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June 1, 2004

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Mr. Peter Drinkwater  
Airports Director  
Gillespie Field  
Airport Administration Building  
1960 Joe Crosson Drive  
El Cajon, CA 92020

**SUBJECT: Gillespie Field – Airport Layout Plan Draft Final Narrative Report, March 2004**

Dear Mr. Drinkwater:

This letter will serve as City of Santee's response to the Gillespie Field Airport Layout Plan (ALP) Draft Final Narrative Report, dated March 2004. The ALP identifies specific areas for existing and future development to meet aviation demand, and encompasses 757 acres, mostly contained in the City of El Cajon. Gillespie Field is classified as a "Regional Business/Corporate Airport" in the California Aviation System Plan. Three demand forecasts were analyzed: a baseline, a high growth and low growth.

While the ALP is represented as a planning document, it clearly describes improvements that have a direct bearing on the expansion of noise contours over the City of Santee. Any expansion of CNEL contours that increases noise impacts to Santee is of great concern.

The ALP utilizes the high growth forecast in planning for improvements through 2025, and is reflected in preferred development Concept 5. The key "landside" elements of this Concept include the redevelopment of the 70-acre El Cajon Speedway to provide hangars, new terminal, tie-down areas, and a six-acre area for helicopter use. Also proposed is the release of 12.6 acres west of Marshal Avenue for non-aviation uses. The key "airside" elements include the extension of Runway QR-27 L by 423 feet, a shortening of the runway displacement threshold for QL – 27 R through removal of airspace obstructions, and surface rehabilitation of all runways.

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The ALP (Concept 5) identifies the acquisition of properties and avigation easements in Santee. Specifically, a 2.2 acre property in the General Industrial Zone, located between Kenney Street and Prospect Avenue, near Cottonwood Avenue is earmarked for acquisition in 2005. Another property at Cuyamaca and Prospect is recommended for acquisition. A 5.8-acre easement is proposed north of Prospect Avenue, just east of Cottonwood Avenue.

The ALP Plan Sheet 2, does not clearly identify these properties by lot or assessor's tax parcel, and the City is unable to ascertain whether all, or a portion of a legal lot or tax parcel is proposed. For instance, the 0.27-acre property targeted for fee acquisition appears to be a 0.54-acre site owned by the Metropolitan Transit Development Board, in the City of Santee (A.P.N. 384-190-44). The ALP should include more precise data on affected properties in Santee.

A 25-foot wide easement is noted on the plan in anticipation of the widening of Prospect Avenue along the airport frontage in the vicinity of Runway 17-35. Please note that a similar easement appears to be necessary on Assessor's Parcel 384-190-72. Additionally, Assessor's Tax Parcel 384-190-44 (8547 Cuyamaca Street) may require an easement that reflects the ultimate improvement of Cuyamaca Street.

The ALP does not appear to take into account the construction of State Route 52 to State Route 67, which is elevated in the northern vicinity of the airport (estimated to be 17 feet per preliminary design drawings). Would this structure cause the modification of the year 2025 noise contour map?

Although the airport is mostly in the City of El Cajon, airborne aircraft produce the most significant impacts to the City of Santee in terms of noise. This is clearly depicted on the year 2000 CNEL noise contour map and the year 2025 CNEL noise contour map which affect a larger area in the City of Santee when compared to the City of El Cajon.

The City adopted General Plan 2020 last year. Within the Noise Element the City has established residential use to be "normally acceptable" up to 65 Ldn dB and "conditionally acceptable" up to 70 Ldn, dB. Similarly, commercial and office uses are "normally acceptable" up to 70 Ldn, dB, while up to 75 Ldn dB is "normally acceptable" for industrial uses. As such, any expansion of areas exposed to noise exceeding 65 Ldn dB affects development in the City of Santee.

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Currently, the 70 CNEL contour is shown to be fully contained within the airport boundary, but by year 2025, this contour is modified to affect properties between Kenney Street and Prospect Avenue, the industrial park at the corner of Cuyamaca and Prospect Avenue, and a single-family residential area at the southern end of Rhone Road. Nonetheless, industrial and residential uses would remain conditionally acceptable up to 70 CNEL per the City's General Plan (subject to interior noise attenuation, aviation easements).

Currently, the 65 CNEL contour is shown to generally match the 1984 Gillespie Field CLUP contour, with a small expansion of area between Prospect Avenue and Kenney Street, and a reduction in area west of Cuyamaca Street. However, by year 2025, the 65 CNEL expands to encompass both single- and multiple-family residential neighborhoods west of Rhone/Slope to Northview Court/Prospect Elementary School, and along Forester Creek close to Mission Gorge Road.

The CNEL maps should provide information such that a property affected by noise can be easily identified. The contours are imposed on outdated base maps, and, absent assessor's tax parcels or street names, an accurate determination of land use impacts is not possible. This is unacceptable to the City of Santee, because such determinations play a role in the processing of land development applications. Specifically, new development and redevelopment of properties are subject to aviation easements and interior noise attenuation per the General Plan – Noise Element Policies 1.10 through 1.12 (listed below).

- The City shall discourage any future expansion of the facilities of Gillespie Field or intensification of operation, other than what has already been planned in the Airport's Master Plan that would result in greater noise impacts to the City (Policy 1.7).
- The City shall encourage the implementation of noise control procedures by Gillespie Field to minimize noise exposure cause by aircraft flyovers within the City (Policy 1.8).
- The City of Santee shall require single-family detached residences located between 65-70 dB CNEL contours for Gillespie Field to ensure that interior noise levels do not exceed 45 dB Ldn (Policy 1.10).
- The City shall require disclosure of airport noise impacts as a condition of all future residential developments in the 65-70 dB noise contours (Policy 1.11).

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- The City shall require the recordation of aviation easements for new development proposed within the 65-70 dB noise contours and the Runway Protection and Inner Approach/Departure zones for Gillespie Field (Policy 1.12)

Clearly the landside improvements proposed in the ALP would allow Gillespie Field Airport to remain competitive in the industry. Airside improvements that establish conformance with FAA regulations are necessary for public safety. However, the anticipated intensification of operations would increase areas within the City affected by noise in excess of 65 CNEL, as demonstrated by the future noise contour map. While several of the above-stated policies address the requirements for aviation easements, Policy 1.8 highlights a need to reduce noise levels.

In consideration of Policy 1.8, are airport operations anticipated to occur 24 hours a day? The ALP states that the traffic control tower currently operates between 7 a.m. and 9 p.m. and that 94% of the traffic is between 7 a.m. and 7 p.m. The ALP further discloses that 11.5% of Del Mar Jets' operations occur between 10 p.m. and 7 a.m. (page 4-10).

Noise control procedures should be implemented by Gillespie Field to minimize noise exposure cause by aircraft flyovers within the City. The fleet mix and frequency should be adjusted for nighttime operations.

Finally, the relationship between the ALP Narrative and the San Diego County Regional Airport Authority Comprehensive Land Use Plan Update for all airports in the County is integral and should also be discussed in the Executive Summary. This is important because the information contained in the ALP Update and Narrative Report is to be considered by the Regional Airport Authority in their Comprehensive CLUP Update. How is it that the Airport Authority's Draft EIR for the Comprehensive CLUP Update is in the public review stage prior to completion of the ALP?

The City would object to the incorporation of the ALP, which is currently based upon a high growth forecast, into the Regional CLUP Update since the Authority's Airport Land Use Commission (ALUC) would update land use policies in accord with the long term plan for Gillespie Field, represented by the ALP. While not the purview of the ALP, the City continues to emphasize that any land use incompatibility determinations made by the ALUC may be overturned by the City Council of the City of Santee.

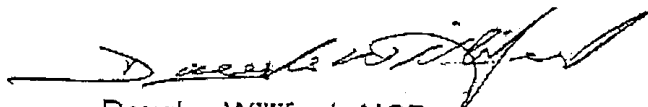
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A Draft Environmental Impact Report (DEIR) for the San Diego County Regional Airport Authority Comprehensive Land Use Plan Update has been prepared in compliance with the California Environmental Quality Act (CEQA). The public review period for the DEIR closes July 6, 2004. The ALP does not address CEQA compliance requirements, and its status relative to CEQA should be included in the ALP.

In conclusion, the City of Santee does not approve of an expansion of airport operations or to airport infrastructure that would lead to the expansion of the 65 CNEL over residential areas within Santee. It is irresponsible for the County of San Diego to utilize a High Growth Forecast to plan for future development which would inevitably increase the impacts associated with airport operations on land uses that currently are unaffected. If any such expansion of CNEL occurs over and above the current (baseline) situation, the City strongly requests that County of San Diego/Gillespie Field provide full mitigation to the newly affected residential properties, to include, but not be limited to mechanical ventilation, multiple-paned windows, and additional wall and ceiling insulation.

Thank you for the opportunity to review and comment on the Report. If you have any questions about this letter, do not hesitate to contact me at (619) 258-4100, extension 167.

Respectfully,



Douglas Williford, AICP  
Director of Development Services

- c. Keith Till, City Manager ✓
- Shawn Hagerty, City Attorney
- Melanie Kush, City Planner
- Ted Anasis, Regional Airport Authority