County of San Luis Obispo General Services Agency
AIRPORT SERVICES
Janette D. Pell, Director

Richard C. Howell, A.A.E., General Manager

MEMORANUM

April 2, 2012

TO: Jill Ogren, hydraulic Planning Unit Project Manager

FROM: Richard Howell, Airports General Manager

SUB JECT: Oceano Drainage Improvement Project: Your memo - March 26, 2012

I have reviewed the subject memo and also asked our aviation general consultant to comment on it also. Enclosed are both sets of comments.

Project constraints summary

1. Staff had a preliminary conversation with our tenant, Pismo Coast RV. The tenant indicated that they would be able to manage a phased approached to the work and would not plan to terminate the agreement because of it. Further discussions will be necessary to completely determine how the project will impact their operations and the final size of the usable premises. While the Airport would not want to give up income, the overall impact to the financial condition of the Oceano County Airport has yet to be determined.
2. Use of Property.
   - Option 1: I believe this accurately states the situation. It is not clear by what method the land would be conveyed. Should a release from FAA be necessary, the local experience is this could take up to a decade.

   Option 2:
   - If the project triggers a NEPA the lead agency would be the FAA as it is an airport project. Our Aviation General Consultant believes any NEPA documentation could be completed within 18 months.

   Option 3:
   - As stated above, any NEPA review will make the FAA the lead agency; however the Airport would be considered the Sponsor's representative.

   Option 4: Appears to be accurate.

   General Notes:
   - Keeping the project outside the Runway Protection Zone (RPZ) is important. The project cannot result in a hazard to flying safety by placing items in the RPZ. There cannot be a wildlife attractant by having standing water in or

adjacent to the RPZ. In reviewing FAA criteria I determined this means the basin cannot hold water for more than 48 hours.

- The creation of any trenches or ditches in or close to the RPZ will also require a change to the Airport Layout Plan (ALP) to meet FAA criteria. This would automatically trigger a NEPA review by FAA discussed above. I would believe a time line for approving an ALP change would be 12-18 months. It would be anticipated that this would occur concurrently with a NEPA review.
- As the Sponsor or an Obligated Airport, the County is essentially prohibited from making changes in or around the facility that in any way effects the use of the airport.

I make estimates to the time lines for FAA action based on previous experience of local County staff, myself, and our Aviation General Consultant Reynolds Smith & Hills. The possibility of these reviews running contrary to these estimates is a distinct possibility and could work for or against the timely approval and completion of the project.

Please contact me with any further questions.

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