

**DEPARTMENT OF TRANSPORTATION**

DIVISION OF AERONAUTICS – M.S.#40

1120 N STREET

P. O. BOX 942873

SACRAMENTO, CA 94273-0001

PHONE (916) 654-4959

FAX (916) 653-9531

TTY (916) 651-6827

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April 21, 2006

Mr. Keith Boyle  
City of Watsonville Community Development Department  
250 Main Street  
Watsonville, CA 95076

Dear Mr. Boyle:

Re: City of Watsonville's March 22, 2006 Response to Comments for the General Plan Update for Watsonville Vista 2030; SCH# 1991123081

The California Department of Transportation, Division of Aeronautics, responded to the Draft Environmental Impact Report (EIR) for the Watsonville Vista 2030 General Plan update in a letter dated October 24, 2005. We recently received the City of Watsonville's (City) March 22, 2006 Response to Comments. We take this opportunity to voice our concerns with the City's response and to request that this letter be provided to the City Council for consideration prior to certification of the Final EIR and adoption of the General Plan.

In the City's March 22, 2006 Response to Comments, the City refers to Resolution 74-05. The Division of Aeronautics did not receive copies of Resolution 74-05 or the notice of intent prior to or in a timely manner following the April 12, 2005 adoption. We have since obtained copies that enabled us to respond to the March 22, 2006 Response to Comments.

It is our position that Resolution 74-05 should be invalidated for the following reasons:

1. Resolution 74-05 amended several pages of the Watsonville Municipal Airport Master Plan. Exhibit A, Table 37 identifying "Safety Compatibility Zones" on page 75, specifically states that the source is the "California Airport Land Use Planning Handbook (January 2002), Modified by City Council on April 12, 2005." The City Council does not have the authority to modify the State of California Airport Land Use Planning Handbook (Handbook).
2. The Draft June 2005 General Plan does not reference the Resolution; reference to the Resolution should have been incorporated into the draft General Plan.
3. We question the modification of the Watsonville Municipal Airport Master Plan through a resolution process and not an accepted master plan public notification process. A Master Plan study includes the creation of a public involvement program. Over the course of the study, the public involvement program will encourage information sharing and collaboration among the airport sponsor, users and tenants, resource agencies, elected and appointed public officials, residents, travelers, and the general public. Collectively, these various groups form the stakeholders who have an interest in the outcome of the study. An effective public involvement program should provide these stakeholders with an early opportunity to comment, before major decisions are made; provide adequate notice of opportunities for their involvement; and should

provide for regular forums throughout the study. We consider amendments that change the basis for nearly all Master Plan forecast projections to be a significant impact. We question not only the modified safety zones, but also the basis for designating the crosswind runway as low activity. One of the justifications cited by the City Council for designating Runway 8-26 as a "low activity runway" is its use by "small aircraft". In contrast, for example, the Airport Master Plan as adopted on June 24, 2003, provides for construction of blast pads for Runway 8-26. (Blast pads are sections of asphalt placed at the ends of runways.) This is done out of necessity where the exhaust and propeller blast from jets and larger turbine aircraft erode the soil in the Runway Safety Area immediately off the end of the runway pavement. This is not consistent with operational characteristics of "small aircraft".

4. Resolution 74-05 violates the State's interpretation of the Handbook. As we stated in our October 24, 2005 letter, adjusting safety zones for the Crosswind Runway 8-26 on the basis that it is a "low activity runway" is incorrect. The Handbook has six different designated safety zones. The Handbook only allows the elimination of the Traffic Pattern Zone (Zone 6) for a low activity runway. Eliminating the Inner Turning Zone (Zone 3) is not an option. The only way to modify Zone 3 is to obtain approval from the Federal Aviation Administration (FAA) to re-designate the runway for a single-sided traffic pattern. A single-sided traffic pattern would result in the elimination of only one wing of Zone 3 on the same side, at both ends of the runway. Safety Zone 3 was established because this area "traditionally experiences aircraft accidents". By unjustifiably eliminating Zone 3 and then removing the language to "avoid children's schools, large day care centers, hospitals, and nursing homes from Zone 6, Resolution 74-05 allows development of incompatible "special function" land uses in the immediate vicinity of Watsonville Municipal Airport and its most critical safety zone, the Runway Protection Zone (Zone 1). Special function uses require special protection. The significant common element is the relative inability of the people occupying the space to move out of harm's way.

Resolution 74-05 does not change the requirement for a school site investigation by the Division of Aeronautics in accordance with Education Code Section 17215. It is also our understanding that representatives from the recently constructed Pajaro Valley High School to the southwest of the airport are already voicing noise complaints. Pajaro Valley High School was constructed within airport safety Zone 6 and just outside Zone 3.

Protecting people and property on the ground from the potential consequences of near-airport aircraft accidents is a fundamental land use compatibility-planning objective. Airport operators and pilots are trained to practice and promote safety and community awareness. Although the chance of an aircraft injuring someone on the ground is historically quite low, and we cannot stress this enough, an aircraft accident is a high consequence event. To protect people and property on the ground from the risks of near-airport aircraft accidents, restrictions on land use are essential. The potential severity of an off-airport aircraft accident is highly dependent upon the nature of the land use at the accident site. The Handbook and airport land use commissions (ALUC) were created to identify and prevent incompatible development in the vicinity of airports.

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Decisions that cities and counties make regarding the use of land must not conflict with State law. Public Utilities Code (PUC) Section 21670 (1) states "it is in the public interest to provide for the orderly development of each public use airport in this state and the area surrounding these airports...and to prevent the creation of new noise and safety problems." The City of Watsonville must comply with PUC section 21670, 21670.1 and in particular 21670.1 (e) which mandates that the "affected city" utilize the State's Airport Land Use Planning Handbook regarding height, use, noise, safety, and density criteria's.

PUC Section 21670.1(e) **requires** the City of Watsonville to incorporate the height, use, noise, safety, and density criteria that are compatible with airport operations as established by this article, and referred to as the Airport Land Use Planning Handbook, published by the Division of Aeronautics. Failure to comply with these criteria requires that a County ALUC and an airport land use compatibility plan be established. In previous correspondence with Santa Cruz County and the City of Watsonville, the Division of Aeronautics' position has been to *not request* the establishment of an ALUC provided they have policies in their respective General or Specific Plans that prevent the creation of new noise and safety problems. We now recommend the formation of a County ALUC.

If the City of Watsonville does not intend to implement the State's request in complying with the State Aeronautics Act, please consider the subject letter as a request for an administrative appeal before the appropriate body that is granted jurisdiction to address the State's concerns.

If you have any questions, please call me at (916) 654-5470.

Sincerely,

*Original Signed by*

MARY C. FREDERICK  
Acting Chief  
Division of Aeronautics

c: State Clearinghouse, Watsonville Municipal Airport, Santa Cruz County