

**May 5, 2021**

**AIRPORT NOISE  
ADVISORY COMMITTEE  
(ANAC) MEETING**

**ITEM 3**

**PUBLIC COMMENT**

**From:** [Gary Wonacott](#)  
**To:** [SDCRAA clerk](#)  
**Subject:** Public Comment for meeting today  
**Date:** Wednesday, April 21, 2021 10:32:54 AM

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I am going to ask the members of this committee to set aside the results just presented and support one relatively small change to the Open SID 290 that is being proposed. And that is to make right the concept of the nighttime noise abatement procedure and move all of the post 10 pm departures, not just those that would otherwise depart on ZZ000. In other words, also move the departures that currently fly out over Mission Beach after 10 pm.

Virtually everyone of the recommendations proposed by the Subcommittee four years ago provide some relief to those people who were negatively impacted by the implementation of NexGen. The PADRZ SID more than doubled the concentration of planes over a small corridor and moved the average crossing point farther north over the Mission Beach coast compared to the PEBLE SIX. A number of the recommendations made by the Subcommittee would mitigate this effect by moving the PADRZ south of the MB peninsula.

Ironically the analyses of these recommendations all resulted in a reduction of the number of people living in the 65, which are the ones eligible for the home noise insulation program. But the people living on the west end of the runway were also told, if you support these recommendations, the noise over you is not going to decrease, but it would decrease the number of people eligible for noise insulation.

More irony is that these people are going to lose that eligibility the next time there is a Part 150, because the projections of number of operations were grossly overestimated for this Part 150. But, in the meantime, the people living in Mission Beach will continue to be subjected to nighttime departures from 10 to 11:30 pm, instead of moving these departures onto the Open SID 290, which is where they were supposed to be until the NexGen codified what had been a creep north. So, again, I ask, change the Open SID 290 and include the current post 10 pm departures over Mission Beach.

**From:** [cathy ives](#)  
**To:** [SDCRAA clerk](#); [Debbie Watkins](#)  
**Subject:** Airport Noise and Mission Beach  
**Date:** Wednesday, April 21, 2021 2:16:10 PM

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To whom it may concern,

Unfortunately I was unable to comment last week and this week on the airport noise in Mission Beach.

I live in South Mission Beach in which we have airplanes overhead almost every minute of the day from 6:30 am to 11:30 pm. Our only relief is after 8 pm in which we can enjoy 20 minutes of uninterrupted time. The 11:25 pm flight is a killer.

I like many others work at home. The flights over Mission Beach have not only increased, they seem to be louder and lower. One cannot have a conversation with an account, is unable to take advantage of outdoor activities without the sound of airplanes overhead.

On an average week, I log in 750 flights that are distracting. That is 75 flights a day. Those do not include the business flights that can go all night, plus the arrivals.

Mission Beach has been unfairly targeted for many things, not least the airplane noise. We continually get sacrificed for our neighbors north and south. I am asking, pleading with you to keep the flight path over the jetty.

You already know the health risks, you already know how it can affect people working at home and you already know that Mission Beach is not included in the Quiet Neighborhood Program. What is a long term resident to do? It is unaffordable to move and untenable to live.

Please, keep the flight path over the jetty, let us have some quality of life. To put more flights directly over South Mission after 8 pm is not the right thing to do.

Regards,  
Cathy Ives  
Resident South Mission Beach.

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Cathy Ives  
[www.greenecoservices.com](http://www.greenecoservices.com)

[www.donttrashmissionbeach.com](http://www.donttrashmissionbeach.com)



April 21, 2021

Mr. Dennis Probst  
Ms. Sjohnna Knack  
Ms. Heidi Gantwerk  
San Diego County Regional Airport Authority

SENT VIA EMAIL

RE: Final Part 150 Report; Public Comment

Dear Dennis, Sjohnna and Heidi,

Thank you for the opportunity to respond to the latest SDIA's Part 150 Study. Initially I would like to speak to the over two year process we have just completed. First and foremost it seemed to be driven unfairly by people living outside the 65 CNEL. I understand that when the FAA instituted Next Gen in 2017 changes occurred in San Diego that led to additional communities becoming impacted by airplane noise. As a consequence, representatives from those areas were invited to become members of the Airport Noise Advisory Committee. In seeking to then find ways to help reduce noise, many recommendations were developed by the ANAC and were evaluated in a Flight Procedure Analysis. And because some of them were likely to have an impact inside the 65 CNEL, those recommendations were pushed forward into the Part 150 Study for further investigation. Surely over 90% of the Part 150 was taken up with analyzing recommendations that would help people outside the noise contours. Because of that, very little attention was paid to looking at ways to reduce noise inside the 65 CNEL. Granted because of the airport's location right next door to neighborhoods there are not a lot of options. But still, that area should have been the priority.

The negative impacts of noise will continue in our community as long as the airport remains. One of the only things that has helped us through the years is the Quieter Home Program. With the on-going support of the Airport Authority and the FAA, it is expected to continue for many years to come.

In addition to the Quieter Home Program, I support the following recommendations from the Part 150 Study:

- A Nighttime Noise Procedure that will reflect the status quo, without shifting noise.
- Developing a NADP (Noise Abatement Departure Procedure) that may produce some noise relief inside the 65 CNEL.
- Instituting a GBAS (Ground Based Augmentation System) that will allow planes to land over downtown in bad weather.
- Developing a plan to entice airlines to fly their quietest equipment into San Diego.

As these new recommendations are analyzed and move forward, it is important that ANAC and the public see that the Airport Authority is committed to and is accountable for implementing strategies that will result in noise reduction.

Respectfully Submitted,  
Nancy Palmtag  
Member CAC  
Loma Portal Resident

April 21, 2021

Mr. Dennis Probst  
Ms. Sjohnna Knack  
Ms. Heidi Gantwerk  
San Diego County Regional Airport Authority

**SENT VIA EMAIL**

RE: Final Part 150 Report; Public Comment

Dear Dennis, Sjohnna and Heidi,

As you are aware, we are current members of the 2021 Part 150 Citizen Advisory Committee (“CAC”) and Sunset Cliffs\Ocean Beach residents as well as Mr. Tarlton has been a TAC member. Pursuant to your invitation, please find below the following comments regarding the current draft Part 150 study for the public record.

## **OVERVIEW**

It was recently disclosed by SDCRAA (“AA”) staff that the April 13, 2021 CAC meeting is a “hard stop”, due to pending AA obligations to the FAA and risk to FAA financial support, that we were not previously made aware of.

We find this quite concerning as we have consistently and frequently expressed concerns regarding the lack of specificity with the evolving Part 150 recommendations remaining. That concern is now greatly exacerbated by the release of the Draft Part 150 study and its lack of detailed information. Specifically, we believe it contains flawed data and assumptions, and it lacks a clear and accountable implementation plan for the recommendations. The draft Part 150, in its current state, is incomplete, inaccurate and inadequate.

Forcing the completion of the Part 150 with this hard stop on April 13<sup>th</sup> completely eliminates the involvement of the community in the process to evaluate, refine and assure implementation of these surviving few ANAC supported recommendations. The ANAC is clearly not the appropriate source for this detailed and technical oversight and it does not provide any opportunity for dialog with the community. In fact, the ANAC purposely is not allowed to respond to public comments or questions. Further, the only material accomplishment of ANAC over the past six years of monitoring has been to unanimously approve the thorough efforts and recommendations of the ANAC Subcommittee.

Further still, AA staff has specifically stated that the Part 150 process has been very protracted, significantly due to the number of alternatives reviewed, as proposed by CAC members. We would respectfully suggest that while this is true, it was the result of our sincere and serious effort to identify solutions to noise impacts and address the ongoing inadequacies of the Part 150 process. But, the expense of time was also the result of the AA management process by: (i) focusing on alternatives pressed by communities miles outside of the constituent 65 dB CNEL neighborhoods, (ii) inadequately addressing the concerns of those CAC’ers from the constituent group (please see previous letters), (iii) AA not disclosing until very late in the process that the

relocation of noise that impacts ANYONE (pursuant to the flawed Census data methodology as previously noted) rendered the disqualification of every route alternative, and (iv) delaying the efforts to pursue in detail the remaining recommendations (“NADP”, Nighttime Procedure and Ground Based Augmentation System (“GBAS”)), even when these alternatives have been positively endorsed by CAC and ANAC members for several years.

Additionally, it should be noted as pointed out in prior comment letters that the Part 150 study has several areas of flawed data, including but not limited to:

- Census data used to calculate a definitive number of noise impacted units is not remotely accurate enough for this detailed application (as stated by the consultant footnotes)
- Aircraft mix used in formulating future noise contours is heavily overweighted with aircraft models currently being mothballed and therefore highly unlikely to be in use in the modeled years (please refer to Paul Grimes comments)
- Future forecasted operations are heavily overweighted in hours of operation not typically frequented in actual operations by airlines
- Future forecasted operations are based upon 2018\2019 base operations and have not been adjusted for the severe impacts of the Covid 19 pandemic

These and many other assumptions baked into the Part 150 are cause to seriously question the accuracy and reliability of the conclusions drawn in the report.

As to the specific Part 150 recommendations, we offer the following comments:

## **Noise Abatement Departure Procedure (“NADP”)**

In our opinion, this proposal looks quite promising and is worthy of significant further study\refinement and then prompt implementation. However, it remains vague and not at a point where we feel comfortable that it has been adequately reviewed. The CAC and ANAC Subcommittee have both pressed for the analysis and implementation of this procedure throughout the 3-4 years of the Part 150 Study, the FPA and before as ANAC Recommendation. Yet, the AA stated that it had been studied and found to be not worthy, when in actuality that procedure was materially different from the current proposal. When finally put forth at the December 2020 Part 150 CAC meeting, the information presented was vague, yet nothing has progressed materially in detail since that offering even though we have continually asked for further clarifications.

This is highly unfortunate given this one recommendation has the most potential to positively impact those within the 65 dB CNEL and beyond.

Further, the recommendation, as written in the Draft Part 150 is fully inadequate as it does not address the variables in aircraft takeoff performance calculations, potential alternatives to the 1500’ initial altitude, nor the inputs used in the modeling, specific detail for further evaluation, study, timeline, or implementation steps. Nor is there a party accountable for its implementation (ANAC is not in a knowledgeable position to accomplish this effort; they have consistently deferred to TAC\CAC). This effort must be overseen by technically knowledgeable community representatives from the 65 CNEL or immediately adjacent (See New ANAC Subcommittee below).

Additionally, as to its missing analysis: (i) please note in the last paragraph in the draft Part 150, page 7.82...it seems no modeling was done for NADP1 at lower altitudes. According to a commercial pilot, experienced with NADP, that for many years his airline used 800' (rather than 1500') for thrust reduction for the NADP1 profile (see page 7.86) Although aircraft will be lower relative to a 1500' thrust cutback and maybe slightly lower over the full departure profile in comparison to the 1500' profile..... it happens sooner after takeoff, so an earlier sound reduction occurs. It appeared to him that this could very well pull in the contours. (ii) it is unclear how NADP1 compares to the current NADP2 with the same 800' thrust reduction altitude...would there be any improvement in Lmax when modeled?

Obviously, further study is required to identify the best alternative for SAN.

Also, within the Part 150, the authors have made or used an incorrect input. On page 7.86 in the middle of the page, it mentions 26,000 feet from the end of the runway to the shoreline. This dimension is actually closer to 2.75 miles or 16,000' to the OB shoreline and 18,000 to the South MB shoreline which likely impacts the results of the close in versus distant comparison.

According to the AA, they wish to “discuss” these options with the FAA, however FAA approval is not a requirement prior to pursuing with the commercial carriers for their buy in. Thus, there remains a very unclear and undefined path for modeling, comparison, evaluation, customization, refinement and implementation that does not meet the pressing needs of the community. This process needs to be defined up front with a clear timeline and direct accountability under ANAC.

This vague approach leaves the Part 150 study, as currently drafted to be incomplete.

## **Nighttime Departure Procedure; SID (“Nighttime SID”)**

It is very clear that the proposed changes to the current Nighttime procedure may very well have potential route impacts within the 65 dB CNEL. Therefore, this procedure should be included within the Part 150 Report recommendations. Yet, the Nighttime Procedure has been quietly omitted from the Draft Part 150 recommendations by the AA with no disclosure nor reasoning. The Nighttime Procedure has been consistently pursued beginning with the ANAC Recommendations, if not before, to NO culmination. If the AA continues to maintain this position, then this procedure must be circulated for evaluation and refinement as an amendment to the Flight Procedure Analysis and incorporated into the scope of the below recommended New ANAC Subcommittee.

Recently (April 2, 2021), the AA’s Sjohnna Knack, Jim Payne & Heidi Gantwerk reached out to several of the CAC members, presumably to feel out our views on the study. In the conversations, several details as to what was being considered for the Nighttime Procedure were shared, many of which we found to be very helpful and appropriate. However, these important provisions to refine the procedure and gain our support were missing from the additional graphics subsequently sent to us, are still missing from the information in the 4/21/2021 presentation package to ANAC, and are significantly inconsistent with our understanding as discussed with the AA a few short weeks ago.

Specifically, after multiple requests, information provided by the AA on the evening of April 7, 2021 regarding the Nighttime SID was found to be confusing and significantly inconsistent with previous distributions as well as with our understanding of the AA proposed alterations to the Nighttime



Procedure, based upon the information provided by Jim Payne (et.al.) from the AA during our recent individual calls.

- It does not have any materially new information except for:
  1. the visual insertion of a new waypoint “AN14-1” (to release ATC from the obligation of releasing the flight off of the vector\onto a RNAV); WP 21 and WP 22
- It is unclear as to if this procedure is: a) in addition to PADRZ whereby the route selection would be determined by route destination, or b) a replacement for all Nighttime Procedures (if a replacement for all current Nighttime Procedures, **100% of nighttime departures** would be left turns to ZZOOO – which is inconsistent with the current historical application of The Nighttime Procedure and ANAC Recommendation #17- “conformance”)
- It is not an “Open SID” as AA represented - it is a “Vectored” departure as in the ATC issued heading overriding the filed Flight Plan SID, consistent with the historical ATC application of The Nighttime Procedure
- It does not prescribe the how\when\where the course change is initiated to proceed to AN14-1 (which has clearly been implemented in the model displayed)
- It should be aligned at 293 degrees to allow for magnetic variation from circa 1988 (1.0 degree per decade +/-) to be historically\geographically consistent
- It does not represent many of the positive features discussed on the calls, including:
  1. the historical alignment to True North versus magnetic (i.e. “304 degrees True”)
  2. It does not have any provision for adjustment for future magnetic variation
  3. It does not have much, if any, in the way of procedural details or initial departure procedure requirements (i.e.: TAKEOFF RWY 27: Climbing right turn heading 290 for radar vector to AN14-1....then via (name of transition to the north or south to connect the routing).

We have continually asked for further clarifications. But nothing productive to fix this mix of information has been forthcoming. As such, the Nighttime SID, while offering many positives, is incomplete and inconsistent at best and certainly does not meet the needs of the community in its current incomplete form.

## Quieter Home Program (“QHP”) \ Quieter Non-Residential Program (“QNonRP”)

Calculations based upon data within the Draft Part 150 report indicate:

**QHP Wait List:** AA has forecasted an additional 11,000 residential properties to become eligible for sound attenuation by 2026, under the current forecast for total operations (it is unclear if this is including the additional 1,400 currently wait listed and the additional 2,500 added from the “boundary adjustment”, which would then total 14,900 residential units impacted). At the current QHP implementation rate of 300-400 units per year, this equates to approximately a **31-34-year addition to the current wait list**.

**QHP Costs:** AA forecasted cost for the 11,000 added residential units are a maximum FAA cost share (up to 80% of total) of \$440 million and therefore a minimum SDCRAA share of

\$110 million. When annualized over the 31-34 year wait list, the FAA cost share exceeds the current “discretionary” annual FAA funding levels by 27%.

This also burdens the AA with a minimum of \$3.5 million per year in QHP costs; for the next 31-34 years.

**QNonRP Wait List:** the new initiative for non-residential properties (“QNonRP”) has forecasted that there will be approximately 56 buildings becoming eligible for sound attenuation under the 2026 forecast. Assuming an average retrofitting rate of 2.5 buildings per year, this equates to approximately a **22-year wait list**.

**QNonRP Costs:** AA forecasted costs for the 56 identified buildings are a maximum FAA cost share (up to 80% of total) range of between \$134 million and \$224 million. This added cost “doubles” the current “discretionary” annual FAA funding levels. This also burdens the AA with a minimum of \$1.5 million to \$2.5 million per year in additional QNonRP costs for the next 22 years.

This brings the minimum combined annual SDCRAA funding obligation for QHP and QNonRP to \$5-6 million over the next 22-31 years.

However, the Part 150 report (Section 9.2.4.2), as currently drafted is mute on these facts, as well as not addressing the severely extended wait lists, and most importantly, the financial viability of the QHP and QNonRP programs given the significant increase in costs and uncertainty of Federal funding. Facts regarding the reliability, sources of funding and viability of their financial model to address the costs associated with the AA’s most “promoted” mitigating measure to noise impacts need to be incorporated into the public Part 150 report and public record.

## **GROUND BASED AUGMENTATION SYSTEM (“GBAS”)**

In our opinion, this proposal also looks quite promising and is worthy of further study. It is not at a point where we feel comfortable that it has been adequately refined as the technology is in the early stages.

We do support this recommendation to the ANAC. However, we would encourage a much more refined implementation strategy as this technology has the potential to positively impact those within the 65 dB CNEL, and beyond.

## **ANAC RECOMMENDATIONS**

Additionally, as the AA’s finalization of the Part 150 report draws the CAC\TAC community efforts to a close after five + years of community involvement, the ANAC deserves to receive an updated clear and concise AA summary of the status of the original recommendations pertaining to operational elements included within the Approved ANAC Subcommittee Recommendations.

This is the last chance for ANAC to cross check their specific requests of the AA that have been addressed by the FPA and the Part 150 process, before they are asked to approve the Part 150 to be finalized and forwarded to the AA BOD on April 21<sup>st</sup>.

## **NEW ANAC SUBCOMMITTEE**

We understand that, regardless of the validity of the community concerns or the report's inadequacies, the AA will press forward with the final Part 150 report and the closure of the Part 150 CAC\TAC committees. This will eliminate all forms of community involvement, input and oversight (ANAC does not provides these community services).

Therefore, we request that the AA immediately proceed with the formation of a new ANAC Subcommittee, responsible for representing the community in the evaluation, refinement, modeling review and prompt implementation of NADP, GBAS and the revised Nighttime Procedure.

This new Subcommittee should consist solely of community representatives currently seated on the current Part 150 CAC, and be residents of neighborhoods either within the 65 dB CNEL or immediately adjacent thereto who possess a strong technical understanding of aircraft arrival and departure procedures. Consistent with these parameters, we would recommend Mr. Bob Herrin. He is a current member of the Part 150 CAC and an active commercial airline pilot. Additionally, Mike Tarlton, an Ocean Beach resident, a current member of the Part 150 CAC and TAC and a retired Airforce Test Pilot would be happy to participate. Additionally, we would recommend that a representative from ANAC also be seated to assure that the communication and transparency of facts flow directly from the Subcommittee to ANAC as the guiding body. Mr. Rob Bates would certainly fulfill and support this effort with his commercial airline background.

In conclusion, we believe that the current Draft Part 150 is incomplete. Further, we support the proposed NADP, GBAS, and Nighttime Procedure modification in concept along with the expanded disclosure and transparency on QHP\QNonRP recommendations. However, we also strongly request that the above comments be used to expand the accuracy, transparency, accountability, and expeditious implementation of these Part 150 recommendations (and Nighttime Procedure). Further, to accomplish this effort, that ANAC proceed with the immediate formation of the new ANAC Subcommittee to offer community support and input as discussed above which is otherwise lacking.

Respectfully submitted,

R. Casey Schnoor  
ANAC Subcommittee Member, FPA CAC Member, Part 150 CAC Member

Mike Tarlton  
FPA CAC\TAC Member, Part 150 CAC\TAC Member

### **Attachments:**

January \_\_, 2021; CAC Member letter  
November 19, 2020; CAC Member letter  
May 28, 2020; Part 150 CAC Meeting; Comments provided by Casey Schnoor, CAC Member  
April 10, 2021; Proposed Nighttime Procedure; Comments provided by Casey Schnoor, CAC Member

## ATTACHMENTS:

Copied below are letters and comments on CAC matters provided to become part of the formal Part 150 public record:

January \_\_\_, 2021

Dear Dennis, Sjohnna and Heidi,

CC: Kim Becker CEO

Pursuant to the January 7, 2021 TAC/CAC meeting and the January 21, 2021 Public Workshop, we submit the following thoughts into public record as members of the Part 150 Citizen Advisory Committee (“CAC”) and Technical Advisory Committee (TAC) that live in Ocean Beach, Loma Portal and Point Loma, including those of us who reside within the 65 CNEL contour, the specific “constituents” of the Part 150 Study.

As you are aware, over the course of the Part 150 study, we have shared significant unified concerns about the lack of viable noise mitigation alternatives being evaluated inside the 65 CNEL as well as the attempts by members of the committee from communities well outside of the 65 db CNEL contour to push noise into the heart of our community using flawed metrics, distorted data and undisclosed new waypoints. Further, using SDCRAA data that was specifically offered *“to provide estimates of the characteristics of the population, not to provide counts of the population...”*

As previously stated, the purpose of the 14 CFR Part 150 study is to:

- (a) Reduce individuals and noncompatible land uses within the 65 dB CNEL and prevent introduction of additional non-compatible land
  - (b) Develop a balanced and cost-effective program to reduce noise impacts within the 65 dB CNEL contours
- while noting that,
- (c) Further, benefits for sensitive areas exposed to noise levels lower than 65 CNEL are not relevant for the purposes of 14 CFR Part 150.
  - (d) The shifting noise from one community to another is not consider to meet 14 CFR Part 150’s purpose by SDCRAA and the FAA

With this in mind, we concur with the conclusion of the SDCRAA consultants that ALL operational alternatives analyzed (1A, 1B, 1C, 1D, 2A, 2B, 2C, 2D, 3A, 3B, and 4) fail to reduce non-compatible land use AND demonstrate a material shift of noise into the residential hearts of Ocean Beach and Loma Portal for the suggested benefit of Mission Beach (well outside of the documented 65 dB CNEL countour), violating tenant (a) and (d) above. More specifically and most impactful is the resulting relocation of departures to reach a complete 100% concentration of departures onto the initial 1 NM plus direct to JETTI (275 degree) track that doubles the impacts experienced by those underneath (and within the 265, 270 and 275 dbCNEL contours) versus the current dispersion accomplished by right hand

turns the commence as early as “wheels up”. This places 100% of the 250,000 [confirm number from SDCRAA data] annual departures flying directly over Point Loma High School and Loam Portal Elementary school. Thus, we must restate that those of us living within and just south or west of the 65 CNEL study area do not accept nor support these alternatives and agree with the SDCRAA that they should not be considered further or put forward to the ANAC or FAA as they do not comply with the purpose of the 14 CFR Part 150.

That said, we do agree with the SDCRAA that there are potentially benefits to continued study of the NADP and Ground Based Augmentation System (BBAS) Operational recommendations as well as the land use recommendations to include: a) Support compatible land use development: Prevent non-compatible development near airport, b) Compatibility Planning Process: Coordination during comprehensive planning processes, c) Support of San Diego County Airport Land Use Commission (ALUC) and d) Continuation of the Quieter Home Program Residential and non-residential insulation with updated for new future base case 65 CNEL 2026 contours. However, to date we have only received vague descriptions of the true nature of these procedures and therefore, require much greater detail prior to publishing the Part 150.

#### **UPDATED SPECIFIC REQUESTS:**

Pursuant to January 7, 2021 TAC/CAC meeting and the January 21, 2021 Public Workshop, we reiterate the following specific requests for additional modeling and analysis of alternatives in line with the SDCRAA recommended path forward to secure our support.

1. Complete a meaningful analysis of NADP options that would add both lateral and vertical dispersion to the current ZZOOO and PADRZ departures
2. Complete a meaningful analysis of GBAS options that would add both lateral and vertical dispersion to the current arrival routes
- 3.
4. Explore alternatives that result in more Stage 4 and Stage 5 aircraft at SAN using either regulation or carrier incentives
5. Ensure “compliance” with the current 290 degree Nighttime Noise abatement Procedure, while accounting for “magnetic variation” shift over time, as was the intent of ANAC recommendation 17, and
6. Analyze ways to ensure maximum compliance with nighttime landing to the west unless safety dictates otherwise

As of the January 21, 2021 Public Workshop, we believe these recommendations are in line with the SDCRAA recommended path forward and could truly benefit those inside the 65 CNEL. Specific details are below:

#### **NADP**

At this point, the one high point of the entire Part 150 is the NADP potential. Therefore, as supported by the SDCRAA, we appreciate the ongoing analysis of NADP options and we request continued modeling and refinement of the of the NADP options as we believe they enable further noise dispersion in the vertical axis. In line with ANAC Recommendation #21 and the goals of this Part 150 study, we strongly request the AA to explore in great detail multiple NADP alternatives. This review should include but not be limited to:

- a) A thorough review of alternative NADP’s implemented at other US and Intl. airports,
- b) Departure Thrust Cutback (as referenced at Part 150 meeting 11/2019),

- c) Designated Noise Abatement Takeoff/Approach Paths (as referenced at Part 150 meeting 11/2019),
- d) NextGen: Performance Based Navigation (PBN) Required Navigation Performance (RNP) (as referenced at Part 150 meeting 11/2019),
- e) Power and Flap Settings/CDA procedure (as referenced at Part 150 meeting 11/2019),
- f) Alternatives for Speed restrictions on initial climb out, and
- g) Dispersion of flight paths using “heading only” versus the current “direct to waypoint” departures.

#### **STAGE 5 AIRCRAFT**

We again request additional information, study, modeling, and alternatives to implement a move to 100% Stage 4 and Stage 5 certified aircraft at SAN. Given the Congressional requirement in Section 175 of the FAA Reauthorization Act of 2018 for the FAA to address the phaseout timing for Stage 3 aircraft, we believe increased compliance could be highly beneficial to those under the 65 CNEL. This would include defined options and alternatives using either regulation or incentives.

#### **NIGHTTIME PROCEDURE**

With respect to the longstanding Nighttime Noise Abatement Agreement, the ANAC records show that the explicit text and the intent of ANAC Recommendation 17 was to specifically ensure “compliance” with the current Nighttime Noise abatement Procedure that calls for a 290 departure heading for both left and right turns. Additionally, we believe the longstanding Nighttime Noise Abatement Agreement and the 290 magnetic heading was actually meant to drive aircraft over the channel at night. That said, and as documented in the recent SDCRAA workshop, in order to remain compliant with the original purpose and intent of the agreement, the heading should be adjusted accordingly, correcting approximately 1 degree added for every 10 years to account for the earth’s natural shift in magnetic variation. Presently, the circa 1985 Nighttime departure heading of 290 degrees must be adjusted to approximately 293 to account for approximately 3 degrees of magnetic variation shift since the procedure was put in place over 30 years ago.

#### **NIGHTTIME LANDINGS**

We strongly request the AA explore in great detail ways to ensure maximum compliance with nighttime landings to the west unless safety dictates otherwise. This analysis should include multiple GBAS alternatives to honor ANAC recommendation #16 and Part 150 goals. This review should include but not be limited to:

- a) A thorough review of alternative GBAS’s implemented at other US and Intl. airports,
- b) Designated Noise Abatement Approach Paths (vertically\glide path and horizontally 260-280) that provide dispersion from the set 270 approach
- c) NextGen: Performance Based Navigation (PBN) Required Navigation Performance (RNP)

#### **QUIETER HOME PROGRAM**

The QHP is the only ongoing mitigating factor offered today, specifically focused to reduce “non compatible land use”. Given this role, a full public understating of the financial sustainability and/or risks of this program based upon the impacts of the forecasted traffic growth to the 65 dB CNEL non compatible properties within the 2026 forecasted 65 CNEL contour fall well within the purview of the Part 150 CAC. Therefore, we specifically expect the AA to promptly provide our committee a thorough financing plan (specific revenue and cost forecasts) as to how they intend to fund the \$365 million dollars in additional increased QHP refurbishment costs for the 9,134 housing units added to the 65 dB CNEL contour over the next five years.

**SUMMARY**

We thank the SDCRAA and their consultants for the hard work put into this 14 CRF Part 150 study to date and we strongly believe there is potential in the recommendations we have stated previously and reiterated above. Further, we believe our recommendations are consistent with the Part 150 mission as well as the ANAC Recommendations. **Our mutual commitment to reduce individual and noncompatible land uses within the 65 dB CNEL has not been fulfilled.** Thus, we request that these further proposals be pursued, and thoroughly discussed openly within the ANAC and the FAA.

Thank you.

Sincerely,

Respectfully submitted,

\_\_\_\_\_  
Michael Tarlton, CAC\TAC Member

\_\_\_\_\_  
Robert Herrin, CAC Member

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Marc Adelman, CAC Member

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David Kujawa, CAC Member

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Robin Taylor, CAC Member

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Nancy Palmtag, CAC Member

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Casey Schnoor, CAC Member

November 19, 2020

Mr. Dennis Probst  
Ms. Sjohnna Knack  
Ms. Heidi Gantwerk  
San Diego County Regional Airport Authority

**SENT VIA EMAIL**

Dear Dennis, Sjohnna and Heidi,

As you are aware, we are members of the San Diego Airport Part 150 Citizen Advisory Committee (“CAC”) that live in Ocean Beach, Loma Portal and Point Loma. The undersigned bring a wealth of knowledge and experience to the discussions and include those of us who reside within the 65 CNEL contour on the southwest side of the airport; the specific “constituents” of the Part 150 Study. As you are also aware, over the course of the Part 150 study (including the latest October 15, 2020 meeting),

we have shared significant unified concerns about the lack of viable noise mitigation alternatives being evaluated as well as the process and the general direction of the Part 150 Study.

## **PART 150 PROCESS**

As previously stated, the purpose of the Part 150 study is to:

- (a) Reduce the number of individuals and noncompatible land uses within the 65 dB CNEL
- (b) Develop a balanced and cost-effective program to reduce noise impacts within the 65 dB CNEL contours, while recognizing that benefits for sensitive areas exposed to noise levels lower than 65 CNEL **are not relevant** for the purposes of 14 CFR Part 150.

We have consistently objected to the Alternative routes offered by the Airport Authority (“AA”) and its consultants because they didn’t meet the basic requirements of the Part 150 study to reduce noise impacts within the 65 dB CNEL contours. Most if not all AA proposals pushed the flight paths to the south and west which in turn drove the noise contours into non-compatible areas of Ocean Beach. Instead, the modeling should have been directed to ideas that actually reduce noise within the CNEL 65 and within the immediately adjacent communities.

Unfortunately, over the two + years, we consistently felt that our input was cut short, shut down and usually dismissed in meetings when we questioned the validity of the data and the proposals.

Further, the ongoing rush with AA’s forced schedule and with each and every meeting prefaced with the need to “get through a lot of information”, the process has precluded in depth discussion and idea generation forcing the time consuming and inefficient burden of letter writing onto the committee members, which again denied discussion of merits or issues

In May 2020, after seeing the latest set of data and the AA’s rejection of the only alternative supported by the OB/PL contingency, and the alternative NADP’s, a thoroughly frustrated OB/PL contingent once again continued to evaluate the options presented and develop new alternatives for consideration. However, we were later surprised to see that our neighbors to the north provided an unsolicited proposal to the AA consultants and the local news outlets, without consultation with us, and clearly not consistent with the Part 150 requirements nor the interests of Ocean Beach. While we did not support their specific proposal, we did see merits in adding a third route between ZZOOO and PADRZ to provide some of level of “dispersion” without compromising throughput and capacity. After submitting our proposal, we were under the impression that once it was reviewed by the consultants that there would be a level of coordination to clarify and nail down the traffic allocations across the three routes.

Unfortunately, none of this happened. Upon our receipt of the Oct 2020 the CAC\TAC presentation packet, the OB/PL contingent were shocked to see our proposal had been rejected and the AA consultants had embraced the La Jolla proposal with their modeling instead (Alternative #3), again showing the flight tracks unevenly and inexplicably distributed to the south to overburden OB and benefit communities to the north.

As the consultants have recently acknowledged most of the alternatives have not focused on reducing the size of the 65 CNEL and greater contours. Instead, the focus has been on addressing noise concerns outside the 65 CNEL contour. As such, we continue to believe that inputs from OB and PL CAC/TAC



members that could help complete a meaningful Part 150 study have thus far not been given their proper due diligence.

Therefore, for the consultants to also state that “prioritization of the requested modeling runs was based on potential to decrease non-compatible land uses in the 65 CNEL and greater contour (without shifting noise)” does not ring true.

But even more impactful, every alternative that has been presented throughout the process has shown movement of the noise outside of the current base contour without any clarifying comment from the consultants regarding its disqualifying elements. As of the October 2020 meeting, the consultants have only now stated that in their opinion, even the slightest shift in CNEL contour will disqualify any alternative routing proposal from their consideration. This became clearly acknowledged when the consultants finally made the statement **that all the alternatives would more than likely be rejected by the FAA for not meeting the 150 criteria** to not move noise into new non compatible areas.

Consequently, it has now, at this late date, become fully apparent that NONE of the proposed routing alternatives offered over the past two years, as modeled for the Part 150 Study by the AA consultants satisfy the Part 150 requirements. This sadly demonstrates the squandering of time and money over the Part 150 process.

#### **PART 150 PROPOSED ROUTE ALTERNATIVES**

Alternatives 1B, 1D, 2C, 2D, and 4 do not favorably impact the any of the 65 dB or greater Part 150 contours that establish the CNEL study area. Therefore, we must restate that those of us living within and just south or west of the 65 CNEL study area do not accept nor support these alternatives as presented and encourage further refinement that would disburse the noise within the baseline 65 dB CNEL contour.

#### **FLAWED DATA**

On several occasions it has been brought to the attention of the AA and their consultants that the Baseline data reliant upon Census data is materially flawed. This has been clearly and consistently demonstrated by the consultant’s own tables, as presented.

Therefore, it is easy to conclude that drawing any material conclusions that severely impact thousands of residents from any re-crafted contours supported by these flawed population and housing unit variances – whether a “newly impacted” or the “net change” approach is applied - is not reliable at best. The reliance upon this inconsistent data is a tremendous prejudice against the residents within the Part 150 study area and to those living within Loma Portal and Ocean Beach, adjacent to and the 65 dB contour. To base material changes to flight paths that will severely impact thousands of residents solely upon this flawed data is unacceptable.

Regardless of the AA consultant representation that the Census Data is “industry standard”, it is incumbent upon the Part 150 process to pursue alternatives to “reduce noise impacts inside the 65 CNEL contours” based upon realistic and reliable data. Therefore, we again ask the AA to consider alternative metrics to substantiate or enlighten the flawed Census Base data. This will ultimately ensure the best possible outcome for the constituents of the Part 150 study area.

#### **UPDATED SPECIFIC REQUESTS**

Fortunately, as a result of our consistent push back, the AA consultants have agreed to pursue two promising avenues: a detailed analysis of the NADP and a modified version to Alternative #3.

We additionally reiterate our requests that were submitted on August 4, 2020 for additional modeling and analysis of alternatives:

7. Examine and analyze new departure procedures that will disperse the noise within the 65 CNEL laterally
8. Complete a meaningful analysis of NADP options, well beyond the single example dismissed in the prior Part 150 study, that would add both lateral and vertical dispersion to the current ZZOOO and PADRZ departures
9. Explore alternatives that result in more Stage 4 and Stage 5 aircraft at SAN using either regulation or carrier incentives
10. Ensure “compliance” with the decades long 290-degree Nighttime Noise abatement Procedure, as was the intent of ANAC recommendation 17, versus eliminating it, and
11. Analyze ways to ensure maximum compliance with nighttime landing to the west unless safety dictates otherwise

As of the October 15, 2020 meeting, we believe these recommendations, while addressed superficially, have not been modeled nor considered thoroughly and in a way that could highlight their true benefit to those inside the 65 CNEL or those threatened to be further impacted by the Proposals.

#### **FLIGHT PROCEDURE ANALYSIS \ PART 150 OVERLAP**

To date the relationship of the Flight Procedure Analysis (“FPA”) recommendations “tabled” for the Part 150 process have not been addressed. For the upcoming meeting, please provide detailed information of the linkage between the two studies and the go forward plan for their respective recommendations to FAA.

#### **ALTERNATIVE #3**

Alt. 3, as proposed, is not consistent with our recommendations and as noted in our August 4, 2020 letter. Given the chosen allocation of traffic counts, the alternative was doomed for failure from “the get go”. The “Alternative 3” analysis completed to date only increased the burden on those within the 65 CNEL and adjacent to the south.

- a) As currently proposed, the three SID allocation by destination does not allocate traffic fairly between ZZOOO (left turn) and PADRZ (right turn) and relocates LANDN south. Re-distribution of 25% of traffic currently using PADRZ south to the middle route effectively moves 50% of the current PADRZ traffic 10 degrees south, thus concentrating noise in OB.
- b) The “NEW LANDN” fix appears to be south of the current “LNDN” fix effectively shifting PADRZ traffic south, concentrating noise in OB. Please clarify.
- c) On initial departure, nearly all aircraft reach 520 feet MSL before the end of the runway, so changing the departure from a VA/DF to a VI/CF initial procedure with a turn at 1.02NM DER drives aircraft on the proposed CWARD/PADRZ or ECHO/MMOTO departure a full mile further into Point Loma on the initial 275 degree heading before any dispersion can begin resulting in a large shift of approximately 0.4 miles south for noise. Although it is readily evident from the CNEL modeling contours, it would be hugely apparent if modeled using the

Lmax approach. An alternative to the “intercept point at 1 NM” is required to mitigate the initial concentration of noise along the initial departure route.

- d) The analysis should also recognize the potential of the extension of JETTI to the west
- e) The analysis should also recognize the potential of the NADP alternatives

To restate, one of our ongoing recommendations\requests is to model vertical and lateral dispersion along the runway departure headings that: (i) exclude the fixed initial 1.0+ miles from the end of the runway and (ii) creates three dispersed departure routes (275, 285, 295) forcing greater dispersion withing the 65 CNEL when compared to current traffic. If this is not possible, as stated in the “*Draft Alternatives Development Screening Memo*” Alternative D5 dismissal, we do not support three departure SIDs. Without strict allocation across the three departure paths, and if a VI/CF initial procedure turning at 1.02NM DER is required, this alternative only exacerbates the noise concerns of those inside the 65 CNEL.

We suggest that the AA consultants rerun the D3 analysis with the following allocations:

- (1) Split the Eastbound traffic equally between ZZOOO (26.2%) and WNFLD (26.2%) and then send the remaining traffic (47.8%) to the proposed New LNDN route
- (2) Create a new analysis again splitting the Eastbound traffic equally between ZZOOO (26.2%) and WNFLD (26.2%) and then send the remaining traffic to the existing PADRZ route (47.8%) and utilize the existing right-hand turn of 520ft. This is an attempt to give the communities just off the runway some relief that a 1 NM intercept would impose and should be incorporated with NADP alternatives

## **NADP**

At this point, the one high point of the entire Part 150 is the NADP potential. Subject to our outstanding requests, it now appears that the only viable alternative approved for further review is the NADP. This option was presented in May 2020 as “dead on arrival” by the consultants, who defended this position by relying upon misleading pretenses related to the previous Part 150 study and its highly limited NADP review. Therefore, as supported in our August 4, 2020 letter, we appreciate the renewed analysis of NADP options and we request continued modeling and refinement of the of the NADP options as we believe they enable further noise dispersion in the vertical axis. In line with ANAC Recommendation #21 and the goals of this Part 150 study, we strongly request the AA to explore in great detail multiple NADP alternatives. This review should include but not be limited to:

- a) A thorough review of alternative NADP’s implemented at other US and Intl. airports,
- b) Departure Thrust Cutback (as referenced at Part 150 meeting 11/2019),
- c) Designated Noise Abatement Takeoff/Approach Paths (as referenced at Part 150 meeting 11/2019),
- d) NextGen: Performance Based Navigation (PBN) Required Navigation Performance (RNP) (as referenced at Part 150 meeting 11/2019),
- e) Power and Flap Settings/CDA procedure (as referenced at Part 150 meeting 11/2019),
- f) Alternatives for Speed restrictions on initial climb out, and
- g) Dispersion of flight paths using “heading only” versus the current “direct to waypoint” departures.
- h) Dispersion of flight paths using 3 SIDs with headings (275, 285, 295) after an initial VA/DF climb to 520 feet leg (omits 1.2 mile concentration along 275 degrees as has been proposed by ABCX2), but subject to strict allocation provisions between the three SID options (Alt 3)

## **STAGE 5 AIRCRAFT**

We again request additional information, study, modeling, and alternatives to implement a move to 100% Stage 4 and Stage 5 certified aircraft at SAN. Given the Congressional requirement in Section 175 of the FAA Reauthorization Act of 2018 for the FAA to address the phaseout timing for Stage 3 aircraft, we believe increased compliance could be highly beneficial to those under the 65 CNEL. This would include defined options and alternatives using either regulation or incentives.

## **NIGHTTIME PROCEDURE**

With respect to the longstanding Nighttime Noise Abatement Agreement, the intent of ANAC Recommendation 17 was to specifically ensure “compliance” with the current Nighttime Noise abatement Procedure that calls for a 290 departure heading for both left and right turns. All alternatives presented to date specifically call for material variations of the Agreement. This is in direct conflict with the specific statement and intent of ANAC recommendation #17 and the Nighttime Noise Abatement Procedure meant to “increase current compliance”, not eliminate it. We do not support ANY variations to the current decades long standing agreement. Rather, we would like to develop procedures to ensure that the Nighttime Noise Abatement Agreement is followed.

## **NIGHTTIME LANDINGS**

We strongly request the AA explore in great detail ways to ensure maximum compliance with nighttime landings to the west unless safety dictates otherwise. This analysis should include multiple GBAS alternatives to honor ANAC recommendation #16 and Part 150 goals. This review should include but not be limited to:

- a) A thorough review of alternative GBAS's implemented at other US and Intl. airports,
- b) Designated Noise Abatement Approach Paths (vertically\glide path and horizontally 260-280) that provide dispersion from the set 270 approach
- c) NextGen: Performance Based Navigation (PBN) Required Navigation Performance (RNP)

## **QHP**

Given at this point, QHP is the sole mitigating factor offered by AA. Therefore, we specifically request the AA to promptly provide our committee a thorough financing plan (specific revenue and cost forecasts) as to how they intend to fund the \$365 million dollars in additional increased QHP refurbishment costs for the 9,134 housing units added to the 65 dB CNEL contour over the next five years.

## **SUMMARY**

As indicated above, we view that to date, regardless of the community efforts, the Part 150 process has yielded no benefit to the constituents that reside inside the 65 CNEL. **Our mutual commitment to reduce individual and noncompatible land uses within the 65 dB CNEL has not been fulfilled.**

However, we strongly believe there is potential in the recommendations we have stated previously and reiterated above. Further, we believe our recommendations are consistent with the Part 150 mission as well as the ANAC Recommendations. Thus, we request that these further proposals be pursued, modeled, and thoroughly discussed openly within the CAC and TAC, **PRIOR** to settling on any AA recommendations as you have proposed for the December 2020 meeting.

Thank you.

Respectfully submitted,

Michael Tarlton, CAC\TAC Member  
Marc Adelman, CAC Member  
Robin Taylor, CAC Member  
Casey Schnoor, CAC Member

Robert Herrin, CAC Member  
David Kujawa, CAC Member  
Nancy Palmtag, CAC Member

CC: Kim Becker SDCRAA CEO  
U.S Senator Diane Feinstein  
U.S. Congressman Scott Peters  
San Diego City Mayor Kevin Faulconer  
San Diego Mayor Elect Todd Gloria  
San Diego District 2 City Councilmember Dr. Jennifer Campbell  
San Diego District 1 City Councilmember Barbra Bry

## **Part 150 CAC Meeting**

**May 28, 2020**

### **Comments provided by Casey Schnoor, CAC Member:**

1. Disappointingly, several CAC member requests for information\data prior to the meeting were not honored which reduced the productivity of the meeting, among others:
  - a. Status of Flight Procedure Analysis recommendations; summarize the initial list of ANAC recommendations, recommendations forwarded, current status, etc.
  - b. Waypoints and Noise Dot references in all route exhibits were requested for context
  - c. CAC member recommendations provided at workshop were not addressed
  - d. Request for additional time for the Part 150 process
2. There was a disconnect between the November 29, 2019 meeting and the May 28,2020 meeting; November was a high level overview of the intent of the Part 150 while May jumped into various alternatives with mixed clarity as to their source, purpose, applicability to specific ANAC requests, goals, etc.
3. The connection and procedure to address “deferred” elements of the FPA, those outside of the Part 150 Scope of work (within the 65 dB CNEL), with the Part 150 was not address leaving significant concern about its omission
4. All **submitted comments** from CAC and TAC members should be distributed to ALL CAC\TAC members for their consideration; with or without authorship noted

5. Include a **Contour overlay** (rather than separate slides 7 & 8) of the 2018 contours and 2026 contours on a single slide (as discussed at the workshop) would have been more illustrative and useful to the CAC to graphically demonstrate the shift in contours over the forecast period
6. **2026 contour forecasts** are distorted due to TRACON's current and frequent application of PADRZ in lieu of the Nighttime departure procedure (290 degrees); this distorts all subsequent Alternative modeling of contours as it over states the 2018 amount of traffic along the northerly side of route boundaries (295 ++ degrees)
7. **Population and Housing Units (slides 9, 29, 30):** The concept of the analysis is merited, however the analysis is flawed:
  - a. Material variance in population/unit (1.6 people/unit to 3.48 people/unit) across the dB contours casts significant doubt on the reliability of the base data for this analysis
  - b. Given the wide variety of multifamily and single-family units in the study area, using Census data defining buildings with 5 or greater living units as "1 unit" greatly distorts the analysis and leads to the unreliability of this analysis
  - c. Lack of consistency between the slides further adds to the doubt on the reliability of the base data for this analysis
8. **ANAC and TAC/CAC Alternatives (slides 11, 12)**
  - a. **Maintaining the linkage** of the ANAC recommendation # (as it is the primary source of Part 150 queries) with each alternative would have been informative, rather than the chart on slide 11 which is not consistently applied through the newly titled "Alternatives"
  - b. **OMMISSIONS** from the Part 150 analysis to date, as noted in the chart on slide 11  
**ANAC recommendations:**
    - i. #12a: "**conduct additional analysis**"; Missed approaches and their impacts are clearly within the 65dB CNEL contour
    - ii. #12k: "**track conformance to 290 degree** heading for nighttime procedure"
    - iii. #14: "Revise PADRZ", the **15 degree alternative**; consistent with "reposition FAA Noise Dot #1"; a 15 degree separation from JETTI at 275 degrees, results in a 290 degree limit for the northerly boundary clearly impacts those within the 65dB CNEL contour (as in the FPA deferral of ANAC recs #14 and #15)
    - iv. #14: "Revise PADRZ"; PROCEDURE SUGGESTIONS; some but not all bullet points addressed including "**Do not move PADRZ SID further south** to avoid negative noise impacts on the south side communities of Point Loma Peninsula"
    - v. #17: **Misstates** as "review the Nighttime ", rather than the original "increase current compliance in Nighttime...";
    - vi. The Alternatives offered **do not address #17 correctly**; The "Alternatives omit analysis of non-compliance with the current 290 nighttime procedure

- vii. **#17 must be separated** within Alternatives as it was always intended as a separate independent analysis limited to nighttime procedures
- viii. #20a: “**reposition FAA Noise Dot #1**”; routes involving Noise Dot #1 clearly impacts those within the 65dB CNEL contour (as in the FPA deferral of ANAC recs #14 and #15)
- ix. #20b: “**reposition FAA Noise Dot #3**”; routes involving Noise Dot #3 clearly impacts those within the 65dB CNEL contour

9. All consultant “**Alternatives**” should reference their source (by individual or group i.e. CAC, public workshop, etc.) and the specific purpose i.e. ANAC recommendation, TAC, CAC, Workshop, etc. the Alternative it is trying to address to understand their context

**ALTERNATIVES:**

**10. Alternative 1A (slides 13, 14):**

- a. Add all relevant waypoints and Noise Dots
- b. Clarify “VA” and “DF”
- c. Separate Alternatives as: Alt 1A; ANAC 14 (daytime), and Alt 1A; ANAC #17 (nighttime) (see 6.v., vi., vii. Above)
- d. Provide clarity, purpose and alternatives to: “climb to 520 feet MSL at climb gradient of 500 feet per NM” (“Turn Axis”); note elevation at Point Loma High School is 180’ plus 60’ of building = 240’; 520’ – 240’ = 280’ clearance over High School building
- e. Clarify the wide variance in location and frequency of Turn Axis (most traffic arrives at Turn Axis before Catalina Street) and impacts to route
- f. Relative location of A1 INT to Noised Dots and Waypoints
- g. Population/Housing data is inconsistently applied (see 6. Above)
- h. Representation of forecast contour redistribution is distorted due to TRACON; (see #5 above)
- i. Alt 1A “Dispersion Version”:
  - i. lacks direct control of Turn Axis location
  - ii. Does not address initial tracking north of 295 degrees\Mission Beach

**11. Alternative 1B (slides 15, 16):**

- a. Add all relevant waypoints and Noise Dots
- b. Clarify “VA” and “CF”
- c. Separate Alternatives as: Alt 1B; ANAC 14 (daytime), and Alt 1B; ANAC #17 (nighttime) (see 6.v., vi., vii. Above)
- d. Provide clarity, purpose and alternatives to: “climb to 520 feet MSL at climb gradient of 500 feet per NM”; note elevation at Point Loma High School is 180’ plus 60’ of building = 240’; 520’ – 240’ = 280’ clearance over High School building
- e. Denote location of “intercept point located 0.98 NM from departure end of Runway 27” (“Turn Axis”);
  - i. presuming 0.98 NM at 275 degrees?
  - ii. Is this a waypoint? Fly Over\Fly By?
- f. Relative location of A1 INT to Noised Dots and Waypoints; Fly By or Fly Over?
- g. Population/Housing data is inconsistently applied (see 6. Above)

- h. Representation of forecast contour redistribution is distorted due to TRACON; (see #5 above)
- i. Alt 1B “Vector to Intercept”:
  - i. Does not necessarily address initial tracking north of 295 degrees\Mission Beach
  - ii. How is “Intercept Point” enforced?

**12. Alternative 1C (slides 17, 18):**

- a. Add all relevant waypoints and Noise Dots
- b. Clarify “DF”
- c. Separate Alternatives as: Alt 1C; ANAC 14 (daytime), and Alt 1C; ANAC #17 (nighttime) (see 6.v., vi., vii. Above)
- d. Provide clarity, purpose and alternatives to: “climb gradient of 500 feet per nautical mile”; note elevation at Point Loma High School is 180’ plus 60’ of building = 240’; 500’ – 240’ = 260’ clearance over High School building
- e. Denote location of A1C FO (“Turn Axis”);
  - i. presuming 0.98 NM at 275 degrees?
  - ii. This is a Fly Over waypoint?
- f. Relative location of A1 INT to Noised Dots and Waypoints
- g. Population/Housing data is inconsistently applied (see 6. Above)
- h. Representation of forecast contour redistribution is distorted due to TRACON; (see #5 above)
- i. Alt 1C “Flyover Design”:
  - i. May help to address initial tracking north of 295 degrees\Mission Beach

**13. Alternative 2A (slides 19, 20):**

- a. Omits clarification of facts surrounding application of “ELSO”; 10-degree limited separation, FAA implementation
- b. Add all relevant waypoints and Noise Dots
- c. Clarify “VA and “DF”
- d. Separate Alternatives as: Alt 2A; ANAC 14 (daytime), and Alt 2B; ANAC #17 (nighttime) (see 6.v., vi., vii. Above)
- e. Provide clarity, purpose and alternatives to: “climb to 520 feet MSL at climb gradient of 500 feet per NM” (“Turn Axis”); note elevation at Point Loma High School is 180’ plus 60’ of building = 240’; 520’ – 240’ = 280’ clearance over High School building
- f. Clarify the wide variance in location and frequency of Turn Axis (most traffic arrives at Turn Axis before Catalina Street) and impacts to route
- g. Relative location of A2 INT to Noised Dots and Waypoints
- h. Population/Housing data is inconsistently applied (see 6. Above)
- i. Representation of forecast contour redistribution is distorted due to TRACON; (see #5 above)
- j. Alt 2A “ELSO Dispersion Version”:
  - i. lacks direct control of Turn Axis location



- ii. Does not address initial tracking north of 295 degrees\Mission Beach
- iii. How does this vary from PADRZ?
- iv. Over shifts noise from MB to OB
- v. Unacceptable as a nighttime alternative (#17)

**14. Alternative 2B (slides 21, 22):**

- a. Omits clarification of facts surrounding application of “ELSO”; 10-degree limited separation, FAA implementation
- b. Add all relevant waypoints and Noise Dots
- c. Clarify “VI” and “CF”
- d. Separate Alternatives as: Alt 2B; ANAC 14 (daytime), and Alt 2B; ANAC #17 (nighttime) (see 6.v., vi., vii. Above)
- e. Provide clarity, purpose and alternatives to: “climb to 520 feet MSL at climb gradient of 500 feet per NM”; note elevation at Point Loma High School is 180’ plus 60’ of building = 240’; 520’ – 240’ = 280’ clearance over High School building
- f. Denote location of “intercept point located 0.98 NM from departure end of Runway 27” (“Turn Axis”);
  - i. presuming 0.98 NM at 275 degrees?
  - ii. Is this a waypoint? Fly Over\Fly By?
- g. Relative location of A2 INT to Noised Dots and Waypoints; Fly By or Fly Over?
- h. Population/Housing data is inconsistently applied (see 6. Above)
- i. Representation of forecast contour redistribution is distorted due to TRACON; (see #5 above)
- j. Alt 2B “ELSO Vector to Intercept”:
  - i. Does not necessarily address initial tracking north of 295 degrees\Mission Beach
  - ii. How is “Intercept Point” enforced?
  - iii. Over shifts noise from MB to OB
  - iv. Unacceptable as a nighttime alternative (#17)
  - v. This alt should be studied as a 290 heading

**15. Alternative 3**

- a. This was not an ANAC recommendation
- b. What was the source of this Alternative and why was it considered?

**16. Alternative 4**

- a. This is incorrectly represents and conflicts with ANAC #17;
- b. ANAC #17 was specifically directed at attaining “compliance” and conformance with the 290 heading within the existing procedure, specifically to address TRACON’s violations by inappropriately applying PADRZ in lieu of the 290 nighttime departure heading
- c. Add all relevant waypoints and Noise Dots
- d. Population/Housing data is inconsistently applied (see 6. Above)
- e. Representation of forecast contour redistribution is distorted due to TRACON; (see #5 above)

### **17. Alternative 5**

- a. This was not an ANAC recommendation
- b. What was the source of this Alternative and why was it considered?

### **18. Alternative 6**

- a. ANAC #21 states "... conduct an engineering analysis of modification to the NADP to assess the potential improvement to noise contours around the airport."
- b. ANAC Subcommittee discussion included Optimal Profile Climb Flight Procedures (Metroplex EA section 1.2.5.3);
- c. "Modeled as part of previous 150 Study" is NOT an accurate statement; the previous Part 150 study was highly limited in scope to solely the unique John Wayne NADP, NOT other actively implemented NADP's
- d. The analysis needs to include among other elements:
  - i. ALL NADP's currently implemented at SAN
  - ii. A thorough review of alternative NADP's implemented at other US and Intl. airports
  - iii. Consistency of application and implementation of NADP's at SAN
  - iv. Comparison to "climb to 520 feet MSL at climb gradient of 500 feet per NM" and "climb gradient of 500 feet per nautical mile"
  - v. Departure Thrust Cutback (as referenced at Part 150 meeting 11/2019)
  - vi. Designated Noise Abatement Takeoff/Approach Paths (as referenced at Part 150 meeting 11/2019)
  - vii. NextGen: Performance Based Navigation (PBN) Required Navigation Performance (RNP) (as referenced at Part 150 meeting 11/2019)
  - viii. Power and Flap Settings/CDA procedure (as referenced at Part 150 meeting 11/2019)

### **19. Next Steps:**

- a. Correct or replace the Population to Housing data with reliable approach (see item 7 above)
- b. Supplement with the Omitted data, analysis, etc. (see items 8b., 16, 18 and others above)
- c. Address the "transfer of noise" restrictions
- d. Expand opportunities for open discussion between committee members; cutting off discussion because "we need to move on to manage our time" is not a preferred approach
- e. Provide a thorough summary of the FPA, detailing:
  - i. opening list of recommendations (per ANAC Recommendations list)
  - ii. concluding list of recommendations
  - iii. recommendations transferred to Part 150
  - iv. status of submitted recommendations
- f. Provide the linkage and procedures to address between deferred FPA recommendations and Part 150
- g. A thorough review and analysis of NADP alternatives

April 10, 2021

Heidi,

Thank you for forwarding the Nighttime presentation. Several of us did find the link to this document as sent late Wednesday night (as attached) and have attempted to quickly review.

From this review, please be advised that I, and others from the CAC, were very confused by this presentation as it is lacking a significant amount of information and appears to be significantly inconsistent with our very recent understanding of the AA proposed alterations to the Nighttime Procedure, based upon the information provided by Jim Payne (et.al.) from the AA during our recent individual calls.

Upon a quick review:

- It does not have any materially new information except for the a visual insertion of new waypoints “AN14-1” (to release ATC from the obligation of releasing the flight off of the vector\onto a RNAV); WP 21 and WP 22
- It is unclear as to if this procedure is: a) in addition to PADRZ whereby the route selection would be determined by route destination, or b) a replacement for all Nighttime Procedures
  1. if a replacement for all current Nighttime Procedures, it implies that **100% of nighttime departures** would be left turns to ZZOOO – which is fully inconsistent with the current historical application of The Nighttime Procedure and ANAC Recommendation #17- “conformance”
  2. if in addition, our strong preference is for one Nighttime Procedure that, upon the fly by of AN14-1, allows for: a) right turn to PADRZ or b) left turn to WP-21, WP-22, ZZOOO
- It is does not appear to be an “Open SID” as AA represented (unless it is undisclosed as a “Radar Vector RNAV SID”?)
  1. it does appear to be a “Vectored” departure as in the ATC issued heading overriding the filed Flight Plan SID, consistent with the historical ATC application of The Nighttime Procedure
- It does not prescribe the how\when\where the course change is initiated to proceed to AN14-1 (which has clearly been determined to be implemented in the model displayed)

- It should be aligned at 293 degrees (NOT 290) to allow for magnetic variation from circa 1988 (1.0 degree per decade +/-) to be historically/geographically consistent
- It does not represent many of the positive features discussed on the calls, including:
  1. That any reference to a magnetic heading should be revised to the historical 1988 alignment for True North, versus magnetic
  2. That, if any reference to a magnetic heading, it must have an adjustment for future magnetic variation that ties to the historical True North heading
- It does not have much, if any, in the way of procedural details or initial departure procedure requirements such as *“TAKEOFF RWY 27: Climbing right turn heading 290 for radar vector to AN14-1, thence..... via (name of transition to the north or south to connect the routing)”*.
- It should be included within the Part 150 Report recommendations, if supported by TAC\CAC, as any changes to the current Nighttime procedure WILL have potential route impacts within the 65 dB CNEL (as required by the Part 150 process); OR, it must become a formal modification of the FPA recommendations, subject to CAC\TAC review and recommendation and ANAC review.

Therefore, as stated, several of us found this presentation to be very concerning as it appears to be inconsistent and incomplete for our understanding and consideration, let alone informative enough to provide guidance to ANAC as requested, yet delivered a mere 5 days before what has been declared the final CAC meeting for ALL FPA and Part 150 matters and one week before ANAC. This is particularly concerning given the fact that this is a topic that CAC, ANAC and the ANAC Subcommittee have consider to be highly important for many, many years.

May I suggest that a much more thorough presentation that includes the many points noted above needs to be distributed ASAP to allow CAC to perform the duties it takes very seriously to support the Part 150, the FPA and ANAC, prior to the CAC discussion on April 13<sup>th</sup>, and the pending ANAC meeting on April 21<sup>st</sup>.

Respectfully,

Casey Schnoor