

Watsonville Municipal Airport: Headed for a Crash?

Synopsis

Watsonville Municipal Airport is a valuable asset to the City of Watsonville and to the entire County of Santa Cruz. While land-use planning around most airports is monitored by regional commissions specializing in airport issues, a unique loophole in California State law permits the Watsonville City Council to serve in this capacity for the airport. The airport's existence is now threatened because the city is meeting its mandated housing goals by planning housing developments in airport safety zones, which could lead to increased noise complaints and untold liability in the event of an accident.

The airport is economically valuable to the city, providing steady employment, business opportunities, a substantial tax base, and drawing business and recreational visitors. Strategically, the airport is a key asset in low frequency but high impact disaster relief efforts, as was demonstrated following the Loma Prieta earthquake. Before any irrevocable decisions are made, the benefits of the airport to the entire region must be carefully evaluated through the formation of an independent Airport Land Use Commission. Such a commission will provide an opportunity for community input and to make impartial land use decisions more frequently to protect this critical regional resource.

Definitions

ALUC: Airport Land Use Commission

ALUP Handbook: State of California Department of Transportation, Division of Aeronautics, Airport Land Use Planning Handbook, 2002

AMBAG: Association of Monterey Bay Area Governments; a forum for study of regional problems of the counties and cities in Monterey, San Benito, and Santa Cruz

APV: Action Pajaro Valley; a consensus-based, nonprofit planning organization based in Watsonville

Blast pad: a section of asphalt placed at the end of a runway to prevent erosion from the blast of jet engines or large twin-engine aircraft as they are preparing for takeoff

CalTrans: in this document exclusively refers to State of California Department of Transportation, Division of Aeronautics

City Council Resolution 00-00: the first two or three digits represent the resolution number and the second two represent the calendar year, thus -00 is 2000, -99 is 1999.

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Crosswind runway: a second airport runway at an angle to the first runway. This permits aircraft activity when the wind is blowing across the first runway, rather than parallel to it. At Watsonville Airport, this is Runway 8-26.

Direct economic impact: spending in the local area for goods and services by airport tenants

FAA: Federal Aviation Administration

Indirect economic impact: the perception that the business community has on the airport's impact on local business operations

Induced economic impact: the multiplier effect that results from the re-spending of the direct impact

LAFCO: Local Agency Formation Commission, governmental entity created by State law in 1963 to regulate the boundaries of cities and special districts within a county

Low activity runway: a runway with less than 2,000 takeoffs and landings a year. The ALUP Handbook allows elimination of the outermost Safety Zone 6 (Traffic Pattern Zone) for a low activity runway.¹

Measure U: Urban Limit Line and Timing Initiative, City Council of Watsonville, Resolution, 199-02, presented to the voters in June 2002

OES: Office of Emergency Services

PUC: Public Utilities Commission

Runway 26: southeast end of Runway 8-26

Runway 8: northwest end of Runway 8-26

¹ Frederick - CalTrans letter to Watsonville, April 21, 2006.

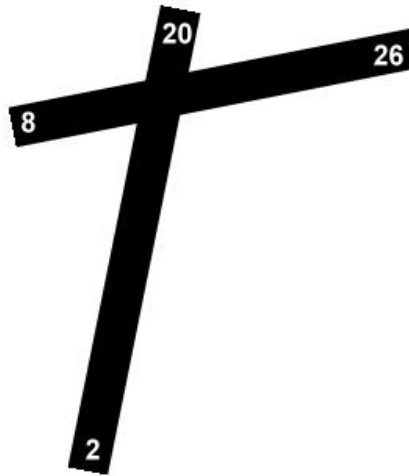


Figure 1: Runway Designators Each of the two paths of concrete at Watsonville Airport contains two runways, depending upon the direction the aircraft is heading when using the runway. The runway designators (e.g. “8”) refer to the compass direction divided by 10. Thus, an airplane landing on Runway 8 will approach from the west (left side of figure) landing near the “8” with a compass heading of (approximately) 80 degrees. Runway 8-26 refers to the entire path of concrete, consisting of Runway 8 and Runway 26.

Safety zones: land near the airport where construction of buildings is limited. These restrictions are mandated by the ALUP Handbook. [See Figure 2.]

- Safety Zone 1: Runway Protection Zone
- Safety Zone 2: Inner Approach/Departure Zone
- Safety Zone 3: Inner Turning Zone
- Safety Zone 4: Outer Approach/Departure Zone
- Safety Zone 6: Traffic Pattern Zone

Tie-down: parking space for an airplane on the tarmac with facility to allow the airplane to be literally tied down in place

Urban Limit Line: the boundary for city-provided services

WatsonvilleVISTA 2030: the City of Watsonville’s general plan for housing development extending to the year 2030. This updated the “Watsonville 2005 General Plan.”

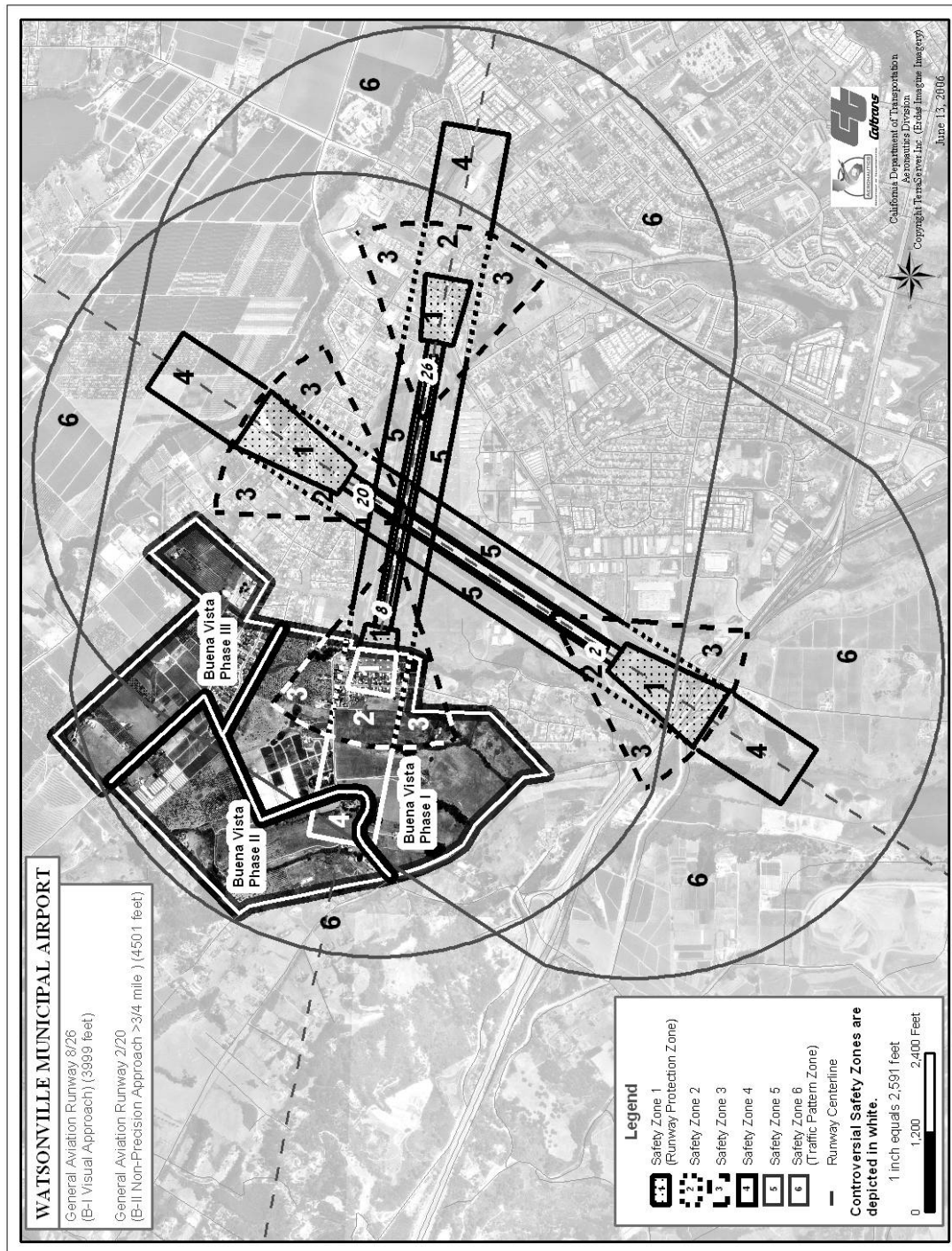


Figure 2: Watsonville Municipal Airport Safety Zones and Buena Vista Areas I, II, and III, showing how Runway 8 Safety Zones overlap Buena Vista Area I and how Zone 4 intrudes into Buena Vista Area II. (Special thanks to California Department of Transportation, Division of Aeronautics for providing this map.)

Background

The Watsonville Municipal Airport was constructed by the Navy during World War II on land purchased by, and incorporated into, the City of Watsonville. In 1947 the airport was transferred back to the city for \$1 provided the land would be used as an airport in perpetuity. Initial construction consisted of two runways, both built to military specifications that make them suitable for use by heavy aircraft such as C-130s and business jets. Two runways are needed to accommodate weather variations. The primary runway, Runway 2-20, is the longest and can be used ninety-four percent of the time. The shorter runway, Runway 8-26, can be used ninety-eight percent of the time and is necessary not only for wind variations, but particularly in summer fog conditions.

Economic factors that make the airport valuable include revenue from taxes, businesses, fuel sales, tie-down and hangar rentals, and direct fiscal impact from itinerant business and pleasure aircraft. Two studies were conducted on the economic impact of the airport to the City of Watsonville and the region. The first was conducted by citizens appointed by the City of Watsonville in 1991.² This study found the Watsonville Airport had an estimated economic impact of more than \$19 million annually to the region. It also presented employment figures of sixty-one jobs at the airport and 188 induced and indirect jobs, with taxes of \$1.4 million, of which \$1 million was retained locally. The second study was conducted by AMBAG in 2003 and estimated that \$35 million annually accrued to the region as both direct and induced income.³ The AMBAG study estimated that the indirect economic impact of the airport on the region could be as high as \$600 million a year, with 291 direct jobs, 329 induced jobs, and 1,030 indirect jobs.

The Watsonville Airport played a vital role in the disaster relief efforts following the Loma Prieta earthquake. Both four-lane roads into the county were closed due to earthquake damage, although Highway 17 opened a few days later to limited traffic while major repairs were carried out. During that time, the airport was the county's major conduit for incoming supplies. At present, many state, federal, and local government entities have aircraft based at the airport for local emergency response.⁴

Housing development is a priority for the City of Watsonville: 2,283 units were mandated by AMBAG in its 2002 report on regional housing needs.⁵ State law requires that adequate sites be identified during the 2002-2007 planning period. These goals necessitate increasing the Urban Limit Line for the city, which is where conflicting economic interests come into play. There is strong public support for preserving agricultural land to the east and west without encroachment by housing. The

²Watsonville Airport, *Airport Economic Impact Study*, p. 3, 1991.

³AMBAG, *Airport Economic Impact Study for Monterey, San Benito and Santa Cruz Counties*, p. 4, August 13, 2003.

⁴Watsonville Airport: *Airport Economic Impact Study*, June 9, 1991.

⁵City of Watsonville, *Housing Element*, chart 4, p. 4-1.

compromise negotiated by Action Pajaro Valley includes environmentally sensitive lands, open space, and relatively undeveloped land around the north side of the airport, some of which is currently under agricultural use.

The City of Watsonville addressed the land acquisition issue by amending the “Watsonville 2005 General Plan” with Watsonville City Council Resolution 199-02. This resolution was presented to, and passed by, Watsonville City voters as Measure U in 2002. The measure outlined several areas for increasing the Urban Limit Line, including the Buena Vista areas (on the map referred to as phases – see Figure 2) designated as I, II, and III, with Area I to be developed first. This area overlaps parts of the safety zones to the north of Runway 8-26.

Scope

This investigation originated as a survey of California airport runways that had been closed due to safety issues and noise complaints after housing densities had increased nearby.

This report examines Watsonville Municipal Airport’s current importance to the entire county as well as to the City of Watsonville. Federal and state regulations governing airports were examined, particularly as they pertain to safety requirements around an airport. City of Watsonville housing plans for areas contiguous to the airport were also studied.

Sources [see Appendix]

Findings

1. AMBAG has declared that the City of Watsonville must plan for 2,283 new housing units in the 2000-2007 period.⁶
2. City Council Resolution 199-02 was the text for Measure U and amended 1994’s “Watsonville 2005 General Plan” (now replaced by Watsonville VISTA 2030) by extending the city boundaries to include Buena Vista areas I, II, and III as proposed locations for meeting mandated housing goals.
3. Santa Cruz County’s Local Agency Formation Commission (LAFCO) must approve any city boundary extensions.
4. Measure U as presented in the pre-election voter information pamphlet reduced the text of Resolution 199-02 from eighteen (18) pages to a single sentence with a generic analysis by the City Attorney regarding Urban Limit Lines:
“Shall the City of Watsonville amend the Watsonville 2005 General Plan thereby imposing certain restrictions on growth, as specified, and restricting

⁶City of Watsonville Housing Element, chart 4, p. 4-1.

later amendments all as provided in the Watsonville Urban Limit Line and Development Timing Initiative?”

A copy of the full text of Resolution 199-02 was only available upon request.⁷

5. A group called the Friends of Buena Vista presented their opposition to Measure U on the voter’s information pamphlet, but because the area is currently outside the city limits, none of the residents of the areas to be annexed were able to vote on the measure.
6. The Friends of Buena Vista and other entities hired an attorney in 2005 to challenge the City of Watsonville’s draft environmental impact document regarding construction in the Buena Vista areas.
7. Neither City Council Resolution 199-02, nor Measure U, mentioned any possible impact on the airport nor possible conflicts between housing and the airport, such as safety and noise pollution.
8. The Watsonville Air Show is a significant regional event, generating annual revenue between \$500,000 and \$3 million.⁸
9. Studies show the overall annual economic impact of the airport to the region is a minimum of \$45 million (in 2006 dollars) and could range as high as \$600 million when indirect economic impacts are included.⁹
10. Businesses and independent owners from all over the county base their aircraft at the airport.¹⁰
11. Itinerant aircraft use the airport, bringing business and recreational visitors who add approximately \$9 million a year to the area.¹¹
12. Watsonville Airport is used in the day-to-day operations of local government entities including the California Highway Patrol, Civil Air Patrol, Drug Enforcement Agency, FEMA, the FBI, National Oceanic and Atmospheric Services, and the Department of Fish and Game.
13. The Watsonville City Council has discussed the possibility of shortening Runway 8-26. This would limit the number of aircraft that could land there, particularly in restrictive weather conditions. The Watsonville City Council rejected this option.
14. One of the guiding principles of Watsonville planners is to “encourage development patterns that protect and are compatible with agricultural lands”¹² which also exist in the Buena Vista areas I, II, and III. In addition, these areas are part of aircraft safety zones. In Buena Vista I, this space includes Safety Zone 1, 2, and 3 (Runway Protection Zone, Inner Approach Zone, and Inner Turning Zone) for Runway 8.

⁷City of Watsonville Voter Information Pamphlet, Measure U, 2002.

⁸www.watsonvilleairport.com; Don French, quoted in Register-Pajaronian, p. 6, June 18, 2005.

⁹AMBAG Airports Economic Impact Study, p 14, 2003.

¹⁰AMBAG Monterey Bay Regional Airport System Plan, Table 2-10, 2005.

¹¹AMBAG Airports Economic Impact Study, p. 12, 2003.

¹²WatsonvilleVISTA2030.

15. Watsonville Airport provided essential logistical support during the Loma Prieta earthquake disaster relief operation. County emergency planners assume the airport, if available, will be used again in this capacity during future major disaster relief operations.
16. County emergency planners believe that in the event of a massive evacuation, all highways would be gridlocked with outbound traffic, as happened in Houston during the 2005 Hurricane Rita evacuation. Should a massive evacuation occur here, Watsonville Airport will be the only practical means of getting significant disaster relief assistance into Santa Cruz County.
17. The airport is not included in the county's OES planning process. Although it is acknowledged as an essential facility in the Santa Cruz County Operational Area Emergency Management Plan, there has been no significant direct contact between county or city emergency planners and airport personnel regarding the coordination of emergency efforts.
18. Runway 8-26 has been used to significantly increase capacity during disaster relief operations.
19. Runway 8-26 is used in twelve percent (12%) of all takeoffs and landings at the airport.¹³
20. Runway 8-26 can be used by all aircraft currently based at the airport. The importance of the runway to future airport operation is demonstrated by the improvements planned, such as the blast pads built at each end of the runway to protect against erosion from heavier aircraft taking off.
21. Runway 8-26 increases airport availability from ninety-four (94%) to ninety-nine percent (99%). Crosswind Runway 8-26 is particularly important during adverse wind and fog conditions¹⁴ prevalent in the summer. Summer weekends tend to be the busiest time at the airport.
22. Runway 8-26 can keep the airport open during maintenance of Runway 2-20 or if an accident closes 2-20 again.
23. The proposed densities for Buena Vista I specified in Watsonville VISTA 2030 will result in more households being exposed to the risks of off-airport accidents and subject to noise pollution.
24. The Watsonville City Council has eliminated Safety Zone 3 (Inner Turning Zone), northwest of Runway 8 to justify greater housing density in Buena Vista I.¹⁵ This action has been opposed by Santa Cruz County Second District Supervisor Ellen Pirie, CalTrans, and others.¹⁶

¹³ Watsonville Municipal Airport Master Plan, p. 26, 2002.

¹⁴ Watsonville Municipal Airport Master Plan, p. 36, 2002

¹⁵ City Council Resolution 74-05, p.3 & p. 5

¹⁶ Pirie letter to Watsonville, May 5, 2006; Frederick - CalTrans letter to Watsonville, April 21, 2006; agenda packet for Watsonville City Council meeting, May 23, 2006.

25. Construction of additional housing northwest of Runway 8-26 will increase the danger from an off-airport landing. Such an event occurred to aircraft N23039 in the late 1970's in the Buena Vista area. At that time, there were no serious consequences because the aircraft was able to land safely in a plowed field.¹⁷
26. Watsonville VISTA 2030 proposes a school in the Buena Vista II area within Zone 6 (Traffic Pattern Zone), less than a mile from the northwest end of Runway 8-26. CalTrans has stated that Watsonville City Council cannot omit school placement safety investigation requirements within Zone 6.¹⁸
27. Discussion has occurred by attendees at Watsonville City Council meetings regarding the possibility of shortening Runway 8 to reduce Safety Zones 2 (Inner Safety Zone) and 4 (Outer Safety Zone).
28. A shortened runway could raise safety concerns, as was demonstrated when an aircraft had to abort a takeoff from Runway 8. The extra length of the runway allowed the aircraft to land safely, just barely within the confines of the airport.¹⁹
29. Excessive noise is already becoming an issue at the new Pajaro Valley High School.²⁰
30. The purpose of an Airport Land Use Commission (ALUC) is "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 to the extent that these areas are not already devoted to incompatible uses."²¹ Santa Cruz County is specifically exempted from requiring the formation of an ALUC by Public Utilities Code, PUC, Section 21670.1 (e), provided that they follow the requirements of Section 21670.1 (d)(2) that "height, use, noise, safety, and density criteria that are compatible with airport operations" are adopted as part of the general plans of the county and city.²²
31. The Watsonville City Council has been acting in the capacity of an ALUC. Because it is acting as an ALUC, the Watsonville City Council is mandated by PUC Section 21670.1 (e) to incorporate height, use, noise, safety, and density criteria that are compatible with airport operations, as described in the ALUP Handbook.
32. Because Watsonville Airport does not have a separate ALUC, CalTrans often has not received timely notifications of Watsonville City Council actions, especially those outside the guidelines of the ALUP Handbook. CalTrans has stated that this has hampered its ability to offer expert opinions, and has precluded it from timely oversight of planning decisions.

¹⁷Maintenance log of aircraft N23093, January 1, 1976.

¹⁸Frederick - CalTrans letter to Watsonville, April 21, 2006.

¹⁹Chauvet, power point presentation to APV, February 25, 2005.

²⁰Frederick - CalTrans letter to Watsonville, April 21, 2006.

²¹ALUP Handbook, p 1-1, 2002.

²²California Public Utilities Code 21670.1(e).

33. Without adequate documentation to support the critical change to this designation, the Watsonville City Council designated Runway 8 as a low activity runway.²³
- Waddel Engineering Corporation provided data in 1994 to the airport showing that Runway 8-26 carried twelve percent (12%) of all airport traffic, with five percent (5%) on Runway 8 and seven percent (7%) on Runway 26.²⁴ Watsonville's City Council Airport Committee reported an adjustment of this pattern [two percent (2%) on Runway 8 and ten percent (10%) on Runway 26] based solely on the estimates of the airport manager.²⁵
 - Extrapolating from a ten-day airport count, total annual aircraft operations (takeoffs and landings) were estimated at 120,000 in 1991,²⁶ and were later estimated at 122,500 annually.²⁷ Two percent (2%) of this number (2,450) exceeds the guidelines for a low activity threshold (less than 2,000 annual operations)²⁸ by twenty-two percent (22%). However, the new estimate is less than 100,000 aircraft operations annually, again based solely on the estimates of the airport manager without a published study.
34. In its April 12, 2005 report, the City Council Airport Committee claims "CalTrans confirmed that the policies in the ALUP Handbook are intended as guidelines and that variations in design, configuration and land use compatibility was [sic] available and within the scope of the City Council."²⁹ This authority is used to eliminate Safety Zone 3 (Inner Turning Zone), thereby overriding housing densities mandated by the ALUP Handbook.
35. CalTrans has stated that formally designating a runway as low activity does not justify the elimination of Safety Zone 3.³⁰ Enforcing lower population densities in Safety Zone 3 by limiting housing construction is intended to reduce the consequences of an off-airport accident. Safety zones are intended to delineate higher probabilities of an off-aircraft accident based on large numbers of operations at airports across the country.
36. The recommendation approved by Watsonville's City Council Airport Committee was inconsistent with the report prepared by their airport planning consultant, Walter Gillfillan and Associates. That report's Option 3 presents the pros and cons for shortening Runway 8 and moving Safety Zone 3 (Inner Turning Zone) onto

²³Boyle, Principal Planner, "Final EIR Comments", citing Don French, Airport Manager, March 22, 2006.

²⁴Watsonville Municipal Airport Master Plan 2001-2020, p. 28, August 2002.

²⁵Recommendations on Revision to the Watsonville Airport Crosswind Runway (8-26), City Council Airport Committee, April 1, 2006.

²⁶Watsonville Airport: Airport Economic Impact Study, Appendix, 1991.

²⁷Watsonville Municipal Airport Master Plan 2001-2020, p.30, August 2002.

²⁸ALUP Handbook, p. 9-42

²⁹Recommendations on Revision to the Watsonville Airport Crosswind Runway (8-26), City Council Airport Committee, p. 4, April 1, 2006.

³⁰ALUP Handbook, fig. 9K; Frederick - CalTrans letter to Watsonville, April 21, 2006.

airport property. The Gillfillan report did not recommend eliminating Safety Zone 3 in any of its options.

37. The maximum densities recommended by the ALUP Handbook in Safety Zones as shown in the following table:³¹

Safety Zone	Maximum Density (dwelling units per acre)
1: Runway Protection Zone	0
2: Inner Approach/Departure Zone	.05 to .10
3: Inner Turning Zone	.20 to .50
4: Outer Approach/Departure Zone	.20 to .50

If the proposed 2,250 homes are built on the 458 acres in the Buena Vista areas, the resulting average housing density (approximately 5 dwelling units per acre) will exceed the maximum density in Safety Zone 3 by a factor of 10 to 25. Any of the planned “medium” (10-17 dwelling units per acre) density occurring within Safety Zone 3 will exceed by 20 to 80 times the maximum density permitted.

38. CalTrans has recommended that an independent ALUC be formed.³²

Conclusions

1. While the City of Watsonville has a mandated housing goal, it does not have a mandated location for the housing.
2. Watsonville Municipal Airport is not sufficiently valued as an economic asset to the City of Watsonville and to Santa Cruz County.
3. Watsonville Airport is an essential regional asset in future disaster relief operations in Santa Cruz County.
4. Crosswind Runway 8-26 is critical to the vitality and efficacy of Watsonville Municipal Airport.
5. If development proceeds according to WatsonvilleVISTA 2030, noise pollution may become a serious issue in the Buena Vista areas.
6. If development proceeds according to WatsonvilleVISTA 2030, the risk that an engine failure will have life threatening consequences to those on the ground is unacceptably increased.

³¹ALUP Handbook, Table 9-C p 9-47.

³²Frederick - CalTrans letter to Watsonville, April 21, 2006.

7. In the event of an off-airport accident in the Buena Vista areas, there will likely be a significant demand for closure of Crosswind Runway 8-26 or even the airport itself.
8. The Watsonville City Council's failure to enforce the maximum population densities in airport safety zones may increase Watsonville's exposure to legal liability in the event of an off-airport accident in these areas. The fact that there are high populations within the safety zones of other runways at the airport does not justify continuing the practice of violating airport safety zone building densities northwest of Runway 8.
9. Watsonville VISTA 2030 threatens the viability of the Crosswind Runway 8-26.
10. The Watsonville City Council has chosen to fulfill its housing planning needs at the expense of airport safety and noise pollution.
11. Failure to enforce ALUP Handbook regulations to achieve the planning goals of Measure U demonstrates an inherent conflict of interest in the City of Watsonville's ability to serve in the role of an ALUC.
12. The Watsonville City Council has not given appropriate weight to either the airport's or Santa Cruz County's interests while serving as Watsonville Airport's ALUC.

Recommendations

1. Santa Cruz County should form an ALUC, with the help of the City of Watsonville, Action Pajaro Valley, Watsonville Pilots Association, and LAFCO.
2. The City of Watsonville should comply with the Airport Land Use Planning requirements of the FAA and the State of California.
3. When LAFCO considers extending the Urban Limit Line to include the Buena Vista areas, it should evaluate all aspects of the airport's importance to the entire county of Santa Cruz as well as to the City of Watsonville, its housing needs, and the safety of the citizens.
4. Santa Cruz County should officially recognize the importance of the airport to its general welfare, both financially and in disaster response, by helping form an ALUC. This will help in ensuring the airport's preservation as an asset to the entire county.
5. The Santa Cruz County Office of Emergency Services and the city managers of the Scotts Valley, Santa Cruz, Capitola, and Watsonville must interact with Watsonville Municipal Airport personnel to include the airport in all emergency preparedness plans that could require use of the airport.
6. Runway 8-26 is a vital component of Watsonville Municipal Airport and its current operational capacity should be fully maintained.

Responses required

Entity	Findings	Recommendations	Respond Within
Santa Cruz County Board of Supervisors	5, 9, 14-17, 29-30, 35, 37	1, 3, 4, 5	60 Days (September 1, 2006)
City of Watsonville	7, 14, 17-38	1, 2, 5, 6	90 days (October 1, 2006)
City of Santa Cruz	17	5	90 days (October 1, 2006)
City of Capitola	17	5	90 days (October 1, 2006)
City of Scotts Valley	17	5	90 days (October 1, 2006)
LAFCO	3, 30	1, 3	90 days (October 1, 2006)
Office of Emergency Services County of Santa Cruz	15-17	5	90 days (October 1, 2006)

Responses requested but not required

Entity	Findings	Recommendations	Respond Within
Action Pajaro Valley	30	1	90 days (October 1, 2006)
California Department of Transportation, Division of Aeronautics	13-14, 23-26, 28, 32, 34-38	1, 2	90 days (October 1, 2006)
Watsonville Pilots Association	30	1	90 days (October 1, 2006)

Appendix - Sources

Interviews

California Department of Transportation, Division of Aeronautics personnel.
City of Watsonville personnel and former personnel.
Santa Cruz County personnel.
Action Pajaro Valley personnel.

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*Flex your power!
Be energy efficient!*

April 21, 2006

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

Dear Mr. Boyle:

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

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

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

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

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

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

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

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

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

Mr. Keith Boyle
April 21, 2006
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Decisions that cities and counties make regarding the use of land must not conflict with State law. Public Utilities Code (PUC) Section 21670 (1) states "it is in the public interest to provide for the orderly development of each public use airport in this state and the area surrounding these airports...and to prevent the creation of new noise and safety problems." The City of Watsonville must comply with PUC section 21670, 21670.1 and in particular 21670.1 (e) which mandates that the "affected city" utilize the State's Airport Land Use Planning Handbook regarding height, use, noise, safety, and density criteria's.

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

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

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

Sincerely,

Original Signed by

MARY C. FREDERICK
Acting Chief
Division of Aeronautics

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