



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

Office of the City Manager (805) 388-5307 FAX (805) 388-5318

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.¹ 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].)

¹ 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* <u>www.rkrinc.com</u> and <u>www.rkrinc.com/cloudnine/</u>.)

December 6, 2019 RE: Proposed CloundNine Private Commercial Hangar/Office Project at Camarillo Airport Page 2 of 3

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 CloundNine Private Commercial Hangar/Office Project at Camarillo Airport Page 3 of 3

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

EXHIBIT 1

FOR CLOUDNINE AT CAMARILLO



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 taxiane 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) light-ing, 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

"CloudNine at Camarillo" Initial Study Project Description

FXHIBIT 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 taxilane 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 taxilane pavement. This depth can 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. Compliance with FAA pavement standards will be required.

² 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)

"CloudNine at Camarillo" Initial Study Project Description

A-4

Appendix B NOISE, AIR POLLUTANT, AND GREENHOUSE GAS MODELING

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 AEDTprovided 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, includ-ing 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

5 B

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.

1.4	The second s	and the second se	
	AEDT Designator	Existing	Existing with Proposed Project
ltinerant			
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
Тигьоргор	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	1,512
Large Jet	GIV	260	572
Large Jet	GV	722	1,346
Large Jet	737700	14	326
Large Jet	CL600	842	842
Large Jet	C17	4	4
Large Jet	CNA750	1,020	1,020
Large Jet	EMB145	28	28
Military	F16A	14	14
Helicopter	BZOGL	6,012	6,742
Local			
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
ltinerant Total		77,151	81,001
Local Total		67,441	67,441
Total		144,592	148,442

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TABLE B2 Cloud 9 Ha Camarillo /	ingar Aircraft Airport				
Hangar	Туре	Annual Operations	Hangar	Туре	Annual Operations
1	Falcon 7X	312	3	Hawker 800	312
1	PC-12	312	3	PC-12	312
1	Hawker 800	312	3	6650	312
1	Hawker 800	312	4	Boeing Business Jet	312
2	G280	312	4	Bell Jet Ranger 206	730
2	G650	312	TOT	AL OPERATIONS	3,850
Source RKP	R, Incorporated and Co	ffman Associates analysis			



City of Camarillo

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Office of the City Manager (805) 388-5307 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:

- 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.
 - 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

City of Camarillo Comments on Draft MND for Proposed Cloud Nine Hangar Development November 20, 2019 Page 2 of 5

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 taxilane pavement. This depth can

City of Camarillo Comments on Draft MND for Proposed Cloud Nine Hangar Development November 20, 2019 Page 3 of 5

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 Carnarillo General Plan Community Design Element. Section 10.2.5 of the Community Design Element states, "Development located with 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

City of Camarillo Comments on Draft MND for Proposed Cloud Nine Hangar Development November 20, 2019 Page 4 of 5

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.

- 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.
- 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."

City of Camarillo Comments on Draft MND for Proposed Cloud Nine Hangar Development November 20, 2019 Page 5 of 5

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 or by phone at (805)388-5362, Alternatively, you may contact Jaclyn Lee, Principal Planner at ilee@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 Jaciyn 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

FXHIBIT 2

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.

FXHIBIT 2

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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. 12.54

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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

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of the police power which regulate the development of the _.ea 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.

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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 fourfifths 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.

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EXHIBIT 2

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The term of this agreement shall be for perpetuity; provided, 15. 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.

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

COUNTY OF VENTURA

By 1 10 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.

Incol Bv Deputy Clerk



CITY OF CAMARILLO 1) Jind. Run Mayor

ATTEST: Eity Clerk an By

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EXHIBIT A

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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.

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- 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.

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ATTACHEENT 1

GENERAL AVIATION

General aviation includes all business and conmercial, 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 cartificated 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 certificates interstate air taxi and charter aircraft with more than 30 seats which operate for revenue on a non-scheduled basis. CAB certificates all interstate common carrier freight airlines also, including air taxi over 7,500 pounds of cargo carried.
- (b) PUC certificates 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 certificate intrastate freight air carriers.

FXHIBIT

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"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 1975, 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 amonded 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".



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 twentyyear periods used in the previous chapter.

TABLE 3A				
Planning Horizon Activity Summa	F Y			
Camarillo Airport	•			
_	2007	Short Term	Intermediate Term	Long Term
Itinerant Operations				
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
Total Itinerant	72,540	90,840	97,510	112,230
Local Operations				
General Aviation	66,788	61,200	68,100	84,000
Military	620	500	500	500
Total Local	67,408	61,700	68,600	84,500
TOTAL ANNUAL OPERATIONS	139,948	152,540	166,110	196,730
TOTAL BASED AIRCRAFT	533	570	630	750

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 The second compocharacteristic). nent, 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 runwayrelated 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
п	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 (March 200	150/5300-13, Cha 7)	inge 13

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 multiengine 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-



Exhibit 3A AIRPORT REFERENCE CODES

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 included 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.

	ny 31, 2008		
ARC	Aircraft Type	Annual Operations	S/2
B-I	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%
Total B-I		154	4.8%
B- 11	Cessna 525	364	11.49
	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	12.69
Total B-II		1,523	47.69
C-I	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%
Total C-I	The second se	240	7.5%
C-II	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%
Total C-II		598	18.7%
C-III	Bombardier Global Express	113	3.5%
Total C-III		113	3.5%
D-I	Lear 60	31	1.0%
Total D-I		31	1.0%
D-II	Gulfstream II	60	1.9%
	Gulfstream IV	240	7.5%
Total D-II		300	9.4%
D-III	Gulfstream V	243	7.6%
Total D-III		243	7.6%

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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.

Air Taxi Jet Operations (Minimum)				
Camarillo Airport				
June 1, 2007 - N				
ARC	Aircraft Type	Annual Operations	%	
Total B-I		0	0.0%	
	Cessna 525	8	0.7%	
	Cessna 550	14	1.3%	
B-II	Cessna 560	435	39.9%	
20 11	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%	
	Cessna 650/80	98	9.0%	
	Cessna 750 (X)	139	12.8%	
C-II	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	A second se	10	0.9%	
D-II	Gulfstream II	35	3.2%	
Total D-11		35	3.2%	
Total D-III		0	0.0%	
Cotal Activity		1,090	100.0%	

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 then 500 annual operations. Thus, the critical 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	
otals 🛛	3,202	1,090	4,292	
ource: FAA ETMSC Report and Air	portIQ			

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 pistonpowered 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.