

Comments by the
Mid Coast Community Council Airport Subcommittee
on the February 1997
"DRAFT" AIRPORT MASTER PLAN for HALF MOON BAY AIRPORT
(Prepared For The COUNTY OF SAN MATEO, CALIFORNIA)
(Prepared By COFFMAN ASSOCIATES, INC)
July 9, 1997

Dear County Staff,

The comments provided here are made by individual MCC Airport Subcommittee members. If a comment is accepted, please modify the "DRAFT" with an addendum. For comments that may only be informational, please provide those to the consultant for utilization in preparing the environmental analysis. For comments that are believed by County Staff to be without merit, please provide response to MCCC Airport Subcommittee as soon as possible. Thank you for considering the MCCC Airport Subcommittee "Comments".

Sincerely,

The MCCC Airport Subcommittee

1) page I-2; paragraph beginning with "General" and ending with "attractive"; Please add to this paragraph a description of the remoteness of HMB Airport to the corporate centers of the peninsula and the delays encountered traveling from the HMB Airport to peninsula corporate centers. The HMB Airport is served by only two two-lane highways that are each a significant distance to the peninsula freeway system and become highly congested at commute times and/or good weather days when the beaches attract many visitors. A shift of corporate use of HMB Airport has not been identified to date and future corporate use will be compromised by the lack of highways serving the HMB Airport.

2) page I-2; paragraph beginning with "Inventory" and ending with "area"; Please provide an appendix that lists relevant documents utilized for references in the "DRAFT". As a reviewer, I could not determine if the consultant had access to 1995 San Mateo County Comprehensive Airport Land Use Plan (CLUP) and other historical San Mateo County Board Actions that describe the existing conditions at the HMB Airport and airport affected community.

ATCH(1) (9 PAGES)

3) page I-2; "Airport Alternatives"; This paragraph suggests that a study objective is to produce various alternatives for airport development. To meet this objective the "DRAFT" provides alternatives 4A, 4B, and 4C that have very similar airside facilities and therefore very similar impacts on the adjacent community. Please include in an addendum two additional alternatives that have much more pronounced differences. I recommend that 4B be evaluated with two new alternatives identified by the MCCC. A more effective analysis will be provided if different runway lengths, greater differences in taxiway systems, and different navigational aid systems are being evaluated. The MCCC Airport Subcommittee is proposing two such alternatives.

4) page I-3; paragraph starting with "One" and ending with "Mateo"; The Planning Advisory Committee (PAC) requires advocates for all adjacent residential communities. The two members of the eighteen person PAC that attempted to represent residential concerns both live west of the north end of runway 30. One member, Chris McComb, believed that his concerns went unanswered in the PAC process in that the majority of the PAC were aviation and/or business advocates and minimized his comments. Please provide the minutes of the PAC activity as an Appendix to the "Draft". The PAC for future evaluation of the HMB Airport Master Plan should be modified to include additional residential advocates for the communities; north of runway 30, northeast of runway 30, west of the airport(mobile home park), south of runway 30, and south east of runway 30. The PAC activity in the future should provide all members minutes and written response to their comments.

5) page I-3; "THE AIRPORT'S ROLE"; The FAA classification that HMB Airport is a "Reliever Airport" for San Francisco International Airport may have a significant impact on the future of HMB Airport. Please expand the "DRAFT" to completely describe what a "Reliever Airport" is supposed to accomplish. The description given that HMB would "provide traffic relief to a commercial service airport" is an activity that is not presently occurring at HMB. If this observation is incorrect; please provide any data that validates that HMB has been providing "Reliever Airport" activity in the last twenty two years. Please evaluate whether this classification for HMB is reasonable, safe, and/or beneficial considering that this "DRAFT" proposes no: 1) no control tower, 2) a weight limit of 12,500 lbs, 3) no precision instrument approach, and 4) a reduction in the terminal facilities. Hopefully, the results of the follow-on analysis can properly match the Master Plan to an accurate role. Once the Master Plan is finalized, San Mateo County should recommend to FAA to modify the classification of HMB Airport that more appropriately matches the Master Planned use.

6) page 1-2; paragraph beginning with "The flight" and ending with "conditions"; I am concerned with two issues in this paragraph. Local pilots have described Visual Flight Rule (VFR) conditions at HMB as; "one mile visibility and staying out of the clouds". This paragraph describes VFR conditions as; "flight visibility is three miles or greater and the cloud ceiling is at least 1,000 feet above the ground". Please determine which description is the FAA authorized VFH conditions for HMB Airport and modify the "DRAFT" accordingly. Past Master Planning efforts indicated VFH conditions at HMB at 60% of the time. This paragraph indicates that users believe that VFH conditions exist 75% of the time. The determination of FAA authorized HMB VFH conditions might resolve the difference in VFH percentage. This issue has a significant impact on the need for navigational systems at HMB and it also affects aviation activity and aviation demand forecasts.

7) page 1-3; "HISTORICAL AIRPORT ACTIVITY". The important issue is that at an uncontrolled airport; actual airport activity data is not always available. All records that I am aware of are estimates. The "DRAFT" should clearly indicate that all historical airport activity is only estimates. I believe the estimates to be off by as large as a factor of four. The 1973 operations are identified as 80,000 with 44 based aircraft. I believe that the number of present operations are similar to those in 1973. My belief is that 20,000 operations a year is a more accurate estimate and I contend that this number has been consistent during the last 24 years. I support my estimate with the following observations:

- 1) The "DRAFT" identifies an increase of based aircraft from 44 in 1973 to 66 currently while it describes aviation activity as changing from 80,000 operations from 1973 to 60,000 operations in the 1980s and to 38,271 in 1994. These two numbers are very interconnected. The "DRAFT" proposes that when based aircraft increase, so will annual operations. Since this is not true in the "DRAFT" for historical activity, the estimated historical activity in the 1975 plan and in this "DRAFT" is probably incorrect.
- 2) This "DRAFT" states that the existing operations in 1994 were exactly 38,271. This precision is not supported by the "DRAFT". The "DRAFT" identifies that a CalTrans statistical sampling conducted in 1993 determined an estimate of 580 annual operations at HMB per based aircraft. (page 2-15) Chris McComb requests in the PAC to see this statistical sampling went unanswered. Actual annual activity per based aircraft at San Carlos where a control tower has accurate information is 269 operations. The weather greatly affects daily operations at HMB. Weekend aviation activity is much greater than weekday activity. Multiplying an unsubstantiated CalTrans statistical sampling of 580 times 66 to obtain actual activity at 38,280(38,271) is very suspect and is probably incorrect. Note: We on the coast have seen numerous CalTrans ideas that we discovered to be somewhat incorrect.

- 3) According to information received at our MCCC Airport Subcommittee meetings, twenty two of the based aircraft at HMB have not operated for at least a year and some much longer. They are stored in hangars at HMB in a long-term storage status. The CalTrans number of 580 operations per based aircraft applied to only the 44 operating aircraft at HMB would yield an estimated annual activity of 25,520 operations.
- 4) Using the San Carlos ratio would yield 17,754 annual operations for 66 based aircraft at HMB or 11,836 annual operations for 44 operational aircraft at HMB.
- 5) The best information that I have comes from discussions during the MCCC Airport Subcommittee meetings. Those discussions concluded that a 100 operations a day was probably the maximum that occurs at HMB on a weekend with excellent weather. Weekday traffic is very erratic, but to insure an activity count that identifies the upper estimate, I will use 50 operations a day for weekday activity at HMB. Using these daily activity estimates; annual activity would be 17,550 operations if VFR conditions exist 75% of the year, and would be 14,040 operations if VFR conditions exist 60% of the year. IFR operations can be used only on departure at HMB and are very rare events.

Please amend the "DRAFT" to show an estimated annual activity of 20,000 operations at HMB Airport.

8) page 1-4; "Runway 12-30"; Please amend the "DRAFT" to identify the present capabilities at HMB with the existing threshold displacements. The MCCC Airport Committee believes that pilots have 4,237 feet of runway for landing and have 5,000 feet of runway for departures with the existing limitations at HMB.

9) page 1-9; "Sanitary Sewer"; Please identify if the existing septic system poses a health concern to the community water source under the HMB airport.

10) page 1-10; "AIRSPACE AND AIR TRAFFIC CONTROL"; Please resolve the different description of VFR conditions at HMB Airport as indicated in comment JW3.

11) page 1-17; "LAND USE PLANNING AND JURISDICTIONAL CONSIDERATIONS"; Please amend the "DRAFT" to include existing "Half Moon Bay Airport Safety Zones" as shown on Map HMB-8, III.-25, 1995 San Mateo County Comprehensive Airport Land Use Plan (CLUP). Also include "Half Moon Bay Airport Projected 1995 Noise Contours*", Map HMB-7, III.-18, CLUP. These maps provide significant information on the safety and noise impacts associated with the existing HMB Airport.

12) page 2-1; "AVIATION DEMAND FORECASTS" I agree with Coffman and Associates that "it is virtually impossible to predict with certainty aviation activity. I do believe that past attempts to predict aviation activity at the HMB Airport should be included in this Chapter. The dismissal of the 1975 Master Plan on page 2-6 does not allow the reader to comprehend that a previous attempt to forecast aviation activity estimated 250 based aircraft and 240,000 operations to occur at HMB by 1995. HMB Airport had 66 based aircraft and an estimated 20,000 operations in 1995. Past estimates at HMB Airport appear to be four to twelve times greater than experienced. I commend Coffman and the County Staff to reducing the forecast in this chapter to only a 41% increase for based aircraft and aviation activity at HMB Airport to the year 2015. Though, I do disagree with the methodology the "DRAFT" utilizes for forecasting future aviation activity at HMB. The "DRAFT" discounts the 1989 California Aviation System Plan (CASP) that predicts a .8 % annual decrease in aviation operations at HMB Airport. The "DRAFT" also disagrees with the 1994 Regional Aviation System Plan (RASP) that forecasts 71 based aircraft at HMB in the year 2010. The "DRAFT" appears to make it's increased forecast based upon 2.5% annual increase in population for the "airport service area"; cities of Half Moon Bay and Pacifica and the Unincorporated Mid-Coast. This increase in population and associated increase in aviation activity is not that clear to members of the MCCC Airport Committee. For the purposes for the next phase of analysis for the HMB Airport Master Plan I propose that we combine recommendations of the "DRAFT" with data provided by the MCCC Airport Committee. The "DRAFT" should be amended to use the predicted growth rate of 41% on the 20,000 estimated existing aviation operations. This would yield in the year 2015; 93 based aircraft and 28,200 operations forecasted at HMB Airport.

13) page 2-14, "AIRCRAFT FLEET MIX"; The MCCC Airport Committee is very concerned about the aircraft fleet mix in the future at HMB Airport . As shown on page 2-15, only 2 twin engine aircraft are presently based at HMB. There are no Turboprops, Turbojets or Rotorcraft presently based at HMB. These types of aircraft have significant safety and noise impacts on operations at the airport and on the surrounding community. Future jet use of HMB would extend the adverse noise impacts beyond El Granada and Moss Beach to Half Moon Bay and Montara. Rotorcraft will provide a significant noise impact to the adjacent community near the proposed helipad. Emergency operations for these types of aircraft are reasonable. Having these types of aircraft participate in special events like the air show and Dream Machines is reasonable. Caution should be taken to avoid having an accident similar to the one that occurred in Sacramento where a privately owned military jet crashed into an ice cream parlor. Some existing land uses near the airport may discourage some types of aircraft at special events. It is recommended by the MCCC Airport Committee that future uses of HMB Airport be advocated

for aircraft types that are presently based at HMB. Please evaluate other administrative actions that the Board could take to limit aircraft types in the future use of HMB Airport. Please identify these options and modify Table 2J, "Based Aircraft Fleet Mix Projections, Half Moon Bay, to have zero turboprop, zero turbojet and zero rotorcraft forecasted to be based at HMB in the year 2015.

14) page 2-17, "ANNUAL INSTRUMENT APPROACHES"; The number of IFR departures (approaches is an obvious typo since HMB had no terminal nav aids for IFR approaches in 1994) listed in Table 2M at 957 in 1994 is highly questionable. Coffman Associates used a percentage to determine this number based upon estimated activity, estimated weather conditions, and estimated itinerant operations. Discussions at the MCCC Airport Committee meetings with IFR rated pilots suggested very few IFR departures by HMB based aircraft. The best estimate number for IFR operations may be 20 to 30 a year. Please survey the HMB pilots to determine their actual IFR activity in 1994. Then use the 60% for based aircraft operations and 40% for itinerant operations to determine the best estimate of annual instrument operations at HMB. Using revised estimates may reduce the forecasted Annual Instrument Approaches in Table 2M from 1,350 in 2015 to as few as a 100.

15) page 2-19, "Forecast Peaking Characteristics, Half Moon Bay"; The forecast in Table 2N should be adjusted to reflect proposed modifications in the forecasted operations and forecasted aircraft mix. This modified table will be very useful in determining proposed amendments to the CLUP. I commend the county on proposing to modify these plans at the same time. We in the MCCC Airport Committee are committed to support both efforts.

16) page 3-12, "Hangars"; The safety issues associated with automobile traffic driving to the 21 port-a-port hangars sharing taxiways with aircraft is the highest priority for new hangar replacement. The twelve hangars in poor condition near West Coast Aviation should also be replaced. The thirty existing users could be accommodated in a new 28 plane standard hangar along with relocating county equipment out of two of the three hangars that are being used for county storage. New aircraft hangars should not be built without demolishing the existing hangars located in unsafe areas and in poor condition. Replacement construction should be the same guideline for the conventional hangars of the Fixed Based Operators. The decision to build more than 28 replacement hangars should be delayed until airport management decides what action should be taken concerning non operating aircraft in county owned hangars. These aircraft are restricting operating pilots from basing their aircraft at HMB.

17) page 3-16, "Fuel Storage Requirements, Half Moon Bay Airport"; Please modify the "Average Fuel Ratio" numbers to reflect existing numbers. An increase in six times the fuel ratio appears to support the belief that larger aircraft are being planned for HMB by 2015. If not, then the fuel ratio should remain the same as today's usage.

18) pages 3-16 & 3-17, "Airport Access" & "Support Facilities"; Utility infrastructure expansion and/or on-site automobile road expansion should not be county provided. The Master Plan should distinguish between utility and road upgrades required to operate the HMB Airport and those provided for developing an industrial park. Building roads and utilities with aviation and/or county funds for speculation of industrial development on the airport is discouraged. Those projects should be justified on their own merits and compete for utility capacity like other property owners on the coast.

19) page 4-3, paragraph beginning with "The *No Action*" and ending with "non precision instrument approaches"; Not providing IFR capability at HMB may be the safest option for the residents and land users near the ends of the runway. The existing Approach Protection Zones (An area managed by the CLUP for the HMB Airport to be kept free of structures and not to cause a concentration of more than 10 people per net acre. / page III-28 of the CLUP) are only 1,000 by 2,000 feet and are located, because of the displaced thresholds, mostly on county owned undeveloped land. Prior proposals for MB Airport with FIR capability recommended Approach Protection Zones (APZ) at 1,500 by 3,400 feet. This much larger APZ provides greater safety for neighbors to an IFR airport. Safety considerations for adjacent land users should be a greater importance than the needs of business flights requiring IFR airports. This discussion for adequate Approach Protection Zones for HMB should continue through the Master Planning effort for the HMB Airport. Please show in an addendum that this issue requires further study.

20) page 4-3, "Relocation of Services"; This is the section of the "DRAFT" where a more accurate definition of what would happen to the land of the HMB Airport if the aviation services are relocated. I am not advocating this option, but, I believe that the environmental analysis will clearly identify options for this facility if it is not used for aviation purposes. My belief is that the deeds to the airport mandate airport use or it's ownership would return to state and federal ownership. All excess federal lands within the Golden Gate National Recreation Area must be considered for inclusion into the GGNRA. The HMB Airport being contiguous to the Fitzgerald Marine Reserve would be strongly considered for GGNRA purposes. This evaluation would occur first prior to other uses of the Airport Land. Please validate this belief so misinformation about the future of the Airport is clarified with this Master Planning effort.

21) page 5-7, paragraph beginning with "In addition" and ending with "contour area"; The CLUP for HMB Airport is more strict than FAA standards for residential use due to aircraft noise. The CLUP states on page III-16; "The Airport Land Use Commission (C/CAG) recognizes the 55 dB CNEL aircraft noise contour at Half Moon Bay Airport as the noise level threshold for reviewing and evaluating proposed land use policy actions." Please amend the "DRAFT" to reflect the guidance of the CLUP.

22) Chapter Six, "FINANCIAL MANAGEMENT AND DEVELOPMENT PROGRAM"; Much of this chapter is significantly modified by accepting the recommendations for existing operations, aircraft mix, and aviation forecasts. Hopefully, revising the economic analysis can be accomplished during the environmental analysis. Please perform future economic analysis on HMB Airport only. Combined economic analysis with San Carlos Airport confuses clear understanding of the economic benefits of decisions at HMB Airport.

23) Appendices, "Survey Forms"; Surveying General Aviation visitors and HMB Airport Aircraft Owners is an excellent source of timely information. I believe that a second survey of general aviation users of HMB should be part of the next phase. I also believe that a survey of those property owners within the lands affected by the airport plans would be very helpful. Controlled surveys are easily managed and results will greatly assist our decision makers. The MCCC Airport Subcommittee can assist with accomplishing user and resident surveys.

24) "Executive Summary"; Changes in the Executive Summary reflecting changes in estimated 1994 operations, Aviation Activity Planning Horizons, Development Funding, showing Approach Protection Zones and inclusion of MCCC comments on the Planning Advisory Committee appear to be unnecessary to continue on in the evaluation if the Executive Summary is not used for information purposes. Please discontinue using this pamphlet when discussing the "DRAFT" Master Plan of the HMB Airport.

25) General Considerations provided by the MCCC Airport Committee:

1) Helicopter activity should be emergency only. Safety and noise concerns associated with helicopters requires much more evaluation if helicopter activity at HMB increases beyond emergency events.

2) Jet aircraft mixed with existing aircraft also poses great safety and noise concerns. If jet aircraft is master planned for HMB, significant effort must be accomplished to understand impacts on safety and noise.

3) IFR traffic patterns are turning from and towards the ocean. This is the safer and quietest approach and departure from HMB. These flights donot travel

over El Granada, Princeton by the Sea, and Moss Beach Heights (Hospital location). Consider changing VFR traffic pattern to be same as IFR pattern. This would also have VFR and IFR aircraft in similar patterns which might provide safer situation for aircraft.

4) Please provide federal, state and county guidance for Approach Protection Zones for a non-precision approach and departure airport like what is being proposed at HMB. Only when the committee clearly understands what is considered safe for the size of a Approach Protection Zone will we be able to concur on master planned alternatives. We understand that the existing Approach Protection Zones were approved for the existing airport that is VFR capability on approach and non-precision for departure. This safety concern must resolved in the next evaluation.

5) Safety is the most important issue for decision making in the MCCC Airport Subcommittee. This extends to the safety of the pilots using HMB and the safety of the residents living near the airport.