

November 20, 2018

Via Electronic Mail
EIR627@ocair.com

Ms. Lea Choum
Land Use Manager at JWA
3160 Airway Avenue
Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report
(SCH No. 2017031072)

Dear Ms. Choum:

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report (“DEIR”) pertaining to the proposed John Wayne Airport General Aviation Improvement Project (“GAIP”):

1. DEIR Complexity and Length Relative to Time Limitations for Comment:

The DEIR was made available for public review on September 20, 2018, with comments due on November 6, 2018, with an extension until November 21, 2018. Comment: This is an incredibly complex and detailed document that is over 600 pages in length, with 2,200 pages of appendices. Although members of the general public are invited to “comment” on the DEIR, it is submitted that most members of the general public are ill equipped to read through the entirety of the document, sufficiently understand it and respond to it with their comments and questions in the time allotted.

Question: Why can’t additional time be provided for the review and comment to the DEIR?

2. Project Objectives (Section 3).

This section lists separate objectives of the GAIP, which appear only to benefit airport operations and profitability.

Comment: As you are surely aware, under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives clearly

pertain the efficiency and economical benefits of the GAIP with no indication of concerns for the communities impacted by noise and pollution emanating from JWA.

Questions:

- a. Is the GAIP for the benefit of nonresident corporate jet aircraft?
- b. Is the GAIP for the benefit of local corporate jet aircraft?
- c. Have local corporations been surveyed regarding their interest in housing their jets at JWA? If no, why not? If yes, what have been their responses?
- d. Does the GAIP benefit the exiting fleet of privately owned piston-powered driven aircraft owners who have historically based their aircraft at JWA? If yes, how?
- e. Will the GAIP result in a decrease of smaller privately owned piston-powered aircraft at JWA?
- f. How does a decrease in the number of smaller privately owned piston-powered aircraft based at JWA and an increase in larger GA jet aircraft, benefit Newport Beach and neighboring communities?
- g. What is the basis for the assumptions of daily departure and arrival of GA jet traffic, including larger corporate aircraft, which will be displacing smaller GA private planes?
- h. Has it been determined how many additional GA jet aircraft departures will occur in a 24-hour period under the GAIP? If yes, how many? If no, why not?
- i. Will there be a cap or a maximum number of GA jet aircraft departures allowable during a 24-hour period? If yes, how many? If no, why not?
- j. How does the GAIP, with its goal of accommodating large corporate jet aircraft at JWA through building additional hangers, benefit Newport Beach and other neighboring communities?
- k. Will the GAIP result in an increase of international flights to JWA via GA jet aircraft?
- l. If the GAIP increases the number of international flights in and out of JWA, will there be a cap or maximum number allowed during any a 24-hour period? If yes, what will be the maximum number? If no, why not?
- m. How many international flights are anticipated to arrive at JWA on a daily or weekly basis?
- n. What type of TSA-type security screening will be conducted regarding the increasing numbers of larger international GA aircraft if the GAIP is approved? Please describe in detail.
- o. What is the predicted net average daily change in aircraft departures and arrivals if the GAIP is approved?
- p. How many GA privately owned jets will JWA be capable of handling during a 24-hour period if the GAIP is approved?
- q. How many overnight hangers or other spaces will be made available for GA privately owned jet aircraft if the GAIP is approved?
- r. What will be the economic benefit to JWA if the GAIP is approved?

- s. If the GAIP is approved, will existing flight schools be permitted to continue their operations? If not, will flight school(s) specializing in jet aircraft flight instruction replace existing flight schools?
- t. If any flight schools specializing in jet aircraft flight instruction are anticipated, will a cap or maximum number of training departures and arrivals during a 24-hour period be established? If yes, what will be the maximum number? If no, why not?
- u. If any flight schools specializing in jet aircraft flight instruction are anticipated, will hours for their operation and training flights be established? If yes, what will be the hours? If no, why not?

3. DEIR Conclusions that Environmental Impacts are Insignificant (Section 4).

Comment: The DEIR conclusion that the GAIP will be not significantly cause a negative impact to the community in terms of noise, air quality, hazardous materials, etc., is unrealistic. It is submitted that there has been an insufficient consideration of the additional noise and pollution that will be created; especially considering the leaded fuel mixture used by private GA jet aircraft and their exemption from curfew hours under GA regulations. There have been numerous studies reported in many peer-reviewed scholarly journals that airport noise and pollution have serious health impacts for neighboring communities. It is unrealistic to conclude that if the GAIP is approved that there will be no significant negative environmental impact to Newport Beach and other neighboring communities.

Furthermore, the assumptions supporting the noise analysis are flawed and unrealistic. The projection that by 2016, 40% of the Boeing 737 and Airbus A320 aircraft using JWA will include the quieter 737-MAX and Airbus A320-Neo is sheer speculation and is in conflict with the 2014 Settlement Agreement EIR noise modeling.

Questions:

- a. As GA jet aircraft have a long history of violating noise limits, how will this be better controlled, especially given the current lack of regulation of the GA jet aircraft fleet?
- b. Is an increase in GA jet aircraft nighttime arrivals and departures anticipated? If yes, how many nighttime arrivals and departures are anticipated?
- c. Will JWA place a cap or limit on the number of nighttime arrivals and departures of GA jet aircraft? If yes, what limitations will be established? If no, why not?
- d. Why wasn't the negative impact of an additional 5-10% noise generating Back Bay departure pattern by the large corporate jets on the same neighborhood impacted by commercial departures considered in the Noise Impact section of the Appendix? As this would have the same impact as a net increase in commercial departures that would replace aircraft that were

- previously fanning after takeoff and not impacting these neighbors, why wasn't this considered?
- e. If the GAIP is approved, what would be the largest GA jet aircraft that would be accommodated by JWA?
 - f. How would the noise from departing large GA jet aircraft compare with the noise emitted from the commercial jet fleet currently using JWA? If this analysis has been done, what is the basis for the analysis?
 - g. Will there be a limitation on large GA jet departures? Will there be any such limitation specifically during the existing curfew hours? If yes, what will be the limitations? If no, why not?
 - h. Do the GAIP conclusions of no significant noise or pollution impact take into consideration the Next-Gen satellite-precision concentrated flight paths that have clearly has a significant negative impact on Newport Beach? If yes, what conclusions have been drawn? If no, why not?

4. Health Risk Analysis (Section 4).

Comment: Although related to the above comment, the health risk analysis ("HRA") in Section 4 of the DEIR is extremely complicated and confusing. The DEIR also relies heavily on the EIR submitted during the 2014 Settlement Agreement ("EIR 617") for its health risk analysis ("HRA"). It is submitted that reliance on the previous EIR is misplaced. EIR 617 relied on existing 2014 flight patterns prior to the implementation of the FAA Next Gen concentrated satellite driven precision flight patterns that are flown today. Furthermore, the DEIR does not anticipate the different emissions anticipated from the expected increase in GA jet aircraft if the GAIP is approved. To suggest that there will be a minimal increase in emissions is unrealistic and unsupported by any evidence.

Comment: The DEIR is also woefully deficient in its discussion of the potential health impacts to more sensitive members of the community, especially the impact on children. The DEIR discusses "sensitive receptors" and "sensitive populations" noting only those closest to the boundary of JWA, specifically mentioning a residential development approximately 855 feet from the boundary of JWA and airport workers. In response, there have been numerous studies conducted and published in peer-reviewed scholarly journals about the serious health issues caused by airports, over flights, departures and arrivals on children and adults in communities under the flight paths. These studies have confirmed that children suffer cognitive deficits and respiratory illnesses, while the general population suffers undue stress, heart disease, high blood pressure, cognitive decline, auditory problems, heart attacks, strokes and greater cancer risk. Similarly, research studies have concluded that the adverse health affects from airport pollution are present within 10 miles of an airport. There are thousands of children in schools well within a distance of 10 miles from the JWA departure paths and thousands of people who live under the flight paths.

Questions:

- a. In arriving at the conclusion that the environmental impact of the GAIP is “less than significant,” what consideration has been given to the schools, athletic fields, parks and residential areas located within a close proximity and under the flight paths of JWA? If the impact these populations have not been considered, why not?
- b. Although noise is discussed in the Sensitive Receptors section of the DEIR, including the impact to schools, why isn't there an in depth discussion of health concerns especially as they relate to children?
- c. Did the County in the preparation of the DEIR review and consider recent research concerning the health and welfare of populations living within a close proximity of airports? Within 10 miles of JWA?
- d. What is the true net increase in pollutants from the new aircraft population departures from JWA as the fuel mixture is different and heavier in carbon and particulate pollutants?
- e. In preparing the DEIR, was there any consideration of the added pollution that would result from the increase in GA jet aircraft combined with the existing commercial fleet? If no, why not?
- f. In preparing the DEIR, was there any consideration of the impact of increased noise levels that would result from nighttime flights of GA jet aircraft? If no, why not?

5. Flight Patterns.

Comment: Although the DEIR states there will be no change in flight patterns, it is unclear as to the flight patterns that were used for its analysis. It is also unclear what flight patterns would be followed by GA jet aircraft upon approval of the GAIP. Clarification is needed to assess the differences between GA and commercial aircraft departure patterns and how they might change upon approval of the GAIP.

Questions:

- a. Will the GA jet aircraft added to JWA through the GAIP follow the existing flight patterns presently used by commercial jets as mandated by the SoCal Metroplex?
- b. If the GA jet aircraft added through the GAIP will follow the flight patterns mandated under the SoCal Metroplex, has there been any consideration as to the impact that will be caused by the increase in air traffic over Newport Beach? If no, why not?
- c. Will there be any changes in GA flight patterns if the GAIP is approved? If yes, what will be the changes?

Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely,

Beverly Blais Moosmann

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