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November 11, 2008

Ms. Sandi Sawa, Manager  
Airport Systems Planning  
San Diego County Regional Airport Authority  
PO Box 82776  
San Diego, CA 92138-2776

Reference: Airport Land Use Compatibility Plan Update – Gillespie Field

Dear Ms. Sawa:

The Aircraft Owners and Pilots Association (AOPA) represents the general aviation interests of 415,000 members, more than two-thirds of the nation's pilots, including over 50,000 members in the State of California. AOPA is committed to ensuring the future viability and economic development of general aviation airports and their facilities as part of a state and national transportation system. We are committed to the safety of aircraft operators as well as members of the community who reside in close proximity to general aviation airports.

We are writing to indicate our Association's strong support for the Gillespie Field Airport Land Use Compatibility Plan (ALUCP) Update as recommended by the Authority's staff and presented to the Authority's Board acting as the Airport Land Use Commission. This updated plan as submitted by staff provides compatible land use protections for this busy general aviation airport which will ensure that the airport continues to play an important and valuable component in both the regional and national aviation transportation system. Anything less will reduce the overall safety and efficiency of Gillespie Field.

However, we are deeply troubled by two factors. The first is the series of delays in adopting the staff recommendations. The longer the adoption of the updated plan is delayed, the more encroachment of the airport occurs with no controls or project approvals based on land use compatibility plans that are very much out of date for current conditions. Second is the suggestion offered by Commissioner Panknin on October 2, 2008 that the land use protection zones for runway 17/35 be modified and shortened in length which in effect will allow both higher density residential development and residential development much closer to Gillespie Airport by reclassification of the runway to a low-activity general aviation runway. It appears to us that this proposal is being driven by the City of Santee. Taking such action is inconsistent with the State of California Airport Land Use Planning Handbook and would seem to indicate the willingness of the City of Santee to jeopardize aviation and community safety in order to accommodate developers.

Gillespie Field Airport is an extremely busy and active general aviation airport, classified as a Reliever airport to San Diego International Airport. It is one of the busiest airports in San Diego County. With over 732-based aircraft and over 240,000 operations each year (according to current Federal Aviation Administration (FAA) master airport records), the airport is currently undergoing significant development that will allow it to accommodate additional based aircraft. The currently adopted airport land use compatibility plan was crafted many years ago when the airport was not as busy and had less based aircraft. This update to that plan is long overdue and desperately needed to ensure that Gillespie continues to meet aviation transportation demands both locally and nationally.

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While runway 17/35 is a crosswind runway, it is also a critical runway for the airport in times of inclement weather when aircraft landings are guided by instrument approaches to the airport. Runway 17/35 is served by an instrument approach that has the best approach minimum altitudes and visibilities to any of the runways at Gillespie. With current plans by the federal government to enhance instrument approaches and lower minimums through the Wide Area Augmentation System (WAAS) and the county's plans to purchase land off the runway ends to remove current displaced thresholds, protecting this approach corridor for future enhancements to this instrument approach is vital to safety at and around the airport. At times of inclement weather and Santa Ana winds, runway 17/35 is the only runway that can accommodate aircraft landing at Gillespie Field. These improvements to the runway will allow it to accommodate additional and larger aircraft flying over the area in question.

As the California Department of Transportation, Division of Aeronautics, indicated in their October 1, 2008 letter, airport compatibility land use plans are designed to protect people and property on the ground from possible injury as the result of an off-airport accident or incident. While extremely rare, they do occur. The state's land use planning guide structured guidance on protection zones and development densities based on statistically valid analysis of aircraft accidents occurring in areas surrounding airports. The severity of off-airport accidents or incidents is directly related to the uses of land in the specific area surrounding the airport. One need only look to Las Vegas earlier this year to see the tragedy and devastation that occurs when residential development is allowed to occur in close proximity to a busy general aviation airport.

Another important factor to consider is that ignoring safety in areas surrounding an airport in light of published guidance designed to enhance safety of aircraft and the community surrounding the airport could expose the agencies making those decisions to liability claims should an off-airport accident occur.

We urge you to adopt the staff recommended airport land use compatibility plan for Gillespie Field in an expeditious manner. We strongly believe the staff recommended plan is the best balance of development and airport land use protection and meets the State of California's criteria as covered in the planning handbook. Degrading safety for aircraft operators and the local community in favor of developers is, in our opinion, poor public policy and counter to protecting the health, safety and welfare of the public.

We appreciate your taking our comments into consideration. Should you have any questions or comments, please feel to contact me.

Sincerely,



Bill Dunn  
Vice President  
Local Airport Advocacy

cc: Alan Bersin, Chairman