

# **APPENDIX J**

**CALTRANS AERONAUTICS  
LETTER TO CITY OF EL CAJON,  
October 30, 2008**



**DEPARTMENT OF TRANSPORTATION**

DIVISION OF AERONAUTICS – M.S.#40

1120 N STREET

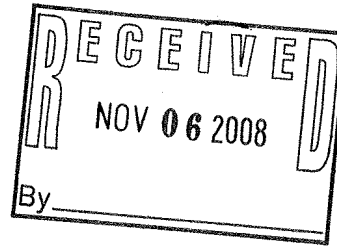
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October 30, 2008

Ms. Barbara K. Ramirez  
City of El Cajon  
200 E. Main Street  
El Cajon, CA 92020

Dear Ms. Ramirez:

City of El Cajon's Request for Comments for APN: 387-190-06

The California Department of Transportation (Caltrans), Division of Aeronautics (Division), reviewed the above-referenced document with respect to airport-related noise and safety impacts and regional aviation land use planning issues pursuant to the California Environmental Quality Act (CEQA). The Division has technical expertise in the areas of airport operations safety, noise and airport land use compatibility. We are a funding agency for airport projects, and we have permit authority for public-use and special-use airports and heliports. The following comments are offered for your consideration.

The proposal is a request to develop a 463,000 square-foot industrial park on 35 acres at the northwest corner of Weld Boulevard and Cuyamaca Street. The proposal includes the amendment of the General Plan designation of the subject property from Special Development Area #1 and Open Space to Industrial Park; rezoning the property from Open Space to Manufacturing; amending Specific Plan 291 to permit industrial uses, and a site development plan.

The project site is located approximately 850 feet west of the approach end to Runway 9L at Gillespie Field Airport. Gillespie Field is an active airport with approximately 750 based aircraft and over 244,000 annual operations. The project site will be subject to direct aircraft overflights and subsequent aircraft-related noise and safety impacts.

The proposal is within the Airport Influence Area for the airport as designated in the adopted Airport Land Use Compatibility Plan (ALUCP) for Gillespie Field. The proposal should be submitted to the San Diego County Regional Airport Authority, which represents the Airport Land Use Commission (ALUC), for a consistency determination. The proposal should also be coordinated with Gillespie Field Airport staff to ensure that the project will be compatible with future as well as existing airport operations.

Protecting people and property on the ground from the potential consequences of near-airport aircraft accidents is a fundamental land use compatibility-planning objective. While the chance of an aircraft injuring someone on the ground is historically quite low, an aircraft accident is a high consequence event. To protect people and property on the ground from the risks of near-airport aircraft accidents, some form of restrictions on land use are essential. The two principal methods for reducing the risk of injury and property damage on the ground are to limit the number of persons in an area and to limit the area covered by occupied structures. The

potential severity of an off-airport aircraft accident is highly dependent upon the nature of the land use at the accident site.

The California Airport Land Use Planning Handbook (Handbook), available on-line at <http://www.dot.ca.gov/hq/planning/aeronaut/documents/ALUPHComplete-7-02rev.pdf>, identifies six airport safety zones based on risk levels. The northeast corner of the project site appears to be within the Runway Protection Zone (RPZ). The remainder of the project site appears to be within Safety Zone 2, the Inner Approach/Departure Zone and Safety Zone 6, the Traffic Pattern Zone. The RPZ is the most critical of the airport safety zones, considered to be at “very high risk” due its proximity to the end of the runway. Just beyond the RPZ is the Inner Approach/Departure Zone, which is considered to be at “substantial risk”. The RPZ together with the inner safety zones encompass 30 to 50 percent of the near-airport aircraft accident sites. CEQA, Public Resources Code Section 21096, requires the Handbook be used as a resource in the preparation of environmental documents for projects within airport land use compatibility plan boundaries or if such a plan has not been adopted, within two miles of an airport. The Handbook generally recommends prohibiting all new structures within the RPZ.

The Federal Aviation Administration’s (FAA) Airport Design Guide, AC150/5300-13, contains guidance pertaining to land uses within the RPZ. The RPZ is further broken down into three sub areas: The Runway Object Free Area, Object Free Area Extension, and Controlled Activity Area. As part of FAA grant assurances, if an airport sponsor receives federal funds for an airport, it is required that use of land adjacent to or in the immediate vicinity of the airport be restricted to activities and purposes compatible with normal airport operations.

California Public Utilities Code Section 21659 prohibits structural hazards near airports. Structures should not be at a height that will result in penetration of the airport runway imaginary surfaces. The proposal must not result in hazards to flight, such as:

- Obstructions to the airspace required for flight to, from, and around an airport
- Wildlife hazards, particularly bird strikes
- Visual hazards associated with distracting lights, glare, and sources of smoke
- Electronic hazards that may interfere with aircraft instruments or radio communication

In accordance with Federal Aviation Regulation (FAR), Part 77 “Objects Affecting Navigable Airspace” a Notice of Proposed Construction or Alteration (Form 7460-1) was submitted to the Federal Aviation Administration (FAA) for each of the four buildings. The FAA Aeronautical Studies Nos. 2008-AWP-524-NRA, 2008-AWP-525-NRA, 2008-AWP-526-NRA, and 2008-AWP-527-NRA all received a “Determination of No Hazard to Air Navigation.” Form 7460-1 should also be submitted for temporary construction-related impacts, such as construction cranes, as appropriate.

The location and type of landscape trees is also a potentially significant concern. Trees should be selected carefully so they do not become a hazard to aircraft around the airport. The RPZ and the Inner Approach/Departure Zones are areas where aircraft fly at low altitudes. Selection of a

species of tree that does not grow taller and become penetrations to the FAR Part 77 imaginary surfaces and potential hazards to aircraft operating to and from the airport.


Should the project be approved, we recommend that a mitigation measure be required so that construction activities are coordinated with the airport manager to ensure that appropriate action, such as, Notice to Airmen (NOTAM), are publicized sufficiently in advance.

The protection of airports from incompatible land use encroachment is vital to California's economic future. Gillespie Field Airport is an economic asset that should be protected through effective airport land use compatibility planning and awareness. Although the need for compatible and safe land uses near airports in California is both a local and a State issue, airport staff, airport land use commissions and airport land use compatibility plans are key to protecting an airport and the people residing and working in the vicinity of an airport. Consideration given to the issue of compatible land uses in the vicinity of an airport should help to relieve future conflicts between airports and their neighbors.

These comments reflect the areas of concern to the Division with respect to airport-related noise and safety impacts and regional airport land use planning issues. We advise you to contact our Caltrans District 11 office concerning surface transportation issues.

Thank you for the opportunity to review and comment on this proposal. If you have any questions, please call me at (916) 654-5314.

Sincerely,

  
SANDY HESNARD  
Aviation Environmental Specialist

c: Gillespie Field Airport, San Diego County ALUC

