

Reince Tyler

Subject: FW: Part 150 Study and FAA Operational Nighttime Procedure Issues
Attachments: Document.docx
Importance: High

From: Gary Wonacott <gwonacott@hotmail.com>
Sent: Sunday, October 2, 2022 7:49 PM
To: SDCRAA clerk <clerk@san.org>
Cc: Gloria Henson <glohenson@san.rr.com>; Debbie Watkins <dkwatks@aol.com>
Subject: Part 150 Study and FAA Operational Nighttime Procedure Issues

Please deliver to the FAA representative at the ANAC as soon as is possible, but no later than the next ANAC meeting.

Gary Wonacott
Mission Beach

Sent from my iPad

Dear FAA:

I have several inputs to you in this letter. I am concerned about the quality of some of the aspects of the recently completed Part 150 Study. I am concerned by the quality of the input operations to the AEDT software. I am concerned that the 2018 operations by aircraft type has far too few operations in the nighttime period from 10 pm to 7 am. I am concerned that this error in the input data resulted in a 65 dB CNEL contour that is too small by about one square mile. And I am concerned that this resulted in too few houses being eligible for the QHP in the 2026 forecast.

In addition, it has come to my attention that the FAA is going to attempt to convert the FAA Operational Nighttime Noise Abatement Procedure (not) to a formal SID without performing a NEPA. My understanding is that the FAA must perform a NEPA if it is changing departures from one community to another. The fact that the FAA is attempting to formalize the departure is proof that this departure is not now, nor has it ever been legal.

Part 150 Issues

The issue is not so much if there are errors as much as, are there checks and balances integrated into the design process. In this most recent Part 150 conducted by the Airport Authority it is not clear there were any checks by the Airport Authority staff on their consultant's AEDT input data. And for this reason, it seems equally important that the FAA serve as an independent reviewer as well on the project.

My problem with the Part 150 process starts with a consultant who published 2018 average daily operational data and 2026 forecast data. The question that I believe needs to be examined is The total number of operations for 2018 is 618 daily or 225,570 annually. This compares with 709 daily or 258,785 operations annually.

While these data look reasonable, it is the breakdown of these into day, evening and night that jumps up. Keep in mind that night is defined as 10 pm to 7 am, with the curfew from 11:30 pm to 6:30 am. So, the 11.1 departures is for a 2 hour period, which is a ridiculously low number. I live in South Mission Beach and I have been analyzing operations for some time, so I can tell you that we have far more nighttime departures than 11.1. The total effective operations with penalties are 516.6 for 2018 and 936 for 2026.

So here is the kicker. Post 10pm, all of the departures are over Mission Beach. Mission Beach would be a huge increase in departures going from 11.1 to 54 from 10 pm to

11:30 pm. This is almost a 500 percent increase over Mission Beach while there is no increase over Pt. Loma and Ocean Beach.

Day	DEPARTURES ONLY		
	Evening	Night	
243.9	53.9	<u>11.1</u>	2018
252	48	54	2026

And when the penalties are added, the total operations for 2018 is 516.6, while for 2026 the total operations is 936. So, the nighttime departures for 2018 is far too low especially given the penalties placed on the different time periods. In addition, there is no explanation nor rationale for the number of departures to decrease during the evening time period in 2026. My question is where was the due diligence, the review of these data? Who was asking the questions before signing off. I received an answer to a similar question that I submitted to the FAA ethics portal and the answer I got back was somewhere between irresponsible and ridiculous. The answer was, the FAA checks the process used by the airport authority in the Part 150, but does not check the numbers. Seriously! If this is the case, then perhaps it is not surprising that Boeing 737's were falling out of the skies!

So if the data into the AEDT model is garbage, then what can we expect of the output? It appears that the number of operations for 2018 was very low, so it is not surprising that the 65 dB CNEL contour is too small. And, it also follows that the 2026 forecast 65 dB contour is also too small. Not only would this result in too few eligible QHP properties, but this might also have resulted in parts of Mission Beach and the Midway District being excluded from the 65 dB CNEL. I will be including all of this in the Part 150 180 day review as well.

TABLE 4.3 MODELED AVERAGE DAILY AIRCRAFT OPERATIONS BY GENERALIZED AIRCRAFT TYPE (2018)

Aircraft Type	Arrivals			Departures			Total
	Day	Evening	Night	Day	Evening	Night	
717200	0.9992	0.4565	0.732	1.4557	0.7265	0	4.3699
737300-800	108.4856	31.8309	22.9101	127.5297	28.4714	6.7414	325.969
747400	0.3841	0.0167	0	0	0.3841	0.0195	0.8044
757300	0.7766	0.1169	0.0362	0.5817	0.1447	0.1921	1.8482
767300	1.7396	0.231	1.8231	1.2024	2.1989	0.3925	7.5875
777200-300	0.0334	0	0	0.0028	0.0306	0.0028	0.0696
1900D	0.0056	0.0028	0	0.0056	0.0028	0	0.0167
7378MAX	0.7654	0.2171	0.1169	0.9324	0.1475	0.0139	2.1933
757PW	3.0339	0.7766	1.3499	3.9079	1.0271	0.2199	10.3153
767CF6	0.6096	0	0.1113	0.6652	0.0529	0	1.439
7773ER	0.4509	0.1225	0	0.0056	0.5483	0.0195	1.1468
7878R	1.0104	0	0.0028	1.0159	0	0	2.0291
A109	0.0251	0	0.0028	0.0167	0.0111	0	0.0557
A310-304	0	0	0	0.0056	0	0	0.0056
A319-21	37.8152	11.7932	6.9446	42.5052	10.7411	3.1898	112.9892
A330-40	0.6653	0.167	0.8656	1.5698	0.1058	0.0167	3.3902
B206L	0.0084	0	0	0.0139	0	0	0.0223
BD-700-1A	0.4593	0.0891	0.0641	0.5289	0.078	0.0084	1.2275
BEC58P	0.2589	0.0028	0.0028	0.2366	0.0167	0	0.5177
CL600	3.4653	0.5177	0.0668	3.7632	0.3117	0.0139	8.1386
CL601	0.8016	0.0974	0.0306	0.8656	0.0557	0.0139	1.8649
CNA172-208	3.098	0.0724	0.0334	2.7974	0.4843	0	6.4853
CNA560	4.7568	0.4454	0.192	4.999	0.4091	0.0252	10.8273
CNA680	1.0187	0.0612	0.0223	1.0382	0.0724	0.0139	2.2267
CNA750	2.8224	0.3368	0.1141	3.0172	0.231	0.0557	6.5772
CRJ9-ER	4.7346	1.2136	1.5531	6.3155	1.1579	0.0167	14.9914
DHC	3.251	0.1504	0.0195	2.8781	0.7348	0.0056	7.0392
EMB175	25.34	5.5111	3.2761	29.2423	4.7763	0.0919	68.2377
GASEPF/V	0.4982	0.0585	0.0195	0.5622	0.0724	0.0028	1.2136
GIV/GV	1.7619	0.2477	0.0919	1.851	0.2254	0.0334	4.2113
IA1125	0.334	0.0251	0.0139	0.3451	0.0278	0.0056	0.7515
LEAR35	2.0959	0.1837	0.1169	2.2044	0.2115	0.0111	4.8236
MU3001	0.5288	0.039	0.0167	0.5455	0.0445	0	1.1746
Other	1.5393	0.1311	0.0308	1.3029	0.3898	0.0474	3.4405
TOTAL	213.5727	54.9136	40.5596	243.9089	53.8921	11.1531	618

SOURCE: HMMH Technical Report, Appendix E - Noise, 2020. Some types are combined; full split is listed in Appendix E - Noise.



TABLE 4.4 MODELED AVERAGE DAILY AIRCRAFT OPERATIONS BY GENERALIZED AIRCRAFT TYPE (2026)

Aircraft Type	Arrivals			Departures			Total
	Day	Evening	Night	Day	Evening	Night	
CL600	3.6923	0.0000	0.0000	3.6923	0.0000	0.0000	7.3846
CNA500	1.0000	0.0000	0.0000	1.0000	0.0000	0.0000	2.0000
CNA510	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
CNA560XL	1.2308	0.0000	0.0000	1.2308	0.0000	0.0000	2.4615
CNA750	2.0000	0.0000	0.0000	2.0000	0.0000	0.0000	4.0000
DHC6	4.0000	0.0000	1.0000	4.0000	1.0000	1.0000	11.0000
GIV	1.8462	0.0000	0.0000	1.8462	0.0000	0.0000	3.6923
GV	2.2308	0.0000	0.0000	2.2308	0.0000	0.0000	4.4615
LEAR35	1.0000	0.0000	0.0000	1.0000	0.0000	0.0000	2.0000
717200	1.0000	0.0000	0.0000	1.0000	0.0000	0.0000	2.0000
737300	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
737700	124.7922	35.6634	34.6040	67.0000	17.0000	15.0000	294.0596
737800	1.2078	0.3366	0.3960	70.0000	12.0000	16.0000	99.9404
767300	1.0000	0.0000	4.0000	0.0000	2.0000	3.0000	10.0000
777300	0.0198	0.0000	0.0000	1.0000	0.0000	0.0000	1.0198
7378MAX	1.0000	0.0000	1.0000	2.0000	0.0000	0.0000	4.0000
757PW	2.0000	2.0000	1.0000	2.0000	1.0000	2.0000	10.0000
7773ER	0.9802	0.0000	0.0000	0.0000	0.0000	0.0000	0.9802
787R	3.0000	0.0000	0.0000	2.0000	1.0000	0.0000	6.0000
A319-131	4.0000	0.0000	1.0000	4.0000	0.0000	1.0000	10.0000
A320-211	3.0000	3.0000	0.0000	3.0000	3.0000	0.0000	12.0000
A320-232	23.0000	8.0000	3.0000	24.0000	4.0000	6.0000	68.0000
A321-232	35.0000	8.0000	9.0000	39.0000	4.0000	9.0000	104.0000
A330-343	0.0000	0.0000	1.0000	1.0000	0.0000	0.0000	2.0000
A340-211	1.0000	0.0000	0.0000	1.0000	0.0000	0.0000	2.0000
EMB175	13.0000	6.0000	1.0000	16.0000	3.0000	1.0000	40.0000
EMB190	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
CRJ9-ER	2.0000	0.0000	0.0000	1.0000	0.0000	0.0000	3.0000
CNA208	1.0000	0.0000	0.0000	1.0000	0.0000	0.0000	2.0000
CNA172	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
T41	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
R44	0.5000	0.0000	0.0000	0.5000	0.0000	0.0000	1.0000
TOTAL	234.5000	63.0000	57.0000	252.5000	48.0000	54.0000	709.0000

NOTE: The A320-211 AEDT aircraft type was used as an FAA-approved substitution to represent the 12 forecast Airbus 320 NEO aircraft; the A321-232 AEDT aircraft was used to represent the 32 forecast Airbus 321 NEO operations.

SOURCE: HMMH Technical Report, Appendix E - Noise, 2020.



Attempt by FAA to formalize nighttime departure

In the early to mid-1980's, the noise levels and contour from Lindbergh Field were huge and extremely impactful on the neighborhoods to the west of the airport. The Port, the City and the FAA agreed to implement temporary changes in the flight paths. A noise abatement program was implemented. Some of the key features of the plan are included in the description below from a 197 document that was obtained by me using a Public Records Request at the Port of San Diego.

The most drastic steps taken include a restricted number of operations, a 30-70 split between the 275 and 295 degree departures, and moving all of the departures post 10 pm to the 295 heading regardless of destination. There is no evidence that the FAA conducted a NEPA or 1050 environmental assessment of the increased noise on the residents under the 295 vector in Loma Portal, Pt. Loma, or in Midway District.

RESTRICTED NUMBER OF OPERATIONS

The number of major (greater than 75,000 lbs.) aircraft jet operations (either landing or takeoff) for the calendar year 1986 shall not exceed 87,000 unless the Board of Port Commissioners expressly consents to additional operations.

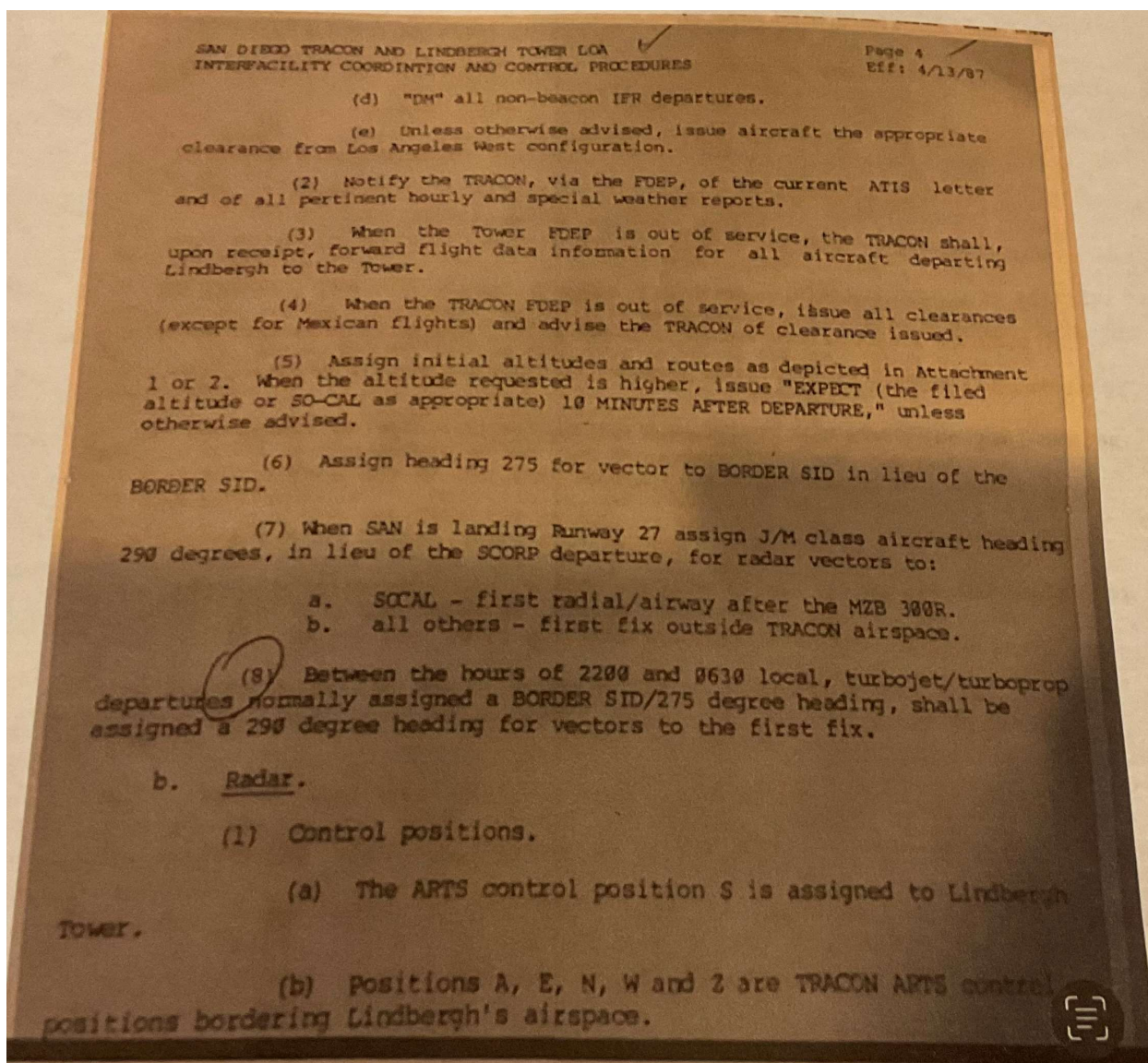
CONTROL OF FLIGHT PATHS AND AIRCRAFT OPERATIONS

Control of aircraft on the ground and in flight is at the discretion of the pilot as regulated by the Federal Aviation Administration (FAA). The prevailing noise abatement operational procedures are expected to be continued unless a more effective means is developed and implemented by the FAA. To achieve the 1986 non-compatible noise impact area, it is necessary that the 1979 flight pattern be maintained (approximately 90 percent departures on Runway 27 of which 30 percent continue straight out, while 70 percent are cleared for a heading of 295 degrees after takeoff; approximately 90 percent arrivals occur on Runway 27 and 10 percent on Runway 9, primarily on the basis of weather conditions).

FAA operational noise abatement procedures are directing all aircraft departing Runway 27 after 10 p.m. to a heading of 295 degrees.

By voluntary agreement, no military operations or practice involving Lindbergh Field are carried out during the nighttime period.

A second document was obtained by PRR that is the letter of agreement between the City and the Port with FAA ATC. Keep in mind these were temporary measures. The restricted number of operations and the 30-70 split on departures were rescinded in the early nineties, but the post 10 pm departures to 295 degrees were illegally maintained.

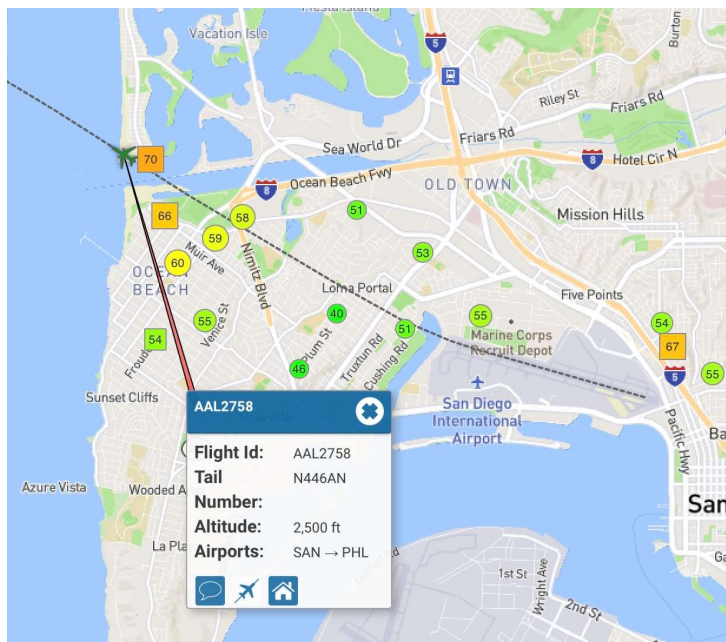


As stated above, the FAA Operational Nighttime Procedure, also referred to as the 290 Nighttime Noise Abatement Agreement, has been in place since the mid to late 1980's without any assessment of the noise impact of this LOA on the residents of Mission Beach. The definition of NEPA is below. There is no statute of limitations mentioned in the definition. It

was illegal when it was implemented and it still is illegal. It is just one more example of the FAA making a mistake and then compounding it.

Legal Definition of National Environmental Policy Act - established a national Council on Environmental Quality to oversee government activities that could affect the environment and required federal agencies to file environmental impact statements before taking any major action. The law was intended to help “maintain conditions under which man and nature can exist in productive harmony” and, as such, has been labeled by the courts an “environmental full disclosure law.” It has often been left to the courts to rule on the accuracy of impact statements that have been contested by environmental or neighborhood groups.

The FAA Operational Nighttime Procedure is not a procedure at all. Departures to the Midwest and East that typically use a ZZ000 SID departure. For departures after 10 pm, pilots still file a ZZ000 departure, but are directed by ATC to turn right to 290 degrees after achieving a specified altitude. As you can see in the picture below, the right turn to 290 degrees takes the aircraft over South Mission Beach, nominally only a short distance south of where PADRZ crosses the coast. This subjects the residents of Mission Beach to one-hundred percent of the post 10 pm departures. This is incredibly unfair and disruptive to the residents of Mission Beach.



Legal Definition of National Environmental Policy Act - established a national Council on Environmental Quality to oversee government activities that could affect the environment and required federal agencies to file environmental impact statements before taking any major action. The law was intended to help “maintain conditions under which man and nature can exist in productive harmony” and, as such, has been labeled by the courts an “environmental full disclosure law.” It has often been left to the

courts to rule on the accuracy of impact statements that have been contested by environmental or neighborhood groups.

While our group hopes that you and the FAA reassess the decision to move the post 10 pm departures to Mission Beach, we feel comfortable that we would prevail in the courts if forced to protect our community.

Summary

Mission Beach does not have a lot of voters and therefore little leverage when it comes to political decisions. In the 1980's, the noise conditions on the neighborhoods to the west of the airport were so adverse that it is likely that even Mission Beach residents agreed to the temporary changes to the distribution and to the nighttime move over Mission Beach. But, it is also very likely that this change was agreed to as a temporary measure that did not require a NEPA. However, no one in Mission Beach would have agreed to one-hundred percent of the post 10 pm over our community. And no one in Mission Beach agrees to this change now!

There needs to be an independent assessment of both the nighttime noise abatement agreement (FAA Operational Nighttime Procedure) and the FAA Part 150 Study 2018 operational data.

Reince Tyler

Subject: FW: Noise Abatement Strategies for SDIA at or near Capacity.

From: Gary Wonacott <gwonacott@hotmail.com>

Sent: Thursday, October 6, 2022 7:42 AM

To: SDCRAA clerk <clerk@san.org>

Subject: Noise Abatement Strategies for SDIA at or near Capacity.

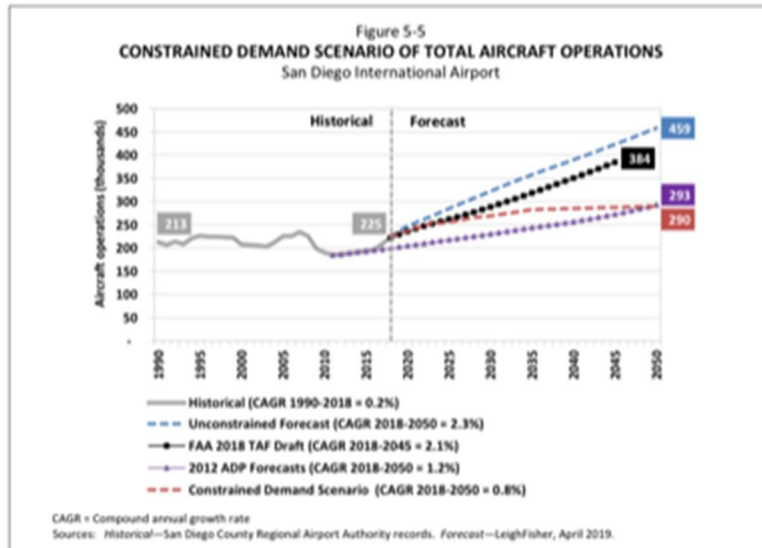
There were several analyses performed in the Part 150 that addressed operations capacity at SDIA. These studies were performed prior to the pandemic; I believe it was reported that we are now back to about 90 percent of pre-pandemic numbers operations. It appears that the curve has moved to the right by between two and three years. It appears at the current rate of operations increase, that the airport will reach capacity between 2030 and 2035. The number of enplanements will continue to increase.

First piece of information of interest is the difference between constrained and unconstrained number of operations and the financial impact on the County of San Diego. In 2018, SDIA contracted for a financial impact assessment that showed about \$14B annual benefit to the County from all sources due to SDIA operations. About \$9B of the total was associated with the number of operations. It can be inferred that the County will lose about \$6B annually by the constrained airport.

Secondly, as the airport approaches and reaches capacity, it would seem that this would open up new noise abatement strategies such as are described in the 1983 letter included. It seems that at some point, options open up for noise abatement that do not interfere with interstate commerce. These dates are not that far off. Perhaps it makes sense for the Airport Authority to stand up a committee to explore different strategies given the potential for airport capacity.

Please distribute before next ANAC meeting in December.

Gary Wonacott



5.5 Aircraft Fleet

Table 5-2 and Figure 5-6 present the passenger airline fleet mix at SDIA for 2017, 2018, and for the constrained demand scenario years (2023, 2028, 2033, and 2050) in terms of the number and percentage of annual passenger airline aircraft operations.

Done

No matches ^ v



DEPARTMENT OF TRANSPORTATION

DIVISION OF AERONAUTICS

122 "N" STREET
SACRAMENTO, CA 95814
(PH) 222-3090



July 8, 1983



Mr. Don L. Nay
Port Director
Port of San Diego
P. O. Box 488
San Diego, CA 92112

Dear Mr. Nay:

Please refer to your letter of March 10, 1983 in which you requested clarification of three items required of you in Condition 4 of the current variance decision for the San Diego International Airport (Case No. L-23495).

Your first question requested clarification of whether it is the intent of this Department to begin slot allocation for your airport as is being done elsewhere by the Federal Government. First of all, let me put aside any concern you may have that this Department intends to require slot allocation at this time. It is our view that insufficient information was presented during the course of the public hearing to formulate a policy or a requirement for the allocation of air carrier slots based upon noise considerations. Condition 4 includes the requirement for the development of additional information in this area. It should not be interpreted as an indication of this Department's intent other than to explore in greater depth the feasibility, practicality, legality, costs, and usefulness of such a concept.

After reviewing the information that was presented during the hearing, the Department recognized the need to explore these specific areas in greater depth. The areas in Condition 4 for which you seek clarification are intended to bring about the development of specific information which may be used in the future toward accomplishing a responsible evaluation of the concept of slot allocation based upon noise considerations.

Actually, these same responses apply to the subjects of Instituting Noise-Based Landing Fees and the Establishment of a Noise Budget for Aircraft Operations which are Items 2 and 3 in your request for clarification. This Department is not predisposed with regard to any of these concepts for controlling noise emission levels. Additional information is necessary in each of these areas prior to determining whether they are suitable and reasonable for implementation at the San Diego International Airport.

Reince Tyler

Subject: FW: Are there more options when SDIA is at or near capacity

From: Gary Wonacott <gwonacott@hotmail.com>

Sent: Thursday, October 6, 2022 8:07 AM

To: SDCRAA clerk <clerk@san.org>

Subject: Are there more options when SDIA is at or near capacity

Please distribute to ANAC Committee.

Could the curfew be moved 15 or 30 minutes back without impacting interstate commerce? If by decreasing the total operating hours for the day, it is likely that there could be some flights impacted. Don't the airlines just make changes to bring the airport back to capacity.

EXCERPT OF MINUTES OF JUNE 5, 1979
OF THE BOARD OF PORT COMMISSIONERS
OF THE SAN DIEGO UNIFIED PORT DISTRICT

LINDBERGH FIELD-
AIRPORT CURFEW REGULATIONS

Chairman Bowler stated that the City Council of San Diego had just taken a vote on a recommendation concerning the airport curfew for Lindbergh Field. He asked Councilman Bill Lowery to report the action of the Council. Councilman Lowery informed the Board that the City Council, with one dissenting vote and two members absent, voted six to one to approve a resolution urging the Port Commissioners to extend the curfew at Lindbergh Field one hour, 30 minutes at each end, resulting in a curfew from 11:30 p.m. to 6:30 a.m.; that the existing regulations regarding Part 36 aircraft (aircraft that meet the Federal Noise Standard into the mid-1980's) continue in effect; and that a grace period of 15 minutes be granted at each end of the curfew for planes that are either ready to take off or in the approach flight pattern.

It was moved by Commissioner Smith and seconded by Commissioner Wolfsheimer that the Board adopt a curfew extension in the same manner that the City of San Diego has recommended, calling for an extension of one hour, 30 minutes at each end, from 11:30 p.m. to 6:30 a.m.; with a 15-minute grace period to be granted only for planes that are scheduled to take off or land before the curfew and that the planes taking off during the grace period should be loaded and ready to go by 11:30 p.m.; that the FAR Part 36 regulations would apply only to landing aircraft; and that these regulations are to take effect in 90 days, and these regulations are to be distributed in the meantime to the Federal Aviation Administration and other interested agencies. Commissioner Ruehle moved that the motion be amended to change the 11:30 p.m. time to 12:00 midnight. The motion was seconded by Commissioner Creaser, but failed for lack of a majority affirmative vote, the vote being as follows: Yeas-Bowler, Creaser and Ruehle. Nays-Cohen, Leyton, Smith and Wolfsheimer. The original motion was adopted by the following vote: Yeas-Cohen, Leyton, Smith and Wolfsheimer. Nays-Bowler, Creaser and Ruehle.

I HEREBY CERTIFY that the foregoing
is a true and authentic copy of the
original thereof.

WILLIAM R. HUNT, Clerk
San Diego Unified Port District

By Sally Lombardo
Deputy Clerk

Date JUN 18 1979

Reince Tyler

Subject: FW: Input to ANAC members
Attachments: Input to ANAC October 2022.pdf
Importance: High

From: Gary Wonacott <gwonacott@hotmail.com>
Sent: Tuesday, October 18, 2022 9:12 PM
To: SDCRAA clerk <clerk@san.org>
Cc: gloria Henson <glohenson@san.rr.com>
Subject: Input to ANAC members

Please distribute to ANAC members prior to the next ANAC meeting.

14 October 2022

Let me begin with a few comments. Each of you on this ANAC represents constituents who are being affected by the aircraft noise from SDIA. I would think that part of your responsibility would be to disseminate what you are learning back to your communities. I would hope that the Airport Authority Noise Abatement Office would provide you some help if you are not familiar with websites and such. Also, I think the Noise Abatement Office should inform the ANAC members of an annual symposium, typically attended by the Noise Abatement Office personnel. There are a number of presentations describing noise abatement measures being evaluated at other airports as well as the latest in aircraft noise disruptions and their effect on health issues.

Aviation Noise & Emissions Symposium

Ready to attend the Aviation Noise & Emissions Symposium? We will use an online platform called Whova for our event. Attendees will be able to ask questions of presenters through this app as well as connect with other in-person and virtual participants. You can [Download the Whova Mobile App or Access It From the Web Platform on Desktop](#):

2022 Session List:

- **Keynote: Designing for a sustainable future of aviation**
- **Session 1 - New Entrants and Technology: Urban Air Mobility**
- **Session 2 - What is "Meaningful" Community Engagement?**
- **Session 3 - How Airports Can Work with Their Communities on Noise Abatement Procedures**
- **Session 4 - Noise Metrics and Impacts: Thinking Beyond DNL**
- **Session 5 - Health Effects of Noise – From Local to National; Three Perspectives on Research, Legislation, and Implementation**
- **Session 6 - Climate Change and Aviation – Pathways to NetZero**
- **Session 7 - Aviation Emissions: Reduction Efforts and Current Research**

Last year there was a very valuable session that related aircraft noise to various health problems, including vascular, cardio, and so on. For the first time, direct cause and effect relationships

were presented between aircraft noise disruption and health. I personally believe that the ANAC should subsidize its members, or at least one member, who wants to attend and can report back to the other members. This leads me to a new topic, the portable noise monitoring equipment.

The aircraft noise outside of your house if you live in the 70 dB contour has far less to do with your health than the noise levels inside your house. I would suggest that at least some of the portable noise monitor plans include collection aircraft noise levels inside your house.

Next, I would like to suggest that your first priority should be to review the Title 21 quarterly noise reports to the State of California. There is unique information provided that you will not see in the ANAC reports. Also, most of us are lay people when it comes to aircraft noise and its effects on people. The ANAC quarterly reports cover a lot of ground. Unless you are like our Mission Beach representative who was on ANAC for 12 years, your shorter tenure will make it difficult to come up to speed on all aspects. I would suggest that you focus your time on one issue or another. I would like to see someone focus on the Fly Quiet Program beginning with the benefit that is supposed to come from it. I personally believe there are better approaches.

The current FQP uses the FAR Part 36 formula to quantify the noise contribution of a specific aircraft type. All aircraft go through the Part 36 process that quantifies its noise levels upon approach, its sideline noise levels, and its flyout noise levels. It also includes a step that decreases the average noise level depending on the gross weight of the aircraft. The idea is that an aircraft with a larger gross weight should not be penalized because it is carrying more passengers or cargo even though it might be far more disruptive to the communities surrounding the airport. Also, the noise levels are normalized so airlines are not penalized for flying many more 737-800s each quarter. I believe that if an airline has many more operations at SDIA, and it is flying loud aircraft, then this information should be provided to the ANAC. We should be providing information to the public that rewards airlines that fly more newer, quieter aircraft, particularly during the most disruptive nighttime hours. Perhaps a committee could be formed to look into this issue.

I reviewed the Title 21 Q2 report for 2022 and found some new language not in previous reports (see underlined sentences in *italics*). Personnel in the noise mitigation office admitted that they had not used the noise monitoring system previously even though the State of California required this system to be used. While the language in the report implies the NMS was used to potentially adjust the 65 dB CNEL contour development (see Figure 1), there is no description of how it was used.

Given recent history when the Airport Authority published erroneous contour data, I don't think it is asking too much for the Authority to go above and beyond in the Title 21 reports. If the NMS was used to adjust the 65 dB CNEL contour, then the details of this adjustment should be included in the report. This should include a detailed description of which noise monitors were used and the degree of adjustment associated with each of the noise monitors.

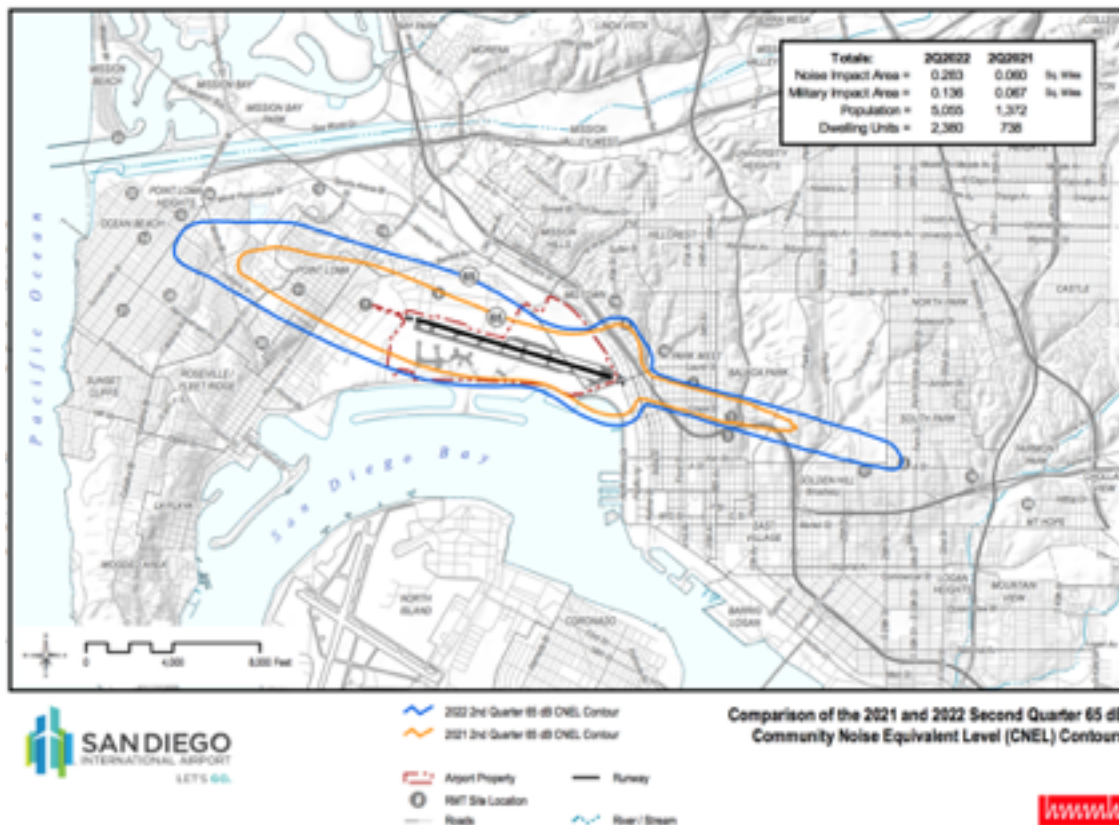
In addition, I previously called for the noise abatement office to enhance their 65 dB CNEL contour with a relatively fine grid system added that encompasses all of the noise monitors.

CNEL values should then be provided for each of the grid points. This will allow the ANAC members to compare the noise monitor values with the contour published.

“Using data generated from the Airport Noise and Operations Monitoring System (ANOMS) and Geographic Information System (GIS), the Airport Noise consultant Harris, Miller, Miller & Hanson Inc.’s (HMMH) developed the Noise Contour and determined the current Noise Impact Area (N.I.A.) and the Federal Military Impact Area (F.M.I.A.).

Noise Contour The Noise Contour on the subsequent page is prepared for the Airport Authority by their consultant HMMH Inc., using their RealContours for Aviation Environmental Design Tool (AEDT) software. AEDT is a state of the art software system that models aircraft performance in space and time to estimate fuel consumption, emissions, noise, and air quality consequences. The extents of the contours are adjusted based on actual noise measurements from permanent noise monitors to meet Section 5032 of the California Noise Standards.”¹

Figure 1 Title 21 Q2 65 dB CNEL contour



¹ Quarterly Noise Report For the California Department of Transportation Second Quarter – Calendar Year 2022, San Diego International Airport, Air[port Noise Mitigation, Aircraft Noise Mitigation September 23, 2022.

As I have mentioned previously, my analyses showed that the Part 150 Study incorrectly published a 65 dB CNEL that is too small by one square mile. This is compared to the 65 dB CNEL that was published in the 2018 Title 21 report. The data in Table 2 identifies what is believed to be the explanation for the disparity in the 22:00-6:59 column. The 11.1 operations for the Part 150 study baseline contour is completely inconsistent with all of the other data shown. Perhaps the Airport Authority can provide an explanation.

Table 1 Comparison of input data for 65 dB CNEL calculation

				Times of day				
Total	7-18:59	19:00-21:59	22:00-6:59	7-18:59	19:00-21:59	22:00-6:59	Total operations	Contour area (squaremiles)
Title 21 2018 Q4	191	52	42	211	42	34	572	5.0
Title 21 Q2 2022	168	43	36	182	35	33	503	3.92
Part 150 2018	213	55	40.6	243.9	53.9	11.1	618	3.86

As I have stated previously, I have a portable noise monitor that I have set up mainly in Mission Beach and operated for 24 hour periods.

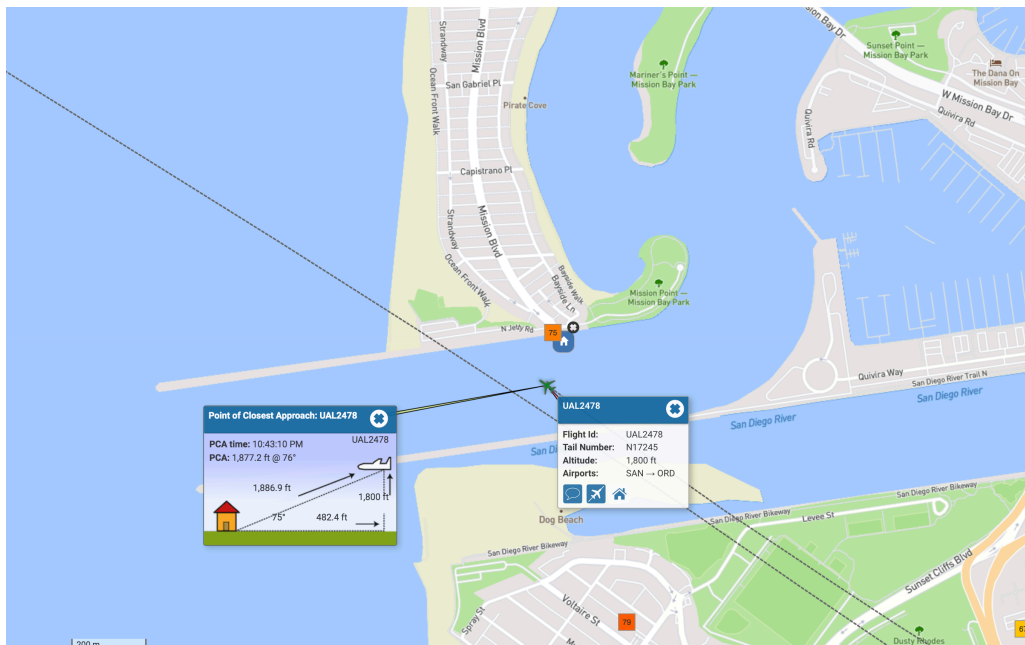
Another important issue is the number and placement of the NMS in Mission Beach. A while back, Ms. Knack indicated that she would add at least one more noise monitor to Mission Beach related to the FAA Satellite Navigation System implementation. I would suggest moving the one at the end of Mission Blvd at the jetty and adding two more.

Satellite navigation implemented in 2017 had the effect of concentrating the flight tracks on the PADRZ SID. Representative tracks are shown in Figure 2 for PADRZ SID departures. The other even more devastating departure, the post 10 pm FAA Operational Nighttime Procedure is shown in Figure 3. It is recommended that a noise monitor be added in the park area on the oceanside. It is also suggested that a noise monitor be added near Capistrano and Ocean Front Walk. Before permanent monitors are added, it might make sense to use the portable monitor to make measurements to ensure that the monitors are necessary.

Figure 2 Typical PADRZ SID departure tracks



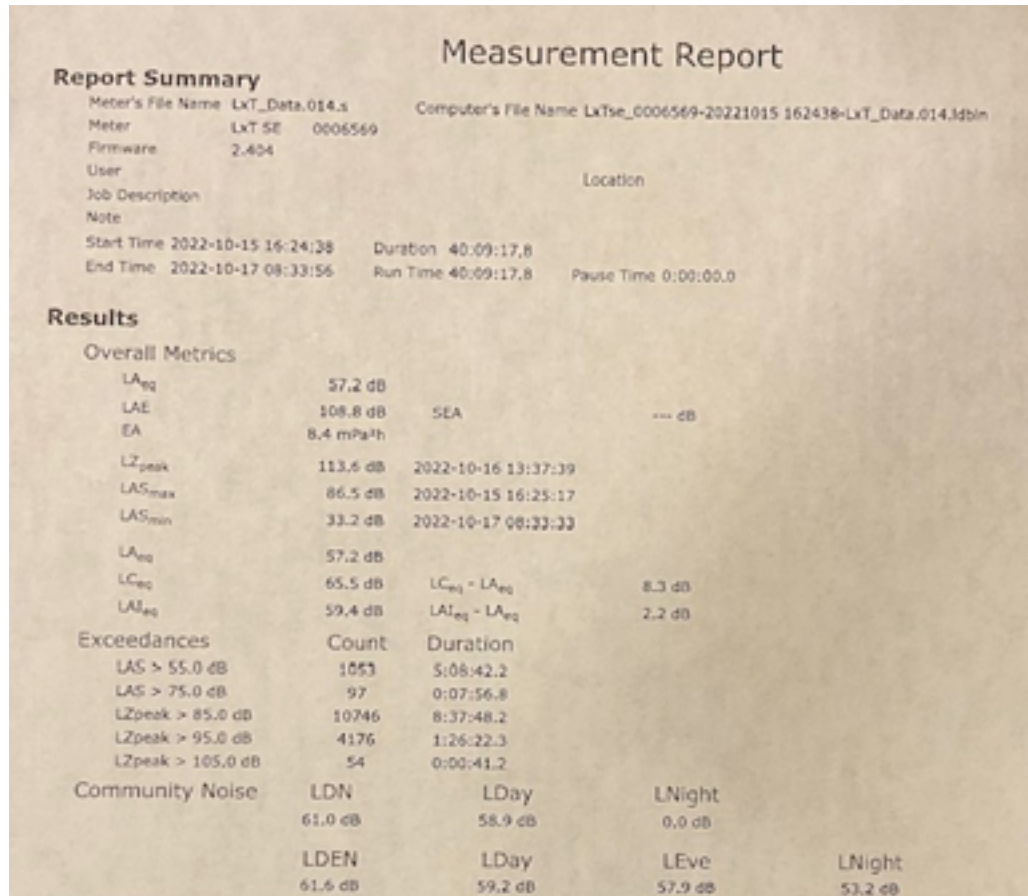
Figure 3 Typical FAA Nighttime Noise Abatement Procedure



Lastly, I set up my Larson Davis portable noise measurement device, LxT model and made measurements on my 3rd story deck for a little more than 40 hours. The community noise levels are summarized in Figure 4. Note the community noise level values for day, evening and night. The fact that the measured values are so large raises into question the validity of the 65

dB CNEL noise contour. More study will be required of the night value to understand why it is so small. Also, I believe the aircraft tags in Webtraks use to show the aircraft type, but no more. Now this very useful piece of information has been replaced by the tail number. If anything, both the aircraft type and the tail number should be included.

Figure 4 Summary of noise data measured using Larson Davis LxT



The results from the portable noise monitor test for two important time periods to the South Mission Beach residents is shown in Figures 5 and 6. The magnitude of these noise levels is very high and extremely disruptive to sleep. We are not claiming these noise levels are greater than the ones in Loma Portal especially for the post 10 pm departures (see Figure 7).

Figure 5 Portable noise measurements in South Mission Beach – 2200 to 2330

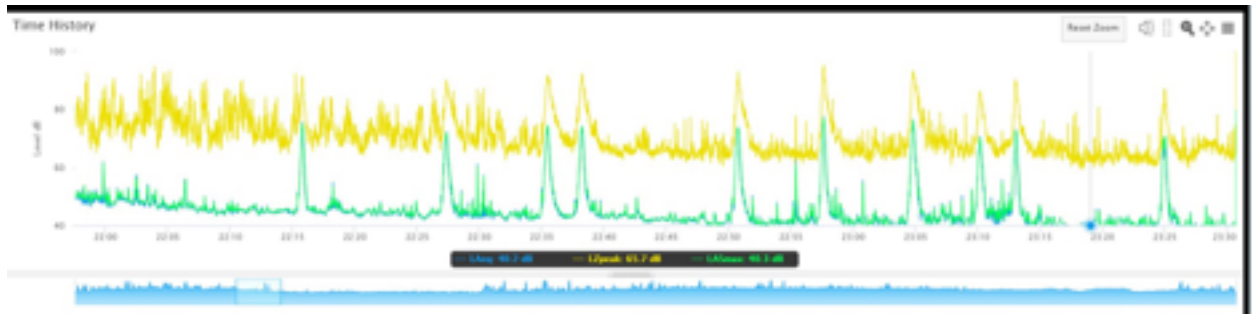


Figure 6 Portable noise measurements in South Mission Beach – 0630 to 0700



Reince Tyler

Subject: FW: Use of Noise Monitor System to enhance the accuracy of the 65 dB CNEL contours
Attachments: Doc2.pdf

From: Gary Wonacott <gwonacott@hotmail.com>

Sent: Tuesday, October 25, 2022 8:21 AM

To: SDCRAA clerk <clerk@san.org>

Cc: gloria Henson <glohenson@san.rr.com>; lengross@san.rr.com; Anthony Stiegler <stiegleranthony@gmail.com>;
cathy ives <cathy.ives@gmail.com>; Larry Webb <lwebb2828@gmail.com>

Subject: Use of Noise Monitor System to enhance the accuracy of the 65 dB CNEL contours

Please distribute to the ANAC members prior to the December meeting.

25 October 2022

It has become clear that the Airport Authority has not complied with the State of California Dept of Transportation Title 21 requirements to use the Noise Monitor System (NMS) to obtain the most accurate contour extents. And it is still not clear whether noise monitor data was used in the most recent Q2 Title 21 report even though a sentence has been added that states that the noise monitors were used. These analyses described below suggest that the noise monitors have not been used.

Below I have extracted a couple paragraphs from the Airport Authority 2022 Title 21 Q2 quarterly report and highlighted in bold the specific sentence that claims that the noise monitors were used to adjust the contours. But then there is no discussion describing the procedure used to adjust the contours. Given this is the first report in the last 10 years where there is any mention of using the noise monitors, it seems more than a little strange that there is not some discussion.

But, then in the next paragraph, a statement, also highlighted in bold below, is made that seems incongruous with the idea that noise monitors were used to adjust the contours. It states that good agreement was found at several key measurement locations. I also found good agreement at several locations, but then also found at several locations the differences between measured and calculated greater than 1.5 dB, shown in red in Table 1 below.

I also reviewed Title 21 reports from Hollywood Burbank that included statements describing how they adjusted the contours using the noise monitors that began with calculating a fine grid of CNEL values included in the report. I had previously requested that this grid be included in the SAN Title 21 reports.

It just seems like more double-talk from the San Diego Airport Authority. If they actually used the noise monitors to adjust the contours, they should describe the methodology and include the grid of CNEL values.

“The Noise Contour on the subsequent page is prepared for the Airport Authority by their consultant HMMH Inc., using their RealContours for Aviation Environmental Design Tool (AEDT) software. AEDT is a state of the art software system that models aircraft performance in space and time to estimate fuel consumption, emissions, noise, and air quality consequences. **The extents of the contours are adjusted based on actual noise measurements from permanent noise monitors to meet Section 5032 of the California Noise Standards.**

The use of GIS technology allows for direct counting of individual parcels within the Noise Contour. The modeling methodology fulfills the requirements of the State of California, Title 21, California Noise Standards. **A review of measured and modeled noise levels indicate good agreement between several key measurement locations.”**

I have also included below the 65 dB CNEL from the Title 21 report. I used Sketch and Calc to calculate the area of the whole contour in Figure 1 at 3.88 square miles. I used a variety of data from the Title 21 report and the FAA AEM software to calculate the values of CNEL at each of the noise monitors, which were then compared to the measured noise monitor values. The input data and the results are shown in Table 1.

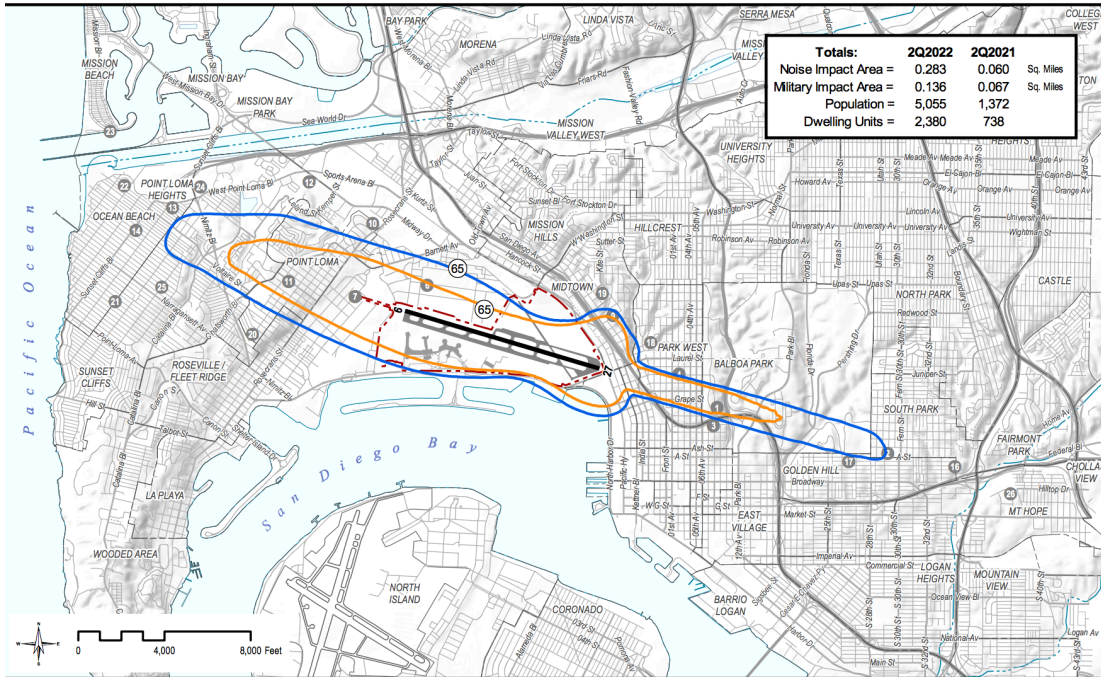
I used the methodology we developed in the student study last academic year to, first quantify the CNEL values at the noise monitor locations and then estimate the effect of the differences on the 65 dB area. I only performed this assessment for the noise monitors to the west of the runway. Based on this limited assessment, I found that that noise monitors to the southwest, 21, 25, and 20 indicate that the contour is too large in this area and that the noise monitors 7 and 11 indicate that the contour is too small in this area due west of the runway. The rest of the noise monitors were reasonably close.

Table 1 Analysis of noise monitor data

Noise Monitor #	Distance from ref.	65 contour	60 contour	70 contour	75 contour	Noise values from rpt	Noise value at NM	Modified area	Delta Noise Monitor and Noise value at NM
24	15089	13378	23679.06			63.4	64.2	3.38	-0.7695029
23	20026	12761	22586.97			61.6	61.3	4.08	0.29683604
13	15916	14163	25068.51			64.9	64.2	4.48	0.70372216
14	17090	14026	24826.02			63.6	63.6	3.88	0.01851589
25	15385	10941	19365.57			60.2	62.4	5.68	-2.1624767
21	17447	9186	16259.22			56.6	59.2	2.56	-2.5603683
20	11111	7814	13830.78			60.2	62.3	2.73	-2.0601624
12	10958	7010	12407.7			60.9	61.3	3.65	-0.4428868
10	7578	6286	11126.22			63	63.7	3.44	-0.6653499
11	9753	13602	24075.54	8527		70.5	68.8	5.52	1.73773679
7	6664	8856	15675.12	8941	4524	74.2	72.6	5.52	1.62245868
						Average of all areas =		4.08363636	

In my experience, general purpose programs like AEDT are reasonably accurate, but they are attempting to replicate very complex physics phenomenon, and they are using average values for the input. In addition, the FAA is requiring that the same assumptions and modeling approach be used at every airport. This requirement for consistency from airport to airport further compromises the accuracy at each airport to some degree. The State of California Department of Aeronautics and the FAA both recognize this issue and both allow noise monitors to be used to adjust the calculated contours. The State goes further and requires that contours be used. The FAA just does not allow the noise monitor data to calibrate the AEDT model. I believe it is time that the Airport Authority elevate the importance of the noise monitors in the 65 dB CNEL contour calculation, which will result in more accurate values for the incompatible noise areas and therefore the eligible homes for the QHP.

Figure 1 2022 Q2 Title 21 65 dB CNEL

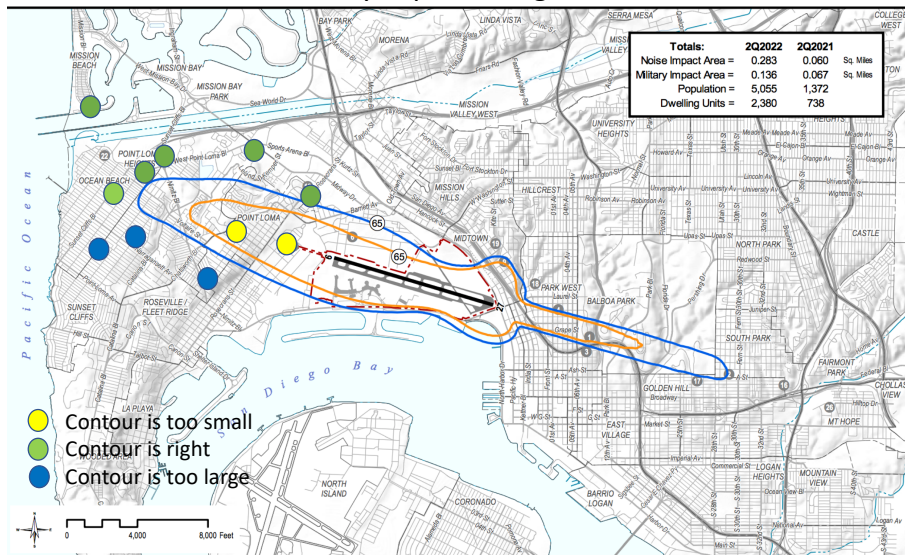


— 2022 2nd Quarter 65 dB CNEL Contour
— 2021 2nd Quarter 65 dB CNEL Contour

Comparison of the 2021 and 2022 Second Quarter 65 dB Community Noise Equivalent Level (CNEL) Contours

Figure 2

In my experience general



● Contour is too small
● Contour is right
● Contour is too large



— 2022 2nd Quarter 65 dB CNEL Contour
— 2021 2nd Quarter 65 dB CNEL Contour

Comparison of the 2021 and 2022 Second Quarter 65 dB Community Noise Equivalent Level (CNEL) Contours

— Airport Property
— Runway
● RMT Site Location
— Roads
— River / Stream



Reince Tyler

Subject: FW: Letter to ANAC November 2022
Attachments: Letter to ANAC November 2022.pdf

From: Gary Wonacott <gwonacott@hotmail.com>
Sent: Monday, November 14, 2022 8:04 AM
To: SDCRAA clerk <clerk@san.org>
Cc: Larry Clark <lctravel@san.rr.com>; jtw@american-design.net; Debbie Watkins <dkwatks@aol.com>; Knack Sjohnna <sknack@san.org>; Reed, Brendan <breed@san.org>
Subject: Letter to ANAC November 2022

Please distribute to ANAC members before the next meeting. Please advise if you are not distributing to the ANAC members.

Gary Wonacott
Mission Beach

3 November 2022

To: ANAC members for December 2022 Meeting

It is not clear what the mission of the ANAC members is every three months in 2022. What do the members learn at these meetings they could not learn by reviewing the material provided by the Airport Authority at home. It just seems that the original objective(s) of this group has been lost. I would like to think that the materials in this paper might benefit Mission Beach, but Ms. Henson, the MB representative is hand picked and completely controlled by Debbie Watkins.

So, my main objective is to put some ideas out there for your consideration, review and comment. This is not my area of expertise, so any feedback will help me to learn more about this subject. In this paper I raised an issue about the CNEL as a measure of impact on resident quality of life and health, identified a different impact from the 11 new Terminal 1 gates, and assessed the need for adding new fixed noise monitors in Mission Beach. This latter objective can be evaluated by adding portable noise monitors around Mission Beach determining if there is a substantial drop-off in the Lmax values compared to NM#23.

LARSON DAVIS LxT PORTABLE NOISE MONITOR REVEALS INTERESTING CNEL INSIGHTS

When you operate the Larson Davis portable noise monitor yourself, you have access to the raw data as well as the approach used to calculate the Community Equivalent Noise Levels (CNEL). Casey Schnoor some time ago raised his objections to the sole use of the 65 dB CNEL, and I along with many others think for good reason.

I did some calculations and found that averaging the total noise over 17 hours instead of 24 not surprisingly made an important difference. But there is another aspect of this averaging calculation that is even more important. Instead of summing the weighted numbers for the entire 24 hours and then adjusting it for 17 hours, I should have taken each of the cumulative measurements for 7 am to 7 pm and divide by 12 hours, then the measurement for evening with the 3 dB added, divide by 3 hours, and lastly, the nighttime measurement with the 10 dB penalty added and divided by 8.5 hours. The last step is to add the logarithms for the three time periods together. As it turns out, dividing the cumulative noise for the two hours of nighttime by 8.5 hours effectively negates the penalty. Perhaps the airport authority could run some examples for the ANAC members quantifying this effect. Clearly, the CNEL does not reflect the disruption in sleep and quality of life that residents experience.

The plotted values in Figure 1 are the approximated area in square miles contributed by one departure to the 65 dB CNEL using the FAA AEM tool. While there is a substantial range of noise levels from aircraft to aircraft, there is even more sensitivity of the noise level to the altitude of the aircraft at flyover. This effect is shown in Figure 2 for NM#23(jetty at South Mission Beach). Suffice it to say, we would be a lot better off if quieter aircraft departed at higher altitudes. Another factor that is not considered is the aircraft thrust level, which is considered in the NADP assessment. The bottom line to all of this is that the Community Noise Equivalent Level is severely lacking as a measure of the health and quality of life impact on the residents. My personal favorite would be to establish limits on number of single event thresholds exceedances for health and quality of life.

IMPACT OF TERMINAL 1 NEW GATES

A second point that I would like to make relates to the potential impact of the new T1 gates on the level of resident disruption. If anyone has seen a picture from Flightradar24 at 6:15 in the morning, not at London Heathrow, but at SDIA, you will see a substantial traffic jam on the taxi-way. Beginning at 6:30 am, there is a constant stream of aircraft departures about one and a half minutes apart that is limited by the number of aircraft stored overnight. The aircraft that come into SAN that are stored overnight is limited by the number of gates. Eleven more gates allows 11 more aircraft to be stored, and the next morning increases the continuous stream of aircraft departures that much longer and

later into the morning. This problem is I believe exacerbated by the type of aircraft stored overnight based on their noise levels.

Figure 1 Relative noise levels of aircraft departing between 6:30 and 7 am

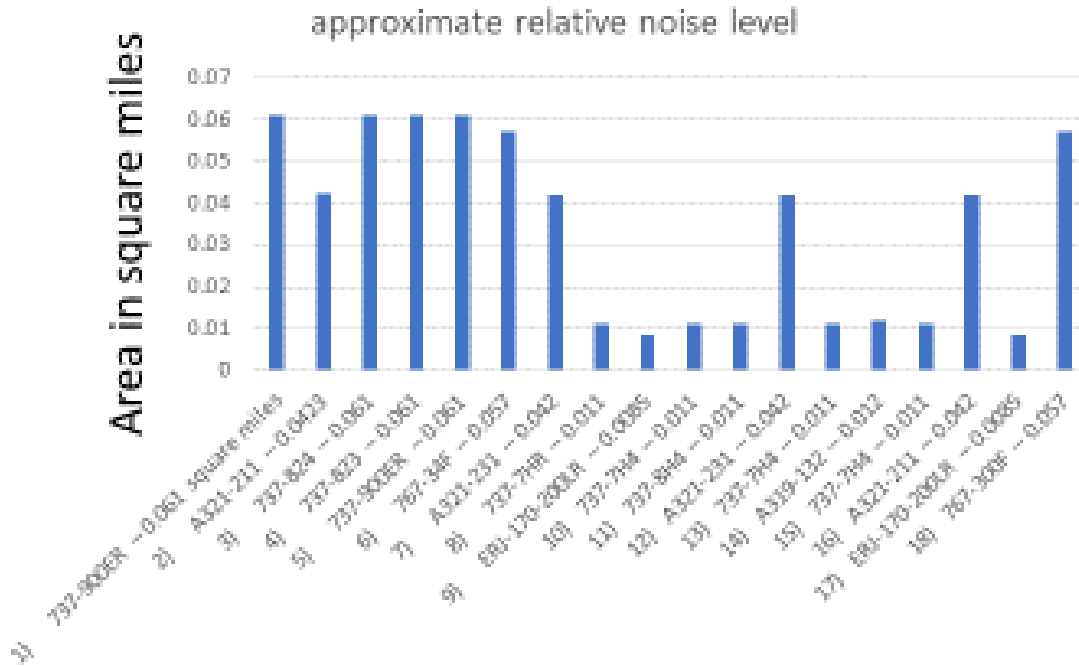
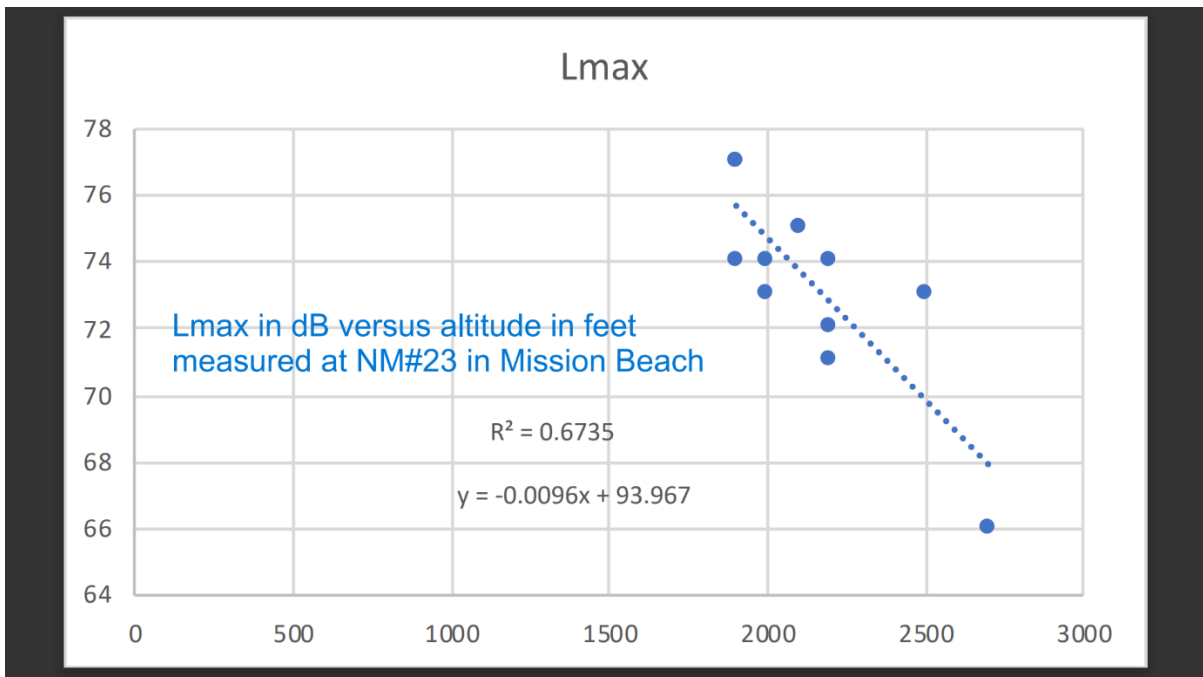


Figure 2 Sensitivity of noise level to altitude at NM#23



ASSESSED THE NEED FOR ADDING FIXED NOISE MONITORS IN MISSION BEACH

There is currently and for some time one fixed noise monitor in Mission Beach, after the Airport Authority removed several others based on the explanation by the Airport Authority Noise Abatement Office that they were removed because the aircraft noise could not be differentiated from the ambient noise levels. I don't completely disagree, but they could begin by moving NM#23 at the jetty that is currently exposed to large numbers of loud trucks and motor-cycles. I am fairly sure that with the implementation of the FAA satellite navigation system, the concentration of noise justifies more than one noise monitor in South Mission Beach.

To demonstrate that the Aircraft Authority explanation for removal of all but one monitor is flawed, the LxT portable noise monitor will be used to measure the noise levels at multiple locations in South Mission Beach each time moving the noise monitor further north. The objective is to prove that indeed the noise levels are loud enough to differentiate from ambient noise, suggesting the need to add fixed noise monitors. It is believed that this could have an impact on the size of the penetration of the 65 dB CNEL into South Mission Beach. The majority of the runs focused were initiated at about 4 pm and data was collected until about 10 the next day. The measure of merit is the single event Lmax value.

So far, two locations have been measured and analyzed (see Figure 3), Avalon Court and Brighton Court. An issue specific to Mission Beach is the addition of more noise monitors promised by Ms. Knack to the previous ANAC representative from Mission Beach. The picture in Figure 3 shows the Airport Authority fixed NM#23 at the south end of Mission Blvd. The red line, 1064 feet north of the NM#23, is the Avalon Court measurement location. The blue line is 1333 feet north of NM#23 to a location on Brighton Court. These two locations coincide with the noise data plotted in Figures.

Figure 4 is an output from the Larson Davis portable noise monitor located on Avalon Court covering the time period from 6:30 am to 7 am on October 16. There are 18 departures with six on ZZOOO and the rest on PADRZ. Note that the departures on PADRZ are all very loud with a number of the peaks exceeding 70 dB (Lasmax only). But in any case, there is little to no respite, except when there is/are arrival(s).

The Lasmax data between the LxT and Webtrax NM#23 is directly compared in Table 1. As can be seen, the LxT measurements consistently exceed the NM#23 for the PADRZ departures, but are less than NM#23 for the ZZOOO departures. There are two possible explanations for the lower values for the ZZOOO departures. The LxT monitor is between 900 and 1,000 feet farther from the aircraft compared to the NM#23 for the ZZOOO departures, but it is also possible that the third story structure partially blocked sound for the LxT monitor.

The information included in the table include the event number, the time when the Lmax occurred, the Webtrax and LxT maximum values, the time difference between departures when the Lmax values are measured, and the delta noise level between the NM#23 and the LxT measurement.

On average there is about 1.67 minutes separating the flights when the peak measurement are made. But some of the departures are as short as 30 seconds apart. Given the lines of aircraft on the taxiway at 6:30 am, there is clearly pressure on the FAA/ATC to launch as many aircraft as fast as possible on runway 27. I mean, if this was an aircraft carrier trying to launch aircraft as fast as possible, then there would be no question, but these are commercial departures. Typically, pilots are very conservative, so it begs the question whether launching aircraft does not raise some safety concerns. This is not an Airport Authority issue, so I will forward the data to the FAA safety office.

Figure 3 (a) Red line is 1065 feet and 314 degrees heading; (b) Blue line is 1,337 feet and 337 degrees heading and c) green line is 1,766 feet and 345 degrees from NM#23

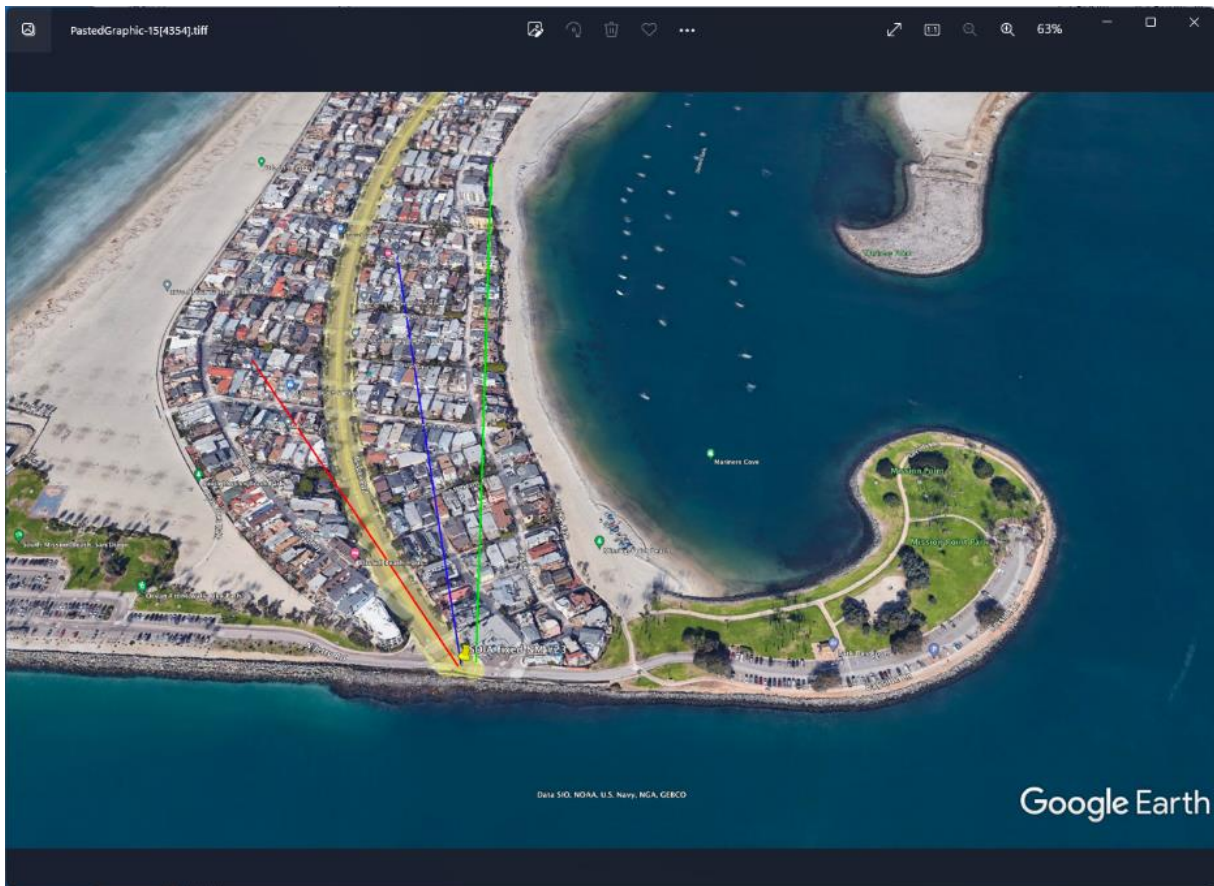


Figure 4 Early morning data (6:30 to 7 am) collected on Avalon Court on 10/16/2022

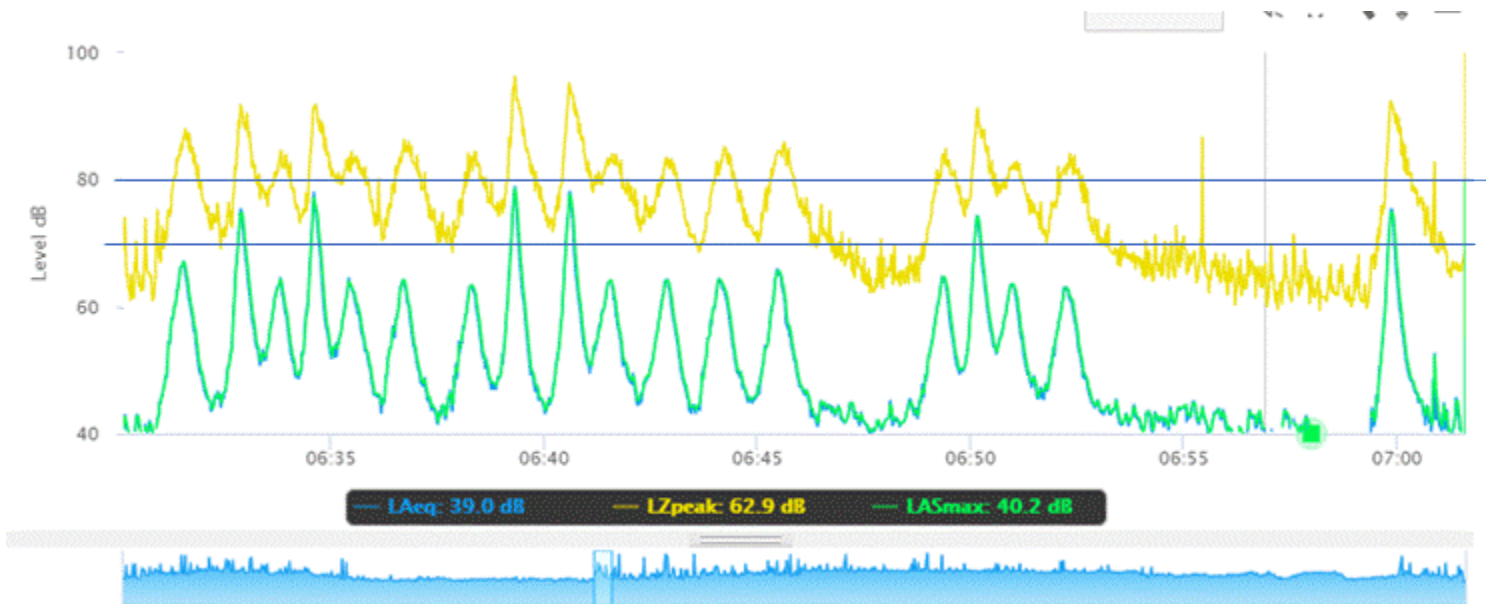


Table 1 Comparison on 10/16 of LxT measured values at Avalon Court and NM#23 Lmax values

October 16, 2022 Avalon Court					
Event	Time	Lmax dB		Time between measurements	Delta Noise level in dB
		Webtrax #23	LxT Avalon		
1	6:31:33	71	67.2		3.8
2	6:32:55	74	75.2	0:01:22	-1.2
3	6:34:06	69	64.5	0:01:11	4.5
4	6:34:36	75	77.4	0:00:30	-2.4
5	6:35:25	67	65	0:00:49	2
6	6:36	68	64.4	0:01:17	3.6
7	6:38:19	68	63.5	0:01:37	4.5
8	6:39:19	77	78.7	0:01:00	-1.7
9	6:40:37	76	78	0:01:18	-2
10	6:41:34	68	64.3	0:00:57	3.7
11	6:42:54	67	64.3	0:01:20	2.7
12	6:44:06	68	64.4	0:01:12	3.6
13	6:45:29	69	65.9	0:01:23	3.1
14	6:49:22	69	64.9	0:03:53	4.1
15	6:50:10	73	74.3	0:00:48	-1.3
16	6:51:01	67	63.6	0:00:51	3.4
17	6:52:17	68	63.1	0:01:16	4.9
18	6:59:53	74	75.2	0:07:36	-1.2
				Average	1.894444
AVERAGE VALUES		70.44444	68.55		2.661815
AVERAGE PADRZ VALUES		74.83333	76.46667		-1.56

A similar assessment was performed for the LxT located on Brighton Court. The picture in Figure 5 shows time history data for the LxT data from the Larson Davis portable noise monitor for, 6:30 to 7 am and 10 to 11:30 pm, the first one on October 16th at Avalon location and the second one on October 31 at Brighton. Mission Beach has one noise monitor located at the jetty at the most southern end of Mission Blvd. At one point, Mission Beach had four monitors, but as the 65 dB CNEL receded, monitors were removed on the pretext that the noise levels could not be distinguished from ambient noise. So, I am making a series of noise measurements to observe the noise levels as the portable monitor is moved north to determine at what point the aircraft noise is the same as other environmental noise. For the two locations measured north of the jetty, the noise levels are very comparable to the fixed NM#23.

It is fair to conclude from the data presented and the analysis comparisons that the noise levels on Avalon Court and Brighton Court are at least as loud as at the jetty. Noise monitors are omni-directional; that is they do not differentiate between noise north or south of the monitor. Given that the noise levels are at least as loud at the two locations where measurements were made by the LxT, then I would conclude that the NM#23 is not adequate by itself in the calculation of the 65 dB CNEL. We can therefore conclude that additional noise monitors are required to the north of NM#23 to more accurately characterize the noise in SMB.

Figure 5 Comparison of 11/2 early morning departures at Brighton Court (green line) and NM#23 Lmax noise values; time history is from LxT

The annotations in red are PADRZ SID and the ones in blue are ZZOOO SID departures

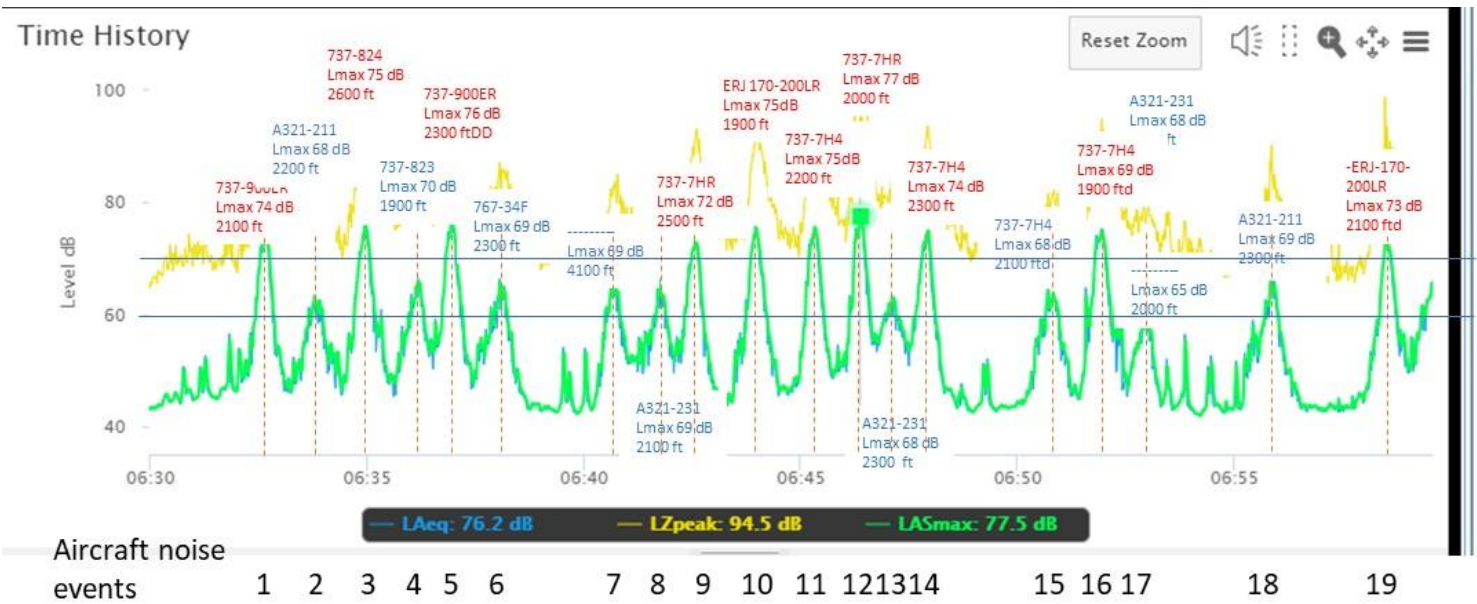


Table 2 Comparison 11/2 of LxT measured values at Brighton Court and NM#23 Lmax values

November 1 2022 Brighton Court					
Event	Time	Lmax dB		Time between measurements	Delta Noise level in dB
		Webtrax #23	LxT Brighton Ct		
1	6:32:39	74	74.2		-0.2
2	6:33:47	68	63.3	0:01:08	4.7
3	6:34:58	75	75.8	0:01:11	-0.8
4	6:36:01	70	62.8	0:01:03	7.2
5	6:36:57	76	77.2	0:00:56	-1.2
6	6:38:03	64	65.6	0:01:06	-1.6
7	6:40:44	69	64.7	0:02:41	4.3
8	6:42:34	72	72.9	0:01:50	-0.9
9	6:43:57	75	75.4	0:01:23	-0.4
10	6:45:20	75	75.5	0:01:23	-0.5
11	6:46:23	77	77.5	0:01:03	-0.5
12	6:47:07	68	63	0:00:44	5
13	6:47:56	74	75	0:00:49	-1
14	6:50:49	68	63.4	0:02:53	4.6
15	6:51:35	68	63.3	0:00:46	4.7
16	6:51:58	69	75	0:00:23	-6
17	6:55:51	69	65.8	0:03:53	3.2
18	6:58:32	73	73.3	0:02:41	-0.3
				Average	1.127778
AVERAGE VALUES		71.33333	70.20556		3.354156
AVERAGE PADRZ VALUES		74	75.18		-0.725

Figure 6 Comparison of 10/16 nighttime departures at Avalon Court (red line) and NM#23 Lmax noise values; time history is from LxT



Table 3 Comparison 10/16 of LxT measured values at Avalon Court and NM#23 Lmax values

October 16, 2022 Avalon Court					
Event	Time	Lmax dB			
		Webtrax #23	LxT Brighton Ct	Time between measurements	Delta Noise level in dB
1		73	73.5		-0.5
2		74	72.8		1.2
3		72	72.9		-0.9
4		71	72.2		-1.2
5		73	72.2		0.8
6		74	71.9		2.1
7		72	72.8		-0.8
8		74	72.7		1.3
9		77	75.7		1.3
10		69	70		-1
11		75	74.1		0.9
12		74	72.5		1.5
13		73	73.7		-0.7
14		72	70.3		1.7
15		-	74.4		
16		73	74.7		-1.7
17		76	75.9		0.1
18		71	73		-2
19		-	58		
AVERAGE VALUES		73.11765	72.27895		
AVERAGE PADRZ		71.66667	72.63333		

Figure 7 Comparison of 10/31 nighttime departures at Brighton Court (green line) and NM#23 Lmax noise values; time history is from LxT



Table 4 Comparison 10/31 of LxT measured values at Brighton Court and NM#23 Lmax values

OCTOBER 31 NIGHTTIME DEPARTURES						
Time	Altitude	Acrft	Departure	Leq	Lmax	Lmax LxT
10:00:00	2200		P	71.5	72	72
10:06:00	1900		NA	76.9	77	76.9
10:26:00	2200		NA	73.4	74	74.6
10:29	1900		NA	73.1	74	75
10:33	1900		NA	77	77	77.3
10:44	2200		NA	70.4	71	70.3
10:45	2700		P	66.4	66	68.8
10:48	2100		NA	74.8	75	75.8
10:54	2000		NA	72.3	73	71.2
11:01	2000		NA	73.3	74	75.4
22:17	2500		NA	72.9	73	74.1

Knack Sjohnna

Subject: FW: Please distribute to the ANAC members prior to the December ANAC meeting.

From: Gary Wonacott <wildcatwonacott@gmail.com>

Sent: Sunday, December 11, 2022 10:05 AM

To: gary wonacott <gwonacott@hotmail.com>

Cc: SDCRAA clerk <clerk@san.org>

Subject: Please distribute to the ANAC members prior to the December ANAC meeting.

This is a follow up statement from my previous claim that the Airport Authority misrepresented data to the FAA by undersizing the 2018 65 dB CNEL in the Part 150 study by one square mile and therefore underestimated the number of housing units eligible for the QHP. I claimed that Ms. Kimberly Becker signed off on two documents one with the 65 dB CNEL to the State of five square miles and one to the FAA of 4 square miles.

And when the Airport Authority did not respond to my claim, I filed a complaint with the SDCRAA ethics office, which contracted out the investigation to an outside law firm. My objective in filing the complaint was to push the SDCRAA to address the differences between the areas reported to the State and to the FAA, but this unfortunately did not happen. The SDCRAA wasted additional money on this consultant only to side step the key issues.

For example, while the consultants highlighted one of my concerns, that South Mission Beach might have been reached in the 2026 65 dB CNEL if accurate data was used, they did not address the main issue, that understating the incompatible noise area would result in far fewer housing units being included in the QHP.

My two main concerns with the investigation are: 1) that the response was one-sided, including Airport Authority staff. I was never approached to hear my assertions and basis for my claims. And 2) that their interpretation of Ms. Becker's responsibilities did not include insuring the technical quality of the reports she was signing off on.

A portion of the response to my claims is included below with my comments (full report is available upon request).

Allegation 1: That one or more Employee(s) intentionally misrepresented the noise map submissions by falsifying aircraft operations data, to undercount either the number of daily nighttime departures or those departures' stage lengths, when preparing the various noise maps.

We find this allegation to be unsubstantiated. First, we reiterate that our investigation concerns the Employees' compliance with the Ethics Code; it is not a technical review of the Authority's submissions to the FAA or Caltrans or an analysis of the quality of the Authority's data collection. Therefore, our question with respect to this allegation is whether any Employee, or any third party acting under their direction or with their encouragement, fraudulently misrepresented the data used to prepare the noise contours. We found no evidence that any Employee did so. On the other hand, which employee is going to be completely candid in that situation? There seems to be a gaping hole between the Airport Authority Noise Abatement Office personnel and the consultants. We could find no facts to support the Complainant's assertions.

Allegation 2: That one or more Employee(s) wrongfully declined to use noise monitor data to adjust noise contours in order to cover up the alleged misrepresentations in those noise maps.

We find this allegation unsubstantiated because we find that the Authority was correct not to use noise monitor data to adjust the shape of the noise contours. We do not dispute the Complainant's assertion that neither the Employees nor the Authority's consultants used noise monitor data to adjust the noise contours in the submission to the FAA. To the contrary, we find that the FAA

would not have accepted the noise maps' submission if the Authority had used noise monitor data to adjust the size and shape of those maps' contours. I don't know if this is a play on words or a reflection of the position of the Airport Authority initially proposed by Brendon Reed, a senior manager at the Airport Authority. The State of California requires the Airport Authority to use noise monitors, which they have failed to do, although there is a subtle implication that this might have been the factor that resulted in the larger area reported to the State. My understanding is that the FAA does not allow the Airport Authority to use the noise monitors to calibrate the AEDT analytical model used to generate the contours, and I also agree that the FAA would resist using the noise monitors to adjust the contours, but I also believe that if the Airport Authority made the argument that noise monitors were used to adjust the contours reported to the State, which is 5 square miles, then the FAA might very well have agreed.

The FAA did, after many communications with the Airport Authority, allow the AA to change the inputs to the AEDT model that changed the glide path angle to the airport on arrival.

After review of not only the information provided by the Complainant but also other FAA regulations, policies, advisory circulars, internal guidance and industry best practices, we do not find a basis for the Complainant's assertion that the FAA allows the use of noise monitor data to alter a noise contour for an FAA-endorsed study. The Complainant's citations are not an accurate reflection of FAA policy or regulations.

Even if the Authority could have used noise monitor data to adjust the noise contours, and even if doing so would have been consistent with industry practice (neither of which has been shown here), the failure to do so would not have violated the Ethics Code. There is no evidence that having the option to use noise monitor data to adjust noise contours would obligate the Authority to do so or that failure to do so would constitute a violation of the Ethics Code. There is no evidence that failure to use noise monitor data in the preparation of the Authority's submission to the FAA was improper or that any decisions were made with regard to the use of noise monitor data that violated the Ethics Code.

Again, no one has addressed my primary assertion that a five square mile 65 dB CNEL was delivered to the State while a four square mile contour was reported in the Part 150 study. Although it was never stated explicitly by Mr. Reed, it was implied that the use of noise monitors explains the difference between the two contours. I will give the Airport Authority credit for using the noise monitors to distract from the main issue, the difference in areas between the two reports.

Allegation 3: That Becker certified the noise maps despite knowing of one or more of the alleged improprieties in allegations 1 and 2 above.

We find no evidence to support the notion that Becker personally manipulated or directed any other Employee or other person to misrepresent either of the noise maps that are the subject of the Complainant's allegations.

The Complainant's basis for alleging Becker's involvement amounts to speculation as to a possible motive—that is, the Complainant's assertion that it would have been in the Authority's interest, and therefore Becker's, to reduce the area of the noise contours depicted in the noise maps to avoid encompassing South Mission Beach (I am sure I also mentioned the reduced number of QHP west of the airport). It is key to understand that the entire difference between the two contours is the area difference on the west side of the airport. The contours on the east side are nearly identical.) This, without more, is not sufficient evidence to sustain an ethics accusation against Becker.

The absence of evidence is particularly persuasive given that Becker, as chief executive of the Authority, did not, and would not, have an extensive personal role in the preparation of a technical noise study for which she had dedicated staff and consultants. We further find no evidence that Becker had any knowledge (or should have known) of any of the alleged inaccuracies that might have existed in any of the noise maps. (How many CEOs have lost their jobs because of technical issues within their companies. Seems to me that the CEO of a popular car company was sent packing when the

company's EPA data manipulation was exposed. We express no opinion on the technical issues that the Complainant raises concerning accuracy of the noise maps. Although it seems like you have made some inferences.

Gary Wonacott
Mission Beach, San Diego

Sent from my iPad

Reince Tyler

Subject: FW: Does moving JETTI farther west benefit the Airport Authority

From: Gary Wonacott <wildcatwonacott@gmail.com>

Sent: Monday, December 12, 2022 6:02 AM

To: SDCRAA clerk <clerk@san.org>

Cc: Casey Schnoor <casey.schnoor4@gmail.com>; Gloria Henson <glohenson@san.rr.com>

Subject: Does moving JETTI farther west benefit the Airport Authority

I am not a pilot, so this a question for one of the ANAC members to ask of Ms. Knack or the FAA representative. The two times of the day when aircraft departures have the greatest negative impact on the quality of life of residents in the departure paths is at night, from 10 pm to 11:30 pm and from 6:30 am to 7 am. The initial departures at 6:30 am illustrate the failings of the one-runway airport as Flightradar24 shows the waiting line for the departing aircraft worse than a Christmas checkout line at Costco.

The 11 new gates will only increase the length of the line in the morning hours. So, have the Airport Authority and the FAA colluded to somehow increase the throughput, the capacity, of the airport. The one operational change supposedly for the noise abatement benefit to residents is the move of JETTI farther west.

This change adds precious flight time for virtually every ZZOOO departure. It increases fuel use for the aircraft and ~45 seconds to every flights heading east. But, during the Part 150, there was no push back from the very cost sensitive airlines. Nor did the FAA resist. And when asked to quantify the noise decrease benefit to the residents of this change, Ms. Knack responded with, there is no measurable difference between the previous and the current departures based on noise monitors. The aircraft noise is less than ambient even at the JETTI closer in location. It is just a bit difficult to see how the FAA and the airlines would agree unless there is another benefit to them.

This is my question to Ms. Knack if I could ask the question. Does this change, moving JETTI farther west, provide any operational benefit to the airlines and the FAA. For example, because the aircraft are flying farther west before they turn south, does this somehow affect the allowed spacing time between departures? Could that time spacing between departures be reduced such that the departures throughput might be increased?

SDIA is approaching capacity again, so does this change, moving JETTI farther west, in any way allow an increase in the capacity of the airport? Because if this is the case, then this means there will be an increase in the frequency of departures with an increased noise impact on the communities. As I stated previously, the 11 new gates means 11 more aircraft can be stored overnight. If the departure spacing is not decreased, then the rush hour beginning at 6:30 am will be extended, which is bad enough, but if the frequency of the departures can be increased, then the combination will be an escalation of the war-like morning attack on residents west of the airport. On the other had, I could be way off. It would not be the first time.

Gary Wonacott
Mission Beach

Sent from my iPad