



County of San Diego

DEPARTMENT OF PUBLIC WORKS

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April 28, 2004

Gillespie Airport Lessee's Association
1905 North Marshall Avenue
El Cajon, CA 92020

Dear GALA Members:

In response to your letter dated April 15, 2004 the following is provided:

Presenting a plan to GALA on April 6 and planning for final approval in June does not allow adequate time for review.

- GALA has been an integral part of the ALP Narrative Update process since the formation and first meeting of the Planning Advisory Committee (PAC) on November 19, 2001.

The proposed ALP increased the BRL from 250 ft to 300 ft west of 17/35 – Why? Does this mean a reduction in usable aviation land? Will this change cause the elimination of existing aircraft tiedown spaces?

- The new BRL is based on AC 5300-13 Chg 7 and incorporates the Runway Visibility Zone, Air Traffic Control Tower Clear Line of Sight, Runway Protection Zone, Runway Obstacle Free Area, Navigational Aid Critical Areas and Area for Terminal Instrument Procedures. The new BRL complies with the current Advisory Circular.
- No, this area is still usable.
- No, tiedowns are acceptable within some areas of the BRL.

What criteria was used to determine the need for B-II standards on these taxiways? If taxiway B currently meets B-II clearance standards, why alter taxiway A?

- Runway 17/35 is a B-II runway; parallel taxiways must complement that standard.

- The category of runway determines the safety standard and use of parallel taxiways, not the number of operations.

The Runway Visibility Zone/Control Tower Clear Line of Sight line further restricts the BRL. Does this constitute a "taking of rights?" Under the terms of existing Master leases, does the County have a legal right to do this?

- No, your lease document requires compliance with all Federal, State and Local Rules and Regulations. At this time all current uses are still allowed.
- Yes, your lease document states the following: **2.4 Lease Subordinate to Conditions and Restrictions Imposed by Public Agencies on Airport Operations.** This Lease shall be subordinate and subject to the terms, conditions, restrictions and other provisions of any existing or future permit, lease and agreement between County and any federal, State or local agency governing County's control, operation or maintenance of the Airport, or affecting the expenditure of federal funds for the Airport. Lessee shall be bound by all such terms and conditions, and shall, whenever County may so demand, execute, acknowledge or consent to any instrument evidencing such terms, conditions, restrictions or provisions. Without limiting the generality of the foregoing, this Lease and Lessee's occupancy of the Premises are expressly made subordinate and subject to the terms, conditions, restrictions and other provisions of those requirements of the Federal Aviation Administration specifically set forth in Exhibit "B" (FAA REQUIREMENTS) and Lessee shall be bound by all such requirements."

The Control Tower Clear Line of Sight line appears to ignore building height considerations. What is the definition of the CTCLS? Why does it ignore height?

- Refer to AC 5300-13 chg 7 - pages 10, 56, 57, 65 (or see www.faa.gov)
- The new BRL is based on AC 5300-13 Chg 7 and incorporates the Runway Visibility Zone, Air Traffic Control Tower Clear Line of Sight, Runway Protection Zone, Runway Obstacle Free Area, NAVAID Critical Areas and Area for Terminal Instrument Procedures. The new BRL complies with the current Advisory Circular. Height is addressed in most areas listed above.

Does the establishment of this Clear Line of Sight improve aviation safety? Does established data justify the establishment of this line?

- Yes
- Yes

The ALP concludes that additional hangars are needed, and then prevents existing Master Leaseholders from building hangars by moving the BRL.

- Yes, additional hangars are needed. All leaseholds were studied and five development concepts were identified in Chapter 6 of the ALP Narrative Update. Because of the new Standards set forth in AC 5300-13, some lessees will not be able to add large hangars toward the taxiways and runways.

A new tower site could reduce or eliminate the BRL problem. Can the new tower be moved to Phase I construction?

- FAA Order 5100.38B, Change 1, Sec. 610 states: 'Relocation of ATCT's solely to correct existing line-of-site problems would not be eligible'. (not eligible for FAA AIP funding)
- County Airports does not foresee having the needed funding for relocating the ATCT at this time.

Existing Master Leaseholders depend on new construction and capital improvements to extend or renew their lease. Removing the ability to build by moving the BRL will prevent new capital improvements and may prevent lease renewals.

- County Airports is bound by Federal Regulation and Grant Assurances to adhere to current FAA standards, including those identified in AC 150/5300-13.

There are two types of FBO's on Gillespie. Those that are passive and those that provide major service to the aviation public. Golden State has fit in the second category for over 30 years. This plan destroys their leasehold. Is this justified? If so, how can this action be mitigated?

- The proposed ALP does not 'destroy the leasehold that Golden State occupies.
- County Airports is bound by Federal Regulation and Grant Assurances to adhere to current FAA standards, including those identified in AC 150/5300-13. Most likely, Golden State will need to relocate approximately 14 tiedown spaces that are within the ROFA, within 30 days of the approval of the new ALP. Their building encroaches into the proposed BRL and at this time, the County does not intend to demand that they move the building. The issue can be addressed further, at their convenience.

Gillespie currently has more hangars (500) than any General Aviation airport in the world known to GALA members. Does adding 400 additional hangars make sense? T-

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Hangar construction produces few jobs, little activity, limited fuel sales, and minimum revenue. Is this really the highest and best aviation use for the majority of the new 70-acre parcel?

- The ALP addresses Aviation Demand Forecast in Chapter 4. The forecast for based aircraft is expected to increase as demand in the region increases.

All aviation parcels should be developed with the same criteria that has existed by several decades. Criteria such as 5-acre minimum size parcels, \$5,000 per acre per year capital improvement requirements, etc. Preferential treatment for any special interest group would be a misuse of public funds and would destroy the existing level playing field.

- County Airports will develop Gillespie Field with guidance and assistance from the Gillespie Field Development Counsel in accordance with FAA Rules and Regulations in a manner that benefits the aviation public and users.

The Federal Aviation Agency, the County of San Diego and GALA all share the same basic objective: To develop Gillespie Field in a manner that best serves the aviation public. In general, GALA believes that high standards, uniformly enforced throughout the Southern California airport system, are the correct road toward this objective. Our final concern is that the FAA is engaging in selective enforcement by attempting to hold Gillespie Field to a standard that they are unable or unwilling to enforce on all Southern California airports.

- This issue/question is best addressed by the Federal Aviation Administration.

If you if have any further questions please contact Airport Manager, Noreen Crane at (619) 956-4805.

Sincerely,

Peter Drinkwater
Director of Airports

PD:jk