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city of san luis obispo

OFFICE OF THE CITY COUNCIL
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March 20, 2013

Airport Land Use Commission
c/o County Government Center
San Luis Obispo CA 93408

SUBJECT: Update of Airport Land Use Plan

Chairman Oxborrow and Members of the Airport Land Use Commission:

The City of San Luis Obispo applauds the Commission's efforts to update the Airport Land Use Plan and provide updated maps in GIS format to enable accurate identification of the safety zones. The Council understands that the Commission is charged with the important task of protecting the health and safety of City and County residents from airport hazards. To that end, our City staff has been collaborating over the years with the Commission in an effort to understand the concerns of the Commission regarding aviation hazards and will continue to collaborate with the Commission in this upcoming update process. The City is committed to ensuring that the airport continues to be a viable, safe, and vital part of our community.

Since airport land use planning is a highly technical endeavor, the City retained Johnson Aviation to support the effort to accurately map the safety zone configurations, noise contours, and local conditions associated with the San Luis Obispo County Regional Airport. In addition, City staff has coordinated this effort with Airport Land Use Commission staff who has been involved in airport planning for over 25 years, and with the Caltrans Division of Aeronautics staff to understand the role of the California Airport Land Use Planning Handbook (Handbook) as a reference and guide to both formation and update of Airport Land Use Plans.

After consultation with airport planning professionals and state staff, the City of San Luis Obispo has concerns and would respectfully ask that the Commission consider the following input as the project description is defined for the update process.

1. The Handbook indicates overall guidance for defining safety zones and the Airport Land Use Plan should refine those zones to address local conditions.

Item # 17 Meeting Date: 3/26/2013
Presented by: Jan Marx
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Specifically, Safety zones should have the four characteristics:

- Easily definable geometric shapes;
- Realistic number of zones;
- Distinct progression in degree of risk represented -less concentrated than in the zones closer to the runway ends; and
- Each zone should be as compact as possible

The safety zones as currently defined in the Airport Land Use Plan and as described in the Dimensional Details Document are now developed in a format that can be repeated in GIS. However there are several zones that do not represent a distinct progression in degree of risk and actually become larger in size as distance from the airport increases. The Dimensional Detail Document proposes expansive safety zones which to date have not been supported by technical documentation that there are "local conditions" that warrant these larger zones and are contrary to zones mapped by the State Aeronautical Handbook.

The "Maneuvering Zones" as defined in the current Airport Land Use Plan describes these larger zones as areas where planes fly within 500-1,000 above the ground. However, the safety zones described in the Handbook includes these operations in their description of safety zones, and the relative risk associated with them in their description of safety zones. The City requests that the Commission consider a reconfiguration of the "Maneuvering Zones" to be consistent with the Caltrans Handbook Zone 4 and that the Commission consider the elimination of Zone S-1c, which has no equivalent Caltrans Handbook Zone.

2. The Dimensional Details of Safety Zone document prepared by Dr. Tefft in 2010 did not contain maneuvering zones for Runway 7-25. The Dimensional Detail document recently updated by Dr. Tefft now includes a maneuvering zone that has associated land use restrictions that will impact land use. The sentence below is a quote from the 2010 document prepared by Dr. Tefft:

   "No Maneuvering Zone is designated for Runway 7-25, as high terrain discourages straight-in arrivals or straight-out departures."

   The Tower operator, airport operational staff, and pilots have indicated that pilots use Runway 11-29 the majority of the time. When Runway 7-25 is used, the approach for Runway 11-29 is used. In addition, the updated Master Plan for the Airport indicates that this runway may be narrowed from 100' in width to 60' in width to accommodate placement of hangars on the south side of the runway. Therefore Handbook zones more than adequately address the safety concerns associated with this low activity runway. The City requests that the Commission consider the use of the Handbook zones for Runway 7-25.

3. Land use limitations associated with several of the Airport Land Use Plan safety zones exceed those reasonable to address risk associated with the Airport.

This is especially true for Safety Zone 2 of the Airport Land Use Plan. Density limitations for this area - an oval that is 10,000 ft. from the sides and end of the runways - have unreasonable density limitations of 12 units per acre for residential development and 150 persons per acre for non-residential uses. The Airport Land Use Plan does contain provisions for cluster development zones and detailed area plans, however, these approaches are not practical in infill or redevelopment sites. This impacts the City's ability to focus residential infill in areas of the City such as the Broad Street Corridor. The physical location of the Broad Street area plan on the north side of intervening hills and nearly two miles away from the airport make this restriction unreasonable. Conversely, the comparable Handbook zone is comprised of a 6,000 ft. oval that has NO land use limitations recommended for either residential or non-residential development other than suggested disclosures related to potential noise from aircraft.

The western dimension of Safety Zone 1-b for Runway 11-29 also creates concerns. The area of the Mid-Higuera plan that envisions redevelopment of the Caltrans site at the intersection of Madonna and S. Higuera will be hindered if the City must abide by a limit of 40 persons/acre for non-residential uses. This restriction would preclude development of offices, motels, restaurants, and retail uses. Residential mixed use would be precluded entirely. There has been no documentation presented or factors that supports the size and configuration of this zone to address safety concerns. Again, the Handbook zones provide adequate notification and do not recommend density restrictions to address potential noise issues. The City requests that the Commission consider amending land use restrictions associated with these areas of the City.

4. It appears that concerns regarding noise complaints are being used to develop the size and dimension of safety zones.

   There are noise impacts associated with the airport operations. The Handbook recognizes this issue and recommends techniques such as deed notifications regarding noise issues. The Handbook also recognizes that standard construction techniques reduce interior noise to acceptable levels. The City is considered an urban area and noise from the Railroad, Highway 101, local traffic and urban living are augmented by Airport noise. This is not to say that noise impacts should not be addressed through land use limitations. There are areas adjacent to the airport where land use restrictions are especially appropriate.

   In order to understand where noise impacts may warrant land use restrictions, noise contours are used to identify the 60 CNEL and 65+ CNEL noise levels. The Airport Master plan mapped anticipated noise levels associated with 140,000 operations per year in the year 2023 (The FAA's Terminal Area Forecast or TAF projects the maximum level of operations for the airport to only be 85,000 out to the year 2040). These Airport Master Plan noise contours did not extend past the identified Handbook interior safety zones (i.e. did not go into the larger 6,000 ft. oval).

The Airport Land Use Plan, by contrast, provided an analog map of noise contours that extended well past the interior zones, into the larger 10,000 ft. oval S2 zone and beyond. The graphic in the plan indicates the contours were based on the "projected maximum use of the runways". City staff is still working with the County staff to determine what assumptions of the equipment mix, hours of operations and total operations were made to develop these contours. However, it appears that the Airport Land Use Plan is projecting noise contours associated with airport operations that will not occur within the foreseeable future, if ever. The City requests that the Commission update the noise analysis and noise contour mapping in the Airport Land Use Plan based upon reasonably foreseeable forecasts of aviation activity.

The Airport Land Use Plan indicates that noise-associated land use restrictions were related to the desire to recognize the "quiet rural nature" environs of the airport. While the property to the south and east is primarily agricultural in nature with some lower density residential development (Country Club, Rolling Hills, and Evans Road development) immediately adjacent to the airport, the City is urban in nature, both in its existing and proposed form. The City is recognized as an urban city according to the US Census bureau and is the jurisdiction that qualifies the County as an Urban County for federal grants. The Handbook clearly addresses the ability of a plan to separately distinguish land use limitations for rural and urban environments where an airport influence area impacts both. The City would request the Commission consider amending land use restrictions in Safety Zone 2.

City staff will continue to work with the Commission in a positive and collaborative manner. Again, the City is very committed to the ongoing viability of the airport which is crucial to the economic vitality of the City and the region as a whole. The City wants to ensure that land use and development concepts in our updated Land Use Element and Specific Plans appropriately reflect the health and safety issues associated with airport operations

Thank you for the opportunity to comment. Please contact Kim Murry, Deputy Director of Long Range Planning with any questions that you may have regarding the issues presented in this letter.

Sincerely,

Jan Marx
Mayor