING PRESENTATION: Can you tell us why you chose not	11
Ш	to do an Aesthetics study?	1 11

1	KATHLEEN BRADY: Because at this point I don't have a design so I can't	
2	tell you that the Northwest FBO is going to have a rock facing or a	
3	rock façade, or it's going to have, what it's going to look like.	
4	PUBLIC QUESTION DURING PRESENTATION: So you will do an Aesthetics	
5	study?	12
6	KATHLEEN BRADY: Those issues will be addressed as each element comes	
7	in. So from Aesthetics from the CEQA it looks at the sensitive view	
8	sheds, who the actual people are that are seeing the facilities and to	
9	be honest with you the Airport does not have a lot of sensitive view	
10	sheds.	
11	PUBLIC QUESTION DURING PRESENTATION: That is up for debate, at this	
050207	stage of the game you have not addressed any of the viewsheds	13
12	whatsoever.	
13	KATHLEEN BRADY: We, as you look in there, there is a lot of photographs	
14	that show what the views are from surrounding the Airport.	
15	PUBLIC QUESTION DURING PRESENTATION: I actually have some of the	
16	photographs from the existing conditions that you have provided and yet	14
17	several of the items you didn't address as part of those findings?	11
18	KATHLEEN BRADY: That would be a great comment to make and then we can	
19	respond to it in writing for you.	
20		15
21	PUBLIC QUESTION DURING PRESENTATION: We'd like to do that.	15
22	KATHLEEN BRADY: Yes, that would be great, and that is what Lea was	
23	talking about, being able to provide the comments.	
24	KATHLEEN BRADY: For the Air Quality, studies were done and the	
25	construction impacts did identify a potential significant impact for	
26	nitrogen oxides or NOx prior to mitigation, and that was to both	
27	alternatives. Mitigation was applied, it required tier 4, the highest	
28	most advanced level of equipment for the construction. Yes	
		3-1168

PUBLIC QUESTION DURING PRESENTATION: In regards to air quality, when you were looking at the fuel farm, are you looking at the impact on unleaded fuel?

KATHLEEN BRADY: To be honest with you I did not do that study, I can research and get back to you on that.

LEA CHOUM: If it is okay with everyone, let's hold our questions until the actual comment period so we can get through the presentation.

KATHLEEN BRADY: Ok, sounds good.

And that the operational emissions would be less than significant. The, as I said, the mitigation measures would be tied to the construction equipment that would be used that would be requiring the most advanced equipment.

For Cultural Resources, the area, the airfield is very disturbed already, it's been constructed already, fields that we don't anticipate impacts to archeological, paleontological and there is no historic resources on the Airport. However, the County does have standard conditions of approval that they apply to all projects that would require monitoring by an archeologist or paleontologist. When it is in native soils and that way if there is something that is found during construction they would be able to appropriately handle the finding.

Greenhouse gases is another technical study that was completed, it was done to the South Coast Air Quality Management District standards and impacts would be less than significant and there is a lot more detail obviously in the EIR on all of this. The document is just about 600 pages, plus another 2200 and something or other in appendices. So if you really want to get into the detail, that is all in the document.

For Hazardous Materials the construction impacts were found to be less than significant. Hazardous Materials is an area that is highly regulated and I have listed some of the compliance requirements that the Airport operates under now and those would obviously continue.

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For Land Use and Planning, there would be a reduction in the number of GA aircraft based at the Airport and there would be additional units exposed to the 65 CNEL standard used for when there is a noise impact. And, that three of those units do not have avigation easements. And, I must point out that is the case with the Proposed Project, Alternative One and the No Project Alternative. Those three additional homes are predicted to be exposed to the increase noise just because of the difference between 2016 and 2026. And, that there is a sound insulation program in place that was adopted in 1985 with the Master Plan and then in 2014 there was an updated one with the Settlement Agreement Amendment that was processed and that it is recognized that, as with those three, there is going to be people that choose not to participate and so you can end up with homes that are exposed to higher noise levels. Than the general plan interior noise standards, so it's a conservative approach but that is kind of the standard the Airport has used.

For Noise, there is a minor increase in general aviation, in the noise at the Airport compared to the baseline. However based on the thresholds that have been adopted, the incremental increase would not be significant and as I've indicated before, there would be additional homes exposed, but they would be able to apply for the sound insulation program.

PUBLIC QUESTION DURING PRESENTATION: Is that a change in your measurement or the type of aircraft?

KATHLEEN BRADY: This has nothing to do with commercial, so all of our studies when we say to the no project, if you look at the projections, a change just even in general aviation — and that is something that really actually is a great point — is that this study is focused on General Aviation. We are not doing anything for changing commercial carriers or their operating procedures or anything with flight tracks.

PUBLIC QUESTION DURING PRESENTATION: I appreciate it. I have one more question for you. I'm confused because you said 30,000 less flights and an increase in noise levels is not quite?

KATHLEEN BRADY: Yes, it is because of the projected type of aircraft.

And in the EIR it does do a distribution of aircraft by general categories.

Ok, Transportation, there would actually be slightly fewer trips and that goes back to the fact that there would be slightly fewer aircraft. But, there would be a slight redistribution of more to the west side because you'd have a complete full service Fixed Base Operator over on this side. But, the impacts, are, were not significant.

Tribal Culture Resources, a new topic that CEQA requires we address. This is slightly different then archeology, and so again because of the disturbed nature of the site, that it is not expected that they are going to find any significant, Tribal Cultural Resources. But there is a provision that when they get into native soil that the tribes would be asked to participate in monitoring and so we call it a minimization measure because there is no real impact there. But they would still be required to comply, it does go into the Mitigation monitoring program of the project.

And Utilities, there would be new connections with new buildings and such, but the overall usage demand is not expected to be substantial and when evaluating what the assumptions are as far as the number of people and the water supplies and the sewer capacity that is for the Airport as a whole, it is still within that envelope and the impact and the project.

One of the actual benefits of the project is a lot of these facilities are pretty old and that as they rebuild they would need to comply with the California Green Building Code and the current standards as opposed to the ones that were in place at the time that they were built.

Water Quality. It's not expected to exceed the capacity of the storm drain system. The Airport is predominantly an impervious surface. There is a few dirt areas that we aren't going to be affecting, like between the runways. It's mostly an impervious surface and the flood control channels and the basins for water quality treatment have all been sized to accommodate all the flows at the Airport. And here again are a listing of some of the requirements that they are required to meet.

And, so as far as where the document is, you can look at it here during business hours, here at the Airport, and they also have a hardcopy, and they also have a computer set up where you are able to come in and look at it. It's in 11 libraries and the addresses of the libraries are listed on the inside of the larger handout there. You can provide comments on the comment card, which are back there, or you can just write letters. The comment cards can get turned in tonight or you can, they are a tri-fold where if you fold it, it has Lea's address on it so it will come directly to her. And the document is also online.

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Here is the website - you don't need to write it down, it is in the handout. This one here, it is listed, the place to send the comments, the address is listed. And, under how can I access it, the web address is in the handout. So this is just repeating where the comments can be sent, this is on the comment cards. It's also in your handout, and we actually very much encourage you to go ahead and submit comments in writing. We will be taking in all the comments that we receive and we will be responding to the comments pertaining to environmental issues in writing. All comments do get forwarded as part of the final package to the decision makers. So even if you are just expressing an opinion on the project, you like it you don't like it, or what have you, that will get forwarded to the decision makers. And as far as when the comments are due, as Lea indicated, they are due November 6, so that gives you a fair amount of time to get in your comments. And then she also mentioned there will be an opportunity to present comments to the Airport Commission and the Board of Supervisors on the project and that is in the first quarter of 2019. Guessing, late February and then updates on the project are provided at the website there.

So if people want to get up here and make comments, you are welcome to it. Generally, we do ask that you try to keep your comments to three minutes, so that people, that it gives everyone the opportunity to make a comment and I am starting.

1	PUBLIC COMMENTS:	
2	DANIEL FREEDMAN: Hi, My name is Daniel Freedman and I am a pilot and a	
3	user of the Airport both commercial and general aviation and I am the	
4	owner of one of the airplanes that is based here. I'm delighted that	
5	the project is going ahead to modernize the facilities of the Airport.	
6	I am very concerned however, that about 25 percent of the airplanes	
7	that are based here are going to be asked to leave. And I recognize	10
8	that this is an environmental hearing and perhaps not the right forum	19
9	to express concerns generally but I do have those concerns. From an	
10	environmental perspective I'm wondering whether the impact of where	
11	those aircraft are going to go and whether the environmental impacts we	
12	have had here are, the commutes, etc., etc., that are going to be	
13	required, is that being taken into account?	
14	KATHLEEN BRADY: It was, it was identified, we identified that like	
15	Fullerton has currently about 200 aircraft based there and they have	
16	capacity for 600. We looked at Long Beach, and there was an estimate on	
17	the amount of vehicle miles that would need to be traveled for aircraft	
18	that are displaced, to be going there. As far as the issues such as,	
19	air emissions and stuff it's all in the same air basin, so it would be	
_ 20	pretty much the same there.	
21	DANIEL FREEDMAN: Thank you for that, that is all I had but I am very,	
22	very concerned that 25 percent of the aircraft are going to be asked to	19 cont.
23	leave.	
24	KATHLEEN BRADY: That is a great comment to put down	
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1	DANIEL FREEDMAN: Thank you very much.	
2	KATHLEEN BRADY: Ok, Thank you.	
3	GARY SCHANK, COTO DE CAZA: Hi, my name is Gary Schank, I live in Coto	
4	de Caza. I am an airline pilot as well as an owner of an aircraft here.	
5	One of my concerns, I look at this and see one of the studies has to do	
6	with how it affects Native Americans, and I get that it is about	
7	diversity and inclusivity and I hope you bring that same philosophy to	
8	the diversity and inclusivity of the type of airplanes that operate	
9	here, because I think you are lumping in general aviation and in that	
10	I think when you talk about for instance, well was that desirable and	
11	they said yes for those facilities and I think the people who desire	2.0
12	those things were biz jets, and you include biz jets in this GA large	20
13	group, this diverse aircraft, biz jets in effect are commercial	
14	aircraft, they are operated by pilots that are paid to fly them and	
15	they are operated for the purpose of going somewhere and conducting	
16	business and making money. That is not the same as our airplanes, our	
17	small airplanes. So the concern is that, when you look at general	
18	aviation, you are looking at biz jets. I get it, they are nice and	
19	profitable, they make a lot of money at the Airport. But I hope you	
20	take into consideration, the diversity includes the small airplanes	
21	KATHLEEN BRADY: Yes.	
22	GARY SCHANK: And an indication of that is when you started the program	
23	you said well the 20 Right is for the commercial airplanes and 20 left	
24	is for GA airplanes, and I assure you that a GA airplane has to shoot	21
25	an instrument approach because he can't get in here otherwise, 20 right	
25 26	is for us too.	
27	KATHLEEN BRADY: That's true, that is an excellent point, thank you.	
28	19	
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1	GARY SCHANK: Ok so that's what we are hoping, that diversity expands to	
2	the little guys.	
3	KATHLEEN BRADY: Yes.	
4	GARY SCHANK: Thanks.	
5	KATHLEEN BRADY: One thing, just to comment on that is the EIR does	
6	break down as far as what the projections are, by the type of aircraft	
7	in various categories and there is actually a table in Section 5, I	
8	want to say it's table 5-2, but I am kind of going by memory, that will	
9	show what all the assumptions are. There is a series of tables in	
10	section 5 which is alternatives which shows a comparison of the number	
11	of flights, the number of aircraft by type and so you might be	
12	interested in looking at that	
13	GARY SCHANK: Ok, because you look at that for instance and the	
14	difference in the amount of airplanes here it goes from 596 to whatever	
15	it was but you call it a general aviation improvement program but to	22
16	the 242 who got booted out I don't think improvement is the word they'd	
_17	be looking at.	
18	KATHLEEN BRADY: Now, what thing to remember, is of the, there is	
19	capacity for 596, but there is only 480 that are out there, there is a	
20	lot of empty spaces out there	
21	GARY SCHANK: Do you know how it would be determined who gets the boot	23
22	and who doesn't?	23
23	KATHLEEN BRADY: I do not	
<u>24</u>	GARY SCHANK: Ok	
25	FRED FOURCHER, CORONA DEL MAR: I am Fred Fourcher, and I live in Corona	
26	Del Mar. I've had my aircraft on the field here for about 30 years, and	24
27	I am also the founder of the Orange County Pilots Association and as a	2 1
28	representative of the general aviation piston community, our needs are	
		3-1176
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to not have our numbers reduced but also more hangars, when we look at 1 2 the waiting list for tie downs there isn't one, but when we look at the waiting list for hangars, it's 35 years. So, it's anything we can do to 3 improve the number of hangars that are in the plan, we'd be in favor of 4 that and we also respect that the FBO's need to have newer and better 5 facilities, I think moving things around the field and optimizing the 6 space on the field based upon the heights that are allowed in areas and 7 24 cont. setbacks, that we could achieve the number of aircraft in hangars, 8 general aviation piston and also jet aircraft and we could optimize 9 that space for both communities. What I am not seeing in these plans is 10 an attempt to optimize the space. I am seeing 3 different plans but 11 none that are a step ahead. It really helps us for both what is called 12 the turbine community and the piston community, so what I would like to 13 see is an alternative that shows how we improve it for both. 14 you. 15 KREG GROAT: Hello my name is Kreg Groat and I represent the CPF Airway 16 Associates, we are adjacent property owners on the Airport, we own 2990 17 Airway as well as 3000 Airway and in addition to our support to general 18 aviation, a couple of my comments, we wanted to just get on record here 19 this evening. We will be submitting our final comments during the 20 review period and to the approving agency, however we did feel as 21 25 though it is important to realize that you have provided a document 22 that is first of all 600 pages. There is over 2000 ancillary pages. 23 California Regulations, Section 14-*15 141 limits an EIR to 300 pages. 24 KATHLEEN BRADY: Recommended 25 KREG GROAT: It is recommended. CEQA should follow those quidelines or 26 if nothing else, provide the general public an opportunity for a more 27 thorough review of these documents. These are thousands of pages and 28

1	so I anticipate that any request would be reasonably be met with an	25 .
2	extension, if that was appropriate.	25 cont.
3	KATHLEEN BRADY: Yes I am a consultant and I won't answer that	
4	KREG GROAT: That is interesting as a consultant. The actual outline of	
5	the EIR itself, several of the existing conditions were not addressed.	
6	In fact, if you went on our property and took a photo of a freight gate	
7	that is the only freight gate that currently serves John Wayne Airport	
8	and yet it appears as though by your dimensions and plans you intend to	26
9	eliminate that gate which serves the commercial aviation market and as	
10	well as provides access for all of our tenants to the Airport. Nothing	
11	was mentioned, nothing was mentioned about the existing heliport on one	
12	of the buildings and what impact your structures would have on those	
13	general aviation activities, the aesthetics, we talked about that a	
14	minute ago. You said it didn't seem to be impactful yet you placed all	
15	your buildings in front of other adjacent property owners that have	
16	window views and you didn't place your buildings in front of properties	27
17	that don't have any window views. It just seems like some of this was	
18	quickly assessed or quickly done or somebody chose to overlook some of	
19	these issues. We would like to have those addressed. Furthermore, I	
20	also think, you made the comment that there would be slightly fewer	
	trips for general aviation. I'm not so sure but our math indicates 20%,	
21	I don't know if that is slightly.	28
22	KATHLEEN BRADY: Fewer vehicle trips	
23	KREG GROAT: No you said fewer aircraft, you said 190,000 to 160,000,	
24	yes that is 20 percent.	
25	KATHLEEN BRADY: When I was talking about traffic, I was talking about	
26	the number of automobiles.	
27		
28	23	
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1	KREG GROAT: I see, well general aviation obviously built this Airport	
2	and I think we should continue to support it. I understand everybody's	
3	needs for hangars and those types of things, which we all encourage but	
4	it does seem as though there maybe a little more attention given to	
5	some of the placement where those hangars and general aviation aircraft	20
6	are being located so as to utilize the space more efficiently. I	29
7	noticed the first phase of your construction suggest tearing down all	
8	of the covered hangars for all the general aviation airplanes and don't	
9	provide any kind of subsequent coverings other than hangars. Is that	
10	correct that was evaluated?	
1	KATHLEEN BRADY: As far as other shade structures, yes I believe at this	
12	point there are no shade structures proposed.	
13	KREG GROAT: Well we will provide our comments and hopefully you will be	
4	reasonable in requesting additional time to review the documents.	30
.5	KATHLEEN BRADY: That request should also be submitted to Lea in	
16	writing.	
17	KREG GROAT: Thank you very much.	
.8	JOE DAICHEIDT: Good Evening, my name is Joe Daicheidt, I am with ACI	
9	Jet, pilot here, learned to fly at John Wayne Airport 12 years ago. Got	
20	2,000 hours flying. I live in Ladera Ranch and I love John Wayne	
21	Airport, learned to fly with Sunrise Aviation, Michael Church. I want	
22	to start out by saying that general aviation is thriving again at John	31
42		
	Wayne Airport and I see every reason for that trend to continue in	
23	Wayne Airport and I see every reason for that trend to continue in spite of the data and the analysis from 2016 forward. I think it is	
23	AND	
23 24 25	spite of the data and the analysis from 2016 forward. I think it is	
23 24 25 26	spite of the data and the analysis from 2016 forward. I think it is critical for the success of Orange County that the Airport remains as	32

1	benefit of two years of data that shows that this was wrong. The	
2	numbers are increasing so we cannot reduce GA aircraft at John Wayne.	
3	In fact we either got to maintain it or increase it. JWA for the	
4	business side needs new hangars, there is no way today to put a global	
5	7000 in a hangar today on jacks if it needs repairs, so this plane has	
6	been designed, tested and engineered and flown, yet we don't have	32 cont.
7	hangars today to even house it and that product is already alive and	
8	real in the business community. Piston aircraft, there has been a surge	
9	in this at John Wayne Airport and the piston aircraft, the tie downs	
10	are starting to get filled up again. It wasn't long ago there was a	
11	two year wait list for tie downs and then it went very vacant and bare	
12	and now they are filling up again. So it's important we have self-	33
13	service fuel farms and that we have full service at a very low cost but	33
14	my top comment is a quicker and faster and more clear approach to the	
15	completion of the process. A document that I prepared was just taking a	
16	look at JWA's website beginning 16 months ago about when the timelines	
17	of the entire GAIP was complete and I know there is a lot of work going	
18	into this. I know there is a ton of people working a lot of different	
19	ways, but this analyzed 16 months and I'd like to submit this for the	
20	record. If you look at the deadlines that were there back in mid-2017	
21	to where they are today, in a period of 16 months, they've all been	34
22	pushed back about 12 months' worth of delays, so the trend is rough,	
23	it's difficult to see that we are going to arrive at a final product	
24	anytime soon. So I would ask that we get a more focused approach, that	
25	we not look at 12 steps of phasing but 3 steps of phasing, not 3 FBO's	
26	but 2 FBO's, not wasting space where airplanes can be parked inside not	
27	outside, we don't need to triplicate places that can be done more	
28	efficiently. But that's it, I really appreciate the time today.	1

1	KATHLEEN BRADY: Thank you, any other comments.	
2	JOE FINELL: These tall guys, that's better, thank you. My name is Joe	
3	Finnell. I've had an airplane tie down here since 2000 and since the	
4	time I brought it here, I actually, it was here when I bought it. It	
5	was occupying a space in the tie down area, the open area and at that	
6	time there was a waiting list for people just to get a tie down and due	
7	to the influx of, I don't know if I'd say money grabbers but	
8	essentially it turns out, it was too expensive to keep my airplane	
9	here. And, I think a number of people over the years have realized	
10	that and they actually have moved their airplanes off the Airport.	35
11	And, it hasn't been that long ago that you can drive to the Airport and	
12	see a number of vacancies out there. Now you mentioned that right now	
13	you have the capacity and with the number of airplanes that are there,	
14	you intend to decrease the capacity. Now how long do you think it's	
15	going to be before you exceed that capacity and again you are forcing	
16	airplanes to not park here and that to me is something that is really	
17	important. I can't afford a hangar myself. I would love to have one but	
18	I can't so I am forced to use the tie down space and I am happy to have	
19	that. It's convenient for me. And, by the way there are a number of	27
20	issues I take with this impact, this environment program but I'm not	36
21	going to go through those at this point, but essentially I want to let	
22	you know that our association, the So Cal Pilots Association, is very	
23	much aware of what is going on here and we've been involved in some of	27
24	the early meetings of what has developed here, and however we seem to	37
25	be left out of some of those meetings. So I think that I'd like to	
26	make a point that we'd like to be more involved and would like to have	
27	a say in what is happening at the Airport. You probably were here and	38
28	remember when the shades were an issue. Our association actually made a	30
	25	
		3-1181
•		

1	move to get those shades built. We were very happy when that occurred	
2	and essentially it would really be a blow to us to see those shades	38 cont.
3	torn down. I will be making further written comments.	
4	KATHLEEN BRADY: Ok, thank you I appreciate that it, thank you very	
5	much.	
6	JIM MOSHER, NEWPORT BEACH: Thank you, my name is Jim Mosher. I am a	
7	resident of Newport Beach, I am not a pilot. I do live near the flight	
8	path for the commercial planes, so my concern is about how this	
9	improvement project is going to affect the number of what has been	39
10	called biz jets here. I am not sure if those are constrained, if the	
11	same flight paths are the same as the commercial ones, next gen change	
12	or not. But many of them seem to depart over Newport Beach and	
13	according to the quarterly noise reports released by the Airport, we	
14	currently have about 3,000 per month of those general aviation biz jet	
15	operations per month, which figure to a hundred per day, landings per	
16	day, so that is about 50 departures. The EIR was released so soon to	40
17	this meeting I haven't had time to look through the 600 pages let alone	
18	the 2,200 so I'm wondering if in the EIR it analyzes, of those 50	
19	departures per day how many of those are coming from the based aircraft	
20	here and how many are coming from visiting jets.	
21	KATHLEEN BRADY: I do not believe so, but put it in writing, and I will,	
22	as I said there was an aviation consultant and those sort of questions	
23	will be directed to them.	
24	JIM MOSHER: Then the particular concern is how this new configuration	
25	in the future, in the long range not just 10 years from now in 2026 but	
VII. (1.00)	in the longer range from now, how that is going to affect the ultimate	41
26	number of biz jets that will be based here as well as visiting and how	
27	that will affect the likely frequency which, will they operate. You	
28		
		3-1182

1	have indicated in your report that the general aviation numbers have	
2	fluctuated greatly like from 500,000 operations down to 200,000 down to	
3	100,000, at one time. I assume that is not due to the number, is not	
4	because of convenience or easy enough to operate. So if the same number	
5	of planes is operating more frequently, so if the EIR is just saying	41 cont.
6	many jets will be here, my concern is how frequently those planes are	
7	going to be operating, and I have no idea if those things are addressed	
8	in the EIR or not or how the new configuration will encourage more or	
9	less frequency.	
10	KATHLEEN BRADY: There was forecast, flight forecast and that was the	
11	information that we used, that we took through our study.	
12	JIM MOSHER: Without reading that I cannot understand what that is based	
13	on and the biggest question I have is the EIR has been delayed by many	
14	months, 3 months. It was expected to be released in June, we are in	
15	September and it is being release now. The Airport Commission which	
16	meets in this room, asked the Airport Director what the reason for the	
17	delay is and I hope I am not misquoting him, but I believe the Airport	
18	Director said something about the initial noise results were not what	42
19	the Airport expected to see and there was a delay so they could go back	
20	and get a different noise model. The original one was too generic or	
21	something like that and you wanted something that gave more accurate	
22	results for John Wayne Airport and I am wondering if you can explain	
23	what that is. Why was the noise study that you didn't like the results	
24	and you came back with one that you did?	
25	KATHLEEN BRADY: No, and that is a good question to put in writing	
26	because it's going to be one that will be better responded to, by the	
27	noise consultant. The FAA has adopted a new noise model and so there	
28	was some calibration issues that needed to be taken care of and someone 27	
		3-1183

1	who knows a lot more about the specifics will be able to answer that	
2	for you.	
3	BOB LANGE: My name is Bob Lange, I am a pilot here at the Airport and I	
4	am an aircraft owner and representative from the Pilots Association for	
5	John Wayne Airport. We have been following this closely. I am a	
6	general aviation pilot and I want to mimic Captain Schank's comment.	
7	This really isn't about General Aviation, this is about Corporate	
8	Aviation, when people think about general aviation they think of my	40
9	little Cessna. But really this is about biz jets, this is about more	43
10	biz jets and fewer smaller airplanes. When we closed down tie downs for	
11	smaller airplanes here it is unrealistic to think that somebody who	
12	lives in South County or anywhere near this Airport are going to get in	
13	their car and drive to Long Beach to go clean the wings of their Cessna	
14	some Friday afternoon, or to Fullerton. So really it means they are	
15	being taken out of the question. When we look at a fuel service and we	
16	don't look at unleaded gasoline we go in the face of the environmental	
17	warning that is on the gate of this Airport warns you that leaded	44
18	gasoline is toxic and we are raining that leaded gasoline all over our	44
19	neighbors at the Airport. To look at the future of General Aviation	
20	here and not look at an unleaded gas is not right and I am not sure	
21	it's moral. In every aviation Airport that I go to in Europe, two	
22	bladed props like I have on my airplane are illegal because they put	
23	out about a third more noise than a three bladed prop. To not look at	
24	the noise impact of our two bladed props in this area and to look at	45
25	where we have a phase for clean idle truck during construction and is	
26	looking at a grain of sand on the beach and is avoiding the 500 pound	
27	gorilla in the room. Naturally, I will put all of these things in	
_28	writing and so that we can comment on them. But my hope is that other	46
	28	
		3-1184

people in the audience will take up some of these bigger picture ideas along with customs facilities. This is not about the maybe 30 pilots a month that are going to go down to Mexico or fly home from Cuba like I 46 cont. do and want to go through customs facilities here. This is about having customs facilities here so we can piggyback on international flights on the other side of the Airport. Thanks for your time. KATHLEEN BRADY: Thank you, anybody else want to comment tonight? Well, as I said, comment period closes November 6. You can submit comments in writing, just letters, or on the comment cards, or via email and they will all be reviewed and responded to. And that package will then go to the Airport Commission and to the Board of Supervisors. So unless there is anything else, or if you want to say anything ok. Thank you so much for coming.

Comments Received After the Public Review Period

3.8 COMMENTS RECEIVED AFTER THE PUBLIC REVIEW PERIOD

After the public review period ended on November 21, 2018, the County received 28 additional comment letters/emails. Although the State CEQA Guidelines do not require that the County respond to these late comments, the County has elected to prepare written responses because they were received within the timeframe when responses were being prepared. The names of those submitting late comments are listed below.

Of the 28 comment letters received after the public review period, 10 are the standardized letter. In the listing below, those with **(sl)** after the name submitted the standardized letter. The bracketed standardized letter is included in Section 3.6. If supplemental comments were included with the standardized letter, those comments are bracketed on the individual letter. Those with supplemental comments are noted with **(sc)** after their name.

- Kathryn Anderson (sl)
- Susan and Sam Anderson
- Camille and Matthew Beehler
- Matthew Christensen (sl)(sc)
- CPF Airway Associates
- CPF Airway Associates
- Scott Fischer (**sl**)
- Marilynn Henry
- Roger Hughes (sl)
- Janssen (sl)⁵
- Julie Johnson (2 through 9)
- Holly Kincaid (sl)
- David and Cathy Lichodziejewski
- Beverly Blais Moosmann
- Beverly Blais Mossmann
- Christine Northridge (sl)
- Bonnie and Dan O'Neil (sl)
- City of Santa Ana
- SCL Equipment Finance submitted by Barbara Griffith (sl)
- Myriam Shapiro
- Veronica Sheward (sl)

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⁵ Letter not signed and only what appears to be a last name is indicated on the envelope.

From: Kathryn Anderson <mkathryna@gmail.com>

Sent: Friday, November 23, 2018 7:29 AM

To: EIR627

Subject: General Aviation Improvement Program

Via Electronic Mail EIR627@ocair.com Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626 Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072) Dear Ms. Choum: As a member of the general public and a concerned resident of Costa Mesa who lives under the flight path, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"): 1. DEIR Complexity and Length Relative to Time Limitations for Comment: The DEIR was made available for public review on September 20, 2018, with comments due on November 6, 2018, with an extension until November 21, 2018. Comment: This is an incredibly complex and detailed document that is over 600 pages in length, with 2,200 pages of appendices. Although members of the general public are invited to "comment" on the DEIR, it is submitted that most members of the general public are ill equipped to read through the entirety of the document, sufficiently understand it and respond to it with their comments and questions in the time allotted. Question: Why can't additional time be provided for the review and comment to the DEIR? 2. Project Objectives (Section 3). This section lists separate objectives of the GAIP, which appear only to benefit airport operations and profitability. Comment: As you are surely aware, under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives clearly pertain the efficiency and economical benefits of the GAIP with no indication of concerns for the communities impacted by noise and pollution emanating from JWA. Questions: a. Is the GAIP for the benefit of nonresident corporate jet aircraft? b. Is the GAIP for the benefit of local corporate jet aircraft? c. Have local corporations been surveyed regarding their interest in housing their jets at JWA? If no, why not? If yes, what have been their responses? d. Does the GAIP benefit the exiting fleet of privately owned piston-powered driven aircraft owners who have historically based their aircraft at JWA? If yes, how? e. Will the GAIP result in a decrease of smaller privately owned piston-powered aircraft at JWA? f. How does a decrease in the number of smaller privately owned pistonpowered aircraft based at JWA and an increase in larger GA jet aircraft, benefit Newport Beach and neighboring communities? g. What is the basis for the assumptions of daily departure and arrival of GA jet traffic, including larger corporate aircraft, which will be displacing smaller GA private planes? h. Has it been determined how many additional GA jet aircraft departures will occur in a 24-hour period under the GAIP? If yes, how many? If no, why not? i. Will there be a cap or a maximum number of GA jet aircraft departures allowable during a 24-hour period? If yes, how many? If no, why not? i. How does the GAIP, with its goal of accommodating large corporate jet aircraft at JWA through building additional hangers, benefit Newport Beach and other neighboring communities? k. Will the GAIP result in an increase of international flights to JWA via GA jet aircraft? I. If the GAIP increases the number of international flights in and out of JWA, will there be a cap or maximum number allowed during any a 24-hour period? If yes, what will be the maximum number? If no, why not? m. How many international flights are anticipated to arrive at JWA on a daily or weekly basis? n. What type of TSA-type security screening will be conducted regarding the increasing numbers of larger international GA aircraft if the GAIP is approved? Please describe in detail. o. What is the predicted net average daily change in aircraft departures and arrivals if the GAIP is approved? p. How many GA privately owned jets will JWA be capable of handling during a 24-hour period if the GAIP is approved? q. How many overnight hangers or other spaces will be made available for GA privately owned jet aircraft if the GAIP is approved? r. What will be the economic benefit to JWA if the GAIP is approved? s. If the GAIP is approved, will existing flight schools be permitted to continue their operations? If not, will flight school(s) specializing in jet aircraft flight instruction replace existing flight schools? t. If any flight schools specializing in jet aircraft flight instruction are anticipated, will a cap or maximum number of training departures and arrivals during a 24-hour period be established? If yes, what will be the maximum number? If no, why not? u. If any flight schools specializing in jet aircraft flight instruction are anticipated, will hours for their operation and training flights be established? If yes, what will be the hours? If no, why not? 3. DEIR Conclusions that Environmental Impacts are Insignificant (Section 4). Comment: The DEIR conclusion that the GAIP will be not significantly cause a negative impact to the community in terms of noise, air quality, hazardous materials, etc., is unrealistic. It is submitted that there has been an insufficient consideration of the additional noise and pollution that will be created; especially considering the leaded fuel mixture used by private GA jet aircraft and their exemption from curfew hours under GA regulations. There have been

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numerous studies reported in many peer-reviewed scholarly journals that airport noise and pollution have serious health impacts for neighboring communities. It is unrealistic to conclude that if the GAIP is approved that there will be no significant negative environmental impact to Newport Beach and other neighboring communities. Furthermore, the assumptions supporting the noise analysis are flawed and unrealistic. The projection that by 2016, 40% of the Boeing 737 and Airbus A320 aircraft using JWA will include the quieter 737-MAX and Airbus A320-Neo is sheer speculation and is in conflict with the 2014 Settlement Agreement EIR noise modeling, Questions; a. As GA jet aircraft have a long history of violating noise limits, how will this be better controlled, especially given the current lack of regulation of the GA jet aircraft fleet? b. Is an increase in GA jet aircraft nighttime arrivals and departures anticipated? If yes, how many nighttime arrivals and departures are anticipated? c. Will JWA place a cap or limit on the number of nighttime arrivals and departures of GA jet aircraft? If yes, what limitations will be established? If no, why not? d. Why wasn't the negative impact of an additional 5-10% noise generating Back Bay departure pattern by the large corporate jets on the same neighborhood impacted by commercial departures considered in the Noise Impact section of the Appendix? As this would have the same impact as a net increase in commercial departures that would replace aircraft that were previously fanning after takeoff and not impacting these neighbors, why wasn't this considered? e. If the GAIP is approved, what would be the largest GA jet aircraft that would be accommodated by JWA? f. How would the noise from departing large GA jet aircraft compare with the noise emitted from the commercial jet fleet currently using JWA? If this analysis has been done, what is the basis for the analysis? g. Will there be a limitation on large GA jet departures? Will there be any such limitation specifically during the existing curfew hours? If yes, what will be the limitations? If no, why not? h. Do the GAIP conclusions of no significant noise or pollution impact take into consideration the Next-Gen satellite-precision concentrated flight paths that have clearly has a significant negative impact on Newport Beach? If yes, what conclusions have been drawn? If no, why not? 4. Health Risk Analysis (Section 4). Comment: Although related to the above comment, the health risk analysis ("HRA") in Section 4 of the DEIR is extremely complicated and confusing. The DEIR also relies heavily on the EIR submitted during the 2014 Settlement Agreement ("EIR 617") for its health risk analysis ("HRA"). It is submitted that reliance on the previous EIR is misplaced. EIR 617 relied on existing 2014 flight patterns prior to the implementation of the FAA Next Gen concentrated satellite driven precision flight patterns that are flown today. Furthermore, the DEIR does not anticipate the different emissions anticipated from the expected increase in GA jet aircraft if the GAIP is approved. To suggest that there will be a minimal increase in emissions is unrealistic and unsupported by any evidence. Comment: The DEIR is also woefully deficient in its discussion of the potential health impacts to more sensitive members of the community, especially the impact on children. The DEIR discusses "sensitive receptors" and "sensitive populations" noting only those closest to the boundary of JWA, specifically mentioning a residential development approximately 855 feet from the boundary of JWA and airport workers. In response, there have been numerous studies conducted and published in peer-reviewed scholarly journals about the serious health issues caused by airports, over flights, departures and arrivals on children and adults in communities under the flight paths. These studies have confirmed that children suffer cognitive deficits and respiratory illnesses, while the general population suffers undue stress, heart disease, high blood pressure, cognitive decline, auditory problems, heart attacks, strokes and greater cancer risk. Similarly, research studies have concluded that the adverse health affects from airport pollution are present within 10 miles of an airport. There are thousands of children in schools well within a distance of 10 miles from the JWA departure paths and thousands of people who live under the flight paths. Questions: a. In arriving at the conclusion that the environmental impact of the GAIP is "less than significant," what consideration has been given to the schools, athletic fields, parks and residential areas located within a close proximity and under the flight paths of JWA? If the impact these populations have not been considered, why not? b. Although noise is discussed in the Sensitive Receptors section of the DEIR, including the impact to schools, why isn't there an in depth discussion of health concerns especially as they relate to children? c. Did the County in the preparation of the DEIR review and consider recent research concerning the health and welfare of populations living within a close proximity of airports? Within 10 miles of JWA? d. What is the true net increase in pollutants from the new aircraft population departures from JWA as the fuel mixture is different and heavier in carbon and particulate pollutants? e. In preparing the DEIR, was there any consideration of the added pollution that would result from the increase in GA jet aircraft combined with the existing commercial fleet? If no, why not? f. In preparing the DEIR, was there any consideration of the impact of increased noise levels that would result from nighttime flights of GA iet aircraft? If no, why not? 5. Flight Patterns. Comment: Although the DEIR states there will be no change in flight patterns, it is unclear as to the flight patterns that were used for its analysis. It is also unclear what flight patterns would be followed by GA jet aircraft upon approval of the GAIP. Clarification is needed to assess the differences between GA and commercial aircraft departure patterns and how they might change upon approval of the GAIP. Questions: a. Will the GA jet aircraft added to JWA through the GAIP follow the existing flight patterns presently used by commercial jets as mandated by the SoCal Metroplex? b. If the GA jet aircraft added through the GAIP will follow the flight patterns mandated under the SoCal Metroplex, has there been any consideration as to the impact that will be caused by the increase in air traffic over Newport Beach? If no, why not? c. Will there be any changes in

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3-1188

GA flight patterns if the GAIP is approved? If yes, what will be the changes? Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR. Sincerely,

Kathryn Anderson 2674 Riverside Drive (across from Newport Beach Golf Course) Costa Mesa, CA 92627

3-1189

3

From: Susan Anderson < susananderson 10@me.com>

Sent: Thursday, November 22, 2018 2:20 PM

To: EIR627

Cc: Sam Anderson; ann Stevenson; mkathryna@gmail.com; gobruins42@yahoo.com; Cheryl Kyle

Subject: Expansion of John Wayne Airport, Santa Ana, CA

As residents of Newport Beach in Beacon Bay, we live directly under the pathway of departing planes. Needless to say this highly impacts the quality of our lives and all the residents in Newport Beach. Most of the residential SSA-1 neighborhoods were established prior to the initial expansion of our airport.

We highly oppose any expansion or additions to our airport, especially in the private plane area allowing corporate jets! SSA-2

All planes departing John Wayne Airport should adhere and be required to honor the time restrictions of no departures SSA-3

after 11pm or prior to 7 am! NO EXCEPTIONS! We are not a international airport!!! SSA-4

Sincerely, Susan & Sam Anderson 63 Beacon Bay Newport Beach, CA 92660 949-887-0823 susananderson10@me.com

Sent from my iPhone

From: Matthew Beehler <matthew@mega-la.com> Sent: Thursday, November 29, 2018 9:40 AM

To: EIR627 <eir627@ocair.com>

Subject: Expansion of John Wayne Airport, Santa Ana, CA

As residents of Costa Mesa, we live directly under the pathway of departing planes. Needless to say this highly impacts the quality of our lives and all the residents in Newport Beach. Most of the residential neighborhoods were established prior to the initial expansion of our airport.	CMB-1
We highly oppose any expansion or additions to our airport, especially in the private plane area	CMB -2
allowing corporate jets! All planes departing John Wayne Airport should adhere and be required	CMB -3
to honor the time restrictions of no departures after 11pm or prior to 7 am! NO	GMD 3
EXCEPTIONS! We are not a international airport!!!	CMB -4

Sincerely, Camille & Matthew Beehler 370 Esther Street Costa Mesa, CA 92627 949-878-7167

Matthew Beehler

Foundr | Creative Director

MEGA

Urban Design | Planning | Landscape

+1 949 878 7167 www.MEGA-LA.com From: Matthew Christensen <christensen.mj@gmail.com>

Sent: Monday, November 26, 2018 11:28 AM

To: EIR627

Subject: Draft EIR Comments **Attachments:** 20181126112728191.pdf

Good morning Ms. Choum... My apologize for not submitting this email prior to November 21st, but was out of town this past week. As both a resident of Dover Shores since 2006 and an airplane owner/pilot (plane hangared at Executive Aircraft), I have an interesting view of John Wayne Airport loving the convenience and service it provides while also noticing a large increase in aircraft noise. Airline patterns off 20R are incredibly inconsistent as some properly depart heading over Back Bay and offsetting correctly whereas many pilots ignore the offset flying directly over my house, which is 3 streets up from the bay. Attached is my signed letter and hope you can still consider it even though the deadline was November 21st. Thanks very much.

MC-1

--

Matthew Christensen

USC Trojans Athletic Board of Directors

Website: http://TrojanBOD.com

Like us on Facebook: http://facebook.com/TrojanBOD

From: Karen Wigylus <karen.wigylus@msrlegal.com>
Sent: Wednesday, February 27, 2019 9:28 AM

To: EIR627

Cc: Matt Henderson

Subject: Letter to Lea Choum, County of Orange dated 2/27/2019 re: John Wayne Airport

Attachments: 2019-02-27 Ltr to Lea Choum, County of Orange.pdf

This email is sent on behalf of Matthew C. Henderson.

Please direct all replies to Matt at matthew.henderson@msrlegal.com.

Thank you, Karen.

CPF 5-1

Karen Wigylus | Miller Starr Regalia

Legal Assistant to Matthew C. Henderson
1331 N. California Boulevard, Fifth Floor, Walnut Creek, CA 94596
t: 925.935.9400 | d: 925.941.3273 | f: 925.933.4126 | karen.wiqylus@msrlegal.com | www.msrlegal.com



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1331 N. California Blvd. Fifth Floor Walnut Creek, CA 94596 T 925 935 9400 F 925 933 4126 www.msrlegal.com

Matthew C. Henderson Direct Dial: 925 941 3271 matthew.henderson@msrlegal.com

February 27, 2019

VIA U.S. MAIL AND EMAIL (EIR627@ocair.com)

Lea Choum County of Orange 3160 Airway Avenue Costa Mesa, CA 92626

Re:

John Wayne Airport General Aviation Improvement Program DEIR, State Clearinghouse No. 2017031072

Dear Ms. Choum.

This letter is sent on behalf of CPF Airway Associates, LLC (CPF). It concerns the Draft Program Environmental Impact Report 627 (DEIR) prepared by the County of Orange (County) for the proposed General Aviation Improvement Program (GAIP) at John Wayne Airport (Airport).

On November 6, 2018 I submitted a request to the County under the Public Records Act (Government Code section 6250 et seq.) for documents relating to the GAIP. This was done with the pending comment deadline for the DEIR of November 21, 2018 in mind. On November 29, 2018 counsel for the County contacted me to indicate that the response to my request would be voluminous. Subsequently we agreed that the request could be narrowed, and the County produced documents on January 15, 2019.

CPF 5-2

Having had the opportunity to review the documents produced by the County, I am writing to express my client's continued concern that the DEIR does not fully address the potentially significant impacts arising from the GAIP. As noted in my letter dated October 25, 2018, the DEIR does not analyze the existence or operation of the heliport at 3000 Airway Avenue, directly adjacent to the Airport, or the existence or operation of the 24 hour secured entry gate along my client's property. This omission is all the more glaring given that the County's consultant was expressly tasked with analyzing both of these important features. The contract between the County and Aecom Technical Services, Inc. (Aecom) entitled "Agreement for Architect-Engineer Services" dated September 27, 2016 includes the following within Aecom's scope of work:

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Lea Choum County of Orange February 27, 2019 Page 2

- "Understand Historic CMA Market, including: 1. Demand General Aviation based aircraft by type, general aviation operations, including HeliStream operations at facilities adjacent to JWA." (Task 4.1, item ii, p. 44.)
- "Define helicopter operating requirements and based helicopter area for a potential consolidated helicopter operating area. This includes a review of baseline conditions including the number of current helicopter operators, operations and based helicopters. Current helicopter traffic patterns will be defined, inclusive of HeliStream's traffic and interaction with JWA based helicopters. A-E will interview ATC to determine current challenges and confirm traffic patterns. Opportunities for new traffic patterns and integration of traffic patterns that would facilitate easier operations based on potential helicopter operating areas will be defined." (Task 5.1.3, pp. 52-53.)
- "Identify location of existing access gates and the proposed gates." (Task 5.2, item iv, p. 53.)

Aecom prepared the "General Aviation Opportunities Facilities Layout Report," the "General Aviation Forecasting and Analysis Technical Report," and the "Orange County/John Wayne Airport (JWA) General Aviation Improvement Program (GAIP) Based Aircraft Parking-Capacity Analysis and General Aviation Constrained Forecasts," appendices B, C, and D to the DEIR (as well as the "General Aviation Facility Requirements Technical Report"). Aecom is also identified as one of the preparers of the DEIR, and would seem to be the consultant with the greatest amount of aviation-related expertise. (DEIR, p. 8-1.)

CPF 5-2 cont.

It is therefore clear that Aecom's reports comprise the backbone of the DEIR's analysis. Yet in spite of the mandate that Aecom take both the heliport and gate into account in its reports, neither the DEIR nor the appendices do so. This lapse is unfortunate as there are serious concerns relating to traffic, air traffic, airport operations, noise, air pollution, and other potential impacts relating to any proposed changes to (let alone the potential cessation of use of) the heliport and/or gate. Moreover, the absence of these features in the DEIR means that its project description and baseline analysis are incomplete. The fact that the County specifically required that the heliport and gate be included in Aecom's reports demonstrates that they are important factors in the environmental analysis. Their omission from the DEIR puts the legal adequacy of that document into serious question, both for its substantive analysis and its role in informing the public and the County's decisionmakers as to the effects of the GAIP and its advisability as a matter of policy.

Thank you for your attention to this matter.

CPF 5-2 cont.

Very truly yours,

MILLER STARR REGALIA

Matthew C. Henderson

MCH:klw

CPFA\55481\2063063.1



1331 N. California Blvd. Fifth Floor Walnut Creek, CA 94596 T 925 935 9400 F 925 933 4126 www.msrlegal.com

Matthew C. Henderson Direct Dial: 925 941 3271 matthew.henderson@msrlegal.com

February 27, 2019



VIA U.S. MAIL AND EMAIL (EIR627@ocair.com)

Lea Choum County of Orange 3160 Airway Avenue Costa Mesa, CA 92626

Re:

John Wayne Airport General Aviation Improvement Program DEIR,

State Clearinghouse No. 2017031072

Dear Ms. Choum.

This letter is sent on behalf of CPF Airway Associates, LLC (CPF). It concerns the Draft Program Environmental Impact Report 627 (DEIR) prepared by the County of Orange (County) for the proposed General Aviation Improvement Program (GAIP) at John Wayne Airport (Airport).

On November 6, 2018 I submitted a request to the County under the Public Records Act (Government Code section 6250 et seq.) for documents relating to the GAIP. This was done with the pending comment deadline for the DEIR of November 21, 2018 in mind. On November 29, 2018 counsel for the County contacted me to indicate that the response to my request would be voluminous. Subsequently we agreed that the request could be narrowed, and the County produced documents on January 15, 2019.

Having had the opportunity to review the documents produced by the County, I am writing to express my client's continued concern that the DEIR does not fully address the potentially significant impacts arising from the GAIP. As noted in my letter dated October 25, 2018, the DEIR does not analyze the existence or operation of the heliport at 3000 Airway Avenue, directly adjacent to the Airport, or the existence or operation of the 24 hour secured entry gate along my client's property. This omission is all the more glaring given that the County's consultant was expressly tasked with analyzing both of these important features. The contract between the County and Aecom Technical Services, Inc. (Aecom) entitled "Agreement for Architect-Engineer Services" dated September 27, 2016 includes the following within Aecom's scope of work:

Lea Choum County of Orange February 27, 2019 Page 2

- "Understand Historic CMA Market, including: 1. Demand General Aviation based aircraft by type, general aviation operations, including HeliStream operations at facilities adjacent to JWA." (Task 4.1, item ii, p. 44.)
- "Define helicopter operating requirements and based helicopter area for a
 potential consolidated helicopter operating area. This includes a review of
 baseline conditions including the number of current helicopter operators,
 operations and based helicopters. Current helicopter traffic patterns will be
 defined, inclusive of HeliStream's traffic and interaction with JWA based
 helicopters. A-E will interview ATC to determine current challenges and
 confirm traffic patterns. Opportunities for new traffic patterns and integration
 of traffic patterns that would facilitate easier operations based on potential
 helicopter operating areas will be defined." (Task 5.1.3, pp. 52-53.)
- "Identify location of existing access gates and the proposed gates." (Task 5.2, item iv, p. 53.)

Aecom prepared the "General Aviation Opportunities Facilities Layout Report," the "General Aviation Forecasting and Analysis Technical Report," and the "Orange County/John Wayne Airport (JWA) General Aviation Improvement Program (GAIP) Based Aircraft Parking-Capacity Analysis and General Aviation Constrained Forecasts," appendices B, C, and D to the DEIR (as well as the "General Aviation Facility Requirements Technical Report"). Aecom is also identified as one of the preparers of the DEIR, and would seem to be the consultant with the greatest amount of aviation-related expertise. (DEIR, p. 8-1.)

It is therefore clear that Aecom's reports comprise the backbone of the DEIR's analysis. Yet in spite of the mandate that Aecom take both the heliport and gate into account in its reports, neither the DEIR nor the appendices do so. This lapse is unfortunate as there are serious concerns relating to traffic, air traffic, airport operations, noise, air pollution, and other potential impacts relating to any proposed changes to (let alone the potential cessation of use of) the heliport and/or gate. Moreover, the absence of these features in the DEIR means that its project description and baseline analysis are incomplete. The fact that the County specifically required that the heliport and gate be included in Aecom's reports demonstrates that they are important factors in the environmental analysis. Their omission from the DEIR puts the legal adequacy of that document into serious question, both for its substantive analysis and its role in informing the public and the County's decisionmakers as to the effects of the GAIP and its advisability as a matter of policy.

Lea Choum County of Orange February 27, 2019 Page 3

Thank you for your attention to this matter.

Very truly yours,

MILLER STARR REGALIA

Matthew C. Henderson

MCH:klw

From: Scott Fischer <spfischer2@gmail.com>
Sent: Friday, November 23, 2018 5:11 PM

To: EIR627

Subject: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

- DEIR Complexity and Length
- 3. Relative to Time Limitations for Comment:

4.

The DEIR was made available for public review on September 20, 2018, with comments due on November 6, 2018, with an extension until November 21, 2018.

Comment: This is an incredibly complex and detailed document that is over 600 pages in length, with 2,200 pages of appendices. Although members of the general public are invited to "comment" on the DEIR, it is submitted that most members of the general public are ill equipped to read through the entirety of the document, sufficiently understand it and respond to it with their comments and questions in the time allotted.

1

Question: Why can't additional time be provided for the review and comment to the DEIR?

- 2.
- 3. Project Objectives (Section
- 4. 3).
 - 5.

This section lists separate objectives of the GAIP, which appear only to benefit airport operations and profitability.

Comment: As you are surely aware, under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives clearly pertain the efficiency and economical benefits of the GAIP with no indication of concerns for the communities impacted by noise and pollution emanating from JWA.

Questions:

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a.
   b. Is the GAIP for the benefit of nonresident corporate jet
c.
       aircraft?
   d.
   e.
f.
       Is the GAIP for the benefit of local corporate jet aircraft?
   g.
   h.
       Have local corporations been surveyed regarding their
       interest in housing their jets at JWA? If no, why not? If yes, what have been their responses?
j.
   k.
   l.
   m. Does the GAIP benefit the exiting fleet of privately owned
       piston-powered driven aircraft owners who have historically based their aircraft at JWA? If yes,
       how?
   0.
p.
   q.
       Will the GAIP result in a decrease of smaller privately
       owned piston-powered aircraft at IWA?
S.
   t.
   11.
       How does a decrease in the number of smaller privately
       owned piston-powered aircraft based at JWA and an increase in larger GA jet aircraft, benefit
Newport Beach and neighboring communities?
   X.
   у.
       What is the basis for the assumptions of daily departure
       and arrival of GA jet traffic, including larger corporate aircraft, which will be displacing smaller
GA private planes?
   bb.
   CC.
   dd. Has it been determined how many additional GA jet aircraft
       departures will occur in a 24-hour period under the GAIP? If yes, how many? If no, why not?
ee.
   ff.
   hh. Will there be a cap or a maximum number of GA jet aircraft
ii.
       departures allowable during a 24-hour period? If yes, how many? If no, why not?
   jj.
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3-1201

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kk.
   ll. How does the GAIP, with its goal of accommodating large
       corporate jet aircraft at JWA through building additional hangers, benefit Newport Beach and
other neighboring communities?
   nn.
   OO.
   pp. Will the GAIP result in an increase of international flights
       to JWA via GA jet aircraft?
qq.
   rr.
   SS.
   tt. If the GAIP increases the number of international flights
       in and out of JWA, will there be a cap or maximum number allowed during any a 24-hour
period? If yes, what will be the maximum number? If no, why not?
   VV.
   ww.
   xx. How many international flights are anticipated to arrive
       at JWA on a daily or weekly basis?
уу.
   7.7..
   aaa.
              What type of TSA-type security screening will be conducted
   bbb.
       regarding the increasing numbers of larger international GA aircraft if the GAIP is
approved? Please describe in detail.
   ddd.
   eee.
   fff. What is the predicted net average daily change in aircraft
       departures and arrivals if the GAIP is approved?
ggg.
   hhh.
   iii.
   iji. How many GA privately owned jets will IWA be capable of
       handling during a 24-hour period if the GAIP is approved?
kkk.
   III.
   mmm.
   nnn.
              How many overnight hangers or other spaces will be made
       available for GA privately owned jet aircraft if the GAIP is approved?
000.
   ppp.
   qqq.
   rrr. What will be the economic benefit to JWA if the GAIP is
       approved?
SSS.
   ttt.
   uuu.
              If the GAIP is approved, will existing flight schools
   VVV.
www. be permitted to continue their operations? If not, will flight school(s) specializing in jet aircraft
flight instruction replace existing flight schools?
   XXX.
   ууу.
              If any flight schools specializing in jet aircraft flight
   ZZZ.
aaaa. instruction are anticipated, will a cap or maximum number of training departures and arrivals
during a 24-hour period be established? If yes, what will be the maximum number? If no, why not?
   bbbb.
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cccc.

3-1202

dddd. If any flight schools specializing in jet aircraft flight eeee. instruction are anticipated, will hours for their operation and training flights be established? If yes, what will be the hours? If no, why not?

ffff.

3.

4. DEIR Conclusions that Environmental Impacts are Insignificant (Section 4).

6.

5.

Comment: The DEIR conclusion that the GAIP will be not significantly cause a negative impact to the community in terms of noise, air quality, hazardous materials, etc., is unrealistic. It is submitted that there has been an insufficient consideration of the additional noise and pollution that will be created; especially considering the leaded fuel mixture used by private GA jet aircraft and their exemption from curfew hours under GA regulations. There have been numerous studies reported in many peer-reviewed scholarly journals that airport noise and pollution have serious health impacts for neighboring communities. It is unrealistic to conclude that if the GAIP is approved that there will be no significant negative environmental impact to Newport Beach and other neighboring communities.

Furthermore, the assumptions supporting the noise analysis are flawed and unrealistic. The projection that by 2016, 40% of the Boeing 737 and Airbus A320 aircraft using JWA will include the quieter 737-MAX and Airbus A320-Neo is sheer speculation and is in conflict with the 2014 Settlement Agreement EIR noise modeling.

Questions:

a.

- b. As GA jet aircraft have a long history of violating noise
- c. limits, how will this be better controlled, especially given the current lack of regulation of the GA jet aircraft fleet?

d.

e.

- f. Is an increase in GA jet aircraft nighttime arrivals and
- g. departures anticipated? If yes, how many nighttime arrivals and departures are anticipated?

h.

i.

- j. Will JWA place a cap or limit on the number of nighttime
- k. arrivals and departures of GA jet aircraft? If yes, what limitations will be established? If no, why not?

l.

m.

- n. Why wasn't the negative impact of an additional 5-10%
- o. noise generating Back Bay departure pattern by the large corporate jets on the same neighborhood impacted by commercial departures considered in the Noise Impact section of the Appendix? As this would have the same impact as a net increase in commercial departures
- p. that would replace aircraft that were previously fanning after takeoff and not impacting these neighbors, why wasn't this considered?

q.

```
r.
   S.
       If the GAIP is approved, what would be the largest GA
   t.
       jet aircraft that would be accommodated by JWA?
u.
   v.
   W.
       How would the noise from departing large GA jet aircraft
   X.
       compare with the noise emitted from the commercial jet fleet currently using JWA? If this
       analysis has been done, what is the basis for the analysis?
   z.
aa.
   bb.
   cc. Will there be a limitation on large GA jet departures?
       Will there be any such limitation specifically during the existing curfew hours? If yes, what will be
the limitations? If no. why not?
   ee.
   ff.
   gg. Do the GAIP conclusions of no significant noise or pollution
hh.
       impact take into consideration the Next-Gen satellite-precision concentrated flight paths that
have clearly has a significant negative impact on Newport Beach? If yes, what conclusions have been
drawn? If no, why not?
   ii.
   4.
```

Comment: Although related to the above comment, the health risk analysis ("HRA") in Section 4 of the DEIR is extremely complicated and confusing. The DEIR also relies heavily on the EIR submitted during the 2014 Settlement Agreement ("EIR 617") for its health risk analysis ("HRA"). It is submitted that reliance on the previous EIR is misplaced. EIR 617 relied on existing 2014 flight patterns prior to the implementation of the FAA Next Gen concentrated satellite driven precision flight patterns that are flown today. Furthermore, the DEIR does not anticipate the different emissions anticipated from the expected increase in GA jet aircraft if the GAIP is approved. To suggest that there will be a minimal increase in emissions is unrealistic and unsupported by any evidence.

5. Health Risk Analysis (Section

6.

7.

4).

Comment: The DEIR is also woefully deficient in its discussion of the potential health impacts to more sensitive members of the community, especially the impact on children. The DEIR discusses "sensitive receptors" and "sensitive populations" noting only those closest to the boundary of JWA, specifically mentioning a residential development approximately 855 feet from the boundary of JWA and airport workers. In response, there have been numerous studies conducted and published in peer-reviewed scholarly journals about the serious health issues caused by airports, over flights, departures and arrivals on children and adults in communities under the flight paths. These studies have confirmed that children suffer cognitive deficits and respiratory illnesses, while the general population suffers undue stress, heart disease, high blood pressure, cognitive decline, auditory problems, heart attacks, strokes and greater cancer risk. Similarly, research studies have concluded that the adverse health affects from airport

5

3-1204

pollution are present within 10 miles of an airport. There are thousands of children in schools well within a distance of 10 miles from the JWA departure paths and thousands of people who live under the flight paths.

Questions:

- a.
- b. In arriving at the conclusion that the environmental impact
- c. of the GAIP is "less than significant," what consideration has been given to the schools, athletic fields, parks and residential areas located within a close proximity and under the flight paths of JWA? If the impact these populations have not been considered,
- d. why not?
 - e.
 - f.
 - g. Although noise is discussed in the Sensitive Receptors
- h. section of the DEIR, including the impact to schools, why isn't there an in depth discussion of health concerns especially as they relate to children?
 - i.
 - j.
 - k. Did the County in the preparation of the DEIR review and
- l. consider recent research concerning the health and welfare of populations living within a close proximity of airports? Within 10 miles of JWA?
 - m.
 - n.
 - o. What is the true net increase in pollutants from the new
- p. aircraft population departures from JWA as the fuel mixture is different and heavier in carbon and particulate pollutants?
 - q.
 - r.
 - s. In preparing the DEIR, was there any consideration of
- t. the added pollution that would result from the increase in GA jet aircraft combined with the existing commercial fleet? If no, why not?
 - u.
 - V.
 - w. In preparing the DEIR, was there any consideration of
- x. the impact of increased noise levels that would result from nighttime flights of GA jet aircraft? If no, why not?
 - y.

5. Flight Patterns.

Comment: Although the DEIR states there will be no change in flight patterns, it is unclear as to the flight patterns that were used for its analysis. It is also unclear what flight patterns would be followed by GA jet aircraft upon approval of the GAIP. Clarification is needed to assess the differences between GA and commercial aircraft departure patterns and how they might change upon approval of the GAIP.

6

Questions:

a.

b. Will the GA jet aircraft added to JWA through the GAIP

c. follow the existing flight patterns presently used by commercial jets as mandated by the SoCal Metroplex?

d.

e.

f. If the GA jet aircraft added through the GAIP will follow

g. the flight patterns mandated under the SoCal Metroplex, has there been any consideration as to the impact that will be caused by the increase in air traffic over Newport Beach? If no, why not?

h.

i.

j. Will there be any changes in GA flight patterns if the

k. GAIP is approved? If yes, what will be the changes?

l.

Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely,

Scott Fischer 34 Cape Andover Newport Beach, CA. 92660 spfischer2@gmail.com

Scott P. Fischer, M.D.
Shoulder Reconstruction Surgery
Orthopaedic Specialty Institute of Orange County
16300 Sand Canyon Avenue, Suite 511
Irvine, CA 92618
(949) 255-9738
www.scottfischermd.com

7 3-1206

From: Marilynn Henry <mleeh@pacbell.net>
Sent: Saturday, November 24, 2018 12:49 PM

To: EIR627 **Subject:** Jets Flying

Over Newport

Beach and surrounding areas

Sent from my iPhone

I am opposed to

Building more hangers to allow jets to fly over Newport Beach And surrounding Areas increasing Pollution and noise!

MH-1

Marilynn Henry 2525 E 16th St Newport Beach, Calif.

92663 949-212-8190 November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626



Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

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The DEIR was made available for public review on September 20, 2018, with comments due on November 6, 2018, with an extension until November 21, 2018.

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Question: Why can't additional time be provided for the review and comment to the DEIR?

2. Project Objectives (Section 3).

This section lists separate objectives of the GAIP, which appear only to benefit airport operations and profitability.

<u>Comment</u>: As you are surely aware, under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives clearly pertain the

efficiency and economical benefits of the GAIP with no indication of concerns for the communities impacted by noise and pollution emanating from JWA.

Questions:

- a. Is the GAIP for the benefit of nonresident corporate jet aircraft?
- b. Is the GAIP for the benefit of local corporate jet aircraft?
- c. Have local corporations been surveyed regarding their interest in housing their jets at JWA? If no, why not? If yes, what have been their responses?
- d. Does the GAIP benefit the exiting fleet of privately owned piston-powered driven aircraft owners who have historically based their aircraft at JWA? If yes, how?
- e. Will the GAIP result in a decrease of smaller privately owned piston-powered aircraft at JWA?
- f. How does a decrease in the number of smaller privately owned piston-powered aircraft based at JWA and an increase in larger GA jet aircraft, benefit Newport Beach and neighboring communities?
- g. What is the basis for the assumptions of daily departure and arrival of GA jet traffic, including larger corporate aircraft, which will be displacing smaller GA private planes?
- h. Has it been determined how many additional GA jet aircraft departures will occur in a 24-hour period under the GAIP? If yes, how many? If no, why not?
- i. Will there be a cap or a maximum number of GA jet aircraft departures allowable during a 24-hour period? If yes, how many? If no, why not?
- j. How does the GAIP, with its goal of accommodating large corporate jet aircraft at JWA through building additional hangers, benefit Newport Beach and other neighboring communities?
- k. Will the GAIP result in an increase of international flights to JWA via GA jet aircraft?
- 1. If the GAIP increases the number of international flights in and out of JWA, will there be a cap or maximum number allowed during any a 24-hour period? If yes, what will be the maximum number? If no, why not?
- m. How many international flights are anticipated to arrive at JWA on a daily or weekly basis?
- n. What type of TSA-type security screening will be conducted regarding the increasing numbers of larger international GA aircraft if the GAIP is approved? Please describe in detail.
- o. What is the predicted net average daily change in aircraft departures and arrivals if the GAIP is approved?
- p. How many GA privately owned jets will JWA be capable of handling during a 24-hour period if the GAIP is approved?
- q. How many overnight hangers or other spaces will be made available for GA privately owned jet aircraft if the GAIP is approved?
- r. What will be the economic benefit to JWA if the GAIP is approved?

- s. If the GAIP is approved, will existing flight schools be permitted to continue their operations? If not, will flight school(s) specializing in jet aircraft flight instruction replace existing flight schools?
- t. If any flight schools specializing in jet aircraft flight instruction are anticipated, will a cap or maximum number of training departures and arrivals during a 24-hour period be established? If yes, what will be the maximum number? If no, why not?
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3. DEIR Conclusions that Environmental Impacts are Insignificant (Section 4).

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Furthermore, the assumptions supporting the noise analysis are flawed and unrealistic. The projection that by 2016, 40% of the Boeing 737 and Airbus A320 aircraft using JWA will include the quieter 737-MAX and Airbus A320-Neo is sheer speculation and is in conflict with the 2014 Settlement Agreement EIR noise modeling.

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- a. As GA jet aircraft have a long history of violating noise limits, how will this be better controlled, especially given the current lack of regulation of the GA jet aircraft fleet?
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- d. Why wasn't the negative impact of an additional 5-10% noise generating Back Bay departure pattern by the large corporate jets on the same neighborhood impacted by commercial departures considered in the Noise Impact section of the Appendix? As this would have the same impact as a net increase in commercial

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- e. If the GAIP is approved, what would be the largest GA jet aircraft that would be accommodated by JWA?
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4. Health Risk Analysis (Section 4).

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Questions:

- a. In arriving at the conclusion that the environmental impact of the GAIP is "less than significant," what consideration has been given to the schools, athletic fields, parks and residential areas located within a close proximity and under the flight paths of JWA? If the impact these populations have not been considered, why not?
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- e. In preparing the DEIR, was there any consideration of the added pollution that would result from the increase in GA jet aircraft combined with the existing commercial fleet? If no, why not?
- f. In preparing the DEIR, was there any consideration of the impact of increased noise levels that would result from nighttime flights of GA jet aircraft? If no, why not?

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Questions:

- a. Will the GA jet aircraft added to JWA through the GAIP follow the existing flight patterns presently used by commercial jets as mandated by the SoCal Metroplex?
- b. If the GA jet aircraft added through the GAIP will follow the flight patterns mandated under the SoCal Metroplex, has there been any consideration as to the impact that will be caused by the increase in air traffic over Newport Beach? If no, why not?

c. Will there be any changes in GA flight patterns if the GAIP is approved? If yes, what will be the changes?

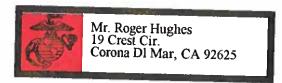
Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely, Joga Hugher

ROGER@RogerL Hughes. com

(include your name, home and

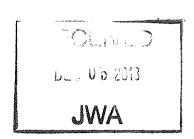
email addresses



November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626



1

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

1. DEIR Complexity and Length Relative to Time Limitations for Comment:

The DEIR was made available for public review on September 20, 2018, with comments due on November 6, 2018, with an extension until November 21, 2018. Comment: This is an incredibly complex and detailed document that is over 600 pages in length, with 2,200 pages of appendices. Although members of the general public are invited to "comment" on the DEIR, it is submitted that most members of the general public are ill equipped to read through the entirety of the document, sufficiently understand it and respond to it with their comments and questions in the time allotted.

Question: Why can't additional time be provided for the review and comment to the DEIR?

2. Project Objectives (Section 3).

This section lists separate objectives of the GAIP, which appear only to benefit airport operations and profitability.

<u>Comment</u>: As you are surely aware, under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives clearly pertain the efficiency and economical benefits of the GAIP with no indication of concerns for the communities impacted by noise and pollution emanating from JWA.

Questions:

- a. Is the GAIP for the benefit of nonresident corporate jet aircraft?
- b. Is the GAIP for the benefit of local corporate jet aircraft?
- c. Have local corporations been surveyed regarding their interest in housing their jets at JWA? If no, why not? If yes, what have been their responses?
- d. Does the GAIP benefit the exiting fleet of privately owned piston-powered driven aircraft owners who have historically based their aircraft at JWA? If yes, how?
- e. Will the GAIP result in a decrease of smaller privately owned piston-powered aircraft at JWA?
- f. How does a decrease in the number of smaller privately owned pistonpowered aircraft based at JWA and an increase in larger GA jet aircraft, benefit Newport Beach and neighboring communities?
- g. What is the basis for the assumptions of daily departure and arrival of GA jet traffic, including larger corporate aircraft, which will be displacing smaller GA private planes?
- h. Has it been determined how many additional GA jet aircraft departures will occur in a 24-hour period under the GAIP? If yes, how many? If no, why not?
- i. Will there be a cap or a maximum number of GA jet aircraft departures allowable during a 24-hour period? If yes, how many? If no, why not?
- j. How does the GAIP, with its goal of accommodating large corporate jet aircraft at JWA through building additional hangers, benefit Newport Beach and other neighboring communities?
- k. Will the GAIP result in an increase of international flights to JWA via GA jet aircraft?
- If the GAIP increases the number of international flights in and out of JWA, will there be a cap or maximum number allowed during any a 24-hour period? If yes, what will be the maximum number? If no, why not?
- m. How many international flights are anticipated to arrive at JWA on a daily or weekly basis?
- n. What type of TSA-type security screening will be conducted regarding the increasing numbers of larger international GA aircraft if the GAIP is approved? Please describe in detail.
- o. What is the predicted net average daily change in aircraft departures and arrivals if the GAIP is approved?
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- q. How many overnight hangers or other spaces will be made available for GA privately owned jet aircraft if the GAIP is approved?
- r. What will be the economic benefit to JWA if the GAIP is approved?
- s. If the GAIP is approved, will existing flight schools be permitted to continue their operations? If not, will flight school(s) specializing in jet aircraft flight instruction replace existing flight schools?

- t. If any flight schools specializing in jet aircraft flight instruction are anticipated, will a cap or maximum number of training departures and arrivals during a 24-hour period be established? If yes, what will be the maximum number? If no, why not?
- u. If any flight schools specializing in jet aircraft flight instruction are anticipated, will hours for their operation and training flights be established? If yes, what will be the hours? If no, why not?

3. DEIR Conclusions that Environmental Impacts are Insignificant (Section 4).

Comment: The DEIR conclusion that the GAIP will be not significantly cause a negative impact to the community in terms of noise, air quality, hazardous materials, etc., is unrealistic. It is submitted that there has been an insufficient consideration of the additional noise and pollution that will be created; especially considering the leaded fuel mixture used by private GA jet aircraft and their exemption from curfew hours under GA regulations. There have been numerous studies reported in many peer-reviewed scholarly journals that airport noise and pollution have serious health impacts for neighboring communities. It is unrealistic to conclude that if the GAIP is approved that there will be no significant negative environmental impact to Newport Beach and other neighboring communities.

Furthermore, the assumptions supporting the noise analysis are flawed and unrealistic. The projection that by 2016, 40% of the Boeing 737 and Airbus A320 aircraft using JWA will include the quieter 737-MAX and Airbus A320-Neo is sheer speculation and is in conflict with the 2014 Settlement Agreement EIR noise modeling.

Questions:

- a. As GA jet aircraft have a long history of violating noise limits, how will this be better controlled, especially given the current lack of regulation of the GA jet aircraft fleet?
- b. Is an increase in GA jet aircraft nighttime arrivals and departures anticipated? If yes, how many nighttime arrivals and departures are anticipated?
- c. Will JWA place a cap or limit on the number of nighttime arrivals and departures of GA jet aircraft? If yes, what limitations will be established? If no, why not?
- d. Why wasn't the negative impact of an additional 5-10% noise generating Back Bay departure pattern by the large corporate jets on the same neighborhood impacted by commercial departures considered in the Noise Impact section of the Appendix? As this would have the same impact as a net increase in commercial departures that would replace aircraft that were previously fanning after takeoff and not impacting these neighbors, why wasn't this considered?

- e. If the GAIP is approved, what would be the largest GA jet aircraft that would be accommodated by JWA?
- f. How would the noise from departing large GA jet aircraft compare with the noise emitted from the commercial jet fleet currently using JWA? If this analysis has been done, what is the basis for the analysis?
- g. Will there be a limitation on large GA jet departures? Will there be any such limitation specifically during the existing curfew hours? If yes, what will be the limitations? If no, why not?
- h. Do the GAIP conclusions of no significant noise or pollution impact take into consideration the Next-Gen satellite-precision concentrated flight paths that have clearly has a significant negative impact on Newport Beach? If yes, what conclusions have been drawn? If no, why not?

4. Health Risk Analysis (Section 4).

Comment: Although related to the above comment, the health risk analysis ("HRA") in Section 4 of the DEIR is extremely complicated and confusing. The DEIR also relies heavily on the EIR submitted during the 2014 Settlement Agreement ("EIR 617") for its health risk analysis ("HRA"). It is submitted that reliance on the previous EIR is misplaced. EIR 617 relied on existing 2014 flight patterns prior to the implementation of the FAA Next Gen concentrated satellite driven precision flight patterns that are flown today. Furthermore, the DEIR does not anticipate the different emissions anticipated from the expected increase in GA jet aircraft if the GAIP is approved. To suggest that there will be a minimal increase in emissions is unrealistic and unsupported by any evidence.

Comment: The DEIR is also woefully deficient in its discussion of the potential health impacts to more sensitive members of the community, especially the impact on children. The DEIR discusses "sensitive receptors" and "sensitive populations" noting only those closest to the boundary of JWA, specifically mentioning a residential development approximately 855 feet from the boundary of JWA and airport workers. In response, there have been numerous studies conducted and published in peer-reviewed scholarly journals about the serious health issues caused by airports, over flights, departures and arrivals on children and adults in communities under the flight paths. These studies have confirmed that children suffer cognitive deficits and respiratory illnesses, while the general population suffers undue stress, heart disease, high blood pressure, cognitive decline, auditory problems, heart attacks, strokes and greater cancer risk. Similarly, research studies have concluded that the adverse health affects from airport pollution are present within 10 miles of an airport. There are thousands of children in schools well within a distance of 10 miles from the JWA departure paths and thousands of people who live under the flight paths.

Questions:

- a. In arriving at the conclusion that the environmental impact of the GAIP is "less than significant," what consideration has been given to the schools, athletic fields, parks and residential areas located within a close proximity and under the flight paths of JWA? If the impact these populations have not been considered, why not?
- b. Although noise is discussed in the Sensitive Receptors section of the DEIR, including the impact to schools, why isn't there an in depth discussion of health concerns especially as they relate to children?
- c. Did the County in the preparation of the DEIR review and consider recent research concerning the health and welfare of populations living within a close proximity of airports? Within 10 miles of JWA?
- d. What is the true net increase in pollutants from the new aircraft population departures from JWA as the fuel mixture is different and heavier in carbon and particulate pollutants?
- e. In preparing the DEIR, was there any consideration of the added pollution that would result from the increase in GA jet aircraft combined with the existing commercial fleet? If no, why not?
- f. In preparing the DEIR, was there any consideration of the impact of increased noise levels that would result from nighttime flights of GA jet aircraft? If no, why not?

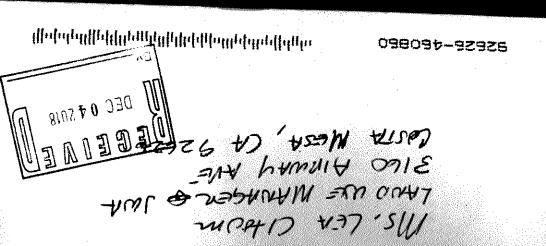
5. Flight Patterns.

<u>Comment</u>: Although the DEIR states there will be no change in flight patterns, it is unclear as to the flight patterns that were used for its analysis. It is also unclear what flight patterns would be followed by GA jet aircraft upon approval of the GAIP. Clarification is needed to assess the differences between GA and commercial aircraft departure patterns and how they might change upon approval of the GAIP.

Questions:

- a. Will the GA jet aircraft added to JWA through the GAIP follow the existing flight patterns presently used by commercial jets as mandated by the SoCal Metroplex?
- b. If the GA jet aircraft added through the GAIP will follow the flight patterns mandated under the SoCal Metroplex, has there been any consideration as to the impact that will be caused by the increase in air traffic over Newport Beach? If no, why not?
- c. Will there be any changes in GA flight patterns if the GAIP is approved? If yes, what will be the changes?

Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.	
Sincerely,	
(includ	e your name, home and email







Janssen BL CEIO EO P.O. Box 5380 P. P.O. Balboa Island, CA 92662

Letter 299

From: Julie Johnson < juliestewartjohnson@gmail.com>

Sent: Tuesday, January 29, 2019 8:33 AM

To: EIR627

Subject: GA EIR comments

Hi Lea,

Did the commercial airlines at JWA provide comments on the GA EIR?

JJ 2-1

Thank you, Julie From: Julie Johnson < juliestewartjohnson@gmail.com>

Sent: Wednesday, January 30, 2019 4:49 PM

To: EIR627

Subject: FAA Standards

Hi Lea,

Can you tell me what the FAA standards specifically are for Alternative #3 please? I believe it involves building heights, clearing spaces and widening taxi areas. Is there a FAA reference to review?

Also you said that their were new community hangers and I would like to know how many and where for Alternative #3. I don't see them on you hand out map.

JJ 3-2

Thanks, Julie From: Julie Johnson < juliestewartjohnson@gmail.com>

Sent: Monday, February 4, 2019 12:44 PM

To: EIR627

Subject: FW: FAA Standards

Hi Lea,

Can you please respond to my email below from last Wednesday?

Thanks, Julie

From: Julie Johnson < juliestewartjohnson@gmail.com >

Date: Wednesday, January 30, 2019 at 4:48 PM

To: < eir627@ocair.com > Subject: FAA Standards

JJ 4-1

Hi Lea,

Can you tell me what the FAA standards specifically are for Alternative #3 please? I believe it involves building heights, clearing spaces and widening taxi areas. Is there a FAA reference to review?

Also you said that their were new community hangers and I would like to know how many and where for Alternative #3. I don't see them on you hand out map.

Thanks, Julie From: juliestewartjohnson@gmail.com
Sent: Tuesday, February 5, 2019 10:29 AM

To: EIR627

Subject: Re: FAA Standards

Hi Lea

Thanks! JJ 5-1

Julie

Sent from my iPhone

On Feb 5, 2019, at 9:29 AM, EIR627 < <u>eir627@ocair.com</u>> wrote:

Hi Julie,

Sorry for the delay. Let me put a response together and I will get back to you.

Thanks, Lea

From: Julie Johnson < julieste wartjohnson@gmail.com>

Sent: Monday, February 4, 2019 12:44 PM

To: EIR627 < eir627@ocair.com > Subject: FW: FAA Standards

Hi Lea,

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From: Julie Johnson < juliestewartjohnson@gmail.com>

Date: Wednesday, January 30, 2019 at 4:48 PM

To: <eir627@ocair.com>
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Thanks, Julie From: juliestewartjohnson@gmail.com
Sent: Tuesday, February 5, 2019 7:34 PM

To: EIR627

Subject: Re: FAA Standards

Hi Lea

Just reviewing all of this but are the two community hangers in alternative three new or existing? Are they being remodeled to accommodate larger jets?

JJ 6-1

Thanks Julie

Sent from my iPhone

On Feb 5, 2019, at 3:43 PM, EIR627 < <u>eir627@ocair.com</u>> wrote:

Hi Julie,

Per our last phone conversation we discussed Alternative 3 and the improvements and changes that would be undertaken to correct existing nonstandard conditions.

Under Alternative 3, the following improvements and changes would be undertaken to correct existing nonstandard conditions:

- (1) Relocate the Vehicle Service Road (also known as Perimeter Road) along Taxiway A to comply with FAA clearance standard dimensions for Group V aircraft;
- (2) Remove obstructions (two community hangars from the Full Service Southeast FBO) to comply with FAA height restrictions; and
- (3) Remove 31 transient aircraft apron parking spaces from within the extended object-free area ("OFA") in the approach to Runway 2L.

Below are the FAA references related to those nonstandard conditions:

- FAA Advisory Circular AC 150/5300-13A. Here is the link to the document that discusses
 OFA. See Chapter 3 Runway Design
 https://www.faa.gov/documentLibrary/media/Advisory Circular/draft 150 5300 13a.pdf
- 2) FAA FAR Part 77 Safe and Efficient Use, and Preservation of the Navigable Airspace (Subpart C discusses obstructions). Here is link to that document: https://www.govinfo.gov/content/pkg/CFR-2012-title14-vol2-title14-t

I've attached the Conceptual Facilities Layout Plan – Alternative 3 and circled the proposed community hangars. They are colored purple per the legend.

Thank you, Lea

Lea Choum | Land Use Manager, Facilities *John Wayne Airport, Orange County* 3160 Airway Avenue | Costa Mesa, CA 92626 **O** 949.252.5123

ocair.com Facebook Twitter

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Sent: Wednesday, January 30, 2019 4:49 PM

To: EIR627 < eir627@ocair.com >

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Thanks, Julie

<Conceptual Facilities Layout - Alternative 3.pdf>

From: juliestewartjohnson@gmail.com
Sent: Thursday, February 7, 2019 3:14 PM

To: EIR627

Subject: Re: FAA Standards

Thanks Lea!

Do you know when all the comments to be submitted in the supervisors will be voting?

I appreciate all your help and getting back to me!

JJ 7-1

Thanks Julie

Sent from my iPhone

On Feb 7, 2019, at 2:38 PM, EIR627 < <u>eir627@ocair.com</u>> wrote:

Hi Julie,

The two community hangars in alternative 3 are existing.

As stated in Draft Program EIR 627, no improvements are proposed in Alternative 3 except for three projects that are needed to comply with FAA standards for airport design.

Under Alternative 3, the following improvements and changes would be undertaken to correct existing nonstandard conditions:

- (1) Relocate the Vehicle Service Road (also known as Perimeter Road) along Taxiway A to comply with FAA clearance standard dimensions for Group V aircraft;
- (2) Remove obstructions (two community hangars from the Full Service Southeast FBO) to comply with FAA height restrictions; and
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- (1) Relocate the Vehicle Service Road (also known as Perimeter Road) along Taxiway A to comply with FAA clearance standard dimensions for Group V aircraft;
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 0 13a.pdf
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I've attached the Conceptual Facilities Layout Plan – Alternative 3 and circled the proposed community hangars. They are colored purple per the legend.

Thank you, Lea

Lea Choum | Land Use Manager, Facilities *John Wayne Airport, Orange County* 3160 Airway Avenue | Costa Mesa, CA 92626 **O** 949.252.5123



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Thanks, Julie

<Conceptual Facilities Layout - Alternative 3.pdf>

From: juliestewartjohnson@gmail.com

Sent: Wednesday, February 27, 2019 10:26 AM

To: EIR627 **Subject:** Law firms

Hi Lea

Can you please provide or refer me to a list of all the consultants and law firms that the County has used for the GAIP

JJ 8-1

please? Thanks

Julie

Sent from my iPhone

From: juliestewartjohnson@gmail.com

Sent: Wednesday, February 27, 2019 8:17 PM

To: EIR627 **Subject:** Re: Law firms

Thank you!

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Sent from my iPhone
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> On Feb 27, 2019, at 3:41 PM, EIR627 <eir627@ocair.com> wrote:
>
> Hi Julie,
> The list of consultants that the County has used for the GAIP are:
> AECOM
> Landrum & Brown
> Psomas
> Austin Transportation Consulting
> Wood
> Law Firm used:
> Gatzke Dillon & Balance
> Thank you,
> Lea
> Lea Choum | Land Use Manager, Facilities John Wayne Airport, Orange
> 3160 Airway Avenue | Costa Mesa, CA 92626 O 949.252.5123
> ocair.com Facebook Twitter
>
>
>
> -----Original Message-----
> From: juliestewartjohnson@gmail.com < juliestewartjohnson@gmail.com >
> Sent: Wednesday, February 27, 2019 10:26 AM
> To: EIR627 <eir627@ocair.com>
> Subject: Law firms
>
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1

> Julie

>

> Sent from my iPhone

From: Holly Kincaid <kincaidrealty@aol.com>
Sent: Saturday, November 24, 2018 11:53 AM

To: EIR627 **Subject:** Airport Issues

November 4, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. <u>2017031072</u>)

Dear Ms. Choum:

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

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2

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3

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e. In preparing the DEIR, was there any consideration of the added pollution that would result from the increase in GA jet aircraft combined with the existing commercial fleet? If no, why not? f. In preparing the DEIR, was there any consideration of the impact of increased noise levels that would result from nighttime flights of GA jet aircraft? If no, why not?

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Comment: Although the DEIR states there will be no change in flight patterns, it is unclear as to the flight patterns that were used for its analysis. It is also unclear what flight patterns would be followed by GA jet aircraft upon approval of the GAIP. Clarification is needed to assess the differences between GA and commercial aircraft departure patterns and how they might change upon approval of the GAIP.

Questions:

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- c. Will there be any changes in GA flight patterns if the GAIP is approved? If yes, what will be the changes?

Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

4

Sincerely,

Holly Kincaid 1511 Santiago Drive Newport Beach, CA 92660 Kincaidrealty@aol.com

From: Leo Lichodziejewski <llichodziejewski@gmail.com>

Sent: Sunday, November 25, 2018 8:38 PM

To: EIR627

Subject: General Aviation Improvement Program

David and Cathy Lichodziejewski 16671 Silktree St. Fountain Valley, CA 92708

To John Wayne Airport Manager,

We are aircraft owners based at John Wayne Airport and have great concerns about the ongoing General Aviation Improvement Program. I have learned that ultimately the general aviation community at John Wayne will lose many tiedown and covered parking areas. In fact, the airport will lose so many parking spots that it will no longer be able to support the community currently based at John Wayne!

DCL-1

The planned "General Aviation Improvements" are NOT great improvements for what is typically called General Aviation but improvements optimized for private for hire business jet aircraft, these are really small commercial aircraft and should not displace the vibrant general aviation community at John Wayne airport.

I understand that revenue is important to Orange County and some expansion and improvements to the airport are overdue. Please plan your improvements to include all interested parties not just favoring small commercial jet operations thinly disguised as "General Aviation". Please retain enough "General Aviation" parking to include the current residents of John Wayne Airport in tie-down, covered, and hangared areas.

DCL-2

Please don't evict us from our airport!

Sincerely,

David Lichodziejewski, N7561E, #249

From: Beverly Blais <bb/>blaisesq@gmail.com>
Sent: Wednesday, December 5, 2018 5:36 PM

To: EIR627 Subject: GAIP DEIR

Dear Ms. Choum:

I submitted comments to the DEIR on behalf of Citizens Against Airport Noise and Pollution (CAANP). Please advise as to when we can receive a response to the comments we have made or some verification as any consideration of our comments.

BBM 2-1

Thank you very much. I look forward to your response.

Sincerely,

Beverly Blais Moosmann Citizens Against Airport Noise and Pollution

From:	Beverly Blais <bblaisesq@gmail.com></bblaisesq@gmail.com>
Sent:	Friday, December 7, 2018 4:04 PM

To: EIR627
Subject: Re: GAIP DEIR
Attachments: image001.png

Dear Lea,

Thank you for your response and the information you have shared regarding the process.

BBM 3-1

Sincerely,

Beverly Moosmann

On Fri, Dec 7, 2018 at 2:25 PM EIR627 <eir627@ocair.com <mailto:eir627@ocair.com > wrote:

Dear Ms. Moosmann,

Thank you for your email. Due to the volume of comments received, response to comments will take some time. All responses will be released at the same time and at least 10 days prior to certifying the Environmental Impact Report. We are anticipating that response to comments will be released within the next few months. We will be sure to include any updates on our webpage at http://www.ocair.com/deir627.

Thank you,

Lea

Lea Choum | Land Use Manager, Facilities

John Wayne Airport, Orange County

3160 Airway Avenue | Costa Mesa, CA 92626

O 949.252.5123

http://facebook.com/johnwayneairport Facebook http://twitter.com/johnwayneair Twitter

Sent: Wednesday, December 05, 2018 5:36 PM To: EIR627 < eir627@ocair.com < mailto:eir627@ocair.com > > Subject: GAIP DEIR
Dear Ms. Choum:
I submitted comments to the DEIR on behalf of Citizens Against Airport Noise and Pollution (CAANP). Please advise as to when we can receive a response to the comments we have made or some verification as any consideration of our comments.
Thank you very much. I look forward to your response.
Sincerely,
Beverly Blais Moosmann
Citizens Against Airport Noise and Pollution

From: Beverly Blais [mailto:bblaisesq@gmail.com <mailto:bblaisesq@gmail.com>]

From: Dcn212 <dcn212@aol.com>

Sent: Thursday, November 22, 2018 9:06 PM

To: EIR627

Subject: GAIP-DEIR SCH#2017031072

Attachments: #11-20-18 EIR Comments - Corporate Jet Hangars.docx

Dear Ms. Choum,

Please consider my letter (attached) as it relates to the GAIP-DEIR.

Thank you,

Chris Northridge

3-1241

1

November 20, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

1. DEIR Complexity and Length Relative to Time Limitations for Comment:

The DEIR was made available for public review on September 20, 2018, with comments due on November 6, 2018, with an extension until November 21, 2018. Comment: This is an incredibly complex and detailed document that is over 600 pages in length, with 2,200 pages of appendices. Although members of the general public are invited to "comment" on the DEIR, it is submitted that most members of the general public are ill equipped to read through the entirety of the document, sufficiently understand it and respond to it with their comments and questions in the time allotted.

<u>Question</u>: Why can't additional time be provided for the review and comment to the DEIR?

2. Project Objectives (Section 3).

This section lists separate objectives of the GAIP, which appear only to benefit airport operations and profitability.

<u>Comment</u>: As you are surely aware, under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives clearly pertain to the efficiency and economic benefits of the GAIP with no indication of concerns for the communities impacted by noise and pollution emanating from JWA.

1 3-1242

Questions:

- a. Is the GAIP for the benefit of nonresident corporate jet aircraft?
- b. Is the GAIP for the benefit of local corporate jet aircraft?
- c. Have local corporations been surveyed regarding their interest in housing their jets at JWA? If no, why not? If yes, what have been their responses?
- d. Does the GAIP benefit the existing fleet of privately-owned piston-powered driven aircraft owners who have historically based their aircraft at JWA? If yes, how?
- e. Will the GAIP result in a decrease of smaller privately-owned piston-powered aircraft at JWA?
- f. How does a decrease in the number of smaller privately-owned pistonpowered aircraft based at JWA and an increase in larger GA jet aircraft, benefit Newport Beach and neighboring communities?
- g. What is the basis for the assumptions of daily departures and arrivals of GA jet traffic, including larger corporate aircraft, which will be displacing smaller GA private planes?
- h. Has it been determined how many additional GA jet aircraft departures will occur in a 24-hour period under the GAIP? If yes, how many? If no, why not?
- i. Will there be a cap or a maximum number of GA jet aircraft departures allowable during a 24-hour period? If yes, how many? If no, why not?
- j. How does the GAIP, with its goal of accommodating large corporate jet aircraft at JWA through building additional hangers, benefit Newport Beach and other neighboring communities?
- k. Will the GAIP result in an increase of international flights to JWA via GA jet aircraft?
- l. If the GAIP increases the number of international flights in and out of JWA, will there be a cap or maximum number allowed during any a 24-hour period? If yes, what will be the maximum number? If no, why not?
- m. How many international flights are anticipated to arrive at JWA on a daily or weekly basis?
- n. What type of TSA-type security screening will be conducted regarding the increasing numbers of larger international GA aircraft if the GAIP is approved? Please describe in detail.
- o. What is the predicted net average daily change in aircraft departures and arrivals if the GAIP is approved?
- p. How many GA privately owned jets will JWA be capable of handling during a 24-hour period if the GAIP is approved?
- q. How many overnight hangers or other spaces will be made available for GA privately owned jet aircraft if the GAIP is approved?
- r. What will be the economic benefit to IWA if the GAIP is approved?
- s. If the GAIP is approved, will existing flight schools be permitted to continue their operations? If not, will flight school(s) specializing in jet aircraft flight instruction replace existing flight schools?

2 3-1243

- t. If any flight schools specializing in jet aircraft flight instruction are anticipated, will a cap or maximum number of training departures and arrivals during a 24-hour period be established? If yes, what will be the maximum number? If no, why not?
- u. If any flight schools specializing in jet aircraft flight instruction are anticipated, will hours for their operation and training flights be established? If yes, what will be the hours? If no, why not?

3. <u>DEIR Conclusions that Environmental Impacts are Insignificant (Section 4)</u>.

<u>Comment</u>: The DEIR conclusion that the GAIP will not significantly cause a negative impact to the community in terms of noise, air quality, hazardous materials, etc., is unrealistic. It is submitted that there has been an insufficient consideration of the additional noise and pollution that will be created, especially from the leaded fuel mixture used by private GA jet aircraft and their exemption from curfew hours under GA regulations. There have been numerous studies published in peer-reviewed scholarly journals that airport noise and pollution have serious health impacts for neighboring communities. It is unrealistic to conclude that if the GAIP is approved that there will be no significant negative environmental impact to Newport Beach and other neighboring communities.

Furthermore, the assumptions supporting the noise analysis are flawed and unrealistic. The projection that by 2016, 40% of the Boeing 737 and Airbus A320 aircraft using JWA would include the quieter 737-MAX and Airbus A320-Neo was sheer speculation and conflicts with the 2014 Settlement Agreement EIR noise modeling.

Questions:

- a. As GA jet aircraft have a long history of violating noise limits, how will this be better controlled, especially given the current lack of regulation of the GA jet aircraft fleet?
- b. Is an increase in GA jet aircraft nighttime arrivals and departures anticipated? If yes, how many nighttime arrivals and departures are anticipated?
- c. Will JWA place a cap or limit on the number of nighttime arrivals and departures of GA jet aircraft? If yes, what limitations will be established? If no, why not?
- d. Why wasn't the negative impact of an additional 5-10% noise generating Back Bay departure patterns by large corporate jets on the same neighborhood impacted by commercial departures considered in the Noise Impact section of the Appendix? As this would have the same impact as a net increase in commercial departures that could replace aircraft that were previously fanning after takeoff and not impacting these neighbors, why wasn't this considered?

- e. If the GAIP is approved, what would be the largest GA jet aircraft that would be accommodated by JWA?
- f. How would the noise from departing large GA jet aircraft compare with the noise emitted from the commercial jet fleet currently using JWA? If this analysis has been done, what is the basis for the analysis?
- g. Will there be a limitation on large GA jet departures? Will there be any such limitation specifically during the existing curfew hours? If yes, what will be the limitations? If no, why not?
- h. Do the GAIP conclusions of no significant noise or pollution impact take into consideration the Next-Gen satellite-precision concentrated flight paths that have clearly had a significant negative impact on Newport Beach? If yes, what conclusions have been drawn? If no, why not?

4. Health Risk Analysis (Section 4).

Comment: Although related to the above comment, the health risk analysis ("HRA") in Section 4 of the DEIR is extremely complicated and confusing. The DEIR also relies heavily on the EIR submitted during the 2014 Settlement Agreement ("EIR 617") for its health risk analysis ("HRA"). It is submitted that reliance on the previous EIR is misplaced. EIR 617 relied on existing 2014 flight patterns prior to the implementation of the FAA Next Gen concentrated satellite driven precision flight patterns that are flown today. Furthermore, the DEIR does not anticipate the different emissions anticipated from the expected increase in GA jet aircraft if the GAIP is approved. To suggest that there will be a minimal increase in emissions is unrealistic and unsupported by any evidence.

Comment: The DEIR is also woefully deficient in its discussion of the potential health impacts to more sensitive members of the community, especially the impact on children. The DEIR discusses "sensitive receptors" and "sensitive populations" noting only those closest to the boundary of JWA, specifically mentioning a residential development approximately 855 feet from the boundary of IWA and airport workers. In response, there have been numerous studies conducted and published in peer-reviewed scholarly journals about the serious health issues caused by airports, over flights, departures and arrivals on children and adults in communities under the flight paths. These studies have confirmed that children suffer cognitive deficits and respiratory illnesses, while the general population suffers undue stress, heart disease, high blood pressure, cognitive decline, auditory problems, heart attacks, strokes and elevated cancer risk. Similarly, research studies have concluded that the adverse health effects from airport pollution are present within 10 miles of an airport. There are thousands of children in schools within 10 miles from the JWA departure paths and thousands of people who live under the flight paths.

4

Questions:

- a. In arriving at the conclusion that the environmental impact of the GAIP is "less than significant," what consideration has been given to the schools, athletic fields, parks and residential areas located in close proximity and under the flight paths of JWA? If the impact on these populations has not been considered, why not?
- b. Although noise is discussed in the Sensitive Receptors section of the DEIR and its impact on schools, why isn't an in-depth discussion of health concerns, especially as they relate to children, included?
- c. Did the County in the preparation of the DEIR review and consider recent research concerning the health and welfare of populations living within close proximity of airports? With the eight communities located within 10 miles of JWA? What were the findings on the specific communities?
- d. What is the true net increase in pollutants from the new aircraft population departures from JWA as the fuel mix is different and heavier in carbon and particulate pollutants?
- e. In preparing the DEIR, was there any consideration of the added pollution that would result from the increase in GA jet aircraft combined with the existing commercial fleet? If no, why not?
- f. In preparing the DEIR, was there any consideration of the impact of increased noise levels that would result from nighttime flights of GA jet aircraft? If no, why not?

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<u>Comment</u>: Although the DEIR states there will be no change in flight patterns, it is unclear as to the flight patterns that were used for its analysis. It is also unclear what flight patterns would be followed by GA jet aircraft upon approval of the GAIP. Clarification is needed to assess the differences between GA and commercial aircraft departure patterns and how they might change upon approval of the GAIP.

Ouestions:

- a. Will the GA jet aircraft added to JWA through the GAIP follow the existing flight patterns presently used by commercial jets as mandated by the SoCal Metroplex?
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- c. Will there be any changes in GA flight patterns if the GAIP is approved? If yes, what will be the changes?

5 3-1246

Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices regarding the GAIP and the Notice of Availability of the Final EIR.

Sincerely,

Christine Northridge 310 Avenida Cumbre Newport Beach CA. 92660 714-401-0660

6 3-1247

Dan O'Neil

To:

From: Bonnie O'Neil <boneil@me.com> Sent:

Tuesday, December 11, 2018 5:25 AM

Dan O'Neil

Subject: Dan, please copy and send to Ms Choum (below)

November 17, 2018

Via Electronic Mail EIR627 a ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program - Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

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Comment: As you are surely aware, under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives clearly pertain the efficiency and economical benefits of the GAIP with no indication of concerns for the communities impacted by noise and pollution emanating from JWA.

Questions:

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- a. In arriving at the conclusion that the environmental impact of the GAIP is "less than significant." what consideration has been given to the schools, athletic fields, parks and residential areas located within a close proximity and under the flight paths of JWA? If the impact these populations have not been considered, why not?
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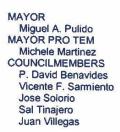
Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely.

Bonnie and Dan O'Neil 314 Morning Star Newport Beach boneil@me.com and dan@oneilstorage.com

Letter 313

CITY MANAGER
Raul Godinez II
CITY ATTORNEY
Sonia R. Carvalho
CLERK OF THE COUNCIL
Maria D. Huizar





DEC 0 3 2018

JWA

20 Civic Center Plaza P.O. Box 1988 • Santa Ana, California 92702 www.santa-ana.org/pba

November 19, 2018

Lea Choum 3160 Airway Avenue Costa Mesa, CA 92626

RE:

Public Notice of Comment Period Extension for Draft Program Environmental Impact Report (DEIR)

Dear Ms. Choum:

Thank you for your letter regarding the extension of the comment period for the Draft Environmental Impact Report for the John Wayne Airport General Aviation Improvement Program. Staff has reviewed the DEIR and has no comments to provide at this time.

SA-1

Please continue to keep the City apprised of any proposed changes or developments at John Wayne Airport (SNA).

Sincerely,

Ali Pezeshkpour, AICP Senior Planner

SANTA ANA CITY COUNCIL

Barbara Griffith <bgriffith@socalleasing.com> From:

Sent: Monday, November 26, 2018 9:46 AM

EIR627 To: **Subject: DEIR**

Attachments: 11.15.18 EIR Comments.docx

Letter regarding the attachment

Barbara Griffith

President



714-573-9804 x 101

bgriffith@sclfinance.com www.sclfinance.com

Connect with us: LinkedIn | Twitter | Facebook | Instagram

"Southern California Leasing provides affordable funding options to businesses so they can grow."

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1

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

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<u>Question</u>: Why can't additional time be provided for the review and comment to the DEIR?

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This section lists separate objectives of the GAIP, which appear only to benefit airport operations and profitability.

<u>Comment</u>: As you are surely aware, under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives clearly pertain the efficiency and economical benefits of the GAIP with no indication of concerns for the communities impacted by noise and pollution emanating from JWA.

1 3-1253

Questions:

- a. Is the GAIP for the benefit of nonresident corporate jet aircraft?
- b. Is the GAIP for the benefit of local corporate jet aircraft?
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- r. What will be the economic benefit to IWA if the GAIP is approved?
- s. If the GAIP is approved, will existing flight schools be permitted to continue their operations? If not, will flight school(s) specializing in jet aircraft flight instruction replace existing flight schools?

2 3-1254

- t. If any flight schools specializing in jet aircraft flight instruction are anticipated, will a cap or maximum number of training departures and arrivals during a 24-hour period be established? If yes, what will be the maximum number? If no, why not?
- u. If any flight schools specializing in jet aircraft flight instruction are anticipated, will hours for their operation and training flights be established? If yes, what will be the hours? If no, why not?

3. DEIR Conclusions that Environmental Impacts are Insignificant (Section 4).

Comment: The DEIR conclusion that the GAIP will be not significantly cause a negative impact to the community in terms of noise, air quality, hazardous materials, etc., is unrealistic. It is submitted that there has been an insufficient consideration of the additional noise and pollution that will be created; especially considering the leaded fuel mixture used by private GA jet aircraft and their exemption from curfew hours under GA regulations. There have been numerous studies reported in many peer-reviewed scholarly journals that airport noise and pollution have serious health impacts for neighboring communities. It is unrealistic to conclude that if the GAIP is approved that there will be no significant negative environmental impact to Newport Beach and other neighboring communities.

Furthermore, the assumptions supporting the noise analysis are flawed and unrealistic. The projection that by 2016, 40% of the Boeing 737 and Airbus A320 aircraft using JWA will include the quieter 737-MAX and Airbus A320-Neo is sheer speculation and is in conflict with the 2014 Settlement Agreement EIR noise modeling.

Questions:

- a. As GA jet aircraft have a long history of violating noise limits, how will this be better controlled, especially given the current lack of regulation of the GA jet aircraft fleet?
- b. Is an increase in GA jet aircraft nighttime arrivals and departures anticipated? If yes, how many nighttime arrivals and departures are anticipated?
- c. Will JWA place a cap or limit on the number of nighttime arrivals and departures of GA jet aircraft? If yes, what limitations will be established? If no, why not?
- d. Why wasn't the negative impact of an additional 5-10% noise generating Back Bay departure pattern by the large corporate jets on the same neighborhood impacted by commercial departures considered in the Noise Impact section of the Appendix? As this would have the same impact as a net increase in commercial departures that would replace aircraft that were previously fanning after takeoff and not impacting these neighbors, why wasn't this considered?

3-1255

- e. If the GAIP is approved, what would be the largest GA jet aircraft that would be accommodated by JWA?
- f. How would the noise from departing large GA jet aircraft compare with the noise emitted from the commercial jet fleet currently using JWA? If this analysis has been done, what is the basis for the analysis?
- g. Will there be a limitation on large GA jet departures? Will there be any such limitation specifically during the existing curfew hours? If yes, what will be the limitations? If no, why not?
- h. Do the GAIP conclusions of no significant noise or pollution impact take into consideration the Next-Gen satellite-precision concentrated flight paths that have clearly has a significant negative impact on Newport Beach? If yes, what conclusions have been drawn? If no, why not?

4. Health Risk Analysis (Section 4).

Comment: Although related to the above comment, the health risk analysis ("HRA") in Section 4 of the DEIR is extremely complicated and confusing. The DEIR also relies heavily on the EIR submitted during the 2014 Settlement Agreement ("EIR 617") for its health risk analysis ("HRA"). It is submitted that reliance on the previous EIR is misplaced. EIR 617 relied on existing 2014 flight patterns prior to the implementation of the FAA Next Gen concentrated satellite driven precision flight patterns that are flown today. Furthermore, the DEIR does not anticipate the different emissions anticipated from the expected increase in GA jet aircraft if the GAIP is approved. To suggest that there will be a minimal increase in emissions is unrealistic and unsupported by any evidence.

Comment: The DEIR is also woefully deficient in its discussion of the potential health impacts to more sensitive members of the community, especially the impact on children. The DEIR discusses "sensitive receptors" and "sensitive populations" noting only those closest to the boundary of JWA, specifically mentioning a residential development approximately 855 feet from the boundary of IWA and airport workers. In response, there have been numerous studies conducted and published in peer-reviewed scholarly journals about the serious health issues caused by airports, over flights, departures and arrivals on children and adults in communities under the flight paths. These studies have confirmed that children suffer cognitive deficits and respiratory illnesses, while the general population suffers undue stress, heart disease, high blood pressure, cognitive decline, auditory problems, heart attacks, strokes and greater cancer risk. Similarly, research studies have concluded that the adverse health affects from airport pollution are present within 10 miles of an airport. There are thousands of children in schools well within a distance of 10 miles from the JWA departure paths and thousands of people who live under the flight paths.

4 3-1256

Questions:

- a. In arriving at the conclusion that the environmental impact of the GAIP is "less than significant," what consideration has been given to the schools, athletic fields, parks and residential areas located within a close proximity and under the flight paths of JWA? If the impact these populations have not been considered, why not?
- b. Although noise is discussed in the Sensitive Receptors section of the DEIR, including the impact to schools, why isn't there an in depth discussion of health concerns especially as they relate to children?
- c. Did the County in the preparation of the DEIR review and consider recent research concerning the health and welfare of populations living within a close proximity of airports? Within 10 miles of JWA?
- d. What is the true net increase in pollutants from the new aircraft population departures from JWA as the fuel mixture is different and heavier in carbon and particulate pollutants?
- e. In preparing the DEIR, was there any consideration of the added pollution that would result from the increase in GA jet aircraft combined with the existing commercial fleet? If no, why not?
- f. In preparing the DEIR, was there any consideration of the impact of increased noise levels that would result from nighttime flights of GA jet aircraft? If no, why not?

5. Flight Patterns.

<u>Comment</u>: Although the DEIR states there will be no change in flight patterns, it is unclear as to the flight patterns that were used for its analysis. It is also unclear what flight patterns would be followed by GA jet aircraft upon approval of the GAIP. Clarification is needed to assess the differences between GA and commercial aircraft departure patterns and how they might change upon approval of the GAIP.

Questions:

- a. Will the GA jet aircraft added to JWA through the GAIP follow the existing flight patterns presently used by commercial jets as mandated by the SoCal Metroplex?
- b. If the GA jet aircraft added through the GAIP will follow the flight patterns mandated under the SoCal Metroplex, has there been any consideration as to the impact that will be caused by the increase in air traffic over Newport Beach? If no, why not?
- c. Will there be any changes in GA flight patterns if the GAIP is approved? If yes, what will be the changes?

5 3-1257

Thank you for your consideration of my comments and questions. Pleatinformed of all developments related to this DEIR, including public no regards to the GAIP and the Notice of Availability of the Final EIR.	
Sincerely,	
(include your name, home an	d email
addresses	

6 3-1258

From: mimi newport <dancingms@gmail.com>
Sent: Friday, November 23, 2018 6:42 AM

To: EIR627 **Subject:** OC airport

Please do not allow private corporate jets expansion at our airport. Our quality of life would be very much affected by the noise level generated by these aircrafts day and night and would make our community less desirable to live in. It is not a wise decision to allow expansion. Please vote against it. Myriam Shapiro 2825 port Sheffield place. Newport

MS-1

Beach 93660

November 17, 2018

Via Electronic Mail EIR627@ocair.com

Ms. Lea Choum Land Use Manager at JWA 3160 Airway Avenue Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

1. <u>DEIR Complexity and Length Relative to Time</u> Limitations for Comment:

The DEIR was made available for public review on September 20, 2018, with comments due on November 6, 2018, with an extension until November 21, 2018.

Comment: This is an incredibly complex and detailed document that is over 600 pages in length, with 2,200 pages of appendices. Although members of the general public are invited to "comment" on the DEIR, it is submitted that most members of the general public are ill equipped to read through the entirety of the document, sufficiently understand it and respond to it with their comments and questions in the time allotted.

Question: Why can't additional time be provided for the review and comment to the DEIR?

2. Project Objectives (Section 3).

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This section lists separate objectives of the GAIP, which appear only to benefit airport operations and profitability. Comment: As you are surely aware, under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives clearly pertain the efficiency and economical benefits of the GAIP with no indication of concerns for the communities impacted by noise and pollution emanating from JWA.

Ouestions:

- a. Is the GAIP for the benefit of nonresident corporate jet aircraft?
- b. Is the GAIP for the benefit of local corporate jet aircraft?
- c. Have local corporations been surveyed regarding their interest in housing their jets at JWA? If no, why not? If yes, what have been their responses?
- d. Does the GAIP benefit the exiting fleet of privately owned piston-powered driven aircraft owners who have historically based their aircraft at JWA? If yes, how?
- e. Will the GAIP result in a decrease of smaller privately owned piston-powered aircraft at JWA?
- f. How does a decrease in the number of smaller privately owned piston- powered aircraft based at JWA and an increase in larger GA jet aircraft, benefit Newport Beach and neighboring communities?
- g. What is the basis for the assumptions of daily departure and arrival of GA jet traffic, including larger corporate aircraft, which will be displacing smaller GA private planes?
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Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

(include your name, home and email addresses)

NICASUE (1)

Sincerely,

Comments on the Environmental Impact Report Sent to Others

3.9 COMMENTS ON THE ENVIRONMENTAL IMPACT REPORT SENT TO OTHERS

To ensure all comments on the Draft Program Environmental Impact Report ("EIR") are properly responded to, the directions on the website, all hand-out materials, and in the Draft Program EIR identified that comments were to be directed to Ms. Lea Choum at the Airport or submitted to the Airport email address EIR627@ocair.com. This allowed there to be a central location at the County for all comments. There was one letter sent directly to Supervisor Bartlett and the Airport was not copied. Supervisor Bartlett forwarded the comment letter to the Airport. Although it may not have been intended as a comment on the Draft Program EIR, because the County received it during the public review period, written responses have been prepared to the issues raised in the comment letter.

Received u/26/18 Letter 317

Andy Couch 1906 Dover Drive Newport Beach, CA 92660 andrew@andrewcouch.com

November 21, 2018

Lisa A. Bartlett Supervisor, 5th District County of Orange 333 W. Santa Ana Blvd., 5th Floor Santa Ana, CA 92701

Re:

John Wayne Airport General Aviation Improvement Plan

Dear Supervisor Bartlett:

	Now that the elections are over, I hope that you will be able to devote attention to the misleadingly labeled "General Aviation Improvement Program" that the County has proposed for John Wayne Airport.	
	This is more accurately described as a "Business Jet Improvement Program", because the primary result of the implementation of the Proposed Project or Alternatives. I or 2 will be a substantial increase in the number of business jet operations at John Wayne Airport, operations that will not be limited by the airline curfew set forth in the 1985 settlement agreement as amended, or the other restrictions on commercial airline operations.	AC 2-1
	It may be necessary to update the 30 year old plan for John Wayne Airport, to modify parts of the airport to comply with FAA regulations or changing needs. It is not necessary to significantly increase the facilities for business jets, which will result in a significant increase in business jet operations and a significant increase in the noise created by business jets.	AC 2-2
	Under current federal statutes, there may be restrictions upon the limits that can be imposed upon business jet aircraft at John Wayne Airport. However, one of the limits that can be imposed is to limit the business jet facilities. If there is no place to park the business jets, then they won't use John Wayne Airport.	AC 2-3
6	The general public will not benefit from the proposed business jet improvements to John Wayne Airport. The very wealthy who fly in business jets will benefit, as will the County, as indicated by the various business jet revenue streams identified in the Draft Program Environmental Report 627. But the general public, and especially Newport Beach residents, will suffer the additional noise generated by the increased business jet operations. A jet engine doesn't care if it is attached to an airliner or business jet, it emits the same noise.	AC 2-4
	I urge you to oppose the Proposed Project and Alternatives 1 and 2. Any required updates to the airport can be accomplished through Alternative 3.	AC 2-5

Yours very truly,