



# *City of Camarillo*

601 Carmen Drive • P.O. Box 248 • Camarillo, CA 93011-0248

*City Manager's Department  
(805) 388-5307  
fax (805) 388-5318*

January 9, 2020

**VIA EMAIL ([dkettle@goventura.org](mailto:dkettle@goventura.org))**

Darren Kettle  
Executive Director  
Ventura County Transportation Commission  
950 County Square Drive, Suite 207  
Ventura, CA 93003

**Re: Response to Department of Airport Letter of 12/31/19 and E-Mail of 1/7/2020 Regarding  
Proposed CloudNine Project at Camarillo Airport**

Dear Mr. Kettle:

On behalf of the City of Camarillo ("City"), I want to thank you and your staff for implementing the City's request to agendize the CloudNine Project ("Project") for discussion at the Commission's meeting on January 10, 2020.

As you know, the City submitted a letter to you on December 6, 2019 (Exhibit 1) requesting the VCTC to agendize a consistency hearing for a determination of whether the Project as described and analyzed in the MND is consistent with the Airport Comprehensive Land Use Plan ("ACLUP") and the Camarillo Airport Master Plan ("CAMP"). The City has received a copy of the December 31, 2019 letter ("DOA Letter"), copy attached as Exhibit 2, from Kip Turner, Director of the Ventura County Department of Airports ("DOA" or "County"), as well as a copy of the January 7, 2020 email from Mr. Turner supplementing that DOA Letter ("DOA Letter Supplement") which is attached hereto as Exhibit 3.

For the reasons described below, the DOA Letter and DOA Letter Supplement underscore the City's concerns with the manner in which the DOA is pursuing its environmental review of the Project which, if the MND is taken at face value, extends far beyond what the applicant claims to be pursuing, and whether done intentionally or not, would facilitate actions that are inconsistent with the Commission's adopted ACLUP and the CAMP.

Therefore, the City hereby reaffirms its request for the VCTC to agendize a full review and determination of whether the Project as described and analyzed in the MND is consistent with the ACLUP and the CAMP.

**I. The Project MND Repeatedly Confirms that Large Boeing Business Jet 737-800 Aircraft Will Operate at the Airport as a Result of the Approval of the Project Despite Such Jets Being Prohibited Under the CAMP and Inconsistent with the ACLUP.**

The DOA Letter contradicts itself by initially asserting on page 2 that the City “misquotes” the MND with respect to a connection between the Project and Boeing Business Jet 737-800 aircraft (“Boeing Business Jets”) and yet then conceding on page 3 that “[i]t is true that the draft MND included Boeing Business Jets in its assumptions for purposes of evaluating the environmental effects of the CloudNine project...” The MND speaks for itself and the DOA cannot have it both ways. In the excerpt of the MND originally provided by the City,<sup>1</sup> under the heading “Description of the Proposed Project” (the key to any legally adequate environmental analysis under CEQA<sup>2</sup>), the ramp by which the “proposed hangars *would be accessed*” is of a depth that “can accommodate an aircraft such as the Boeing Business Jet 737-8000 or Gulfstream G650, *two of the largest types of aircraft that are anticipated to use the airport.*” (Emphasis added.)

Appendix B of the MND unequivocally connects the Project to significant numbers of Boeing Business Jets: “Table B1 list the existing condition with and without operations associated with the proposed Cloud 9 development. As noted in the table, *the Proposed Project contours were modeled with additional ... business jet aircraft which are anticipated to operate at the airport as a result of the proposed Cloud 9 development.*”<sup>3</sup> (Emphasis added.)

The noise analysis in Appendix B is based on the assumption that “ten fixed wing aircraft ... will be stored in the Cloud 9 hangars. *The additional aircraft associated with the Cloud 9 hangars assumed for the noise modeling are summarized in Table B2.*”<sup>4</sup> (Emphasis added.) Table B2 lists the *Boeing Business Jet and Gulfstream G650* as aircraft that each will utilize Hangar 4 of the Project *for up to 312 annual operations.*

In light of the clear inclusion of Boeing Business Jets and Gulfstream G650 aircraft by the DOA in both the Project Description and environmental analysis of the Project’s MND, the approval of which as drafted would provide environmental clearance for the operation of Boeing Business Jets and Gulfstream G650 aircraft, the VCTC should not be swayed by the current developer’s/lessor’s non-binding statements as to what type of aircraft is currently proposed to be housed in the Project’s hangars.

With respect to the contention in the DOA Letter that the City has failed to identify an element of the CAMP that conflicts with the CloudNine Project, this is also incorrect. The City’s December

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<sup>1</sup> City letter of 12/6/19, Exhibit 1.

<sup>2</sup> Numerous cases have repeated the general principal that an accurate, stable and finite project description is the indispensable prerequisite to an informative and legally sufficient CEQA document. (CEQA Guidelines § 15124; *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 192; see also *Washoe Meadows Community v. Department of Parks & Recreation* (2017) 17 Cal.App.5th 277, 287; *Save Round Valley Alliance v. County of Inyo* (2007) 157 Cal.App.4th 1437, 1448; *San Joaquin Raptor Rescue Ctr. v. County of Merced* (2007) 149 Cal.App.4th 645, 655; *San Joaquin Raptor/Wildlife Rescue Ctr. v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 730; *Kings Canyon Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 738.)

<sup>3</sup> City letter of 12/6/19, Exhibit 1.

<sup>4</sup> Id.

6, 2019 letter contained the following discussion regarding the Project's inconsistency with the CAMP that the DOA Letter simply chose to ignore:

“[T]he CAMP appears to limit airport development and use to the types/sizes of smaller planes currently utilizing the airport and prohibit Boeing Business Jets and other aircraft larger than the Gulfstream V and Global Express models. (See CAMP, pp. 3-2 to 3-8 including Exhibit 3-A [attached hereto as Exhibit 3].)”<sup>5</sup>

In short, the City has demonstrated a clear and compelling factual and legal basis for the Commission's review of the Project.

## **II. The Commission Has Authority to Review and Comment on the CloudNine Project**

The Commission should reject the DOA's constrained interpretation of the VCTC's legal authority as the local Airport Land Use Commission. In establishing ALUCs, the Legislature expressly declared that such commissions are established “to protect public health, safety, and welfare by ensuring the orderly expansion of airports and the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards within areas around public airports....” (Public Utilities Code § 21670(a)(2).)

To carry out these vital purposes, the Legislature, in Public Utilities Code section 21674, granted the Commission the following powers and duties:

(b) To coordinate planning at the state, regional, and local levels so as to *provide for the orderly development of air transportation, while at the same time protecting the public health, safety, and welfare.*

(d) *To review* the plans, regulations, and *other actions of local agencies* and airport operators pursuant to Section 21676.

The contention in the DOA letter that the Commission lacks jurisdiction under Public Utilities Code section 21674(d) to determine whether the proposed Project is consistent with the ACLUP because the County is not formally proposing to modify the CAMP for this Project is misplaced.

The Legislature clearly delegated to the Commission the authority to make consistency determinations on local agency actions that may require a modification to an airport master plan, and the County's apparent determination to avoid such modification by proceeding with a Project that has a description at odds with the CAMP should not allow the Project to avoid scrutiny by the Commission.

Additionally, the City is puzzled as to why the DOA Letter Supplement makes reference to Ventura County General Plan Policy 2.14.2.2(4). The contention in the DOA Letter Supplement that Policy 2.14.2.2(4) further supports the notion that the Commission lacks such jurisdiction is also without merit. Simply put, the City does not cite or rely on that Policy to support its argument that the

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<sup>5</sup> City letter of 12/6/19 at p 2, and Exhibit 3 thereto.

Commission has the authority to review and that the DOA is legally required to refer the Project to the Commission for a consistency determination before considering whether to approve the Project.

As demonstrated above and in the City's December 6, 2019 letter, that authority is tied to the fact that the Project described, analyzed and provided CEQA clearance by the proposed MND is clearly at odds with and thus requires an amendment to the CAMP as part of any decision to approve the Project. As the DOA Letter concedes, the Commission absolutely has the power pursuant to Public Utilities Code section 21676(c) to review projects like the proposed CloudNine Project which require a modification to the applicable airport master plan.

Moreover, nothing in the Public Utilities Code precludes the Commission from commenting on a local agency's environmental document in accordance with the California Environmental Quality Act where resources under the jurisdiction of the Commission (e.g., local airport land uses) could be affected by the Project. (*See* Public Resources Code §21104; *see also* CEQA Guidelines §§15072(e) and 15086(a).)

In sum, there is a clear legal basis for the Commission's review of the Project with respect to a consistency determination regarding the CAMP and ACLUP, as well as potential environmental impacts associated with the proposed operation of larger Boeing Business Jets and Gulfstream G650 aircraft at the Camarillo Airport.

**III. The Department of Airports Can End This Controversy by Agreeing to Revise the Project Description and Analysis of the MND to Eliminate the Proposed Operation of Boeing Business Jets and Other Large Aircraft.**

The DOA Letter indicates that there may be revisions to the MND that come out of the public comment process. Based on the purported disavowal of the developer not "to allow Boeing 737 aircraft to operate from the CloudNine location," the simple solution to this controversy would then be for the applicant and the County to remove all references to such aircraft in the Project Description of the MND and to remove all environmental analysis of the hundreds of annual flights associated with such aircraft operating out of the Project hangars in the draft MND. With such revisions, the City and the general public, which have been understandably alarmed by the contents of the MND, will have appropriate assurances.

Accordingly, the City requests that the DOA make such commitment at the upcoming meeting, and when such revisions are formally made, the VCTC may remove this item from further consideration.

Respectfully,



David J. Norman  
City Manager  
City of Camarillo

Exhibit 1: City Letter of December 6, 2019  
Exhibit 2: Department of Airports Letter of December 31, 2019  
Exhibit 3: Kip Turner E-Mail of January 7, 2020 Supplementing Department of Airports Letter of December 31, 2019

cc: Board of Commissioners, Ventura County Transportation Commission  
Board of Supervisors, County of Ventura  
City Council, City of Camarillo  
Michael Powers, County Executive Officer  
Kip Turner, Director of Airports



# City of Camarillo

601 Carmen Drive • P.O. Box 248 • Camarillo, CA 93011-0248

Office of the City Manager  
(805) 388-5307  
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December 6, 2019

## Via Hand-Delivery

Darren Kettle  
Executive Director  
Ventura County Transportation Commission  
950 County Square Drive, Suite 207  
Ventura, CA 93003

Re: Proposed CloudNine Private Commercial Hangar/Office Project at Camarillo Airport  
("CloudNine Project")

Dear Mr. Kettle:

The purpose of this letter is two-fold: (1) to bring the CloudNine Project to the Ventura County Transportation Commission's ("Commission") attention; and (2) to request that the Commission place an item on the agenda for its next regular meeting to discuss the CloudNine Project, assess the Project's consistency with the Airport Comprehensive Land Use Plan ("ACLUP") and the Camarillo Airport Master Plan ("CAMP") and determine whether the County's proposed Mitigated Negative Declaration ("MND") describing and analyzing the potential impacts of the Project is adequate and in compliance with the California Environmental Quality Act ("CEQA").

The County of Ventura is currently analyzing the potential environmental impacts of the CloudNine Project under CEQA and has prepared and released a draft MND in furtherance of that effort. The Project proposes to develop approximately seven acres of open land on the northeast quadrant of the Camarillo Airport with four private commercial hangars and offices totaling 121,450 square feet of building area and related facilities including traffic/roadway and aircraft ramp/apron improvements under a leasehold from the airport.<sup>1</sup> The MND expressly notes that the Project's purpose is to facilitate larger aircraft "such as the Boeing Business Jet 737-800 or a Gulfstream G650" and seeks environmental clearance for noise, air quality and greenhouse gas emission impacts associated with such larger aircraft. (See MND pp. A-2 to A-4; MND Appendix B pp. B-1 to B-3 [attached hereto as Exhibit 1].)

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<sup>1</sup> Indeed, the CloudNine Project applicant, RKR Incorporated, is apparently already leasing luxury private aircraft hangar and office space in the proposed Project pursuant to its website's home and CloudNine-specific pages. (See [www.rkrinc.com](http://www.rkrinc.com) and [www.rkrinc.com/cloudnine/](http://www.rkrinc.com/cloudnine/).)

The City of Camarillo informed the County of its concerns about the Project and the adequacy of the MND in the letter dated November 20, 2019, attached hereto as Exhibit 2. Those concerns focused primarily upon the MND's failure to acknowledge, and the Project's inconsistency with, key Camarillo Airport limitations imposed by the 1976 Agreement between the County of Ventura and City of Camarillo Pertaining to Camarillo Airport Development and Surrounding Land Use ("Agreement"). Specifically, the City's letter points out that the Project's facilitation of Boeing Business Jets (which can weigh up to 171,500 pounds) would violate the Agreement's 115,000 pound aircraft weight limit and that the Agreement requires the County to refer the Project and its MND to the Camarillo Airport Authority ("CAA") created by the Agreement for its review and recommendation before taking any action on the Project.

In addition to the CAA's authority over the CloudNine Project pursuant to the Agreement, the Commission, in its role as the County's Airport Land Use Commission, has authority not only to formulate a comprehensive land use plan for the area surrounding each public use airport *but to review and provide consistency determinations to local agencies regarding proposed amendments/modifications to general/specific plans, zoning ordinances and building regulations and airport master plans.* Indeed, the Commission has prepared and adopted an Airport Comprehensive Land Use Plan ("ACLUP") covering the County's Camarillo, Santa Paula and Oxnard Airports as well as the Naval Air Station Point Mugu and their surrounding areas. It appears that the County's MND, however, does not contain a reference to or any analysis of the Project's consistency with the ACLUP. Instead, the MND concludes, without any detailed analysis, that the Project is consistent with the CAMP because the CAMP conceptually anticipated private hangar development in the same area as the CloudNine Project.

The fact that the CAMP may have projected the development of new large private commercial hangars in the area of the proposed CloudNine Project does not end the discussion regarding the Project's consistency with the CAMP. For example, it appears that in addition to the 115,000 pound aircraft weight limitation in the Agreement, the CAMP appears to limit airport development and use to the types/sizes of smaller planes currently utilizing the airport and prohibit Boeing Business Jets and other aircraft larger than the Gulfstream V and Global Express models. (See CAMP, pp. 3-2 to 3-8 including Exhibit 3-A [attached hereto as Exhibit 3].) Accordingly, it appears that an amendment to the CAMP is required as the MND and its description of the CloudNine Project indicate that the Project is intended to facilitate the use and storage of such larger aircraft at the Camarillo Airport.

For the above reasons, I respectfully request that the Commission place an item on the agenda for its next regular meeting to: (1) discuss the CloudNine Project; (2) assess (or, at a minimum, promptly schedule an assessment of) the Project's consistency with the ACLUP and the CAMP and the adequacy of the County's proposed MND; and (3) develop comments and/or a recommendation regarding the Project's consistency with the ACLUP and CAMP and adequacy of the MND to be provided to County staff working on and County decision makers tasked with considering approval of the CloudNine Project. Should the County propose to consider adopting the MND and approving the CloudNine Project before the Commission can discuss, prepare and provide its comments and recommendations, I also propose that the Commission contact the

December 6, 2019

RE: Proposed CloudNine Private Commercial Hangar/Office Project at Camarillo Airport

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County and request that it postpone any such actions until the Commission is able to meet, discuss and provide its comments.

Respectfully,



David J. Norman  
City Manager  
City of Camarillo

Enclosures:

Exhibit 1: Referenced excerpts from CloudNine Project draft MND

Exhibit 2: November 20, 2019 City of Camarillo Comments on Draft Mitigated Negative Declaration for Proposed Cloud Nine Hangar Development at the Camarillo Airport

Exhibit 3: Referenced excerpts from Camarillo Airport Master Plan

cc: Board of Commissioners, Ventura County Transportation Commission  
Board of Supervisors, County of Ventura  
City Council, City of Camarillo  
Michael Powers, County Executive Officer  
Kip Turner, Director of Airports



# CAMARILLO

## AIRPORT

VENTURA COUNTY, CALIFORNIA



DRAFT

MITIGATED NEGATIVE  
DECLARATION AND  
INITIAL STUDY

FOR CLOUDNINE AT  
CAMARILLO

EXHIBIT 1

Exhibit 1

## 2. PROJECT NAME/APPLICANT

CloudNine at Camarillo

Applicant RKR Incorporated

## 3 PROJECT LOCATION

The Proposed Project would be located on an approximate seven-acre site located in the northeast corner of the Camarillo Airport (Exhibit A1). The project site would be accessed via Las Posas Road for vehicles and by a taxiway off Taxiway G1 for aircraft. The project site is generally bordered by the Camarillo Drain to the north, Las Posas Road to the east, privately developed hangars on County land to the south, and the site of proposed County-owned hangars to the west.

Camarillo Airport has one runway available for use (Exhibit A2). Runway 8-26 is oriented in a west-east manner and is 6,013 feet long and 150 feet wide. The airfield taxiway system consists of two parallel taxiways (Taxiways F and H) on the south side of the runway with five entrance/exit taxiways (Taxiways A through E), as well as a partial parallel taxiway (Taxiway G).

## 4 PURPOSE OF THE PROPOSED PROJECT

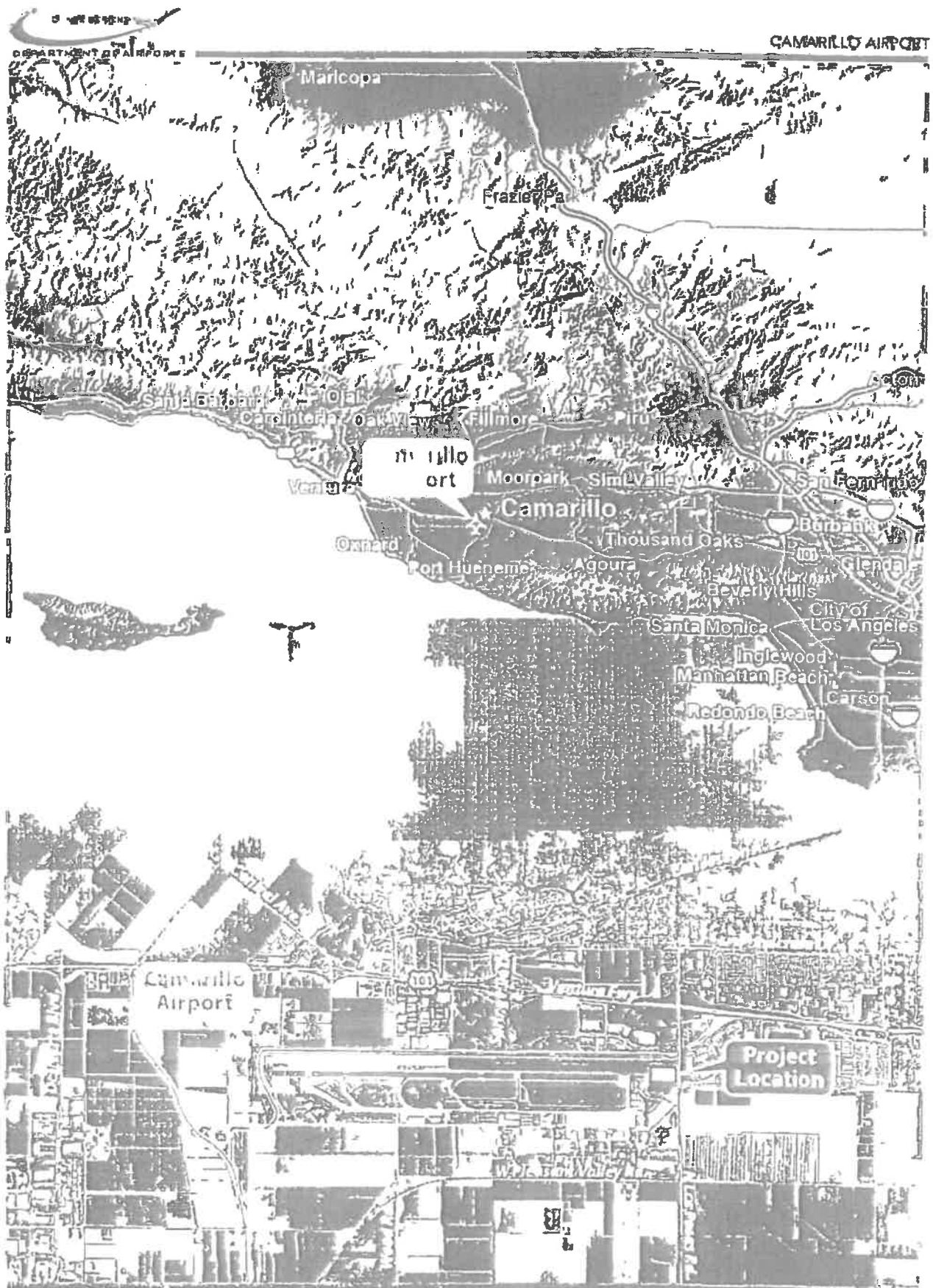
The purpose of the Proposed Project is to provide additional commercial hangars at Camarillo Airport to meet increased aircraft storage needs. The type of hangars proposed would allow for storage of larger aircraft in a private setting, which currently is not available at the airport. Each hangar/office space would feature amenities such as executive offices with energy-efficient light-emitting diode (LED) lighting, private lounges, flight department offices, and fitness rooms.

To maintain self-sustaining sources of revenue (as required by the airport's federal grant assurances), the County needs to plan for ways to continue and augment the airport's revenue stream and to provide a range of aeronautical services in keeping with aviation business trends.

## 5 EXISTING ZONING AND GENERAL PLAN DESIGNATION

Camarillo Airport is owned by the County and operated by the County Department of Airports; it is designated as Urban on the County of Ventura Land Use Map (South Half) (County of Ventura 2019c).

The airport is also within the corporate limits of the City of Camarillo (City), three miles west/southwest of the City's central business district. The airport, including the project site, is designated as Public on the *City of Camarillo General Plan* (City of Camarillo 2017) and is zoned as M-1, Light Manufacturing (City of Camarillo 2019). The City generally defers to the adopted *Camarillo Airport Master Plan* (AMP) as the



# EXHIBIT 1

Exhibit 1

applicable planning document for development within the airport's boundaries (see Section 10 11 11, Development Controls, Community Design Element) The Proposed Project is consistent with the current *Camarillo Airport Master Plan* (County of Ventura Department of Airports 2011), which included four large commercial hangars proposed as private investments with ground leases maintained with the County

## 6 DESCRIPTION OF THE PROPOSED PROJECT

The Proposed Project is the development of approximately seven acres of open land on the northeast quadrant of the airport with four private commercial hangars and offices under a leasehold from the airport The Proposed Project includes the following elements (Exhibit A3)

- Four proposed hangar structures, each 168 feet wide by 150 feet deep by 44 feet high, would be constructed These adjoining structures would provide a total overall length of approximately 672 feet by 150 feet Each hangar would include 25,200 sf of hangar space Single-story office space ranging from 5,095 to 5,365 sf would adjoin each hangar with one office located adjacent to the east of the easternmost hangar and the other offices located north of the respective hangars Total building area proposed for the project is 100,800 sf of hangar space and 20,650 sf of hangar office space
- Approximately 100,000 sf of landscape, hardscape, and vehicular parking and driveways are proposed On-site vehicular parking would be north of the hangars and is planned to include 114 standard stalls and six *American Disability Act* (ADA)-compliant stalls A two-way vehicular driveway is proposed in the northeast corner of the project site from Las Posas Road The Proposed Project includes an acceleration/deceleration traffic lane as well as a bike lane, sidewalk, and landscaping
- The proposed hangars would be accessed by a ramp (also called an apron) on the south side of the hangars, with a portion of the existing taxiway reconstructed south of the ramp The proposed aircraft ramp would be 84,000 sf (782 7 feet wide by 120 feet deep) to be located between the new hangars and existing taxiway pavement This depth can accommodate an aircraft such as the Boeing Business Jet 737-800 or a Gulfstream G650,<sup>2</sup> two of the largest types of aircraft that are anticipated to use the airport Based on the geotechnical report, the recommended taxiway pavement design could consist of six inches of asphalt, over five inches of stabilized base, over 10 inches of crushed aggregate base Compliance with FAA pavement standards will be required

<sup>2</sup>The Boeing Business Jet 737-800 has a wingspan of 34 meters and a length of almost 40 meters, the Gulfstream G650 has a wingspan and length of approximately 30 meters each (SKYbrary website 2019)

## **Appendix B**

### **NOISE, AIR POLLUTANT, AND GREENHOUSE GAS MODELING**

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#### **NOISE MODELING METHODOLOGY**

The standard methodology for analyzing noise conditions at airports involves the use of a computer simulation model. The Airport Environmental Design Tool, Version 2d (AEDT) is required by the Federal Aviation Administration (FAA) for developing noise exposure contours. AEDT is designed to predict annual average aircraft noise conditions at a given geographic location. The purpose of the noise model is to produce noise exposure contours that are overlain on a map of the airport and vicinity to graphically represent aircraft noise conditions.

For the purposes of this report, Community Noise Equivalent Level (CNEL) noise exposure contours were prepared. CNEL accounts for the increased sensitivity during the evening hours (7:00 PM to 10:00 PM) and nighttime hours (10:00 PM to 7:00 AM). A 10-decibel weighting is applied to noise events occurring at night, and a 4.8-decibel weighting is applied to those occurring during the evening hours. CNEL is a summation metric which allows for objective analysis and can describe noise exposure comprehensively over a large area. In addition to being widely accepted, the primary benefit of using the CNEL metric is that it accounts for the average community response to noise as determined by the actual number and types of noise events and the time of day they occur.

To achieve an accurate representation of an airport's noise conditions, the AEDT incorporates a combination of industry standard information and user-supplied inputs specific to the airport. The software provides noise characteristics, standard flight profiles, and manufacturer-supplied flight procedures for aircraft within the United States (U.S.) civil and military fleets, including those which commonly operate

at Camarillo Airport (airport) As each aircraft has different design and operating characteristics (number and type of engines, weight, and thrust levels), each aircraft emits different noise levels Based on AEDT-provided and user inputs, aircraft sound exposure for the annual average day is calculated for the points in a grid covering the airport and surrounding areas The grid values, represented with the CNEL, at each intersection point on the grid represent a noise level for that geographic location To create the noise contours, a line linking equal values, similar to those on a topographic map, is drawn which connects points of the same DNL noise value In the same way that a topographic contour represents the same elevation, the noise contour identifies equal noise exposure

The AEDT contains database tables correlating noise, thrust settings, and flight profiles for most of the civilian aircraft and many common military aircraft operating in the U S This database, often referred to as the noise curve data, has been developed under FAA guidance based on rigorous noise monitoring in controlled settings This information was developed through more than a decade of research, including extensive field measurements of more than 10,000 aircraft operations The database also includes performance data for each aircraft to allow for the computation of airport-specific flight profiles (rates of climb and descent)

Airport-specific information, including runway configuration, flight paths, aircraft fleet mix, runway use distribution, elevation, atmospheric conditions, and numbers of daytime and nighttime operations, are also used as modeling inputs Specific modeling assumptions for Camarillo Airport are discussed in the following sections and were derived from the *Camarillo Airport Master Plan* (County of Ventura Department of Airports 2011)

## **AIRCRAFT FLEET MIX AND OPERATIONS**

### **Database Selection**

Noise emissions from an aircraft vary by the type and number of engines, as well as the airframe AEDT provides more than 3,000 engine and airframe combinations to represent many of the aircraft operating in the United States Table B1 lists the existing condition with and without operations associated with the proposed Cloud 9 development As noted in the table, the Proposed Project contours were modeled with additional turboprop and business jet aircraft which are anticipated to operate at the airport as a result of the proposed Cloud 9 development

Based on preliminary assumptions, ten fixed wing aircraft and one helicopter will be stored in the Cloud 9 hangars The additional aircraft associated with the Cloud 9 hangars assumed for the noise modeling are summarized in Table B2 It is assumed that each fixed aircraft will perform six operations (takeoff or landing) per week, for a total of 312 annual operations per aircraft For the helicopter, two daily operations are assumed, for a total of 730 These operations are in addition to the Existing baseline condition

**TABLE B1**  
**Aircraft Fleet Mix and Operations**  
**Camarillo Airport**

	AEDT Designator	Existing	Existing with Proposed Project
<b>Itinerant</b>			
Single Engine Fixed Pitch Propeller	GASEPF	27,450	27,450
Single Engine Variable Pitch Propeller	GASEPV	27,450	27,450
Beech Baron	BEC58P	5,876	5,876
Turboprop	DHC6	954	954
Turboprop	CNA441	2,233	2,233
Turboprop	Pilatus PC-12	590	1,214
Turboprop	SF340	20	20
Turboprop	CNA208	52	52
Turboprop	C130	90	90
Small Jet	CNA510	626	626
Small Jet	CNA525C	883	883
Small Jet	ECLIPSE500	266	266
Small Jet	CNA500	688	688
Medium Jet	CNA680	112	112
Medium Jet	CNA560U	118	118
Medium Jet	LEAR35	464	464
Medium Jet	IA1125	364	1,612
Large Jet	GIV	260	572
Large Jet	GV	722	1,346
Large Jet	737700	14	326
Large Jet	CL500	842	842
Large Jet	C17	4	4
Large Jet	CNA750	1,020	1,020
Large Jet	EMB145	28	28
Military	F16A	14	14
Helicopter	B206L	6,012	6,742
<b>Local</b>			
Single Engine Fixed Pitch Propeller	GASEPF	30,519	30,519
Single Engine Variable Pitch Propeller	GASEPV	30,519	30,519
Multi Engine Piston	BEC58P	6,404	6,404
<b>Itinerant Total</b>		<b>77,151</b>	<b>81,001</b>
<b>Local Total</b>		<b>67,441</b>	<b>67,441</b>
<b>Total</b>		<b>144,592</b>	<b>148,442</b>

Source RKR, Incorporated and Coffman Associates analysis

**TABLE B2**  
**Cloud 9 Hangar Aircraft**  
**Camarillo Airport**

Hangar	Type	Annual Operations	Hangar	Type	Annual Operations
1	Falcon 7X	312	3	Hawker 800	312
1	PC-12	312	3	PC-12	312
1	Hawker 800	312	3	G650	312
1	Hawker 800	312	4	Boeing Business Jet	312
2	G280	312	4	Bell Jet Ranger 206	730
2	G650	312	<b>TOTAL OPERATIONS</b>		<b>3,850</b>

Source RKR, Incorporated and Coffman Associates analysis



# City of Camarillo

601 Carmen Drive • P.O. Box 248 • Camarillo, CA 93011-0248

Office of the City Manager  
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FAX (805) 388-5318

November 20, 2019

Ms. Erin Powers  
Department of Airports, County of Ventura  
555 Airport Way, Suite B  
Camarillo, CA 93010

*(Sent via email and hand delivered)*

**RE: City of Camarillo Comments on Draft Mitigated Negative Declaration for  
Proposed Cloud Nine Hangar Development at the Camarillo Airport**

Ms. Powers:

The City has received a Notice of Availability and Intent to Adopt a Mitigated Negative Declaration for the proposed Cloud Nine hangar development, located on the northeast quadrant of the Camarillo Airport and provides the following comments:

1. An Agreement Between County of Ventura and City of Camarillo Pertaining to Camarillo Airport Development and Surrounding Land Use ("Agreement") was entered into in October of 1976 (attached). Specifically, the Agreement includes Exhibit B – Camarillo Airport Restrictions ("Airport Restrictions"), which state:
  1. The airport shall be operated for general aviation purposes only. General aviation is defined in Attachment 1, affixed hereto and incorporated herein.
  2. The airport operating hours will be from 7:00 a.m. to 10:00 p.m.
  3. The useable runway length shall not exceed 6,000 feet and shall be the most westerly 6,000 feet of the existing runway.
  4. An aircraft weight limitation of 115,000 lbs. (twin wheel) shall be in effect.
  5. The airport VFR traffic pattern shall be to the south of the airfield as designated on Attachment 2, affixed hereto and incorporated herein.
  6. Airport development shall be guided to ensure that residential areas are not exposed to noise levels greater than 60 CNEL average noise and 90 dBA single event noise.

The IS/MND fails to acknowledge the Agreement and the aforementioned Airport Restrictions contained in Exhibit B of the Agreement as applicable land use policies/regulations the project must comply or be conditioned to comply with. The

## EXHIBIT 2

Exhibit 1



IS/MND ignores the restrictions placed on the operation of the Airport, especially the aircraft weight limit of 115,000 lbs and runway location/length limit of the most westerly 6,000 feet. Tables B1 and B2 of the IS/MND disclose the various types of aircraft that will potentially use the proposed hangars and the numbers of operations annually (3,850 operations annually). The IS/MND indicates that the project may facilitate the operation of Boeing Business Jets, which could weigh up to 171,500 lbs., which is in violation of the Agreement. Even if this aircraft will not be operated at the maximum weight, it does not answer what the standard weight of such aircraft, or in other words, how can such aircraft operate without exceeding the weight limitation in the Agreement. The IS/MND does not address any safeguards or mitigation measures to ensure the maximum weight limit established in the Agreement is not exceeded.

The IS/MND also completely fails to acknowledge that the Agreement created the Camarillo Airport Authority ("Authority") specifically so that the County of Ventura and City of Camarillo could jointly review and oversee all airport development and surrounding land use planning. As such, it similarly fails to acknowledge that the Agreement clearly requires that this proposed Airport land use project and its environmental document be submitted to and brought before the Authority for a recommendation first, before the Ventura County Board of Supervisors considers granting its approval of the project. (Agreement, Sections 3 and 4.) Indeed, the Agreement requires the Ventura County Board of Supervisors to give full consideration to all Authority recommendations and precludes the Supervisors from taking any action inconsistent with the Authority's recommendations unless by at least a four-fifths vote. (Agreement, Section 9.)

At a minimum, the MND should be revised to:

- Acknowledge the existence and important role of the Authority and ensure the Project and the IS/MND are submitted to the Authority first, as required by the Agreement, so the Authority can provide recommendations to the Ventura County Board of Supervisors regarding the adequacy of the MND and on whether to approve the project; and
  - Acknowledge the proposed project's potential conflict with the Agreement's Airport Restrictions as a potentially significant land use impact and develop concrete mitigation measures to impose on the Project to ensure compliance therewith, including but not limited to measures to ensure no aircraft above the 115,000 lbs limit and that only the westerly 6,000 feet of the runway will be used and ensure those measures are monitored and enforced by the County going forward.
2. The Project Description on Page A-4 states, "The proposed hangars would be accessed by a ramp (also called an apron) on the south side of the hangars...The proposed aircraft ramp would be 84,000 sf (782.7 feet wide by 120 feet deep) to be located between the new hangars and existing taxiway pavement. This depth can

## EXHIBIT 2

### Exhibit 1

accommodate an aircraft such as the Boeing Business Jet 737-800 or a Gulfstream G650, 2 two of the largest types of aircraft that are anticipated to use the airport. Based on the geotechnical report, the recommended taxilane pavement design could consist of six inches of asphalt, over five inches of stabilized base, over 10 inches of crushed aggregate base."

The design of the taxilane pavement is over-engineered to accommodate large aircraft exceeding the weight limitation of 115,000 lbs., in violation of the Agreement's Airport Restrictions.

3. The IS/MND does not use the standard CEQA Initial Study Checklist from Appendix G of the CEQA Guidelines, but rather, appears to use a different checklist and thresholds of significance developed by Ventura County. Based on the above comments and on our review it appears the IS/MND does not satisfy CEQA requirements and includes fairly cursory analyses and/or inadequate or improperly deferred mitigation of several potentially significant impact areas that may not have substantial evidence to support the ultimate conclusions, specifically in addressing the potentially significant adverse impacts associated with the following:

- Air Quality
- GHG emissions
- Biological Resources
- Noise/Vibration

4. The Mitigation, Monitoring, and Reporting Program does not adequately address how potential impacts to land use, air quality, GHG emissions, and noise/vibration will be mitigated as there are no analyses or mitigation measures proposed to ensure the project's compliance with the Airport Restrictions set forth in the Agreement which were instituted to address environmental and land use concerns. The IS/MND acknowledges that the project may facilitate the operation of Boeing Business Jets, which could weigh up to 171,500 lbs., which is in violation of the Agreement. The IS/MND must be revised to identify and require mitigation measures to ensure the proposed project's compliance with the Agreement's Airport Restrictions and that monitoring efforts will ensure that operation of the project similarly complies with all Airport Restrictions going forward.
5. The IS/MND fails to discuss or analyze potential land use impacts associated with the fact that the project site is located within the City's Heritage Zone, as specified in the Camarillo General Plan Community Design Element. Section 10.2.5 of the Community Design Element states, "Development located within the Heritage Zone must utilize architectural styles that would be appropriate within the Heritage Zone such as Mission, Monterey, Early California, Spanish, Mediterranean, or modern interpretations of these styles. The most important aspect of the Heritage Zone is the type of materials, their colors and textures and the scale of the architectural elements within the building design." In addition, section 10.4.3 Commercial Design Guidelines – Form and Massing part a. states, "Commercial projects located within the Heritage Zone should apply Spanish-style architecture and include the use of

## EXHIBIT 2

### Exhibit 1

natural materials.” In order to fully comply with the Heritage Zone requirements of the Camarillo General Plan, the City requests a landscape trellis be incorporated into the project design along Las Posas Road.

6. The IS/MND needs to be revised to indicate that an encroachment permit is required to be obtained from the City of Camarillo for all work located within the public right-of-way on Las Posas Road.
7. Based on the Agreement, the City’s role on the Authority and the other City permits required for the proposed project, the City is a Responsible Agency for purposes of this project’s CEQA review and compliance.
8. Transportation and Circulation, Section b. Pedestrian/Bicycle – The existing language, “Existing bicycle and pedestrian traffic on Las Posas Road will be accommodated by the project’s right-turn in/right-turn out only driveway connection,” infers that bicycle traffic will be forced to merge with the right-turn driveway traffic, which is a potentially significant safety impact. The IS/MND must be revised to acknowledge and develop mitigation measures to avoid potential impacts. Suggest incorporating mitigation measures and rewording to “Pedestrian traffic on Las Posas Road will be accommodated by a new sidewalk. Bicycle traffic on Las Posas Road will be accommodated by restriping the existing Class II bicycle lane. The design will be subject to City traffic engineer approval.”
9. Flood Control Facilities/Watercourses, Section a. Watercourses – VCWPD Facilities – Suggest deleting: “The post-development runoff flows will be the same as the pre-development levels.” The sentence prior to this in the IS/MND explains how the project is mitigating the excess runoff caused by the increase in impervious area. Further review is needed on how the runoff is handled in the interim and future widening of Las Posas Road. The stormwater detention feature should be sized to accommodate runoff from the ‘interim’ and ‘future’ widening of Las Posas as noted in the email to Dan Bianco on June 21, 2019.
10. Page A-7 Construction Activity – The document states that there will be a net export of 6,744 cubic yards. To where will the dirt be exported? If the dirt will be delivered to a site within the City of Camarillo limits, then, the receiving site must have a valid City of Camarillo Grading Permit. If the export is being hauled to a site outside of the City limits, but is using streets within the City limits, then a haul permit from the City of Camarillo is required. Further, the IS/MND is unclear whether the IS/MND determined the number of diesel haul trucks and routes that will be needed/used for the anticipated soil import/export activities and included those trips in the impact analyses for air quality, GHG emissions, noise/vibration and traffic/transportation.
11. Page B-51 Water Supply, section a. Quality Impact Analysis – Insert/add at the end of the No Impact paragraph, “If the engineering plans are approved by the City of Camarillo and connection fees have been paid to the City of Camarillo, the City of Camarillo will issue a ‘will-serve’ letter.”

12. Page B-53 Waste Treatment and Disposal Facilities, section b. Sewage Collection/Treatment Facilities Impact Analysis – In the No Impact paragraphs, revise "City" to read "Camarillo Sanitary District" in all places. In the first paragraph after the first sentence, insert "The sewer service connection is consistent with a LAFCO approved Out-of-District Sewer Agreement No. 2017-3."


In the second paragraph, revise the last sentence of the second paragraph to read, "Once the engineered plans are approved by the City of Camarillo/Camarillo Sanitary District, application for Camarillo Sanitary District sewer service permit will be submitted. Camarillo Sanitary District will issue a 'will-serve' letter if the engineering plans are approved by the City of Camarillo/Camarillo Sanitary District and connection fees have been paid to the Camarillo Sanitary District."

13. The Water Supply and Waste Treatment and Disposal Facilities sections should reference the prior studies and analysis conducted in the Final Mitigated Negative Declaration and Initial Study for the Proposed Northeast Hangar Development, approved and adopted by the County of Ventura Board of Supervisors on September 27, 2016.

In conclusion, based on the comments provided above, the IS/MND is inadequate and fails to fully discuss and mitigate all of the proposed project's potentially significant environmental impacts and should be revised and recirculated to address the issues noted herein.

If you have any questions, please feel free to contact Joseph R. Vacca, Director of Community Development at [jvacca@cityofcamarillo.org](mailto:jvacca@cityofcamarillo.org) or by phone at (805)388-5362. Alternatively, you may contact Jaclyn Lee, Principal Planner at [jlee@cityofcamarillo.org](mailto:jlee@cityofcamarillo.org), or by phone at (805) 383-5616.

Sincerely,



Dave Norman

Attachments: Agreement Between County of Ventura and City of Camarillo Pertaining to Camarillo Airport Development and Surrounding Land Use

cc: Naftalia Tucker, Assistant Director of Public Works/City Engineer, City of Camarillo  
Dave Klotzle, Director, Public Works, City of Camarillo  
Joe Vacca, Director, Community Development, City of Camarillo  
David Moe, Assistant Director, Community Development, City of Camarillo  
Ken Matsuoka, Principal Civil Engineer, City of Camarillo  
Jaclyn Lee, Principal Planner, City of Camarillo  
Jason Samonte, Traffic Engineer, City of Camarillo  
Troy Spayd, Senior Civil Engineer, City of Camarillo  
Andrew Grubb, Senior Civil Engineer, City of Camarillo  
Brian Pierik, City Attorney

AGREEMENT BETWEEN COUNTY OF VENTURA AND CITY OF  
CAMARILLO PERTAINING TO CAMARILLO AIRPORT DEVELOP-  
MENT AND SURROUNDING LAND USE

THIS AGREEMENT is entered into by and between the COUNTY OF VENTURA (hereinafter "COUNTY") and the CITY OF CAMARILLO (hereinafter "CITY") and shall become binding and effective upon the date of the last signature hereupon. The parties make the following recitals:

A. COUNTY has been granted possession of the major portion of the former Oxnard Air Force Base under lease from the Federal Government for use as a public airport facility (which facility is hereinafter referred to as the "Camarillo Airport").

B. COUNTY and CITY anticipate that fee title to the Camarillo Airport will be transferred from the Federal Government to COUNTY in the near future in accordance with COUNTY'S application therefor.

C. COUNTY'S application for transfer of Camarillo Airport calls for the establishment of a joint powers body representing COUNTY and CITY to oversee airport development.

D. Most of the Camarillo Airport and much of the land surrounding the airport is located within CITY.

E. COUNTY and CITY desire to achieve maximum mutual cooperation in the development of Camarillo Airport and to maintain a balanced perspective in fulfilling COUNTY aviation requirements within a framework of continuing community sensitivity.

10/13/76

F. COUNTY and CITY objectives will be realized by a joint exercise of powers by and between COUNTY and CITY to form a joint review body to oversee airport development and surrounding land use planning.

Based upon the foregoing recitals, the parties do hereby agree as follows:

1. COUNTY and CITY do hereby jointly exercise their powers and create the Camarillo Airport Authority (hereinafter "Authority").

2. The Authority shall be composed of two members of the Ventura County Board of Supervisors, which members shall be selected by the Board of Supervisors; two members of the Camarillo City Council, which members shall be selected by the City Council; and a fifth member to be selected by a majority of the other four members.

3. The Ventura County Board of Supervisors shall not give formal approval or otherwise act upon any matter brought before it pertaining to development, operation or any other matter at the Camarillo Airport until the matter shall have first been submitted to the Authority and a recommendation received therefrom.

4. The Camarillo City Council and the Ventura County Board of Supervisors shall not grant any approval or take any other action in respect to any land use matter within the Camarillo Airport Zone until the matter shall have first been submitted to the Authority and a recommendation received therefrom. "Any land use matter within the Camarillo Airport Zone" shall mean actions relating to zoning, master or general planning, use permits and all other exercises

of the police power which regulate the development of the area designated in Exhibit A, attached hereto and incorporated herein by this reference.

5. COUNTY shall operate the Camarillo Airport in a manner consistent with the restrictions specified in Exhibit B, attached hereto and incorporated herein by this reference. The restrictions shall not be modified, except in emergencies, until the proposed modification shall have first been submitted to the Authority and a recommendation received therefrom.

6. COUNTY and CITY shall exercise their police powers so as to maintain the compatibility of the land within the Camarillo Airport Zone with aviation use and shall not allow uses inconsistent therewith.

7. The Authority shall act expeditiously and avoid unreasonable delays in formulating recommendations for the Ventura County Board of Supervisors and the Camarillo City Council. Any matter submitted to the Authority shall be deemed to have been approved following the expiration of sixty (60) days following submission unless a majority of the members of the Authority shall have denied or taken other action on a matter submitted to it.

8. Notwithstanding the provisions of paragraphs 3 and 4, the Camarillo City Council and the Ventura County Board of Supervisors may act on any matter prior to (1) receiving a recommendation from the Authority or (2) the expiration of sixty (60) days, whichever occurs first, to the extent that such action may be required by law. In the event of a requirement for early action on any matter to be submitted to the Authority, such matter shall be submitted to the Authority at the earliest possible date and the Authority shall be given notice of the date by which action must be taken.

9. The Ventura County Board of Supervisors and the Camarillo City Council shall each give full consideration to all recommendations of the Authority and shall not take any action inconsistent therewith unless by at least a four-fifths vote.

10. The Authority shall hold monthly meetings at a time chosen by members of the Authority. Special meetings may be called by the chairman, vice chairman or any three members. The Authority shall promulgate and adopt rules for the orderly conduct of its meetings and affairs.

11. The Authority shall elect from its members a chairman and vice chairman to serve for one year. Elections shall be held in January.

12. COUNTY shall, without cost to CITY, provide staff and secretarial support to the Authority, which said support shall include the taking of minutes at all Authority meetings, the preparation and distribution of agendas for Authority meetings and coordination of Authority business with CITY staff.

13. All additional expenditures which are recommended by Authority shall be paid by COUNTY subject to COUNTY'S prior approval. The provisions of paragraph nine, pertaining to the four-fifths vote requirement, shall not apply to funding approvals. In the event COUNTY fails to approve any proposed expenditure, the expenditure shall not be incurred unless and until the manner of payment is mutually agreed upon between the parties hereto.

14. The debts, liabilities and obligations of the Authority shall be solely the debts, liabilities and obligations of the Authority and neither the CITY nor the COUNTY shall be liable therefor.



15. The term of this agreement shall be for perpetuity; provided, however, that if COUNTY is precluded from operating the Camarillo Airport for public airport purposes, then this agreement shall be of no further force or effect.

16. This agreement may be modified at any time by mutual agreement of the parties.

COUNTY OF VENTURA

By

*Robert L. Hamm*  
Chairman, Board of Supervisors

ATTEST:

ROBERT L. HAMM, County Clerk,  
County of Ventura, State of California, and ex officio Clerk of the Board of Supervisors thereof.

By

*Ray Shiland*  
Deputy Clerk



CITY OF CAMARILLO

By

*Robert H. Pineda*  
Mayor

ATTEST:

By

*Kan Keller*  
City Clerk

## EXHIBIT A

The "Camarillo Airport Zone" shall consist of the area bounded by the following:

Highway 34 to the south; the southerly extension of Carmen Drive to the east; Highway 101 to the north; the western boundary of the Camarillo sphere of interest, as designated on the 1974 Camarillo General Plan, to the west.

## **EXHIBIT B**

### **CAMARILLO AIRPORT RESTRICTIONS**

1. The airport shall be operated for general aviation purposes only. General aviation is defined in Attachment 1, affixed hereto and incorporated herein.
2. The airport operating hours will be from 7:00 AM to 10:00 PM.
3. The usable runway length shall not exceed 6,000 feet and shall be the most westerly 6,000 feet of the existing runway.
4. An aircraft weight limitation of 115,000 lbs. (twin wheel) shall be in effect.
5. The airport VFR traffic pattern shall be to the south of the airfield as designated on Attachment 2, affixed hereto and incorporated herein.
6. Airport development shall be guided to ensure that residential areas are not exposed to noise levels greater than 60 CNEL average noise and 90 dBA single event noise.

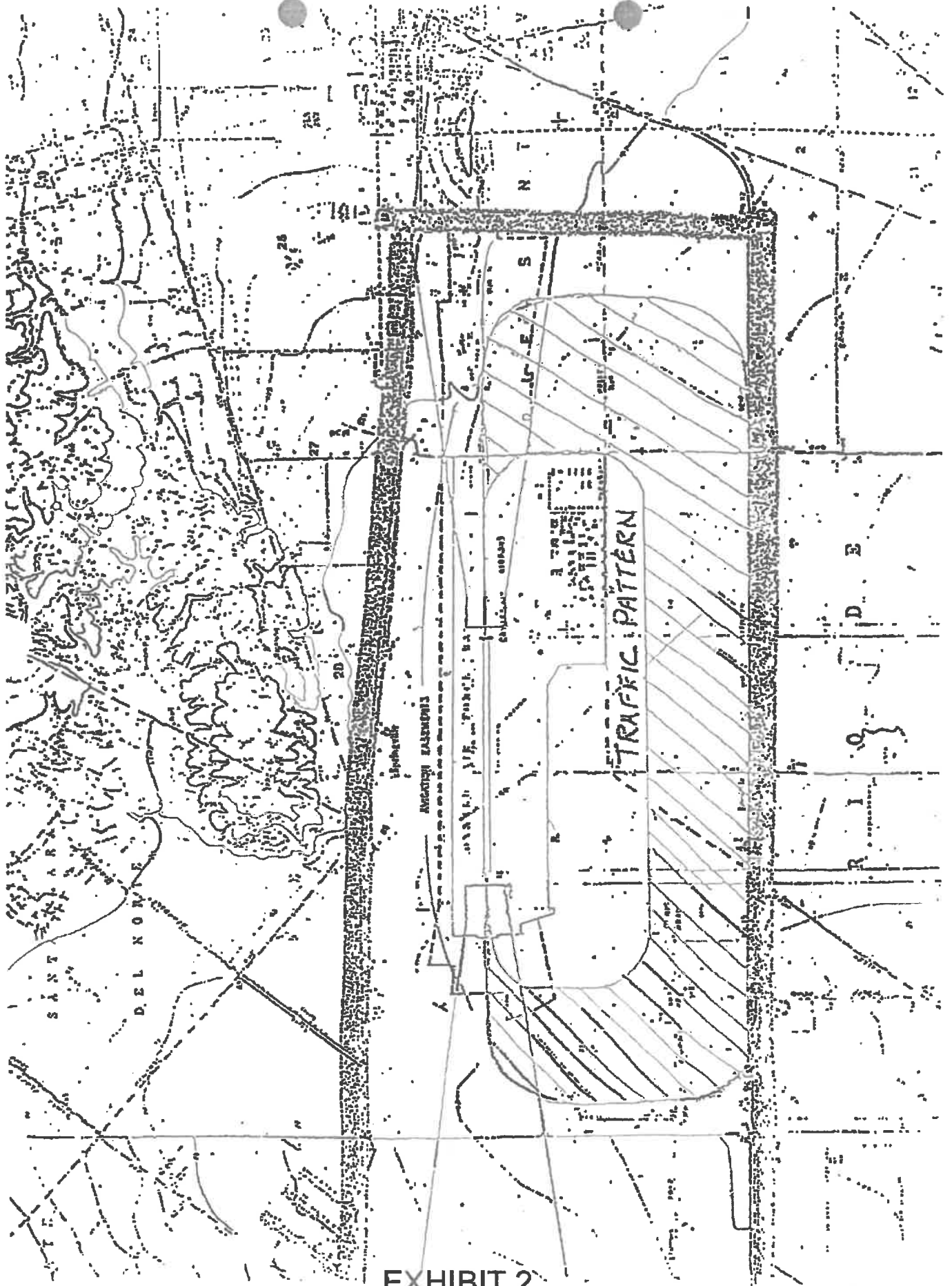


EXHIBIT 2

Exhibit 1

## ATTACHMENT 1

### GENERAL AVIATION

General aviation includes all business and commercial, training, personal transportation, proficiency, and sport flying not classified as air carrier. General aviation includes air taxi or charter for revenue on a non-schedule basis (interstate limited to 30 passengers, 7,500 lbs. cargo), and intrastate freight carriers and interstate freight carriers which operate through exclusive long-term contracts (non-common carriers).

Excluded from general aviation are all air carrier operations. Air carrier operations consist of operations which are certificated by the CAB or the PUC and comprise the following:

- (a) CAB Certificate of Convenience & Necessity covers all interstate common carriers (services offered to public at large) on a regular schedule and route. CAB also certifies interstate air taxi and charter aircraft with more than 30 seats which operate for revenue on a non-scheduled basis. CAB certifies all interstate common carrier freight airlines also, including air taxi over 7,500 pounds of cargo carried.
- (b) PUC certifies all air carrier (people) of any size which operate on a regularly scheduled basis over scheduled routes for revenue. This includes third level carriers such as Golden West. PUC does not certify intrastate freight air carriers.

AMENDMENT #1.

"AGREEMENT BETWEEN COUNTY OF VENTURA AND  
CITY OF CAMARILLO PERTAINING TO CAMARILLO  
AIRPORT DEVELOPMENT AND SURROUNDING LAND USE"

1. WHEREAS, the County of Ventura and the City of Camarillo, in October of 1976, entered into a joint powers agreement pertaining to Airport Development and Surrounding Land Use; and
2. WHEREAS, said agreement provides for the formation of the Oxnard Airport Authority and selection of members thereof; and
3. WHEREAS, the Authority now wishes to amend the "Agreement" to allow alternate members to be appointed and vested with certain voting authority;
4. NOW, THEREFORE, it is hereby resolved that the "AGREEMENT BETWEEN COUNTY OF VENTURA AND CITY OF CAMARILLO PERTAINING TO CAMARILLO AIRPORT DEVELOPMENT AND SURROUNDING LAND USE" be amended as follows:

pg 2 para 2 "Composition of Authority."

Add: "Members of the Board of Supervisors may be selected by the Board of Supervisors as alternates, and members of the City Council may be selected by the City Council as alternates". An alternate to the fifth member (public member) may be selected by a majority vote of the other four Authority members. "Such designated alternate(s) may be a voting participant(s) at an Authority meeting at such time as the regular member(s) representing his/her jurisdiction is not in attendance".

# CAMARILLO AIRPORT



**AIRPORT MASTER PLAN**

**EXHIBIT 3**  
Exhibit 1

The objective of this effort is to identify, in general terms, the adequacy of the existing airport facilities and outline what new facilities may be needed and when they may be needed to accommodate forecast demands. Having established these facility requirements, alternatives for providing these facilities will be evaluated in Chapter Four to determine the most practical, cost-effective, and efficient direction for future development.

## PLANNING HORIZONS

Cost-effective, safe, efficient, and orderly development of an airport should rely more on actual demand at an airport than a time-based forecast figure. Thus, in order to develop a Master Plan that is demand-based rather than time-based, a series of planning horizon milestones have been established that take into consideration the reasonable range of aviation demand projections.

It is important to consider that over time, the actual activity at the airport may be higher or lower than what the annualized forecast portrays. By

planning according to activity milestones, the resulting plan can accommodate unexpected shifts or changes in the aviation demand. It is important to plan for these milestones so that airport officials can respond to unexpected changes in a timely fashion. As a result, these milestones provide flexibility and potentially extend this plan's useful life should aviation trends slow over time.

The most important reason for utilizing milestones is to allow the airport to develop facilities according to need generated by actual demand levels. The demand-based schedule provides flexibility in development, as the schedule can be slowed or expedited according to actual demand at any given time over the planning period. The resulting plan provides airport officials with a financially responsible and needs-based program. Table 3A presents the planning horizon milestones for each activity demand category. The planning milestones of short, intermediate, and long term generally correlate to the five, ten, and twenty-year periods used in the previous chapter.

**TABLE 3A**  
**Planning Horizon Activity Summary**  
**Camarillo Airport**

	2007	Short Term	Intermediate Term	Long Term
<b>Itinerant Operations</b>				
General Aviation	70,190	88,000	94,000	106,900
Air Taxi	2,249	2,640	3,310	5,130
Military	101	200	200	200
<b>Total Itinerant</b>	<b>72,540</b>	<b>90,840</b>	<b>97,510</b>	<b>112,230</b>
<b>Local Operations</b>				
General Aviation	66,788	61,200	68,100	84,000
Military	620	500	500	500
<b>Total Local</b>	<b>67,408</b>	<b>61,700</b>	<b>68,600</b>	<b>84,500</b>
<b>TOTAL ANNUAL OPERATIONS</b>	<b>139,948</b>	<b>152,540</b>	<b>166,110</b>	<b>196,730</b>
<b>TOTAL BASED AIRCRAFT</b>	<b>533</b>	<b>570</b>	<b>630</b>	<b>750</b>



## AIRFIELD PLANNING CRITERIA

The selection of appropriate Federal Aviation Administration (FAA) design standards for the development and location of airport facilities is based primarily upon the characteristics of the aircraft which are currently using or are expected to use the airport. The critical design aircraft is used to define the design parameters for the airport. The critical design aircraft is defined as the most demanding category of aircraft, or family of aircraft, which conducts at least 500 operations per year at the airport. Planning for future aircraft use is of particular importance since design standards are used to plan many airside and landside components. These future standards must be considered now to ensure that short term development does not preclude the long range potential needs of the airport.

The FAA has established a coding system to relate airport design criteria to the operational and physical characteristics of aircraft expected to use the airport. This airport reference code (ARC) has two components. The first component, depicted by a letter, is the aircraft approach category and relates to aircraft approach speed (operational characteristic). The second component, depicted by a Roman numeral, is the airplane design group and relates to aircraft wingspan (physical characteristic). Generally, aircraft approach speed applies to runways and runway-related facilities, while aircraft wingspan primarily relates to separation criteria involving taxiways, taxilanes, and landside facilities.

According to FAA Advisory Circular (AC) 150/5300-13, *Airport Design*, Change 13, an aircraft's approach category is based upon 1.3 times its stall speed in landing configuration at that aircraft's maximum certificated weight. The five approach categories used in airport planning are as follows:

**Category A:** Speed less than 91 knots.

**Category B:** Speed 91 knots or more, but less than 121 knots.

**Category C:** Speed 121 knots or more, but less than 141 knots.

**Category D:** Speed 141 knots or more, but less than 166 knots.

**Category E:** Speed greater than 166 knots.

The airplane design group (ADG) is based upon either the aircraft's wingspan or tail height, whichever is greater. For example, an aircraft may fall in ADG II for wingspan at 70 feet, but ADG III for tail height at 33 feet. This aircraft would be classified under ADG III. The six ADGs used in airport planning are as follows:

ADG	Tail Height (feet)	Wingspan (feet)
I	<20	<49
II	20 - <30	49 - <79
III	30 - <45	79 - <118
IV	45 - <60	118 - <171
V	60 - <66	171 - <214
VI	66 - <80	214 - <262

Source: AC 150/5300-13, Change 13  
(March 2007)

**Exhibit 3A** summarizes representative aircraft by ARC. As shown on the exhibit, the airport does not currently, nor is it expected to, regularly serve aircraft in ARCs C-IV, D-IV, or D-V.

These are large transport aircraft commonly used by commercial air carriers and air cargo carriers, which do not currently use, nor are they expected to use, Camarillo Airport through the planning period.

The FAA recommends designing airport functional elements to meet the requirements for the most demanding ARC for that airport. The majority of aircraft currently operating at the airport are small single engine aircraft weighing less than 12,500 pounds. The airport also has a significant volume of corporate aircraft ranging from the smaller Cessna Citation family to the Bombardier Global Express and Gulfstream business jet family of aircraft, which can weigh more than 90,000 pounds and range up to ARC D-III.

In order to determine airfield design requirements, the critical aircraft and critical ARC should first be determined, and then appropriate airport design criteria can be applied. This process begins with a review of aircraft currently using the airport and those expected to use the airport through the long term planning period.











### **CURRENT CRITICAL AIRCRAFT**

The critical design aircraft is defined as the most demanding category of aircraft which conduct 500 or more operations at the airport each year. In some cases, more than one specific make and model of aircraft comprises the airport's critical design aircraft. For example, one category of aircraft

may be the most critical in terms of approach speed, while another is most critical in terms of wingspan. Smaller general aviation piston-powered aircraft within approach categories A and B and ADG I conduct the majority of operations at Camarillo Airport. Business turboprops and jets with longer wingspans and higher approach speeds also utilize the airport less frequently. While the airport is used by a number of helicopters, helicopters are not included in this determination as they are not assigned an ARC.

As of June 2008, there were 533 based aircraft at Camarillo Airport. The majority of these are single and multi-engine piston-powered aircraft which fall within approach categories A and B and ADG I. There are 11 turboprop aircraft and 22 jets based at the airport. Representative turboprop aircraft include the Aero Commander 690A, Beechcraft King Air, and vintage aircraft including a Convair 240. These aircraft range from ARC B-I (Aero Commander) to B-III (Convair 240).

There is a wider divergence of aircraft types when considering the airport's 22 based jets. These range from smaller Cessna Citations (ARC B-I) to foreign made military trainers to large business jets in the Bombardier and Gulfstream families. The most demanding jet aircraft based at the airport, according to ARC, is the Gulfstream V (G-V) business jet which falls within ARC D-III. There are two G-V aircraft based at CMA. The airport is also home to a G-III (ARC C-II), G-IV (ARC D-II), and Global Express (ARC C-III) business jet aircraft. Be-

<b>A-I</b> 	<ul style="list-style-type: none"> <li>• Beech Baron 55</li> <li>• Beech Bonanza</li> <li>• Cessna 150</li> <li>• Cessna 172</li> <li>• Cessna Citation Mustang</li> <li>• <b>Eclipse 500</b></li> <li>• Piper Archer</li> <li>• Piper Seneca</li> </ul>	<b>C-I, D-I</b>  <ul style="list-style-type: none"> <li>• Beech 400</li> <li>• <b>Lear 25, 31, 35, 45, 55, 60</b></li> <li>• Israeli Westwind</li> <li>• HS 125-400, 700</li> </ul>
<b>B-I</b> <i>less than 12,500 lbs.</i> 	<ul style="list-style-type: none"> <li>• Beech Baron 58</li> <li>• Beech King Air 100</li> <li>• Cessna 402</li> <li>• <b>Cessna 421</b></li> <li>• Piper Navajo</li> <li>• Piper Cheyenne</li> <li>• Swearingen Metroliner</li> <li>• Cessna Citation I</li> </ul>	<b>C-II, D-II</b>  <ul style="list-style-type: none"> <li>• Cessna Citation III, VI, VIII, X</li> <li>• <b>Gulfstream II, III, IV</b></li> <li>• Canadair 600</li> <li>• ERJ-135, 140, 145</li> <li>• CRJ-200, 700, 900</li> <li>• Embraer Regional Jet</li> <li>• Lockheed JetStar</li> <li>• Super King Air 350</li> </ul>
<b>B-II</b> <i>less than 12,500 lbs.</i> 	<ul style="list-style-type: none"> <li>• <b>Super King Air 200</b></li> <li>• Cessna 441</li> <li>• DHC Twin Otter</li> </ul>	<b>C-III, D-III</b>  <ul style="list-style-type: none"> <li>• <del>ERJ-170, 190</del></li> <li>• <del>Boeing Business Jet</del></li> <li>• <del>B-727-200</del></li> <li>• <del>B-737-300 Series</del></li> <li>• <del>MD-80, DC-9</del></li> <li>• <del>Fokker 70, 100</del></li> <li>• <del>A319, A320</del></li> <li>• <b>Gulfstream V</b></li> <li>• <b>Global Express</b></li> </ul>
<b>B-I, B-II</b> <i>over 12,500 lbs.</i> 	<ul style="list-style-type: none"> <li>• Super King Air 300</li> <li>• Beech 1900</li> <li>• Jetstream 31</li> <li>• Falcon 10, 20, 50</li> <li>• Falcon 200, 900</li> <li>• <b>Citation II III IV, V</b></li> <li>• Saab 340</li> <li>• Embraer 120</li> </ul>	<b>C-IV, D-IV</b>  <ul style="list-style-type: none"> <li>• <del>A-757</del></li> <li>• <del>A-777</del></li> <li>• <del>C-130</del></li> <li>• <del>DC-3-70</del></li> <li>• <del>DC-90</del></li> <li>• <del>M-11</del></li> <li>• <del>A-1011</del></li> </ul>
<b>A-III, B-III</b> 	<ul style="list-style-type: none"> <li>• DHC Dash 7</li> <li>• <b>DHC Dash 8</b></li> <li>• DC-3</li> <li>• Convair 580</li> <li>• Fairchild F-27</li> <li>• ATR 72</li> <li>• ATP</li> </ul>	<b>D-V</b>  <ul style="list-style-type: none"> <li>• <del>B-747 Series</del></li> <li>• <del>B-777</del></li> </ul>

Note: Aircraft pictured is identified in bold type.

CAMARILLO  
AIRPORT

Exhibit 3A  
AIRPORT REFERENCE CODES

## EXHIBIT 3

Exhibit 1

fore making a final determination of the critical aircraft family, an examination of the itinerant jet aircraft using the airport should also be considered.

### Jet Aircraft Operations

A wide range of transient jet aircraft operate at the airport. Jet operations are typically those that will influence required airport facilities as the critical aircraft. In order to discern the number and type of jet aircraft operations at Camarillo Airport, an analysis of instrument flight plan data was conducted. Flight plan data was acquired for this study from two sources; the FAA Enhanced Traffic Management System Counts (ETMSC) and the subscription service, *Airport IQ*. The data available includes documentation of instrument flight plans that are opened and closed on the ground at the airport. Flight plans that are opened or closed from the air are not credited to the airport. Therefore, it is likely that there are more jet operations at the airport that are not captured by the methodology.

**Table 3B** presents private jet operations at Camarillo Airport from June 1, 2007, to May 31, 2008 (12-month operational count). The privately owned and operated aircraft are not flown under Federal Aviation Regulation (F.A.R.) Part 135 (considered air taxi). These operations would be considered itinerant general aviation operations.

There were a total of 3,202 operations by privately owned jet aircraft in-

cluded in the FAA data. The greatest number of operations in any single ARC family was 1,523 in ARC B-II. This number accounted for nearly half of the total, at 47.6 percent of the total.

The table also presents the number of operations by specific aircraft type. The Hawker 800 model performed the most jet operations (402) at the airport over the period. The most demanding privately operated aircraft, in terms of ARC design standard, has been the Gulfstream V. The Gulfstream V is classified by the FAA as ARC D-III and conducted 243 operations at CMA over the last year. The Global Express, an ARC C-III aircraft, is similarly sized and conducted 113 operations at CMA during the period.

Another segment of corporate aircraft users operate under F.A.R. Part 135 (air taxi) rules for hire and through fractional ownership programs. Air taxi operators are governed by the FAA rules which are more stringent than those required for private aircraft owners. For example, aircraft operating under Part 135 rules must increase their calculated landing length requirements by 20 percent for safety factors. Fractional ownership operators are actual aircraft owners who acquire a portion of an aircraft with the ability to use any aircraft in the program's fleet. These programs have become quite popular over the last several years, especially since 9/11. Some of the most notable fractional ownership programs include NetJets, Bombardier Flexjet, Citation Shares, and Flight Options.

**TABLE 3B**  
**Private Jet Operations (Minimum)**  
**Camarillo Airport**  
**June 1, 2007 - May 31, 2008**

<b>ARC</b>	<b>Aircraft Type</b>	<b>Annual Operations</b>	<b>%</b>
<b>B-I</b>	Eclipse 500	29	0.9%
	Diamond Jet	8	0.1%
	Cessna Mustang	12	0.4%
	Cessna 500	42	1.3%
	Premier 390	60	1.9%
	Falcon 10	8	0.2%
<b>Total B-I</b>		151	4.8%
<b>B-II</b>	Cessna 525	364	11.4%
	Cessna 550	236	7.4%
	Cessna 560	166	5.2%
	Falcon 20	30	0.9%
	Falcon 50	121	3.8%
	Falcon 900	163	5.1%
	Falcon 2000	28	0.9%
	Hawker 600	13	0.4%
	Hawker 800	402	12.6%
<b>Total B-II</b>		1,523	47.6%
<b>C-I</b>	Lear 24/5	2	0.1%
	Lear 31/5	30	0.9%
	Lear 40/5	119	3.7%
	Lear 55	20	0.6%
	IAI 1121 Commodore	6	0.2%
	IAI Westwind/Astra	19	0.6%
	Beech 400	44	1.4%
<b>Total C-I</b>		240	7.5%
<b>C-II</b>	Cessna 650/80	122	3.8%
	Cessna 750 (X)	68	2.1%
	Gulfstream III	101	3.2%
	Sabre 75	3	0.1%
	Hawker 1000	14	0.4%
	CRJ 200/Challenger 800	4	0.1%
	Challenger 300	7	0.2%
	Challenger 600	269	8.4%
	Embraer 135/140 Legacy	10	0.3%
<b>Total C-II</b>		598	18.7%
<b>C-III</b>	Bombardier Global Express	113	3.5%
<b>Total C-III</b>		113	3.5%
<b>D-I</b>	Lear 60	31	1.0%
<b>Total D-I</b>		31	1.0%
<b>D-II</b>	Gulfstream II	60	1.9%
	Gulfstream IV	240	7.5%
<b>Total D-II</b>		300	9.4%
<b>D-III</b>	Gulfstream V	243	7.6%
<b>Total D-III</b>		243	7.6%
<b>TOTAL ACTIVITY</b>		3,202	100.0%

Source: FAA ETMSC Report and AirportIQ.com based on IFR filing data

From June 1, 2007, to May 31, 2008, air taxi and fractional ownership operators accounted for an additional 1,090 jet operations. Table 3C provides additional information regarding

the ARC and model type of aircraft utilized by the fractional and charter companies which operated at Camarillo Airport over the last year.

**TABLE 3C**  
**Air Taxi Jet Operations (Minimum)**  
**Camarillo Airport**  
**June 1, 2007 - May 31, 2008**

ARC	Aircraft Type	Annual Operations	%
Total B-I		0	0.0%
B-II	Cessna 525	8	0.7%
	Cessna 550	14	1.3%
	Cessna 560	435	39.9%
	Falcon 20	1	0.1%
	Falcon 2000	56	5.1%
	Hawker 800	118	10.8%
Total B-II		632	58.0%
C-I	Lear 40/5	40	3.7%
	Beech 400	101	9.3%
Total C-I		141	12.9%
C-II	Cessna 650/80	98	9.0%
	Cessna 750 (X)	139	12.8%
	Challenger 300	22	2.0%
	Challenger 600	3	0.3%
	Embraer 135/140 Legacy	10	0.9%
Total C-II		272	25.0%
Total C-III		0	0.0%
D-I	Lear 60	10	0.9%
Total D-I		10	0.9%
D-II	Gulfstream II	35	3.2%
Total D-II		35	3.2%
Total D-III		0	0.0%
Total Activity		1,090	100.0%

Source: FAA ETMSC Report and AirportIQ.com based on IFR filing data

The combination of private and air taxi jet and turboprop operations accounted for a minimum of 4,292 itinerant operations at Camarillo Airport over the last year, as presented in Table 3D. Based upon these figures, operations by jet aircraft within ARC C-II exceed the substantial use threshold of 500 operations per year to be considered the current critical design aircraft. While ARC B-II aircraft totaled

approximately 50 percent of all operations used in this analysis, ARC C-II aircraft accounted for an additional 20 percent of the total operational count.

As previously mentioned, critical aircraft design does not necessarily require one aircraft which makes the 500 annual operations. In many cases, a family of aircraft within the same ARC can define the critical aircraft.

As such, consideration should be given to the operations by the most demanding aircraft to determine if the threshold has been exceeded. Over the last year, jet aircraft operations at CMA in approach categories D-I through D-III combined for more than 500 annual operations. Thus, the crit-

ical approach category is D. Aircraft in airplane design group II also accounted for more than 500 annual operations. Therefore, the current critical design aircraft for Camarillo Airport is defined by cabin-class aircraft in ARC D-II.

**TABLE 3D**  
**Minimum Itinerant Jet Operations by ARC**  
**Camarillo Airport**

Aircraft Reference Code (ARC)	Private Jet Ops	Air Taxi Jet Ops	Total
B-I	154	0	154
B-II	1,523	632	2,155
C-I	240	141	381
C-II	598	272	870
C-III	113	0	113
D-I	31	10	41
D-II	300	35	335
D-III	243	0	243
Totals	3,202	1,090	4,292

Source: FAA ETMSC Report and AirportIQ

## FUTURE CRITICAL AIRCRAFT

The aviation demand forecasts indicate the potential for continued growth in business jet and turboprop aircraft activity at the airport. This includes the addition of 23 based jets and eight based turboprops through the long term planning period. Itinerant business jet and turboprop activity is also expected to continue to be strong. Therefore, it is expected that business jet and turboprop aircraft will continue to define the critical aircraft parameters for Camarillo Airport through the planning period.

Camarillo Airport is fully capable of serving the full breadth of piston-powered and turboprop general aviation aircraft. The airport is also capable of serving the full array of business

jet aircraft in the fleet today as evidenced by the G-V and Global Express which are currently based at CMA. Future business jet aircraft which will base and operate at CMA will likely mirror current conditions, however, in higher volumes.

The G-V and Global Express represent the largest commonly used business jets in the fleet today. Both of these aircraft are currently based at the airport, however, their operations fell short of the 500 operation threshold. In the near future, however, these aircraft will likely operate more than 500 times annually at CMA. As such, the future critical aircraft for planning purposes will remain ARC D-III defined by the G-V and Global Express business jet aircraft.

December 31, 2019

RECEIVED

JAN 2 2020

ADMINISTRATION

Ventura County Transportation Commission  
ATTN: Darren Kettle, Executive Director  
950 County Square Drive, Suite 207  
Ventura, CA 93003

Re: December 6, 2019, Letter from City of Camarillo Regarding CloudNine Project

Dear Mr. Kettle:

The County of Ventura has reviewed the above-described letter to your Commission, requesting various actions relating to the CloudNine project at the Camarillo Airport. The City's letter lacks legal and factual support. The County therefore requests that your Commission take no action regarding the CloudNine project.

**The CloudNine Project**

The CloudNine project is a proposed ground lease between the County and a private developer, RKR Incorporated, to develop an approximately six-acre site in the northeast corner of Camarillo Airport. The project will eventually include the construction of four 25,000 square-foot aircraft hangars, plus associated offices and ramp space. Although the lease was approved by the Ventura County Board of Supervisors on September 25, 2018, the County has not yet executed the lease. The lease was also approved by the Camarillo Airport Authority on August 9, 2018.

The CloudNine project is currently undergoing environmental review, with a draft Mitigated Negative Declaration (MND) having been opened for public comment on October 21, 2019, and closed on November 20, 2019. The County's review of those public comments is ongoing, and it is anticipated that the MND, including any revisions that come out of the public-comment process, will be presented to the County's Board of Supervisors in early 2020 for approval.

**The City's Letter Lacks a Factual Basis**

The City's letter claims that the CloudNine project will "facilitate" Boeing Business Jets. (City letter, p. 1.) This is not correct. The hangar facility contemplated in the CloudNine project is not suitable for, is not being designed for, and will not house, Boeing Business Jets (a type of Boeing 737). The CloudNine project is intended to develop hangars for private jet aircraft, consistent with the Camarillo Airport's current and planned operations and within all legal restrictions under which the Camarillo Airport currently operates, including the 1976 Joint Powers Agreement (JPA) between the County and the City.



The City's claim that the CloudNine project will "facilitate" Boeing Business Jets rests solely on the anticipated physical dimensions of the pavement in front of the hangars.

In its letter, the City misquotes a portion of the draft MND, which the City included as an enclosure. The City says that the draft "MND expressly notes that the Project's purpose is to facilitate larger aircraft 'such as the Boeing Business Jet 737-800 or a Gulfstream G650' ...." (City letter, p. 1, quoting from the draft MND.) The draft MND does no such thing.

The language the City quotes is not found in the draft MND's statement of the project's purpose but instead in its description of the physical dimensions of the ramp to be built in front of the proposed hangars: "This depth [120 feet] can accommodate an aircraft such as the Boeing Business Jet 737-800 or a Gulfstream G650, two of the largest types of aircraft that are anticipated to use the airport." (Draft MND, p. A-4 [a footnote, omitted here, provides the physical dimensions of these two aircraft].) The only other mention of a Boeing Business Jet is found in a table on page B-3 of the draft MND, listing the aircraft for which the draft MND conducted its environmental analysis.

In addition, the developer of the CloudNine project, RKR, Incorporated, has assured the County, in writing, that Boeing Business Jets are not going to operate out of the CloudNine facility: "RKR Inc is NOT and has NO intention now or in the future to allow Boeing 737 aircraft to operate from the CloudNine location." (See enclosure, p. 1.) RKR also notes that the designed height for its hangars would not accommodate a 737. (Enclosure, p. 2.)

If the mere size of a hangar's ramp were to constitute proof that the project intends to "facilitate" Boeing Business Jets, the CloudNine project would hardly be worth mentioning, given that the physical dimensions of the runway, taxiways, and other airport tenants' ramps at the Camarillo Airport are also large enough to accommodate Boeing Business Jets, which has been true since long before the County acquired the Camarillo Airport from the Air Force in 1976. The infrastructure of the Camarillo Airport is designed to accommodate aircraft up to a certain width (wingspan) and height, under the FAA's Airplane Design Group (ADG III). ADG III includes all aircraft—regardless of manufacturer, model, weight, or other characteristic—between 79 and 118 feet wide and between 30 and 45 feet tall. ADG III encompasses Boeing Business Jets, simply because Boeing Business Jets fit within the above limits. But Boeing Business Jets cannot operate at the Camarillo Airport except under limited circumstances, because of the 1976 JPA.

That JPA imposes an aircraft weight limit of 115,000 pounds. The JPA is otherwise silent on aircraft dimensions and does not exclude aircraft based on manufacturer or model. Fully loaded with fuel, a Boeing Business Jet would exceed the 115,000-pound weight limit, but a Boeing Business Jet with a smaller fuel load can be safely operated under that limit. And many aircraft that fall into the ADG III dimensions are already based at and use the Camarillo Airport on a regular basis, in compliance with the JPA's 115,000-pound limit. Nothing in the draft MND or the CloudNine project alters, or could alter, the 115,000-pound limit in the JPA.

It is true that the draft MND included Boeing Business Jets in its assumptions for purposes of evaluating the environmental effects of the CloudNine project, but this helps more than it hurts, because the draft MND finds that even Boeing Business Jets, which are heavier than the aircraft for which the CloudNine project is being designed, would have no significant environmental impacts at the Camarillo Airport.

The City's letter also fails to identify any element of either the Camarillo Airport Master Plan or your Commission's Comprehensive Airport Land Use Plan that conflicts with the CloudNine project. As discussed below, your Commission's authority extends only to determinations of consistency with that Airport Land Use Plan.

In sum, the mere size of the CloudNine project's ramp will not "facilitate" Boeing Business Jets, and the City has not identified any other basis for your Commission to take action on this project.

#### **The City's Request Lacks a Legal Basis**

Even if the City had been able to identify a reason for your Commission to act here, it does not appear that your Commission has a legal basis for doing so. Reviewing individual projects is beyond your Commission's legal authority, and the City provides no legal ground for believing otherwise.

The Legislature lists your Commission's powers in Public Utilities Code section 21674, and they do not include reviewing particular airport projects. Your Commission's powers "shall in no way be construed to give the commission jurisdiction over the operation of any airport." (Pub. Util. Code, § 21674(e).) As relevant here, your powers include only the review of certain County *regulatory* actions under Public Utilities Code section 21676, to determine whether a County action is consistent with your Commission's Comprehensive Airport Land Use Plan. (Pub. Util. Code, § 21674(d).)

Under section 21676, your Commission may review County regulatory actions in only three circumstances: (1) When the County proposes to amend a general plan or specific plan; (2) when the County proposes to adopt or approve a zoning ordinance or building regulation; and (3) when the County proposes to modify its airport master plan. (Pub. Util. Code, § 21676(b), (c).) None of these three predicate acts has occurred, and the City's letter does not claim otherwise. Your Commission therefore has no legal basis for taking action here.

The CloudNine project is important to the Camarillo Airport and the County, but despite various efforts to show otherwise—including the City's here—the project is largely unremarkable. It does not involve regulatory changes. It will not result in a change in the aircraft types operating at the airport. It will not violate the 1976 JPA. It is in no way inconsistent with any governing plan or regulation. This project involves nothing more than the construction of four aircraft hangars and associated facilities on a public airport, a place where aircraft hangars and associated facilities must be built, where hangars and related

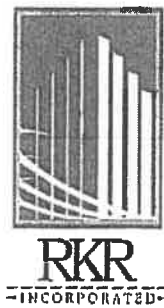
facilities of similar sizes have existed for decades, and where aircraft of similar size and weight have operated for decades. It does not warrant your Commission's attention.

A handwritten signature in black ink, appearing to read "Kip Turner". The signature is fluid and cursive, with a long horizontal stroke at the end.

KIP TURNER, C.M.  
Director of Airports

Enclosure: Letter from RKR Incorporated dated November 19, 2019

cc: Board of Commissioners, Ventura County Transportation Commission  
Board of Supervisors, County of Ventura  
David Norman, City Manager, City of Camarillo  
City Council, City of Camarillo  
Michael Powers, County Executive Officer, County of Ventura



November 19, 2019

Kip Turner  
Airports Director, County of Ventura  
Ventura County Dept. of Airports  
555 Airport Way, Suite B  
Camarillo CA 93010

RE: Boeing 737 Operations from CloudNine

Dear Kip,

It has been brought to my attention that there is a rumor being circulated through-out the airport and local community that the CloudNine hangars are being constructed to accommodate and house Boeing 737 aircraft (See attached Ad in Ventura County Star). I would like to address this on the record to help clear up any misconceptions there may be and to reassure the tenants and local community of the intent of the CloudNine development.

As you know parts of the CloudNine development and supporting taxi-lane are designed and engineered to the Airports current design group (ADG III) which does include the Boeing 737 aircraft among others. When engineering certain elements of this project RKR must always take into consideration continuity of the current airport design standards while also ensuring this project stands the test of time far beyond RKR's initial lease. Please do not mistake RKR's desire to comply with the current airports design group as anything other than that. RKR is also aware of the current Joint Powers Agreement that exist between the city of Camarillo and the County of Ventura that limits aircraft operating weight at 115,000lbs as such RKR Inc. seeks to always operate within the safe operating limitation set forth by the County of Ventura and the Federal Aviation Administration.

Although one party approached RKR early in the development phase with a Boeing BBJ request, RKR Inc and the development team in coordination with the interested party ultimately determined Camarillo and the CloudNine development were not a suitable location for their aircraft to operate from. Additionally, the cost of engineering the hangars to accommodate the additional wingspan and tail height were cost prohibitive. For that reason, among others, the CloudNine development as a whole is NOT physically designed to accommodate the Boeing 737 aircraft. To be clear, **RKR Inc is NOT and has NO intention now or in the future to allow Boeing 737 aircraft to operate from the CloudNine location.** Attached you will also find a section of CloudNine's current design packet showing the various elements of the structures

design dimensions including door height limited to 28 feet again making the structure unusable by the Boeing 737 which boast a tail height of over 41 feet.

We hope this letter helps dispel any rumors and demonstrates RKR Inc's willingness to commit to a development that the community can be proud of. Feel free to contact me for any questions or concerns you might have.

Sincerely,



Ronald K. Rasak  
CEO RKR Inc.

cc: Supervisor Kelly Long  
Supervisor John Zaragoza  
Co. of Ventura CEO Mike Powers  
Airport Authority Chair Bill Thomas  
Camarillo City Manager Dave Norman



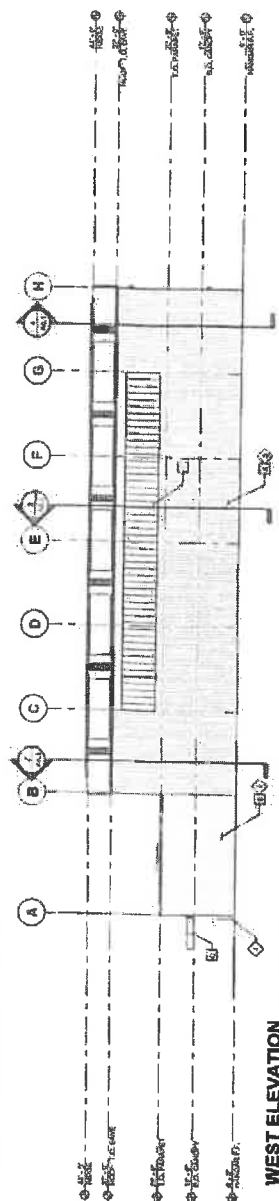
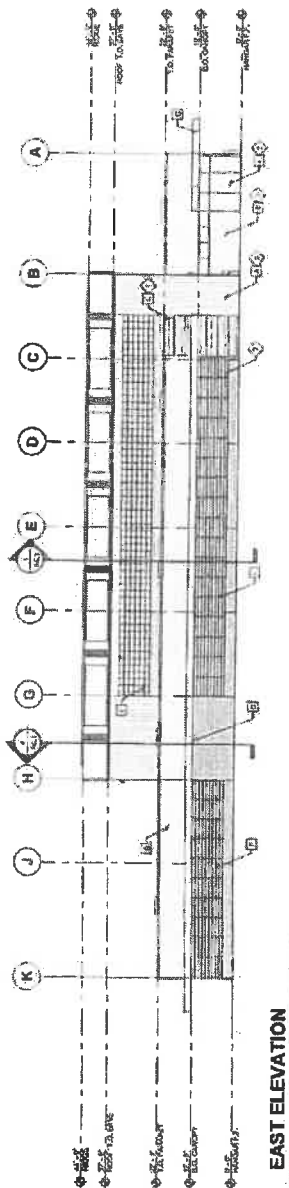
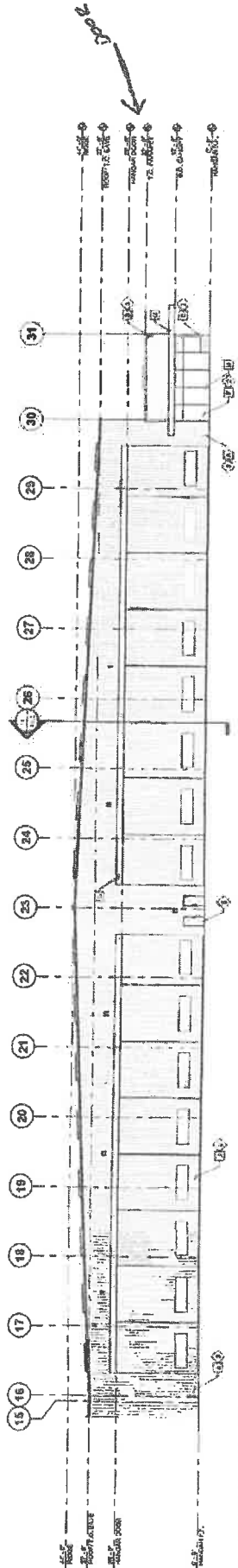
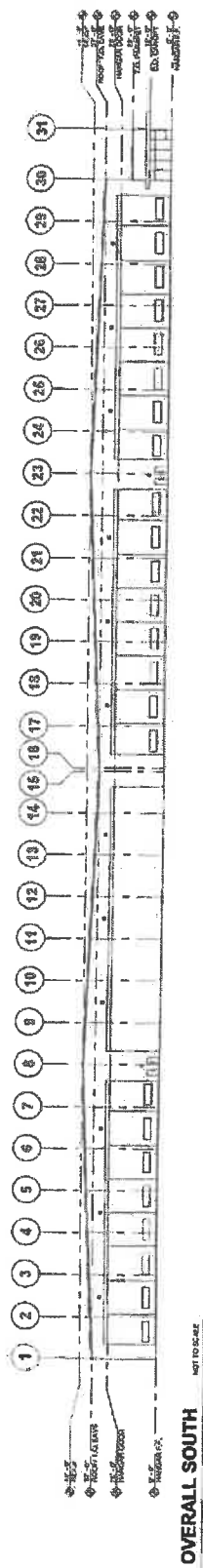
# **ATTENTION CAMARILLO**

## **BIG JETS ARE COMING SOON UNLESS YOU ACT**

Page 2A of the Ventura County Star on November 18, 2019, states that the proposed new hangars on Las Posas Road will be "large enough to house the type of business jets that already use the airport". True but misleading. The Department of Airports is proposing to base airliner-sized Boeing Business Jets there under a 50-year lease. If approved these will be the largest and potentially the loudest aircraft ever permanently based at this airport. These private Boeing 737-800s are up to twice as heavy on take-off as the 10-15 passenger executive jets that currently use the airport.

If approved, this proposal will fly in the face of a 1976 agreement with the City of Camarillo not to base such large aircraft at this airport.

If you disagree, you only have until 5:00 PM on Wednesday, November 20, 2019, to submit written comments to Ms. Erin Powers at [erin.powers@ventura.org](mailto:erin.powers@ventura.org). The Department of Airports has refused to extend the comment deadline despite the lack of effective public notice.



- KEYNOTES**
- 1 EXTERIOR SPA WALL CLADDING
  - 2 ALUMINUM FINISHED STAIRCASES
  - 3 INSULATED ALUMINUM WALL PANELS
  - 4 CONCRETE FLOORED INTERIOR WALLS
  - 5 ALUMINUM FINISHED INTERIOR WALLS
  - 6 INTERIOR WALL LINING (SEE DETAIL)

**FINISH KEYNOTES**

KEYNOTE	FINISH	KEYNOTE	FINISH
1	EXTERIOR SPA WALL CLADDING	11	ALUMINUM FINISHED INTERIOR WALLS
2	ALUMINUM FINISHED STAIRCASES	12	ALUMINUM FINISHED INTERIOR WALLS
3	INSULATED ALUMINUM WALL PANELS	13	ALUMINUM FINISHED INTERIOR WALLS
4	CONCRETE FLOORED INTERIOR WALLS	14	ALUMINUM FINISHED INTERIOR WALLS
5	ALUMINUM FINISHED INTERIOR WALLS	15	ALUMINUM FINISHED INTERIOR WALLS
6	INTERIOR WALL LINING (SEE DETAIL)	16	ALUMINUM FINISHED INTERIOR WALLS
7	EXTERIOR SPA WALL CLADDING	17	ALUMINUM FINISHED INTERIOR WALLS
8	ALUMINUM FINISHED STAIRCASES	18	ALUMINUM FINISHED INTERIOR WALLS
9	INSULATED ALUMINUM WALL PANELS	19	ALUMINUM FINISHED INTERIOR WALLS
10	CONCRETE FLOORED INTERIOR WALLS	20	ALUMINUM FINISHED INTERIOR WALLS
11	ALUMINUM FINISHED INTERIOR WALLS	21	ALUMINUM FINISHED INTERIOR WALLS
12	ALUMINUM FINISHED INTERIOR WALLS	22	ALUMINUM FINISHED INTERIOR WALLS
13	ALUMINUM FINISHED INTERIOR WALLS	23	ALUMINUM FINISHED INTERIOR WALLS
14	ALUMINUM FINISHED INTERIOR WALLS	24	ALUMINUM FINISHED INTERIOR WALLS
15	ALUMINUM FINISHED INTERIOR WALLS	25	ALUMINUM FINISHED INTERIOR WALLS
16	ALUMINUM FINISHED INTERIOR WALLS	26	ALUMINUM FINISHED INTERIOR WALLS
17	ALUMINUM FINISHED INTERIOR WALLS	27	ALUMINUM FINISHED INTERIOR WALLS
18	ALUMINUM FINISHED INTERIOR WALLS	28	ALUMINUM FINISHED INTERIOR WALLS
19	ALUMINUM FINISHED INTERIOR WALLS	29	ALUMINUM FINISHED INTERIOR WALLS
20	ALUMINUM FINISHED INTERIOR WALLS	30	ALUMINUM FINISHED INTERIOR WALLS
21	ALUMINUM FINISHED INTERIOR WALLS	31	ALUMINUM FINISHED INTERIOR WALLS

EXTERIOR ELEVATIONS  
NEW HANGAR FACILITY  
CLOUD NINE  
LAS POSAS ROAD  
CAMARILLO, CA

CLOUDNINE



SCALE: 1/8" = 1'-0"

A5.2

Job No. 5435  
04/12/2019  
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**From:** [Turner, Kip](#)  
**To:** [Darren Kettle](#)  
**Cc:** [Zaragoza, John](#); [Bravo, Robert](#)  
**Subject:** Follow up to Ventura County Department of Airports Letter Concerning RKR Development Project  
**Date:** Tuesday, January 7, 2020 1:25:29 PM  
**Attachments:** [image001.png](#)  
[12-31-19 VCTC CloudNine Letter.pdf](#)

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Darren,

Please consider and add the following comments to further supplement the recent letter sent on behalf of the Department of Airports (attached), regarding the RKR (CloudNine) development project which is planned on Airport property.

General Plan, section 2.14.2.2(4) does not require VCTC to review the CloudNine lease, simply because the term "Airport Hazard Zone" used in that section does not include the airport itself.

Section 2.14.2.2(4) says: "Discretionary development within the Airport Hazard Zones shall be reviewed by the Ventura County Transportation Commission (VCTC) for consistency with the Ventura County Comprehensive Airport Land Use Plan."

The term "Airport Hazard Zone" is not defined in the General Plan except graphically, using a map known as a "Hazards Protection Map," which simply draws a box around the Camarillo Airport. (See § 2.14.2.2(1).)



The box appears at first glance to include the airport itself, but the text of the General Plan tells us that's not the intent. In the same section (2.14.2.2(1)), we're told that the only uses allowed within this box are the following:

- Agriculture and agricultural operations.
- Cemeteries.
- Energy production from renewable resources.
- Mineral resource development.
- Public utility facilities.
- Temporary storage of building materials.
- Waste treatment and disposal.
- Water production and distribution facilities.

Notably missing are aviation-related uses, which surely would have been allowed if "Airport Hazard Zone" were intended to include the airport itself. Therefore, the only plausible way to read "Airport Hazard Zone" is to exclude the airport itself. So when General Plan section 2.14.2.2(4) uses the term "Airport Hazard Zone," it means land other than the airport itself.

Thank you,



Kip

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