

January 19, 2017
[Hand delivered to PAAC Staff at January 19, 2017 Meeting]

Ray & Ellen Bender
1015 Camino del Arroyo Dr.
San Marcos, CA 92078
Email: benderbocan@aol.com
Phone: 760 752-1716

CarlsbadPatch.com Palomar Articles: <http://patch.com/users/raymond-bender-79afd24d>

To: Palomar Airport Advisory Committee (PAAC) Members:

Chair Chuck Collins, Vice Chair Clifford Kaiser
Members: Ronald Cozad, Dan Frazee, Gordon Nesbit, John O'Reilly, Thomas Ricotta, Calvin Weeks,

San Diego County Director of Airports Peter Drinkwater

Gentlemen:

**Re: (1) Comments on PAAC Proposed 2016 Annual Report of PAAC Activities to Board of Supervisors, Agenda Item 7 for January 19, 2017 Meeting;
(2) Request for Discussion of Below Items at 2017 PAAC Meetings**

The Board of Supervisors created the PAAC to increase the discussion of McClellan-Palomar Airport (Palomar) issues with the community. In 2016, multiple community members expressed multiple concerns about Palomar. The PAAC's proposed 2016 Annual Report discusses few of the community concerns expressed. Here is a partial list of the items the PAAC's draft report omits:

- **May 19, 2016 Meeting:** County buy out of part of the Jet Source lease at Palomar for \$1.7 million. The community asked why county was paying any money to Jet Source when Jet Source had been in default of its lease for many months at the time of the buyout.
- **August 18, 2016:** Increase of several airport rates. The community noted that the County had maintained several of its rates for 20 to 39 years and asked why the rates were not increased more frequently – especially since the PAAC on several occasions has said that Palomar has insufficient monies to provide more aircraft noise monitoring.
- **Additional Activities:** In passing, the draft PAAC letter notes that Palomar airport noise concerns the community. But the report says nothing about other issues the community raised at the 2016 PAAC meetings. Those issues included:
 - **Safety.** Why does Palomar, an FAA-designated B-II airport, which handles more than 15,000 FAA-designated C and D aircraft continue to use only a 300-foot runway safety area at runway end rather than the 1,000-foot RSAs which the FAA design standards call for?
 - **Safety.** How safe are Palomar aircraft operations when the county's own SCS Engineers study shows that the east end RSA over a methane-emitting landfill,

which has had past underground fires, would create significant problems for an aircraft crashing into the landfill area?

- **County Palomar Runway Feasibility Study Defective Benefit Cost Analysis (BCA) Guidelines.** The community has shown that Chapter 9 of the County 2011 Runway Feasibility Study did not correctly calculate the BCA ratio that the Board of Supervisors relied on in December 2015 when instructing staff to proceed with a Palomar Master Plan. Specifically, the county analysis relied on an income stream (increased fuel charges related to longer distance flights using a planned longer Palomar runway). This reliance was improper because Palomar aircraft taking on more fuel at Lindbergh Field already provide the same revenue stream to the county. The 1999 FAA BCA Manual expressly prohibits using transferred revenues to calculate BCAs. PAAC members have refused to discuss this issue at the PAAC meetings.
- **County Refusal to Landscape the Palomar Slopes Along Palomar Airport Road and El Camino Real.** For 20 years, Carlsbad has designated the areas along Palomar Airport Road and El Camino Real as Scenic Corridors. For 20 years, county has refused to landscape them with permanent irrigation. In 2015, county airport staff did make a PAAC presentation. Staff said permanent irrigation was not possible because (1) water had to be kept out of the underground landfill and (2) pipes on the slope would interfere with annual slope grading. Those claims are without merit. The County's own consultant has said that watering slope plants only percolates down a foot or two. Also, irrigation pipes need not be placed on the slopes. Pipes along the top and bottom with rain birds can easily water the slopes. Moreover, even if the county's claims were true, county could easily place a "landscaped wall" along the sidewalks at the base of the slopes. Such walls are used in other parts of the country.
- **Designation of Palomar Critical Aircraft.** County continues to say it is an FAA-rated B-II airport though it handles more than 15,000 FAA-rated C and D aircraft annually. FAA standards provide that if an airport handles more than 500 C rated aircraft annually, the airport should be classified as a C-rated airport. The FAA orders provide that – although pilots of C-rated aircraft can land at a B-rated airport, the airport agency should undertake operational measures – such as displaced runway thresholds – to improve safety. The PAAC refuses to address this issue.
- **Status of Palomar Master Plan and EIR.** For many months, the PAAC has failed to say when county will release the Palomar Master Plan and EIR.

By this letter, we request that the PAAC modify its 2016 Annual Report to the Board of Supervisors to more accurately reflect community concerns. We also request that the above items be include as PAAC agenda items.

Thank you for this opportunity to comment. Please forward our comments to the Board of Supervisors with the PAAC annual report. Also, pursuant to PAAC Rules of Procedure (Rule 7) retain this letter as part of the record of the January 2017 PAAC meeting.


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2017 bender PAAC letter re PAAC annual report jan mtg