APPENDIX

# K PUBLIC HEARING/ COMMENT PERIOD

## 14 CFR PART 150 UPDATE

# 14 CFR PART 150 UPDATE

**Public Hearing/Comment Period Appendix Note:** This appendix includes presentations and information provided for the San Diego International Airport Part 150 Study public hearing and public comment period. Contents include the public hearing presentation, advertisements for the meeting, and the responses to the public's comments.

The contents below are navigable both using the PDF bookmarks or the PDF page numbers on the top right of the page.



SAN DIEGO INTERNATIONAL AIRPORT

The San Diego Union-Tribune

# Legal Notices

Metro San Diego | 866-411-4140
North San Diego | 619-293-2007
The Californian, SW Riverside | 951-251-0329

email: legals@sduniontribune.com | email: legalsnorth@sduniontribune.com | email: legalswr@sduniontribune.com

## Fictitious Business Names

**FICTITIOUS BUSINESS NAME STATEMENT Filed County of Riverside Peter Aldana Assessor –County Clerk – Recorder R-202102064 02/24/2021**
The following person(s) is (are) doing business as: **PREMIUM PARKING SERVICE L.L.C.** at **28676 OLD TOWN FRONT STREET TEMECULA, CA 92590** Riverside **Mailing Address: 601 POYDRAS STREET SUITE 1500 NEW ORLEANS, LA 70130**
Registrant Information: **2a. PREMIUM PARKING SERVICE L.L.C. 601 POYDRAS STREET SUITE 1500 NEW ORLEANS LA 70130 CA/LA**
This business is conducted by: **Limited Liability Company Registrant commenced to transact business under the fictitious business name(s) listed above on 2/1/2021**
I declare that all the information in this statement is true and correct. (A registrant who declares as true any material matter pursuant to Section 17913 of the Business and Professions Code, that the registrant knows to be false is guilty of a misdemeanor punishable by a fine not to exceed one thousand dollars ($1,000).)
/s/ **BEN MONTGOMERY PRESIDENT**
**NOTICE** - In Accordance with Subdivision (a) of Section 17920, A Fictitious Business Name Statement generally expires at the end of five years from the date on which it was filed in the Office of the County Clerk, except, as provided in Subdivision (b) of Section 17920, where it expires 40 days after any change in the facts set forth in this statement pursuant to Section 17913 other than a change in the residence address of a registered owner. A new Fictitious Business Name Statement must be filed before the expiration. The filing of this statement does not of itself authorize the use in this State of a Fictitious Business Name in violation of the rights of another Federal, State or Common Law (See Section 14411 Et Seq., Business and Professional Code).
I hereby certify that this copy is a correct copy of the original statement on file in my office. Peter Aldana Riverside County Clerk.
**3/9/21, 3/16/21, 3/23/21, 3/30/21 7759670**

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**FICTITIOUS BUSINESS NAME STATEMENT Filed County of Riverside Peter Aldana Assessor –County Clerk – Recorder R-202101291 02/02/2021**
The following person(s) is (are) doing business as: **JSG GROUP** at **27111 RED ROCK COURT, MENIFEE, CA 92585** Riverside
Registrant Information: **2a. JEFFREY SCOTT GERHARDT 27111 RED ROCK COURT MENIFEE CA 92585**
This business is conducted by: **Individual Registrant has not yet begun to transact business under the fictitious name(s) listed above.**
I declare that all the information in this statement is true and correct. (A registrant who declares as true any material matter pursuant to Section 17913 of the Business and Professions Code, that the registrant knows to be false is guilty of a misdemeanor punishable by a fine not to exceed one thousand dollars ($1,000).)
/s/ **JEFFREY GERHARDT**
**NOTICE** - In Accordance with Subdivision (a) of Section 17920, A Fictitious Business Name Statement generally expires at the end of five years from the date on which it was filed in the Office of the County Clerk, except, as provided in Subdivision (b) of Section 17920, where it expires 40 days after any change in the facts set forth in this statement pursuant to Section 17913 other than a change in the residence address of a registered owner. A new Fictitious Business Name Statement must be filed before the expiration. The filing of this statement does not of itself authorize the use in this State of a Fictitious Business Name in violation of the rights of another Federal, State or Common Law (See Section 14411 Et Seq., Business and Professional Code).
I hereby certify that this copy is a correct copy of the original statement on file in my office. Peter Aldana Riverside County Clerk.
**2/16/21, 2/23/21, 3/2/21, 3/9/21 7752803**

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**FICTITIOUS BUSINESS NAME STATEMENT File No.: 2021-9001114**
Filed with Ernest J. Dronenburg, Jr. Recorder/County Clerk County of San Diego: **Jan 27, 2021**
Fictitious Business Name (s): **AMPDRAW HOBBIES**
Located at: **1540 ENCINITAS BLVD. ENCINITAS CA SAN DIEGO 92024**
Mailing Address: 3506 MISSISSIPPI ST. SAN DIEGO CA 92104
Registrant Information: 1. **RC TECH LLC 3506 MISSISSIPPI ST. SAN DIEGO CA 92104 CALIFORNIA**
This business is conducted by: **a Limited Liability Company The first day of business was 01/01/2010**
I declare that all information in this statement is true and correct. (A registrant who declares as true any material matter pursuant to Section 17913 of the Business and Professions code that the registrant knows to be false is guilty of a misdemeanor punishable by a fine not to exceed one thousand dollars (1,000).)
Registrant Name /s/ **RC TECH LLC SHANE ARCHER CEO**
**2/16/21, 2/23/21, 3/2/21, 3/9/21 7752747**

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**FICTITIOUS BUSINESS NAME STATEMENT File No.: 2021-9001855**
Filed with Ernest J. Dronenburg, Jr. Recorder/County Clerk County of San Diego: **Feb 4, 2021**
Fictitious Business Name (s): **Sync Systems**
Located at: **10204 Lone Dove Street San Diego CA San Diego County 92127**
Mailing Address: same. Registrant Information: 1. **Kayvan Farzin 10204 Lone Dove Street San Diego CA 92127 2. Liza Razani 10204 Lone Dove Street San Diego CA 92127** This business is conducted by: **a General Partnership The first day of business has not yet started**
I declare that all information in this statement is true and correct. (A registrant who declares as true any material matter pursuant to Section 17913 of the Business and Professions code that the registrant knows to be false is guilty of a misdemeanor punishable by a fine not to exceed one thousand dollars (1,000).)
Registrant Name /s/ **Kayvan Farzin 3/2, 3/9, 3/16, 3/23/2021 7758208**

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**FICTITIOUS BUSINESS NAME STATEMENT File No.: 2021-9001754**
Filed with Ernest J. Dronenburg, Jr. Recorder/County Clerk County of San Diego: **Feb 03, 2021**
Fictitious Business Name (s): **MOBILE NOTARY SOLUTIONS**
Located at: **1161 COLUMBUS WAY VISTA CA SAN DIEGO 92081**
Mailing Address: 770 SYCAMORE AVE, UNIT 122-173 VISTA CA 92083 Registrant Information: 1. **MADELYN MERTZ 1161 COLUMBUS WAY VISTA CA 92081** This business is conducted by: **an Individual The first day of business has not yet started**
I declare that all information in this statement is true and correct. (A registrant who declares as true any material matter pursuant to Section 17913 of the Business and Professions code that the registrant knows to be false is guilty of a misdemeanor punishable by a fine not to exceed one thousand dollars (1,000).)
Registrant Name /s/ **MADELYN MERTZ 2/16/21, 2/23/21, 3/2/21, 3/9/21 7752741**

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**FICTITIOUS BUSINESS NAME STATEMENT File No.: 2021-9000736**
Filed with Ernest J. Dronenburg, Jr. Recorder/County Clerk County of San Diego: **Jan 25, 2021**
Fictitious Business Name (s): **Ultrafit Organizers**
Located at: **10804 Heather Ridge Dr San Diego CA San Diego County 92130**
Mailing Address: Registrant Information: 1. **Cindy Whitmarsh-Sweeney 10804 Heather Ridge Dr San Diego CA 92130**
This business is conducted by: **an Individual The first day of business was 11/20/2020**
I declare that all information in this statement is true and correct. (A registrant who declares as true any material matter pursuant to Section 17913 of the Business and Professions code that the registrant knows to be false is guilty of a misdemeanor punishable by a fine not to exceed one thousand dollars (1,000).)
Registrant Name /s/ **Cindy Whitmarsh-Sweeney 2/23, 3/2, 3/9, 3/16/2021 7754192**

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**FICTITIOUS BUSINESS NAME STATEMENT File No.: 2021-9000498**
Filed with Ernest J. Dronenburg, Jr. Recorder/County Clerk County of San Diego: **Jan 20, 2021**
Fictitious Business Name (s): **NEXUS ROOF SERVICES**
Located at: **2166 GOODWIN DR. VISTA CA SAN DIEGO 92084**
Mailing Address: Registrant Information: 1. **MIGUEL SAUCEDO 2166 GOODWIN DR. VISTA CA 92084**
This business is conducted by: **an Individual The first day of business has not yet started**
I declare that all information in this statement is true and correct. (A registrant who declares as true any material matter pursuant to Section 17913 of the Business and Professions code that the registrant knows to be false is guilty of a misdemeanor punishable by a fine not to exceed one thousand dollars (1,000).)
Registrant Name /s/ **MIGUEL SAUCEDO 2/16/21, 2/23/21, 3/2/21, 3/9/21 7752706**



## PUBLIC WORKSHOP/HEARING ANNOUNCEMENT

Please join the San Diego County Regional Airport Authority (Airport Authority)for a Public Workshop and Hearing on the 14 CFR Part 150 Noise Compatibility Study Update (Study).

**Thursday, April 8, 2021**

**5 p.m. to 6:30 p.m. – Public Workshop (Information and Questions)**
**6:30 p.m. to 8 p.m. – Public Hearing (Official Public Comment)**

The Study is being conducted to identify and evaluate current and future noise effects caused by aircraft operations at the San Diego International Airport (SAN). The purpose of the Public Hearing is to obtain public comments on the Study.

After the completion of the Public Workshop portion, the official Public Hearing will begin, and all members of the public may submit verbal comments that will become part of the public record. Airport Authority staff and expert consultants will be in attendance to answer questions during the Public Workshop and listen to public comments during the Public Hearing.

Due to the COVID-19 pandemic, this meeting will be held virtually. To attend, please visit the study website below to register and receive the Zoom meeting link.

The Draft document can be viewed on the study website, **sannoisestudy.com**, or at the Airport Authority's Liberty Station office at 2722 Truxtun Road, San Diego, CA 92106. Viewing is by appointment only, please call 619-400-2309 to schedule.

In addition to verbal comments at the Public Hearing, members of the public are encouraged to submit written comments via the study website **sannoisestudy.com** or in writing to:

Mead & Hunt
Attn: Jen Wolchansky
1743 Wazee Street, Suite 400 Denver, CO 80202.
**Comments will be accepted through April 21, 2021.**

If you have a disability or require language translation, please call 619-400-2309 to discuss your needs with at least 48 hours' notice.

SAN DIEGO INTERNATIONAL AIRPORT. LET'S GO.

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**IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE**

In re The Hertz Corporation, *et al.*,[1] Debtors.

Chapter 11
Case No. 20-11218 (MFW)
(Jointly Administered)
**Hearing Date: April 16, 2021 at 10:30 a.m. (ET)**
**Objection Deadline: April 9, 2021 at 4:00 p.m. (ET)**

**NOTICE OF HEARING TO CONSIDER APPROVAL OF PROPOSED DISCLOSURE STATEMENT AND SOLICITATION PROCEDURES FOR JOINT CHAPTER 11 PLAN OF REORGANIZATION OF THE HERTZ CORPORATION AND ITS DEBTOR AFFILIATES**

**TO ALL PARTIES IN INTEREST IN THE DEBTORS' CHAPTER 11 CASES:**

**PLEASE TAKE NOTICE THAT** The Hertz Corporation and its affiliated debtors in the above-captioned chapter 11 cases (collectively, the "**Debtors**") have filed (i) their *Joint Chapter 11 Plan of Reorganization of The Hertz Corporation and Its Debtor Affiliates* [D.I. 2912] (together with all the schedules and exhibits thereto, and each as amended, modified or supplemented from time to time, the "**Proposed Plan**")[2] and (ii) the *Disclosure Statement for Joint Chapter 11 Plan of Reorganization of The Hertz Corporation and Its Debtor Affiliates* [D.I. 2913] (together with all the schedules and exhibits thereto, and each as may be amended, modified, or supplemented from time to time, the "**Proposed Disclosure Statement**").

**PLEASE TAKE FURTHER NOTICE THAT** the Debtors will also file a motion seeking entry of an order (i) approving the Proposed Disclosure Statement as containing "adequate information" pursuant to section 1125 of the Bankruptcy Code, (ii) approving solicitation and voting procedures in connection with the Proposed Plan, (iii) establishing certain deadlines in connection with approval of the Proposed Disclosure Statement and the Proposed Plan, (iv) approving the manner and forms of ballots and certain notices, and (v) granting related relief (the "**Motion**").

**The Proposed Plan contains releases of the Debtors and certain third parties and related injunction and exculpation provisions, which will become effective if the Proposed Plan is confirmed. You should carefully review the Plan and the applicable release, injunction, and related provisions at https://restructuring.primeclerk.com/hertz.**

**PLEASE TAKE FURTHER NOTICE THAT:**

1. A hearing (the "**Disclosure Statement Hearing**") will be held before the Honorable Mary F. Walrath, United States Bankruptcy Judge, in the United States Bankruptcy Court for the District of Delaware (the "**Bankruptcy Court**"), 824 North Market Street, 5th Floor, Courtroom 4, Wilmington, Delaware 19801, on **April 16, 2021, at 10:30 a.m. (prevailing Eastern Time)**, to consider entry of an order, determining, among other things, that the Proposed Disclosure Statement contains "adequate information" within the meaning ascribed to such term in section 1125 of the Bankruptcy Code and approving the Proposed Disclosure Statement. Please be advised that the Disclosure Statement Hearing may be adjourned or continued from time to time by the Bankruptcy Court or the Debtors without further notice other than as indicated in any notice or agenda of matters scheduled that is filed with the Bankruptcy Court or by being announced in open court. If the Disclosure Statement Hearing is continued, the Debtors will post the new date and time of the Disclosure Statement Hearing at https://restructuring.primeclerk.com/hertz. The Disclosure Statement and Plan may be modified, if necessary, in accordance with the Bankruptcy Code, the Bankruptcy Rules, and other applicable law, before, during, or as a result of the Disclosure Statement Hearing, without further notice to creditors or other parties in interest.

2. Any party in interest wishing to obtain a copy of the Proposed Disclosure Statement and the Proposed Plan should contact Prime Clerk LLC, the Debtors' Solicitation Agent, in writing at, The Hertz Corporation Ballot Processing Center c/o Prime Clerk LLC, One Grand Central Place, 60 East 42nd Street, Suite 1440, New York, NY 10165, by telephone at (877) 428-4661 (Domestic) or +1-929-955-3421 (International), or electronic mail to hertzinfo@primeclerk.com (with 'Hertz' in the subject line). Interested parties may also review the Proposed Disclosure Statement and the Proposed Plan free of charge at https://restructuring.primeclerk.com/hertz/. The Proposed Disclosure Statement and the Proposed Plan can also be viewed by scanning the below Quick Response Barcode using the camera on a smart phone or tablet.

3. In addition, the Proposed Disclosure Statement and Proposed Plan are on file with the Bankruptcy Court and may be reviewed by accessing the Bankruptcy Court's website: www.deb.uscourts.gov. Note that a PACER password and login are needed to access documents on the Bankruptcy Court's website. A PACER password can be obtained at: www.pacer.psc.uscourts.gov.

4. Objections, if any, to approval of the Proposed Disclosure Statement must: (i) be in writing; (ii) conform to the Bankruptcy Rules and the Local Rules; (iii) set forth the name of the objecting party and the nature and amount of Claims or Interests held or asserted by such party against the Debtors' estates or property; (iv) provide the basis for objection and specific grounds thereof, and provide proposed language that, if accepted and incorporated by the Debtors, would obviate such objection; and (v) be filed, together with proof of service, with the Bankruptcy Court, and served so that they are **actually received** by the following parties no later than **April 9, 2021 at 4:00 p.m. (prevailing Eastern Time)**:

(a) counsel to the Debtors, (i) White & Case LLP, Southeast Financial Center, 200 South Biscayne Boulevard, Suite 4900, Miami, FL 33131 (Attn: Thomas E Lauria (tlauria@whitecase.com), and Matthew Brown (mbrown@whitecase.com)), 1221 Avenue of the Americas, New York, NY 10020 (Attn: David Turetsky (david.turetsky@whitecase.com)), and 555 South Flower Street, Suite 2700, Los Angeles, CA 90071 (Attn: Ronald K. Gorsich (rgorsich@whitecase.com)), and (ii) Richards, Layton & Finger, PA, One Rodney Square, 9210 North King Street, Wilmington, DE 19801 (Attn: John Knight (knight@rlf.com), and Brett M. Haywood (haywood@rlf.com));

(b) the U.S. Trustee, 844 King Street, Suite 2207, Lockbox 35, Wilmington, DE 19801 (Attn: Linda Richenderfer (Linda.Richenderfer@usdoj.gov));

(c) counsel to the Committee, (i) Kramer Levin Naftalis & Frankel LLP, 1177 Avenue of the Americas, New York, NY 10036 (Attn: Thomas Moers Mayer (tmayer@kramerlevin.com), Amy Caton (acaton@kramerlevin.com), and Alice Byowitz (abyowitz@kramerlevin.com)), and (ii) Benesch, Friedlander, Coplan & Aronoff LLP, 222 Delaware Avenue, Suite 801, Wilmington, DE 19801 (Attn: Jennifer R. Hoover (jhoover@beneschlaw.com), Kevin M. Capuzzi (kcapuzzi@beneschlaw.com), and John C. Gentile (jgentile@beneschlaw.com)); and

(d) counsel to the Plan Sponsors, Kirkland & Ellis LLP, 601 Lexington Avenue, New York, NY 10022 (Attn: Steve Hessler (stephen.hessler@kirkland.com)); Kirkland & Ellis 1301 Pennsylvania Avenue, N.W. Washington, D.C. 20004 (Attn: AnnElyse Scarlett Gains annelyse.gains@kirkland.com)).

5. **IF AN OBJECTION TO THE PROPOSED DISCLOSURE STATEMENT IS NOT FILED AND SERVED STRICTLY AS PRESCRIBED HEREIN, THE OBJECTING PARTY MAY BE BARRED FROM OBJECTING TO THE PROPOSED DISCLOSURE STATEMENT OR THE ADEQUACY THEREOF AND MAY NOT BE HEARD AT THE DISCLOSURE STATEMENT HEARING.**

6. Following approval of the Proposed Disclosure Statement by the Bankruptcy Court, Holders of Impaired Claims against the Debtors that are entitled to vote will receive Solicitation Packages in accordance with the order approving the Motion, including instructions to obtain, free of charge, the Proposed Plan, the Proposed Disclosure Statement, and various other documents related thereto, unless otherwise ordered by the Bankruptcy Court. Holders of Unclassified Claims and Claims in the Unimpaired Classes shall receive (i) the Confirmation Hearing Notice and (ii) the Unclassified/Unimpaired Non-Voting Status Notice. Holders of Impaired Claims and Interests that are deemed to reject the Plan shall receive (i) the Confirmation Hearing Notice and (ii) the Impaired Non-Voting Status Notice.

7. **THIS NOTICE IS NOT A SOLICITATION OF VOTES TO ACCEPT OR REJECT THE PROPOSED PLAN. VOTES ON THE PROPOSED PLAN MAY NOT BE SOLICITED UNLESS AND UNTIL THE PROPOSED DISCLOSURE STATEMENT IS APPROVED BY AN ORDER OF THE BANKRUPTCY COURT.**

Dated: March 2, 2021
**RICHARDS, LAYTON & FINGER, P.A.** */s/ Brett M. Haywood*
Mark D. Collins (No. 2981), John H. Knight (No. 3848), Brett M. Haywood (No. 6166), Christopher M. De Lillo (No. 6355), J. Zachary Noble (No. 6689), One Rodney Square, 920 N. King Street, Wilmington, DE 19801, Telephone: (302) 651-7700, Facsimile: (302) 651-7701, Collins@rlf.com, Knight@rlf.com, Haywood@rlf.com, DeLillo@rlf.com, Noble@rlf.com —and— **WHITE & CASE LLP,** Thomas E Lauria (admitted *pro hac vice*), Matthew C. Brown (admitted *pro hac vice*), 200 South Biscayne Boulevard, Suite 4900, Miami, FL 33131, Telephone: (305) 371-2700, tlauria@whitecase.com, mbrown@whitecase.com, J. Christopher Shore (admitted *pro hac vice*), David M. Turetsky (admitted *pro hac vice*), Andrew T. Zatz (admitted *pro hac vice*), Kathryn Sutherland-Smith (admitted *pro hac vice*), 1221 Avenue of the Americas, New York, NY 10020, Telephone: (212) 819-8200, cshore@whitecase.com, avid.turetsky@whitecase.com, azatz@whitecase.com, kathryn.sutherland.smith@whitecase.com, Jason N. Zakia (admitted *pro hac vice*), Laura E. Baccash (admitted *pro hac vice*), 111 South Wacker Drive, Chicago, IL 60606, Telephone: (312) 881-5400, jzakia@whitecase.com, laura.baccash@whitecase.com, Roberto Kampfner (admitted *pro hac vice*), Ronald K. Gorsich (admitted *pro hac vice*), Aaron Colodny (admitted *pro hac vice*), Doah Kim (admitted *pro hac vice*), 555 South Flower Street, Suite 2700, Los Angeles, CA 90071, Telephone: (213) 620-7700, rkampfner@whitecase.com, rgorsich@whitecase.com, aaron.colodny@whitecase.com, doah.kim@whitecase.com. *Co-Counsel to the Debtors and Debtors in Possession.*

[1] The last four digits of The Hertz Corporation's tax identification number are 8568. The location of the Debtors' service address is 8501 Williams Road, Estero, FL 33928. Due to the large number of Debtors in these chapter 11 cases, which are jointly administered for procedural purposes, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at https://restructuring.primeclerk.com/hertz.

[2] Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Proposed Disclosure Statement or the Proposed Plan, as applicable, or as the context otherwise requires.

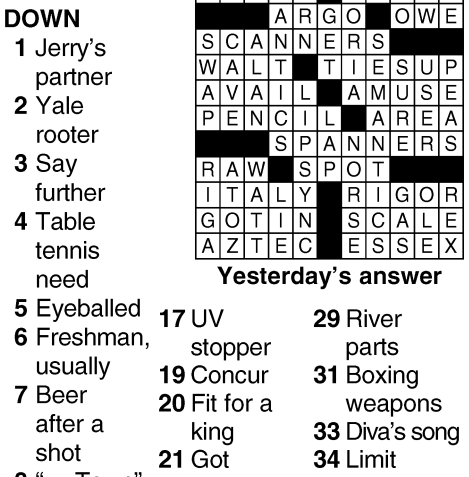
## CROSSWORD
By THOMAS JOSEPH

**ACROSS**
1 Brewing need
7 Fizzy drink
11 Geriatrics topic
12 Colors
13 "The Hobbit" setting
15 Cars' scars
16 Audacious
18 Get news of
21 Labyrinth
22 Technical talk
24 Swelled head
25 Mover's truck
26 Reuben base
27 Sawbuck
29 Out of play
30 Wolfish look
31 Detect, in a way
32 Slow mover
34 Prominent position
40 Illegally off base
41 Roma's land
42 Sampras of tennis
43 Agreement

**DOWN**
1 Jerry's partner
2 Yale rooter
3 Say further
4 Table tennis need
5 Eyeballed
6 Freshman, usually
7 Beer after a shot
8 "— Town"
9 Rented out
10 Pipe waste
14 Patriot Allen
16 Doughy ring
17 UV stopper
19 Concur
20 Fit for a king
21 Got together
22 Mayo buy
23 Homer's neighbor
25 Captain Nemo's creator
28 Get snug
29 River parts
31 Boxing weapons
33 Diva's song
34 Limit
35 Shearling's mom
36 Negating word
37 Pub pint
38 Tonic's partner
39 Have dinner

| | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| T | E | A | R | S | ■ | A | D | A | P | T |
| A | L | L | O | T | ■ | S | U | S | H | I |
| B | L | A | M | E | ■ | T | O | T | E | M |
| ■ | ■ | ■ | A | R | G | O | ■ | O | W | E |
| S | C | A | N | N | E | R | S | ■ | ■ | ■ |
| W | A | L | T | ■ | T | I | E | S | U | P |
| A | V | A | I | L | ■ | A | M | U | S | E |
| P | E | N | C | I | L | ■ | A | R | E | A |
| ■ | ■ | ■ | S | P | A | N | N | E | R | S |
| R | A | W | ■ | S | P | O | T | ■ | ■ | ■ |
| I | T | A | L | Y | ■ | R | I | G | O | R |
| G | O | T | I | N | ■ | S | C | A | L | E |
| A | Z | T | E | C | ■ | E | S | S | E | X |

Yesterday's answer



3-9

AXYDLBAAXR
is LONGFELLOW

One letter stands for another. In this sample, A is used for the three L's, X for the two O's, etc. Single letters, apostrophes, the length and formation of the words are all hints. Each day the code letters are different.

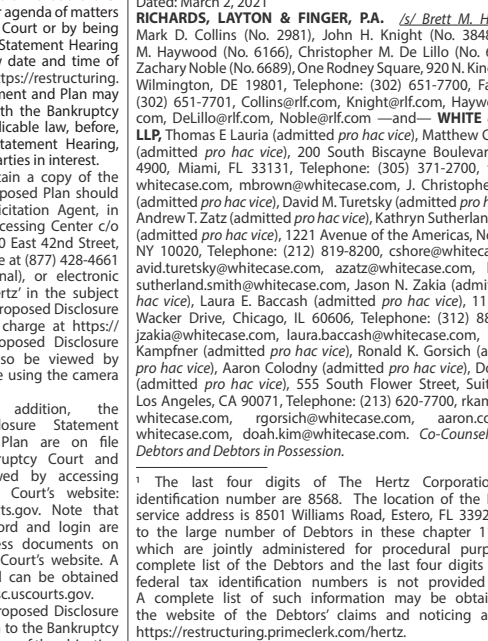
**3-9 CRYPTOQUOTE**

NE FTNSPKME KL QDTPA TO KP EDTGL, CDG UH JSP DPYE QH FTNSP MDZHMFHG.

— AHLNDPA MTMT

**Yesterday's Cryptoquote:** INTOLERANCE IS A FORM OF EGOTISM, AND TO CONDEMN EGOTISM INTOLERANTLY IS TO SHARE IT. — GEORGE SANTAYANA

## Family Circus BY JEFF & BIL KEANE




**"What are we gonna do with those boys, Mommy? They left the seat up again."**

## Bridge WITH BOB JONES

### A LEGEND AT PLAY

3/9/21

East-West vulnerable, West deals

NORTH
♠ A 4
♡ Q 10 7 6 5
◇ 6 4
♣ Q 8 6 3

WEST
♠ Q 10 9 6
♡ A J 4
◇ Q 8 5
♣ A K 5

EAST
♠ 8
♡ 9 8 3
◇ A 10 7 3
♣ J 10 7 4 2

SOUTH
♠ K J 7 5 3 2
♡ K 2
◇ K J 9 2
♣ 9

The bidding:

| WEST | NORTH | EAST | SOUTH |
|---|---|---|---|
| 1NT | Pass | Pass | 3♠ |
| ◇bl | All pass | | |

Opening lead: Ace of ♣

The late Tim Seres became a legend in Australian bridge after emigrating there from his native Hungary in 1947. He represented Australia in International play many times, but his main love was rubber bridge. He spent most of his afternoons, for several decades, playing high-stakes rubber bridge in Sydney. He was South in today's deal.

The jump to three spades was a little exuberant, but that was his style. Great players get to call that kind of bidding "style."The ace of clubs lead held the first trick, and West shifted to the ace of hearts. Seres unblocked his king under the ace to create an extra entry to dummy. The diamond shift from West went to East's ace and the diamond return was won by Seres with the king.

Seres led a heart to the queen and ruffed a club. He ruffed a diamond in dummy and then ruffed another club in his hand, noting the fall of the king from West. He crossed to the now bare ace of spades and ruffed a heart in his hand. He was down to three cards — the king, jack of spades and the jack of diamonds. He exited with the jack of diamonds, which West had to ruff and return a spade from his queen. Seres took the last two tricks and scored up his doubled contract. Well played!

*Bob Jones welcomes readers' responses sent in care of this newspaper or to With Tannah Hirsch and Bob Jones Tribune Content Agency, LLC., 16650 Westgrove Dr., Suite 175, Addison, TX 75001. E-mail tcaeditors@tribune.com.*



**SUDOKU SOLUTION**

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| 3 | 6 | 2 | 4 | 7 | 9 | 1 | 8 | 5 |
| 7 | 9 | 5 | 1 | 6 | 8 | 3 | 4 | 2 |
| 1 | 4 | 8 | 2 | 3 | 5 | 6 | 7 | 9 |
| 4 | 2 | 6 | 9 | 1 | 7 | 8 | 5 | 3 |
| 8 | 5 | 7 | 3 | 2 | 6 | 4 | 9 | 1 |
| 9 | 3 | 1 | 5 | 8 | 4 | 2 | 6 | 7 |
| 2 | 8 | 9 | 7 | 4 | 1 | 5 | 3 | 6 |
| 6 | 7 | 3 | 8 | 5 | 2 | 9 | 1 | 4 |
| 5 | 1 | 4 | 6 | 9 | 3 | 7 | 2 | 8 |

# Election postponement is opportunity to get involved

College Area Happenings

BY JOSE REYNOSO

As reported last month, in light of the pandemic, the planning department provided guidance to community planning groups (CPGs) on how to handle elections this year since face-to-face meetings are simply not practicable. The options ranged from mail-in voting to online voting or simply postponing the elections until the local state of emergency is lifted.

Due to the light at the end of the tunnel provided by the vaccine rollout, the College Area Community Planning Board (CACPB) & Council voted to postpone the election. It is anticipated that the state of emergency will be lifted by the end of the summer, God willing. You will be updated as we get closer to the target horizon.

This postponement provides an extended opportunity for interested residents to attend the requisite number of meetings (two) to run for the board. It also provides an easy opportunity (Zoom) for residents, who may not be interested in running for the board but who have awakened to issues/projects within the community to get more information regarding what is going on in terms of development proposals and the guidelines for them, envisioned by the community, through the visioning process of the past few years and the community plan update currently underway. This may change their minds about getting involved.

I have heard multiple statements from residents, concerned about various proposals, upset because they knew nothing about them. Case in point: Due to the critical lack of housing, the state has routinely set housing development targets and allocated goals by region. In our case, the goal was given to our regional planning entity, SANDAG, who then allocated these goals to individual jurisdictions. In most cases, these goals have not been met. I believe it was for 2019, but the city of San Diego only met about one fourth of its annual target.

In view of this, and the results from previous years, the incentives (carrots) offered in the past, were instead converted to mandates (sticks). One example was the elimination of limitations on accessory dwelling units that local municipalities had typically placed in order limit the numbers. Similar changes were made on developments within transit priority areas/zones, which encouraged developments along transportation corridors, thereby helping the state and local jurisdictions in meeting climate action priorities and goals.

The College Area was designated a high growth area by SANDAG. Our population is expected to close to double in the next 30 years. Knowing this, the CACPB created a visioning project to solicit input from the community so that a development strategy could be presented to the city to accommodate this growth where we felt it was appropriate, rather than the city telling us where it should go.

Transit Priority Areas (TPAs) can be very large, and in fact, most of the College Area is a big giant TPA. In order to prevent the elimination of the substantial single-family neighborhoods within the community, we identified an overarching goal of prioritizing development along three main corridors, Montezuma Road, College Avenue and El Cajon Boulevard and at the intersections of the corridors (nodes). It was felt that the anticipated growth could be accommodated along these corridors and nodes while maintaining the integrity of the single-family neighborhoods and providing the economic

SEE **CA HAPPENINGS,** Page 13

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1743 Wazee Street, Suite 400 Denver, CO 80202.
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SAN DIEGO INTERNATIONAL AIRPORT. LET'S GO.

# *Vaccinations, rental assistance, STVRs and crime prevention*

**District 7 Dispatch**

**By RAUL A. CAMPILLO**

Allow me to begin with a quick COVID-19 vaccination update. Currently, anyone who is a healthcare worker, is over the age of 65, or is an employee in a school, education or childcare setting, a non-medical emergency first responder or worker in the food and agriculture sectors is eligible for vaccination. I encourage folks to check their eligibility online and make an appointment at bit.ly/3bskvl5.

At the March 2 City Council meeting, I was proud to make the motion to create a new emergency rental assistance program for struggling San Diego families funded with $83 million and another $9 million for outreach and communications to ensure that we are able to make our most vulnerable neighbors aware of all of the benefits available to them. To read more about the new program, visit bit.ly/3rt4nVV.

Also at the March 2 City Council meeting, I was pleased to second Council President Campbell's motion to create a new ordinance governing Short Term Vacation Rentals (STVRs) in our City. This ordinance will finally give us the ability to regulate STVRs appropriately and hold bad actors accountable, as our previous inability to do so posed a public safety risk. This ordinance protects our neighborhoods while continuing to provide critical options for San Diego property owners and visitors. Under the new policy, hosts will be required to educate their guests about local requirements in order to ensure that they are good short-term neighbors in the community they are visiting.

Lastly, I would like to thank all of the residents who have made our office aware of the incidents of exhibitions of speeding and racing on the city streets in our District. Both my office and the SDPD take this issue extremely seriously, and we request that residents continue to report these violations to SDPD immediately when you witness them. Once you have made the report to SDPD, please feel free to make our office aware of your report so that my relevant representative can follow up with the police department for an update on any enforcement actions that have taken place as a result of the report. An enforcement action that resulted in multiple arrests and vehicle impounding was recently taken on Mission Gorge Road as a result of a District 7 resident's report.

Thank you again for affording me this opportunity to serve. As

SEE **DIST. 7 DISPATCH**, Page 13

**THE NEW STVR ORDINANCE DETAILS**

- Caps the whole-home STVRs at 1% of the City's housing stock per the San Diego Planning Commission (based on SANDAG's annual Demographic and Socioeconomic Housing estimates), which would equate to 5,400 today.
- No limits put on home-sharing STVRs.
- Allows part-time STVR operators to obtain a license at lower annual fees to accommodate high visitor events such as Comic-Con, Pride or December Nights.
- Allows STVR owners a maximum of one license, per person.
- Creates a detailed Good Neighbor Policy along with strict enforcement guidelines, a fine structure for violations, and a license revocation standard.

The short-term rental issue is scheduled to return to the City Council in October 2021 for final review and refinement.

# Is being a social media influencer considered homework? It is for Point Loma High students

By DAVE SCHWAB | The Beacon

Point Loma High School instructor Anthony Palmiotto had an idea for engaging the interest of his cinema students: a project titled "How to be a social media influencer."

The assignment was straightforward. Choose a topic and promote it via any social media platform.

Turns out, some of his pupils already had a head start.

"I have a student in the class who's been doing digital media on YouTube for four years and he has 45,000 subscribers on a channel," Palmiotto said. "I thought, 'Wouldn't it be cool if you had a YouTube channel that was for social media influencing, sort of like digital marketing 101?'

Added Palmiotto: "I'd hoped the project would allow students to continue to enhance their video production skills. I wanted them to step into the digital age by making a film, or a video, and put it on YouTube or on a social media site."

Many of his students have exceeded Palmiotto's expectations. One is senior Noah Sanford.

"I recently created a video talking about a fishing company called Roboworm," said Sanford. "After the video was uploaded to YouTube, I sent them a link with a quick message, and in just 15 minutes they reached out to me and wanted to offer me a sponsorship. Of course I accepted, and this is hopefully just the start to a successful future in this industry."

An avid bass fisherman, Sanford said his expectations are to "be able to promote the sport of bass fishing and the importance of catch and release, as well as respecting wildlife/nature."

An NFL fan, senior Cade McKaveney runs a successful YouTube channel called "Steeler Nation Highlights."

"I produce content about the Pittsburgh Steelers and have amassed more than 75,000 followers on my social media platforms (42,000 subscribers on Youtube, and 33,000 followers on Instagram)," he said. "What started off as a hobby in 8th grade creating football highlight videos has grown into over 75,000 followers on social media and the opportunity to work closely with big-name NFL players. I've produced content for more than 50 NFL players."

Added McKaveney, "My goal for my Youtube channel and Instagram account is to continue to attract as many followers and subscribers as I can, and to further expand my knowledge of modern high-end marketing."

Senior Jessica Ellis created a video titled "The College Guide" (Get into your dream school – Jess' College Guide on YouTube).

"It's a short podcast about the college application process, what to expect when applying and getting decisions, as well as tips and tricks when applying," Ellis said. "My goal is to expand on this project and make it a series where I make multiple shorter videos about each topic discussed in the podcast, as well as other topics I didn't get to discuss. This includes building a college list, writing application essays, navigating applications, applying for financial aid and more."

Point Loma High senior Jessica Ellis.

Added Ellis: "My hope for this channel is to be a trustworthy and helpful resource for students during this confusing and exciting process. I hope to share some of my experience with applying to college during a global pandemic, so that other students can learn from my triumphs and mistakes."

Junior Aidan Cruz chose for his influencer project something familiar: making a YouTube channel trailer sharing his love for film.

"I decided to make mine on my top five films of 2020 because I have grown up watching similar reviews on YouTube," he said. "And being someone who dreams of one day making films of my own, I thought making this channel to share my passion for film would be a good idea. The trailer I'm making is a form of promotion for the channel I made, Aidan vs Evil Dead, to hopefully build an audience.

"But I wanted to make my trailer stand out while still advertising what the channel offers. That's why I decided to take inspiration from Rod Serling and shoot the trailer in black and white with an underlying horror theme, because that's the genre that interests me the most as a filmmaker right now."

Of his goals, Aidan said it is "to post any film-related project that I work on and to expand my reach. To get my name out there (even if it's just locally) would be a great help for my filmmaking career moving forward."

Cinema teacher Palmiotto talked about his expectations for this assignment.

"Every company on the planet markets on the internet now," he pointed out. "That's a big deal. Every local business uses Instagram, Facebook, etc. The goal was to teach kids skills that are transferable to marketing and advertising."

Reach Dave Schwab at reporter@sdnews.com.



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Historic church restoration

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A veteran receives a vaccine *(Photo by Lisa Misraje)*

Students from San Diego City College assist with vaccinations *(Photo courtesy SD City College)*

Veteran Johnny Bryant rests after receiving the vaccine *(Photo by Lisa Misraje)*

# Vulnerable populations receive vaccine

By Kendra Sitton

83-year-old Floyd Flagg received the Johnson & Johnson vaccine on the morning of Monday, March 22 as part of a partnership between the Veterans Village of San Diego (VVSD) and Family Health Centers.

Flagg said his arm felt fine after receiving the vaccine. The only hesitation he had in receiving the vaccine was mixed messages doctors gave him about whether he needed it after previously fighting a case of COVID-19.

The frail Navy veteran explained that he "had the virus but [is] still kicking."

He hopes others get the vaccine as well because people are dying and many people have lost their jobs.

"Just get back to normal," Flagg said.

For Flagg, receiving the vaccine came after a year of chaotic moves. He was admitted to Grossmont Hospital with COVID-19 for six days. After being released, he stayed in one of the county-funded hotels until he tested negative for the virus. At that point, he was moved to the mass shelter at the San Diego Convention Center before finally transferring to the Veterans Village transitional housing.

An area in the transitional housing building was converted into an open area to administer the vaccine for the residents and a few alumni of the program who are enrolled in the VA (Veteran's Affairs). Even an unsheltered veteran was able to walk into the clinic to receive the one-dose vaccine. The vaccination center being on site meant residents could easily access the vaccine and only have to make one trip before being fully inoculated. The effort from the VA, Family Health Centers and Veterans Village are part of an ongoing effort to ensure that vulnerable populations disproportionately affected by the virus also receive the vaccine.

"The vulnerable population deserves the best of the best. So if we know this is one time and go, then this is the population that needs that," said Lisa Misraje, the director of development at VVSD.

An army veteran who was vaccinated at the site, Johnny Bryant, said he was curious how the day would go because he had witnessed the chaos of the Petco Park mass vaccine site. He found the check-in process to be simple with almost no line.

"They said only one dose so that's even better," Bryant said. "It's convenient."

SEE **VACCINES,** Page 13

# *Social workers provide key support to struggling families*

By Kendra Sitton

Social work is a challenging profession at all times, but a year in pandemic meant many local social workers had to adapt quickly to changing conditions in order to serve some of the people most affected by coronavirus.

"I've come across, countless individuals who are unemployed and became homeless at the beginning of the pandemic or during and have connected their homelessness directly to the pandemic," said Rosalias Read.

As a social worker for Home Start, she does outreach to unsheltered people in East County to help connect them to services and housing. However, many of those resources evaporated during the pandemic. There are also waitlists for emergency shelters and permanent housing as the number of people experiencing homelessness rapidly increased in the past year.

Karina Hernandez, another social worker with the nonprofit organization Home Start, also works with unsheltered individuals, particularly transition age youth who are 18 to 24. She found assisting them to be a challenge this year because there were not many available jobs.

"With the lack of the opportunities for employment, it has been really hard," she said.

SEE **SOCIAL WORKERS,** Page 11

**Karina Hernandez works with transition age youth who are experiencing homelessness.** *(Photo courtesy Karina Hernandez)*

# Needlecraft Cottage celebrates one year

**Fashion Files**

By DIANA CAVAGNARO

Picture of Needlecraft Cottage *(Courtesy photos)*

Co-owners: Megan Hearle and Aaron Hughes

Yarns inside the store

Needlecraft Cottage opened last April with two new co-owners: Megan Hearle and Aaron Hughes. They took over this store which has been in Pacific Beach for 30 years. At a time when more people are staying home, needle work has become a new trend. People are looking for more DIY projects to do. The Needlecraft Cottage has you covered, offering needle crafts such as yarns for knitting and crocheting. They also carry beautiful fabrics for quilters. Quilting can be considered an art, a craft, or a hobby. In 2020 the size of the market was between 9-11 million quilters in North America.

I asked Hearle how they were affected by the Pandemic. She said they had to learn to adapt really fast and also how to sell products without people being able to come into the store. Since the pandemic, there is an even bigger demand for fabric to be used for making masks. The store did really well with this. The future goal is to bring in supplies and classes for cross stitch, embroidery, and other needlework.

Right now, they offer classes on Zoom but may change to in-person depending on San Diego's tier level. Currently, they give a class to teach basic crochet stitches. They also offer a Sweater Club which has no cost to join. The only requirement that the customer purchase their yarn for the project through the Needlecraft Cottage. The projects for March and April are Winters Beach and Gramps. If you are having trouble with your project, customers can make an appointment for knitting troubleshooting!

The yarns are sold at different price points so if you are an inexperienced knitter or crocheter, you can come in and find an inexpensive yarn to try it out for the first time. If you are an experienced knitter, you can come in and find an expensive yarn for your project. Many people are allergic to wool or have extra sensitive skin and the store has yarns for them too.

Needlecraft Cottage also has "Knit Alongs" where people on similar projects can get together and work on their projects while having fun at the same time. They hope in the future to have in-person classes, a launch party to celebrate the opening and to attract a younger crowd. They are open from 10 a.m.-5 p.m. on Tuesday through Sunday. For more information visit needlecraftcottagesd.com.

*—Diana Cavagnaro is an internationally renowned Couture Milliner based in the San Diego. Learn more about our Hat Designer, Teacher & Blogger at DianaCavagnaro.com*

Fabric inside the store

Inside store

Winters Beach project for March and April

Gramps project for March and April

## UPCOMING EVENTS

**April 7, 2021**
Making Waves: Textiles Addressing Sustainability at Visions Art Museum with Professor Susan Lazear at 11 a.m. Registration is free. bit.ly/3sqq1ui

**April 16, 2021**
Fashion Redux! Will be at 7 p.m. on zoom. This is a co-ordination between Mesa College and The San Diego History Center featuring a discussion panel with the top 4 Student designer. Registration at bit.ly/3fcPjlz

**April 22, 2021**
FWSD21 Spring Showcase from 6 p.m.-9p.m. For tickets visit: FashionWeekSD.com

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# San Diego Uptown News

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Local firms go international



Needlecraft Cottage's one year



Note from Toni



San Francisco writers



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SEE **SOCIAL WORKERS,** Page 11

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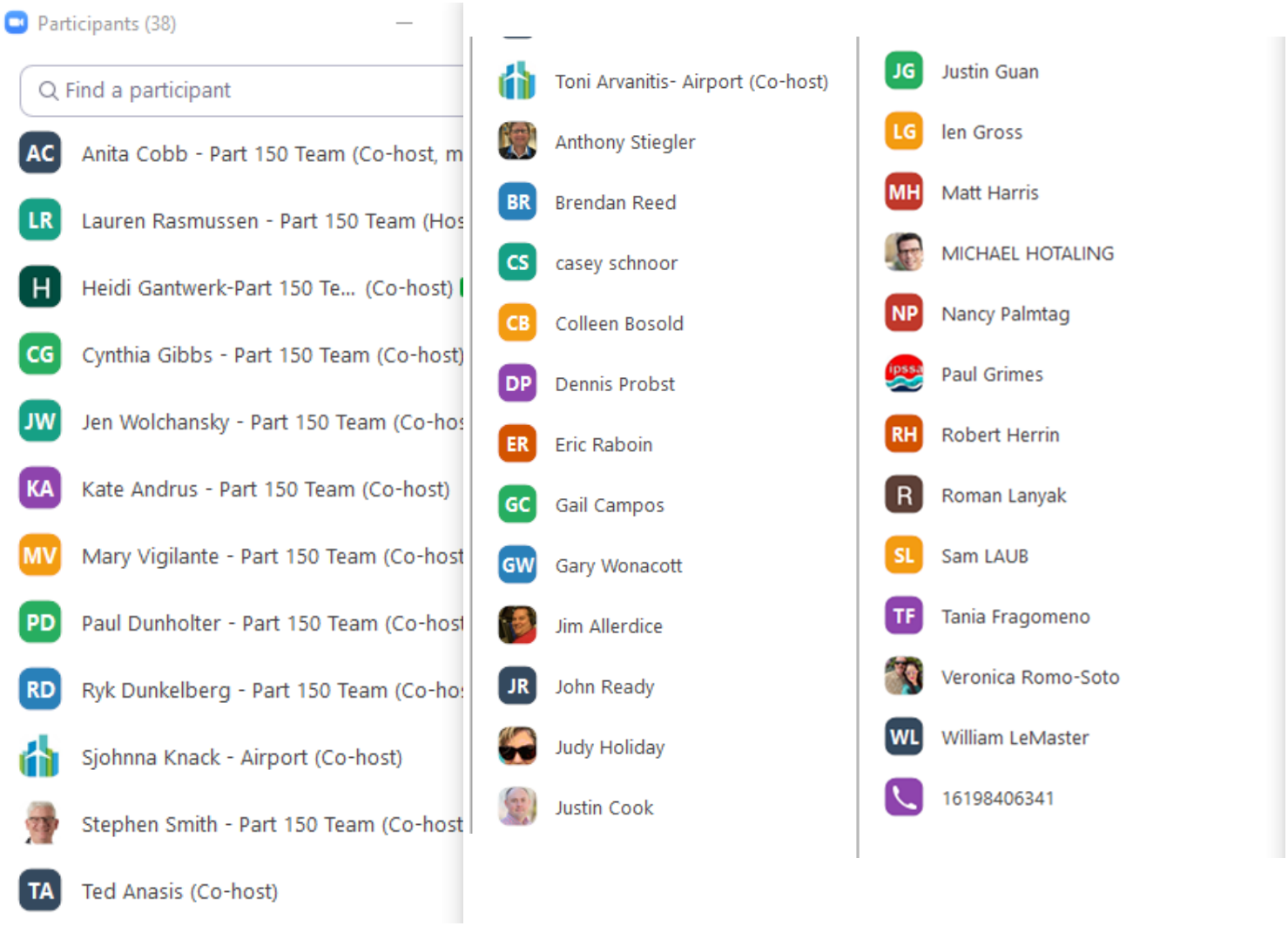
SDIA 14 CFR Part 150 Public Hearting - April 8, 2021
Attendee List



# SAN NOISE STUDY

## Official Public Hearing

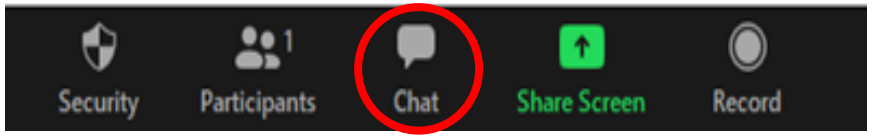
## 04.08.21

Mead & Hunt

SAN DIEGO INTERNATIONAL AIRPORT

# Zoom: Public Comment

- **All participants are muted to avoid over-talking in the main room**
- **Please remain muted until called on for public comment**
- **For help with Zoom, please use chat function to Jen Wolchansky**
- ***Meeting will be recorded***




SAN NOISE STUDY

Mead & Hunt

# Public Hearing Agenda

- **6:30 pm: Public Hearing Intro Presentation**
  - **Summary of Study and Recommendations**
- **6:40-8:00 pm: Verbal Public Comments**
  - **3 minutes per individual**
  - **People who registered on Zoom will go first, in order posted on website**
  - **The next three individuals on deck will be notified verbally and the next three individuals will also be placed in the chat to everyone**

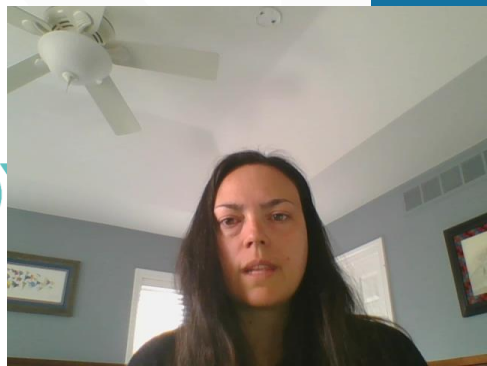
SAN NOISE STUDY

Mead & Hunt

# Welcome: Purpose of a Part 150 Study

- **Part 150 Studies *are voluntary,* the Airport Authority is being proactive to address aircraft noise levels and to identify measures to address them**
- **The Part 150 Study addresses aircraft noise issues within the 65 CNEL noise contour only**



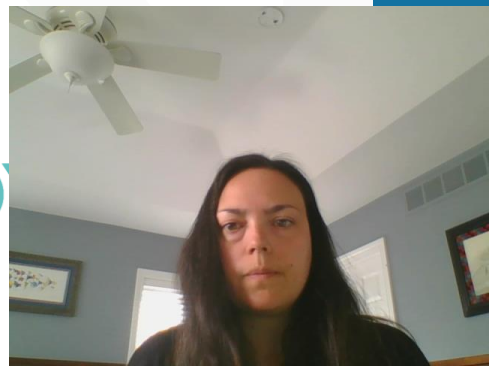


Mead & Hunt

# Elements of the Study

- The *Noise Exposure Maps (NEMs)* are accepted by the Federal Aviation Administration
- The *Noise Compatibility Program (NCP)* measures are either approved or disapproved by the FAA. Approved measures are eligible for Federal funding
- The Study will look at *aircraft fleet mix,* increase in *operations* and *noise levels* associated with them





# Existing and Future Operations

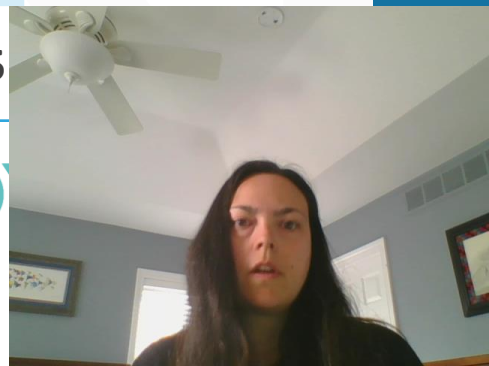
| Aircraft Category | 2018 Existing Operations* | 2026 Forecast Operations** |
|---|---|---|
| Commercial/Cargo | 212,430 | 247,105 |
| Air Taxi/Charter | 365 | 730 |
| General Aviation | 11,680 | 9,855 |
| Military | 730 | 730 |
| Helicopter | 365 | 365 |
| **Total** | **225,570** | **258,785** |

*Private Aircraft*

*As congestion and delays increase, GA operations will relocate to less congested airports*

***Source:** Airport ANOM Data, 2018, Leigh Fisher and HMMH Analysis
****Source:** 2018 Aviation Activity Forecast Update, LeighFisher June 2019

SAN NOISE STUD



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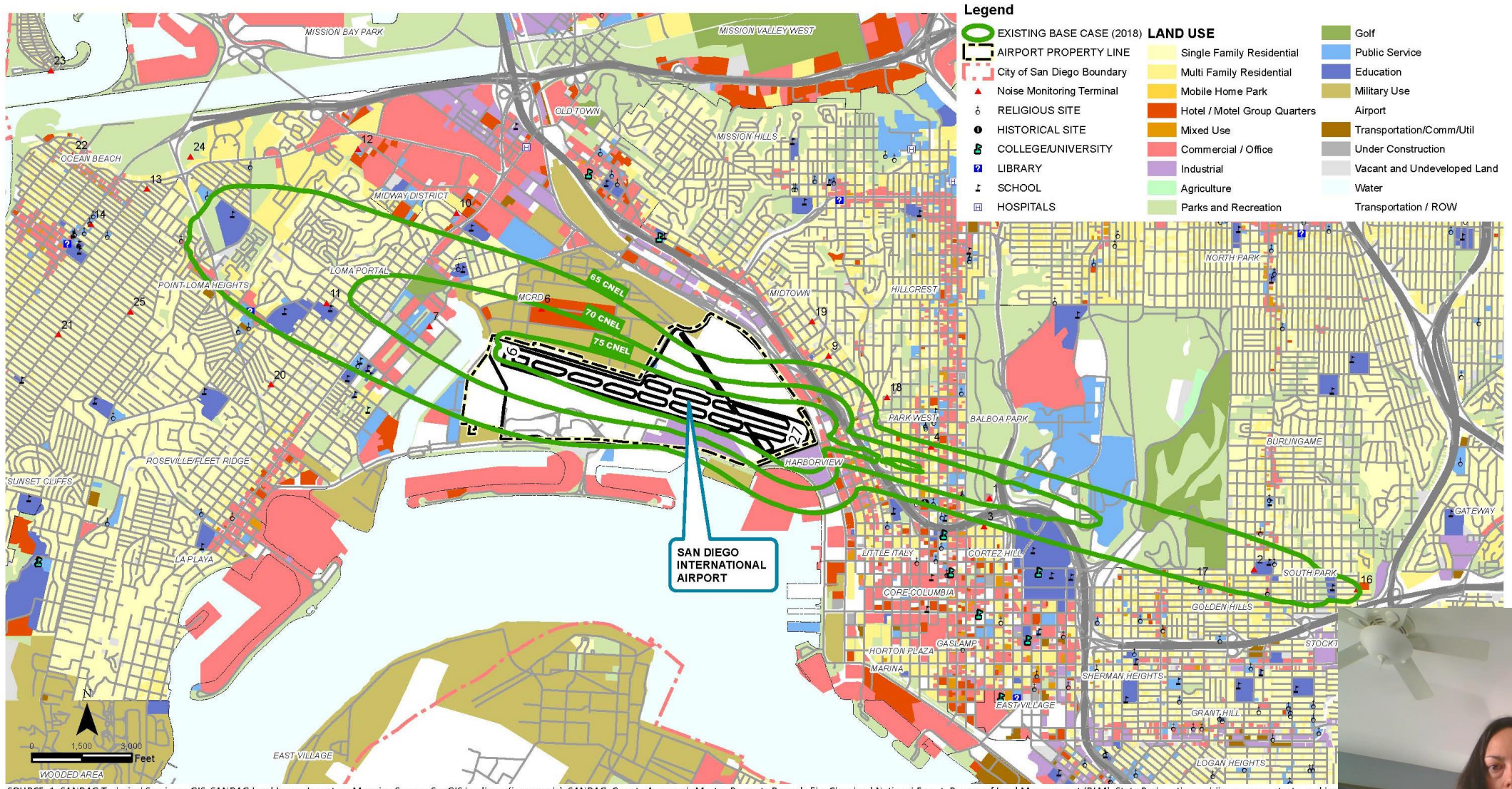
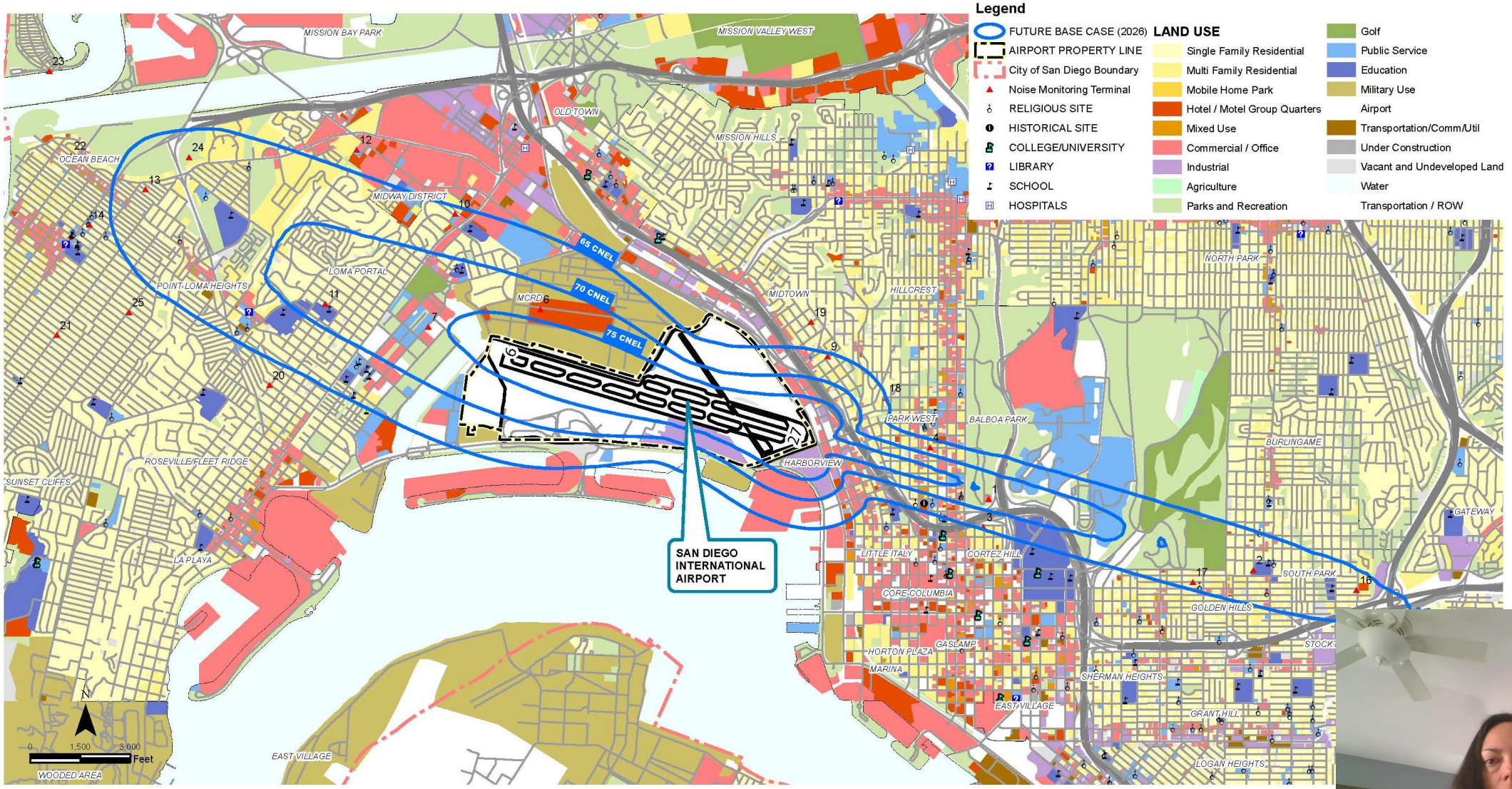
# Existing NEM (2018)




SOURCE: 1. SANDAG Technical Services - GIS, SANDAG Land Layers Inventory Mapping Source: SanGIS landbase (i.e. parcels), SANDAG, County Assessor's Master Property Records file, Cleveland National Forest, Bureau of Land Management (BLM), State Parks, other public agency contacts, and loc
2. SDIA ANOMS 2019 and associated appendices. 3. HMMH, September, 2020 (Refined Base Case Contours).

Mead & Hunt

# Future NEM (2026)

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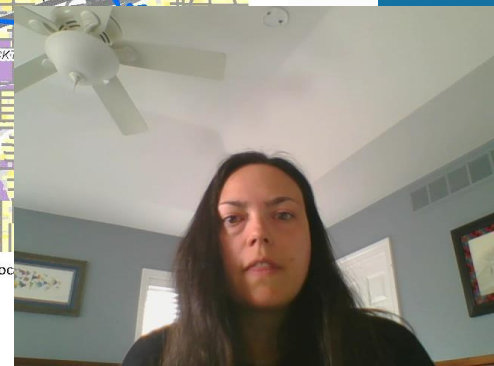


Mead & Hunt

# Population and Housing Units Base Case: 2018 and 2026



| 2018 | Population | Housing Units |
|---|---|---|
| 65 dB CNEL and greater | 16,188 | 7,805 |
| 70 dB CNEL and greater | 1,907 | 1,236 |
| 75 dB CNEL and greater | 178 | 131 |

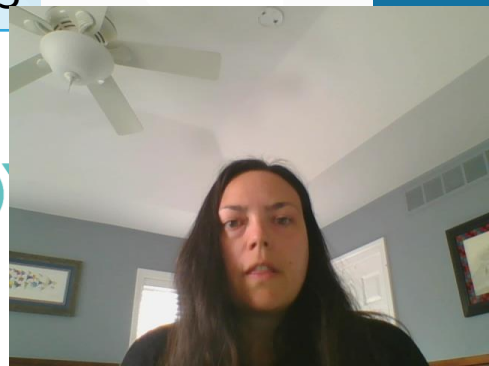
| 2026 | Population | Housing Units |
|---|---|---|
| 65 dB CNEL and greater | 30,976 | 15,149 |
| 70 dB CNEL and greater | 5,173 | 2,642 |
| 75 dB CNEL and greater | 699 | 515 |

**Source:** US Census 2010, Mead & Hunt Land Use Analysis, 2020; HMMH Contours, 2020.

**Note:** These numbers include homes that have been sound attenuated or were built after October 1, 1998 and therefore considered compatible (Approx. **4,300** homes have been sound attenuated through 5/28/20)

**Contours are cumulative (i.e. 65 dB CNEL includes all homes within the 65, 70 and 75 contours)**

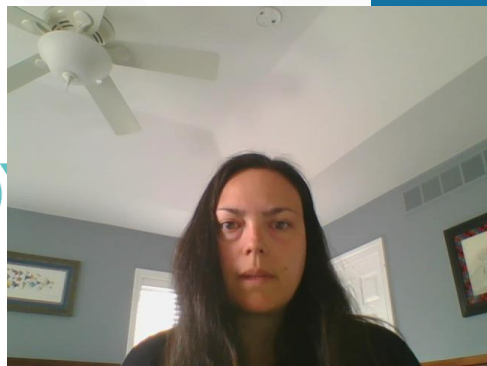
SAN NOISE STUD



Mead & Hunt

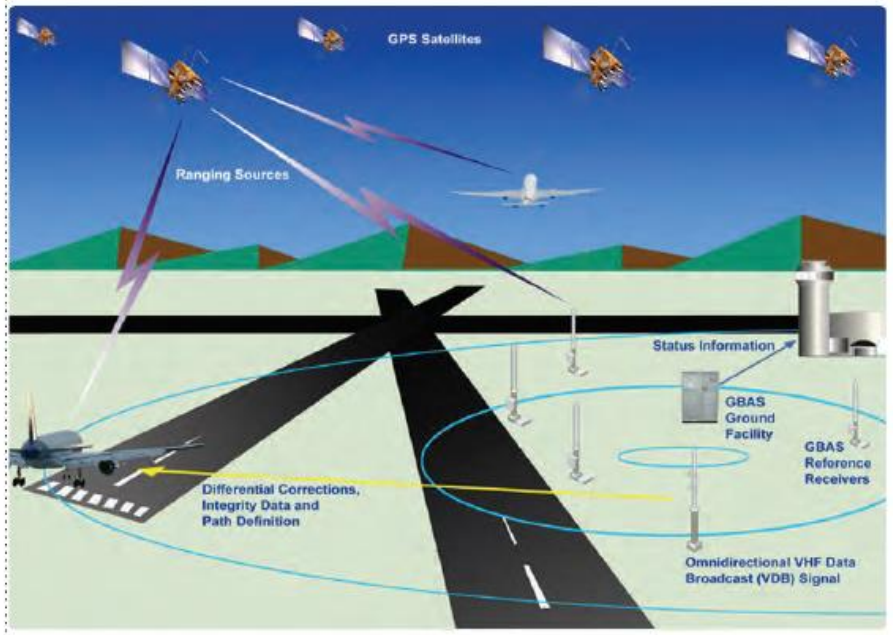
# Categories of Recommendations

- **Operational and Facility Recommendations**
- **Land Use Recommendations**
  - Preventative: Land Use Restrictions
  - Remedial: Sound Attenuation (Quieter Home Program)
- **Administrative Recommendations**



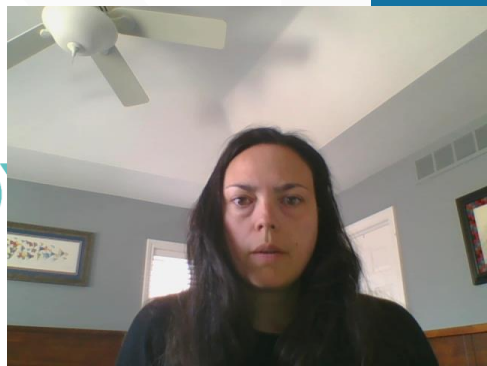
# FACILITY RECOMMENDATION – Ground Based Augmentation System (GBAS)






- GBAS can provide precision lateral and vertical guidance for multiple runway ends
- Allows for more repeatable and precise paths and consistency with 3.5-degree glidepath
- Reduction/elimination of level segments during the descent, requiring less engine thrust
- Could provide reductions of 1-2 dBA on east side approach
  - Less than 5 dBA is typically not "perceived" by the human ear
  - However, cumulative changes and consistency could result in long term benefits

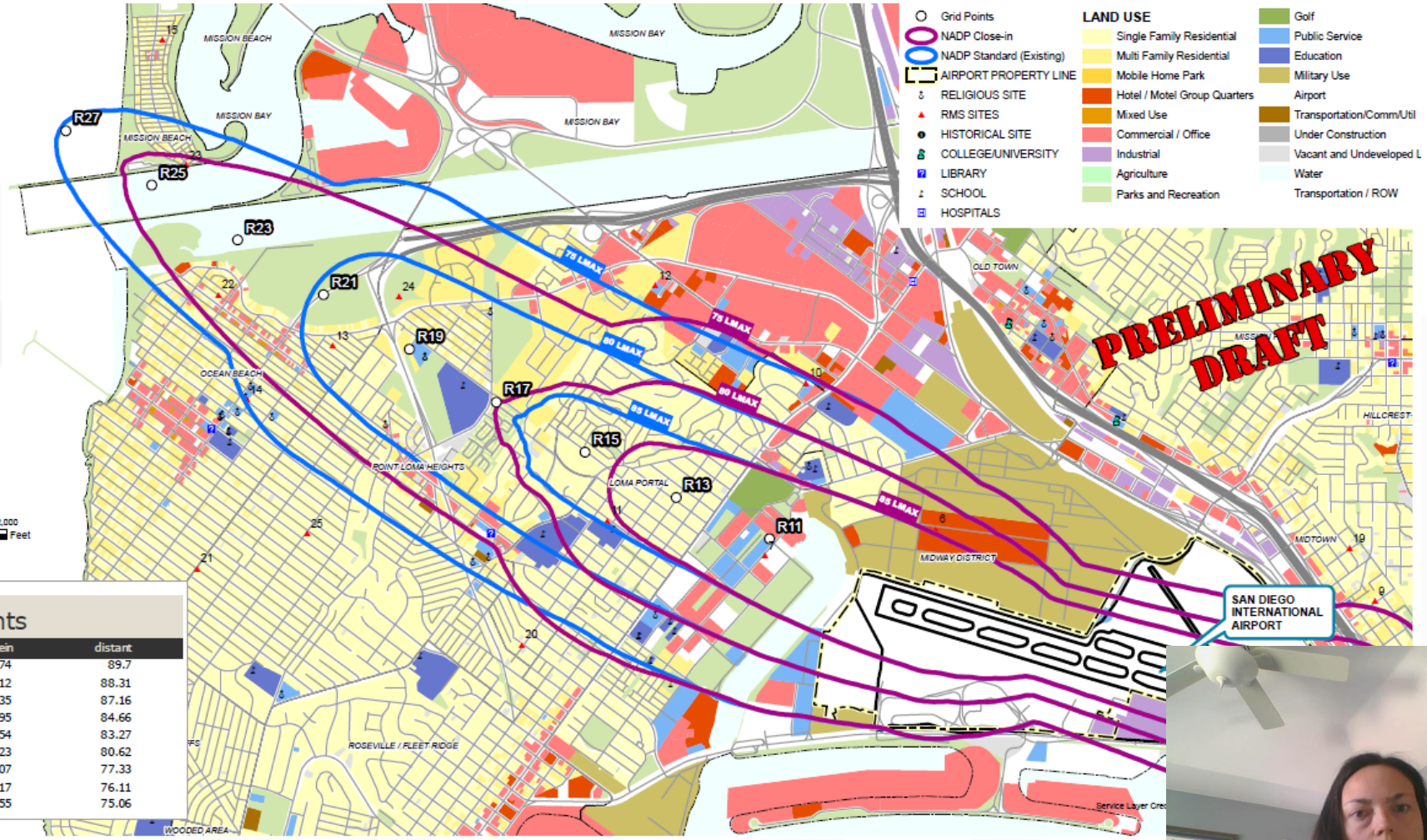
SAN NOISE STUDY



Mead & Hunt

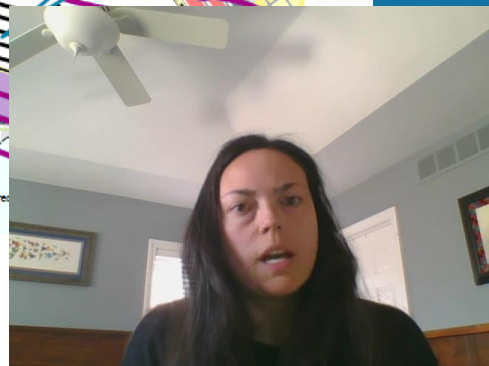
# Climb Profile - Modification to Noise Abatement Departure Procedure (NADP): LMAX Analysis

| | Distant NADP (Existing) | Close-in NADP |
|---|---|---|
| | **Population** | **Difference** |
| **> 85 Lmax** | 2,048 | -1,016 |
| | **Housing Units** | **Difference** |
| **> 85 Lmax** | 877 | -438 |




Grid Points

| id | closein | distant |
|---|---|---|
| R11 | 89.74 | 89.7 |
| R13 | 87.12 | 88.31 |
| R15 | 82.35 | 87.16 |
| R17 | 79.95 | 84.66 |
| R19 | 78.54 | 83.27 |
| R21 | 77.23 | 80.62 |
| R23 | 76.07 | 77.33 |
| R25 | 75.17 | 76.11 |
| R27 | 74.55 | 75.06 |



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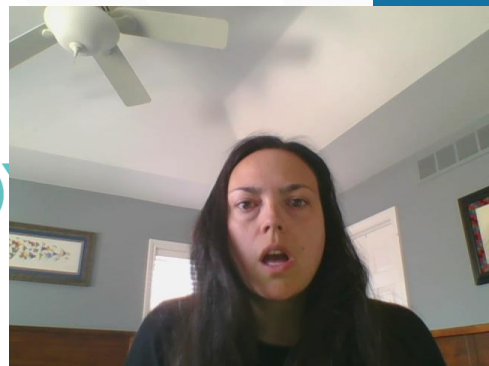
# Administrative Recommendations

- **Continued measures**
  - Continued Support of Aircraft Noise Office and Program Manager
  - Update Airport Noise and Operations Monitoring System (ANOMS)
  - Communicate Noise Issues with Airlines
  - Provide Airport Use Regulations
  - Continue Completing California Quarterly Noise Reports
  - Update Noise Exposure Maps, every 5 years
  - Update NCP as needed
- **Updated Measures**
  - Continue Fly Quiet Program with updates
- **New Measures**
  - Implement Portable Noise Monitoring

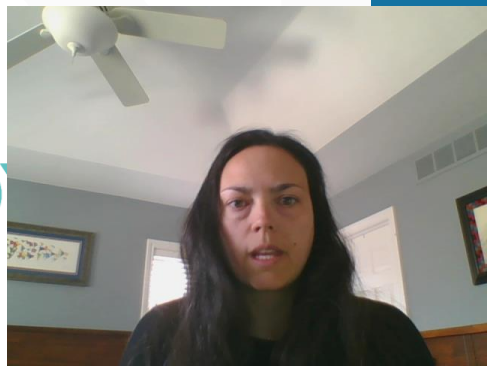
SAN NOISE STUDY



# Land Use Recommendations

- **Continued measures**
  - Support compatible land use development: Local jurisdictions
  - Compatibility Planning Process: Local jurisdictions
  - Support of San Diego County Airport Land Use Commission (ALUC)
- **Updated Measures**
  - Continuation of Quieter Home Program
    - Residential and non-residential insulation

SAN NOISE STUDY



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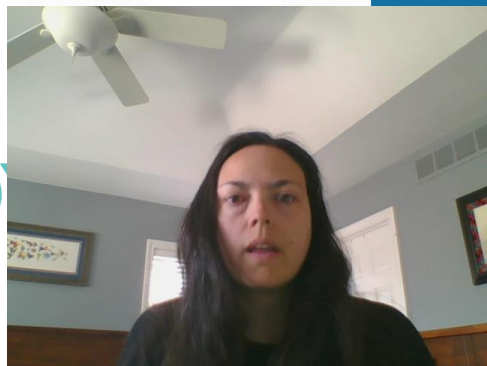
# Next Steps of Study

- Gather comments at the hearing and through the end of the public comment period (April 21)
- Respond to all substantive comments for inclusion in the Study
- Review comments and recommendations with TAC/CAC (April 13)
- Present Part 150 Study Update to ANAC for their recommendation to submit to Airport Authority Board (April 21)
- Airport Authority Board (June 3)





# Public Comment Format

- 3 minutes per individual
- People who registered on Zoom will go first, in order posted on website
- Team will call next three individuals on deck and the next three individuals will also be identified in the chat to everyone
- When your name is called, please unmute and provide your comments
- Three-minute timer will start, give notice when close to end with color change
  - If additional time is available, we will open it up at end for non-registered individuals to comment
  - Additional written comments can be submitted through April 21, 2021

SAN NOISE STUDY

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# Next Steps and Closing

- **Thank you!**
- **Please submit any additional comments by April 21st at:**
  - https://sannoisestudy.com
  - Or written to:

    Jen Wolchanksy

    1743 Wazee Street, Suite 400

    Denver, CO 80202
  - Document, video presentation links and additional workshop slides can also be found on the project website

SAN NOISE STUDY

Mead & Hunt

Thank you!

# SAN NOISE STUDY

## Official Public Hearing

## 04.08.21

Mead & Hunt

SAN DIEGO INTERNATIONAL AIRPORT

Transcript of the Proceedings of:

# PUBLIC HEARING

SAN DIEGO INTERNATIONAL PART 150 STUDY

April 8, 2021

IMAGINE
REPORTING

SAN DIEGO INTERNATIONAL PART 150 STUDY

SAN DIEGO, CALIFORNIA

THURSDAY, APRIL 8, 2021

Reported by:

Cynthia Denise Stires, CSR No. 4472

I N D E X

SAN DIEGO, CALIFORNIA; APRIL 8, 2021; 6:32 P.M.

MS. GANTWERK: If you're joining us for the public hearing on the Part 150 Study update, we will be starting in just a moment.

Hi, everybody, and welcome to our Part 150, the public hearing this evening. We can go to the next slide just to give you a little bit of, sort of, logistical information. Obviously we are working on Zoom tonight.

In this main room, we have everybody muted to avoid folks talking over each other, and we're going to ask that you remain muted, that everybody keep their -- themselves on mute until you're called on for public comment, when we get to the public comment section of this hearing.

If you need help with Zoom or with anything technical, if you look at your chat function, you should be able to chat to Jen Wolchansky. Jen is going to be helping you. She will work with you to make sure that you can see and hear and participate.

I would like to make sure everybody understands that this meeting is going to be recorded, and you should see that happening soon, and we are also making sure to transcribe all of the comments that come

in today.

With that, I'm going to turn it over to Sjohnna Knack.

MS. KNACK: Thank you, Heidi.

Today is April 8th, 2021, at about 6:34 p.m., the time, and we want to welcome everyone to the official public hearing for the 14 CFR Part 150 Noise Compatibility Study update for the San Diego International Airport.

My name is Sjohnna Knack, and I represent the Airport Authority.

The purpose of today's public hearing is to obtain public comments on the Draft Part 150 Study. All comments given during this hearing will be recorded as part of the official public record and will become part of the official study.

I want to thank those who participated in the workshop and asked some really good questions. I heard there was some really good robust dialogue.

The hearing is intended for the comments on the draft. Comments provided during this meeting and through the public comment period will be included in the study, and all substantive comments will be addressed in the final study.

We appreciate everyone's interests and

participation in this process and look forward to your comments.

With that, I'll hand it back off to Heidi to discuss the process.

MS. GANTWERK: Thanks, Sjohnna.

As we move into this, we're going to have this brief presentation, and then we're going into those comments. And what we have is a list of individuals who have preregistered to speak during the hearing. We're going to start with that list.

We are going to put names in the chat, and I will also be reading those names. I'm going to read three names at a time, so the next person to speak and the two folks after that. You'll see Jen place those in the chat.

When your name is first on the list, please unmute yourself, and then you can put your camera on if you'd like. And we ask that when you speak, that you please slowly and clearly introduce yourself before you make your comments, with your name.

Once you start speaking, after you've introduced yourself, you will get three minutes. We will have a countdown clock visible, and it's going to change color to yellow when you have one minute left, and then it's going to change color to red when you

have 15 seconds left, and we ask at that point that you wrap up your comments.

We ask that you keep to that three-minute time, as you can always follow up. If you have more that you feel you'd like to share in a comment, you have the opportunity to submit a written comment again all the way through the 21st of April.

And just as a reminder, as you just heard from Sjohnna, that we are not responding to questions or comments; that the purpose of this public hearing is to take all of your comments, to record them, for the purposes of that study.

So with that, we are going to move on to a short video that lays out the key elements of the Part 150 Study.

**VIDEO PRESENTATION**

We would like to welcome you to the public hearing for the San Diego International Airport Part 150 Noise Compatibility Study. We appreciate the participation and feedback on the elements of the study.

Before opening up for public comment, we would like to give a short presentation summarizing the process, the noise exposure maps, and the draft recommendations of the study.

The purpose of a Part 150 Study is to reduce the number of noncompatible land uses and to prevent new noncompatible land uses as well. These studies focus on the noise contained within the 65 community noise equivalent level, or CNEL contour.

Within the 65 CNEL, land uses, such as residences, are considered noncompatible with air traffic noise. These studies are voluntary, and San Diego International Airport has participated in these programs since 1991, when their first Part 150 Study was completed.

This Part 150 Study update was primarily initiated in response to the Airport Noise Advisory Committee, or ANAC, recommendations, relative to operational changes that may change the 65 CNEL contour.

Additionally, updated noise exposure maps are required to continue to get federal funding for recommendations in a Noise Compatibility Program, and specifically for San Diego, funding to continue the sound insulation efforts of the quieter home program.

There are two main parts to any Part 150 Study: The first is the noise exposure maps, or NEMs, which depict the annual average cumulative noise through a set of contours.

There are two NEMs: The existing, which for this project is for the year 2018, when the study was initiated, and the future, 2026, which is five years from the year of submission.

As stated previously, the future NEM is one element needed to determine the eligibility of federal funding programs like sound insulation.

The second part of the study is the Noise Compatibility Program, or NCP. These are the measures that are analyzed and determined whether or not they meet the purposes of the Part 150 Study, which is to reduce noncompatible land uses and prevent any new noncompatible land uses. (Inaudible)

For the noise exposure maps, we used existing operations for 2018 for the existing NEM and a forecast of future operations for 2026. Those numbers are detailed here and in the forecast chapter of the document.

This figure shows the existing noise exposure map for the year 2018, which was the year that the study was initiated. This shows the 65 CNEL and greater noise contours. This figure shows the future noise exposure map for the forecast operations approximately five years from now in 2026.

The 65 CNEL contour, depicted here as the

outermost contour, is the one used by FAA to determine potential eligibility for federal funding land uses, such as residences and schools within the 65 CNEL and greater contour are considered to be noncompatible land uses.

This table summarizes those noncompatible land uses within the 65 CNEL and greater contours for the existing and future noise exposure maps.

The housing units within the 2026 65 CNEL and greater contours are potentially eligible for federal funding for any accrued measures of the Noise Compatibility Program.

Building on the noise exposure maps, the next step is to evaluate a series of alternatives to meet the purpose of reducing noncompatible land uses. Over the course of the study, the team has evaluated a range of operational alternatives, facility alternatives, land use alternatives, and administrative alternatives.

During the alternatives evaluation, the study included extensive public and stakeholder coordination with regular meetings of the technical and community advisory committees, public workshops, and briefings to ANAC, the FAA, and the Airport Authority.

Alternatives were selected for modeling or

additional analysis based on several criteria, the first of which is the consistency with Part 150 requirements. Four rounds of modeling were conducted to refine and add alternatives based on comment in addition to all the alternatives required by Part 150.

A Part 150 Study focuses on reducing the number of noncompatible land uses within the 65 CNEL, or greater contour, and preventing new noncompatible land uses. This is an important detail because it means that generally shifting noise, which could create new noncompatible land uses, is not considered to meet the purpose of Part 150.

Therefore, many operational alternatives that were evaluated are not moving forward as recommendations because they would shift noise, creating new noncompatible land uses.

The preliminary recommendations were developed by the consultants for consideration of the public. These recommendations are based on consistency with Part 150 to reduce noncompatible land uses and prevent new noncompatible land uses. The general feasibility of the alternatives within the 65 CNEL public and committee discussions as well as the expertise of the team. The recommendations also builds on the fact that the airport has a mature noise program

already in place.

Last time we discussed the range of alternatives examined and analyzed in the Part 150 Study, and today we'd like to focus on those alternatives that are recommended.

Because many operational alternatives showed a shift in noise, the team turned to other options that may not have a material impact on the 65 CNEL contour immediately, but they could have immediate single-event benefits and the potential for long-term benefits for the 65 CNEL contour.

The first facility recommendation is the ground-based augmentation system, or GBAS, which is a facility alternative that provides precision lateral and vertical guidance.

The airport currently has a steeper than normal glide path, 3.5 degrees versus 3 degrees. And GBAS could allow for more repeatable and precise paths for consistency with this (Inaudible).

This technology could also reduce the level segments during descent requiring less engine noise. The technology is new. And, currently, only approximately 20 to 25 percent of the aircraft operating at the airport are equipped to use GBAS once implemented at the airport.

These aircraft could see a reduction in one to two DBA on the eastside approach, which would not deprive a visible reduction in the cumulative 65 CNEL contour.

However, over time, increased use of this type of technology would provide more substantial benefits. Therefore, the team has included it as a recommendation.

The second recommendation is the use of a noise abatement departure procedure, or MADP. This involves a takeoff procedure that changes the profile of departure from the airport resulting in a steeper ascent than normal.

This recommendation could create a reduction in the single-event levels around the airport, but would not likely have a large impact on the cumulative metric of CNEL.

The study builds upon the previous Part 150 studies that the airport has completed. The administrative recommendation include the following continued measures primarily surrounding the continued support of the noise program already in place at the airport.

Additionally, the study is recommending some additional revisions to the Fly Quiet Program to track

additional metrics relative to the phasing out of earlier noisier aircraft over time.

New alternatives include implementing portable noise monitoring, allowing the airport to expand their permanent noise monitoring program with portable noise monitoring, to check additional areas of concern by the community. A placement and analysis of this program would be directed by a noise engineer.

Land use recommendations include the continued support of preventative measures. This includes supporting the San Diego County Airport Land Use Commission and other local land use development and compatibility planning processes in order to prevent the creation of new noncompatible land uses close to the airport.

Updated alternatives include the continuation of the quieter home program, which will be updated with a new eligibility boundary for the sound insulation program prior to the 65 CNEL noise contour of the 2026 future NEM map shown earlier. Additionally, it would allow nonresidential structures, such as schools, to be insulated.

Today we're here to gather verbal comments from the public on the study, and we will also be collecting written comments through the 21st of April.

We appreciate all the feedback.

After the comment period is closed, the team will respond to all substantive comments for inclusion in the study. We will also conduct a meeting with the technical advisory committee and the community advisory committee on the comments received to date and the recommendations of the study.

Then, on April 21st, we will present the study to ANAC for their recommendation to go to the Airport Authority Board. The Airport Authority Board will also need to pass a resolution to submit the study to the FAA.

Once it is submitted to the FAA, it will review the noise exposure maps and accept the noise exposure maps, at which point, a 180-day clock starts for the review of the noise compatibility plan.

After this review period, the FAA will either approve or disapprove of each individual recommendation. Approved recommendations would then potentially be eligible for federal funding, including elements of the -- such as the continuation of the Quieter Home Program.

Thank you for your participation in the study, and we look forward to your comments at the hearing and through the public comment period.

**END OF VIDEO PRESENTATION**

MS. GANTWERK: Thank you.

So as a reminder for those of you who have joined us, we are now starting the public comment period. We have three minutes per individual. Folks who registered will go first in the order posted on the website. I'm going to read those names in a moment. I will be calling three people.

Again, the first person can unmute themselves and put themselves on video. And you should see a square that is called "timer," and that timer is going to change colors at one minute and then 15 seconds.

Once we get through all of the people that have registered, if we have additional time available, we will open it up at the end for nonregistered individuals who have not yet had an opportunity to comment, to comment.

Once again, we encourage you to submit written comments through April 21st, 2021.

With that, I'm going to call the first three names, and the first three names are going to be Carla -- is it Perkin or Peakin? Carla, and Sara Hanson, and Megan Bryan.

Again, when it is your time to speak, please slowly and clearly state your name so that we make sure

we have that in the record as well.

Carla. Do we have Carla? Is Carla on? Okay. I am not seeing Carla. We will come back and check for Carla in a moment.

Sara Hanson. Sara, are you here with us? Okay.

Next on the list is going to be Megan Bryan. Megan? Okay. Perhaps we can go to the next few names on the list.

And Carla or Megan or Sara, if you are here and for some reason are having trouble, please chat Jen in the chat -- Jen Wolchansky. Thanks.

Sam Laub. Sam is going to be the next speaker. And I believe after Sam, is Kathy Vanderheuvel.

So, Sam, I believe you -- I saw you earlier, Sam. Are you with us? Did we lose Sam? Okay. Interesting.

Then I think -- is Kathy with us? Okay. I know Sam was here earlier. Kathy is not here. We're going to keep going down the list.

Is Casey back? Casey are you here, Casey Schnoor?

MS. SCHNOOR: I'm here, but I have no comments. Thank you.

MS. GANTWERK: Okay. Thanks, Casey.

Paul Grimes. Paul?

MR. GRIMES: Yes, I am here. Name, Paul Grimes, 936 Moana Drive, San Diego 92106. I'm a former director of schedule planning of PSA, former ANAC member when I worked for Byron Ware (phonetic).

I'm here today to speak mostly about the large narrow body of fleet projections. There's major miscalculations on these. There are no 737 900s listed. There are no Airbus NEO airplanes listed on any -- on either the 2018 or 2026. 2026, there's only two Maxes, two roundtrip Maxes. So obviously the west side contours have got to be way off to some extent.

Old technologies aircraft, the current ones -- I'm excluding the Maxes and the NEOs -- are expected to go up by 32 percent, from my calculations, from the 2018 numbers. I'm not sure where those airplanes are coming from since they're out of production, and a lot of them are being retired at this point.

The 320, for example, is being doubled in the expectations, and the airplane will be 27 years old in 2026. Southwest is buying 737 700s, Maxes, to retire their 737 700s, but you're expecting 80 percent more of them any ways.

There's approximately a 10 percent narrow body fleet before the Max and the NEL family at this point. My calculation says it goes up to 35 percent within a few years in this time frame. All of them will not necessarily be delivered.

So something has to be done to address these problems we have with the -- with this forecast. I see numerous options to try and improve things, but the one that's missing is the big elephant in the room, which is the fleet mix.

In 1990, the US passed the Airport Noise and Capacity Act, which accelerated the use of stage 2 airplanes in exchange for local airports losing control. Fortunately, we still have our curfew.

However, this law has had no effect on the airlines negatively for years, while the restrictions on the airports still remain.

I hope that the San Diego Regional Airport Authority could work with the local Congressional delegation or someone to come up with a new regulation that would at least require airlines to fly a minimum of their newer-engined airplanes into the airport and also to provide maybe limitations on when those airplanes could be operated, because that's where a lot of the problems are.

You're expecting 30 percent growth here. It's not going to come out of the old airplanes. It's going to come out of the new ones, but we've got to do something to keep the noise down.

So I appreciate your time. Thank you very much.

MS. GANTWERK: Thank you very much, Paul.

We next have Elizabeth Getzoff and then Gary Wonacott.

MS. GETZOFF: This is Elizabeth Getzoff. Thank you for the helpful presentations. I want to support the comments that Paul has obviously put a lot of time into.

And it appeared that aside from any mistakes in the forecast, the major thing that's doable is the NADP procedure, and I hope that can be implemented soon. Thank you.

MS. GANTWERK: Thank you, Elizabeth.

We next have Gary Wonacott, and we had Kathy Ives. I'm not sure.

Is Kathy still with us?

But, Gary, go ahead.

MR. WONACOTT: Thank you.

My name is Gary Wonacott. I live at 731 Avalon Court, in Mission Beach, and I would like to

begin by reminding us all that in 2017, when the FAA implemented the NextGen, it concentrated the flow of aircraft over South Mission Beach, and it dramatically increased the noise here.

That was -- we had a large -- a very large -- increase in complaints, and it was one of the reasons that we ended up with the 22 recommendations to try to find solutions that would move Padres south or find some mitigation measures.

And so I'm very disappointed that after four years, maybe hundreds of thousands of dollars of taxpayer money and many hours, as Casey said, of community service, we've accomplished virtually nothing.

I'm also disappointed in the inconsistencies. Also, supporting Paul's point, that in the forecast, there's, to me, a huge, glaring inconsistency under the nighttime departures. I'm comparing 2018 and 2026. In 2018 there are 11 departures at night and in 2026 there are 54.

So what I was told is that the nighttime covers the period from 10:00 p.m. until 7:00 a.m. the next morning.

Well, I can guarantee you there are not just 11 departures between 10:00 p.m. and 7:00 a.m. the next

day. The 54 is also a huge number. It's a huge increase, and it's really driving this -- the whole 150 Study.

And yet, under the screening analysis, the 2018 numbers reduced again, which are very, very small and not at all representative of what is in the 2026. So I think there's a huge inconsistency in the screening study that was done and then the final Part 150.

I'm also certainly at odds with the Airport Authority analysts, or the consultants, when it comes to the position of the 290 as well as the Padres as it crosses over Mission Beach. You show an average distance between those two of about a 10th of a mile. That's nothing.

Our analyses shows that it's more like almost .3 miles. So there's no way that the study can end up with some of the results it did. And I think this really should be looked at because it's such a huge disparate. I think there's still a lot of work to be done.

Thank you.

MS. GANTWERK: Thank you, Gary.

Let me check again if Kathy Ives is here. And I'm just going to read down the names from our list

before.

If you were not registered but wish to make a comment, you can put your name in the chat now, and we'll be able to take any additional comments. Just put that name in the chat to Jen, and we will make sure to include.

Just going back to Carla. Has Carla rejoined or Sara, Megan, or Sam? I'm not seeing any of those folks back. Kathy? And I think we've heard from everybody else. Okay.

Anyone else who has put their names in the chat who wishes to address the group and submit a public comment at this point? Okay. I am not seeing any names.

Jen, if you could confirm that for me. We'll give it another minute. Okay. We'll just give it one more minute and just make sure there is no one else here who wishes to address this group. We really want to make it easy for you to do so. I am not seeing --

Go ahead.

MS. KNACK: Heidi, can I just recommend if there's anyone who couldn't do a chat, if they just want to raise their hand if they can't. I just want to make sure we get everybody.

MS. GANTWERK: Yep. You can feel free to

turn your camera on and wave at me if you'd like to speak. Okay. I am not seeing anybody.

Folks from my team, is there anyone I am missing that you see? We really want to make sure you have the chance.

Okay. Well, then, I think can we go back, Anita, and share the last couple of slides.

Okay. And, again, I encourage those of you who did not address the group today, if you have comments or if you have thoughts after the public workshop and this hearing today, you can, again, access all of the materials for the Part 150 Study on the website and submit those comments.

And with that, I'm going to turn it over to Sjohnna to close out this meeting.

MS. KNACK: Thank you, Heidi.

On behalf of the Airport Authority, I want to thank everyone for joining us here for the 14 CFR Part 150 Noise Compatibility update public hearing. We appreciate the comments, and they will be included in the public record.

Again, as Heidi just mentioned, if there are additional comments, you can submit them on the study's website, sannoisestudy.com, through April 21st. Or if you do not have access to a computer, we do have -- you

can write to the physical address on this.

I will mention, if you need to physically look at a copy, we do have one in the aircraft noise office in Liberty Station, and you can e-mail Jen for that information as well.

It looks like there are no more public comments.

It is currently 7:00 p.m., and we will close the public hearing. Thank you so much.

* * * * * *

Whereupon, the within proceedings concluded at the approximate hour 7:00 p.m. on the 8th day of April, 2021.

* * * * * *

STATE OF CALIFORNIA

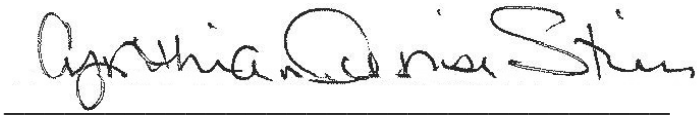
COUNTY OF SAN DIEGO

I, CYNTHIA DENISE STIRES, Certified Shorthand Reporter, in and for the State of California, Certificate Number 4472, do hereby certify:

That the proceedings were taken before me, at the time and place therein set forth, and reported by me in shorthand and transcribed, through computer-aided transcription, under my direction; and that the above and foregoing pages are a true record of the proceedings had.

I do further certify that I am a disinterested person and am in no way interested in the outcome of this action or connected with or related to any of the parties in this action.

In witness whereof, I have hereunto set my hand this 16th day of April, 2021.



CYNTHIA DENISE STIRES, CSR NO. 4472

# SAN NOISE STUDY

## ANAC

05.05.21

Mead & Hunt

SAN DIEGO INTERNATIONAL AIRPORT

# Agenda

- Summary of Part 150 Study recommendations
- Summary of public comments
- Comments and discussion

SAN NOISE STUDY

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# Welcome: Purpose of a Part 150 Study

- **Part 150 Studies *are voluntary,* the Airport Authority is being proactive to address aircraft noise levels and to identify measures to address them**
- **The Part 150 Study addresses aircraft noise issues within the 65 CNEL noise contour only**

SAN NOISE STUDY

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# Elements of the Study

- The *Noise Exposure Maps (NEMs)* are accepted by the Federal Aviation Administration
- The *Noise Compatibility Program (NCP)* measures are either approved or disapproved by the FAA. Approved measures are eligible for Federal funding
- The Study looks at *aircraft fleet mix*, increase in *operations* and *noise levels* associated with them

# A Look Back at the Process

The Part 150 Noise Study has been updated **three times** in the last **30 years**

Over **two years**, **14 public meetings** have been held

**10 noise impacted San Diego communities** have been represented in those discussions

**More than 30 alternatives** were evaluated

**17 recommendations** were presented as feasible

SAN NOISE STUDY

Mead & Hunt

# Existing and Future Operations

*FAA approved the forecasts for use in the 150 Study in June of 2019*

| Aircraft Category | 2018 Existing Operations* | 2026 Forecast Operations** |
|---|---|---|
| Commercial/Cargo | 212,430 | 247,105 |
| Air Taxi/Charter | 365 | 730 |
| General Aviation | 11,680 | 9,855 |
| Military | 730 | 730 |
| Helicopter | 365 | 365 |
| **Total** | **225,570** | **258,785** |

*Private Aircraft*

*As congestion and delays increase, GA operations will relocate to less congested airports*

***Source:** Airport ANOM Data, 2018, Leigh Fisher and HMMH Analysis
****Source:** 2018 Aviation Activity Forecast Update, LeighFisher June 2019



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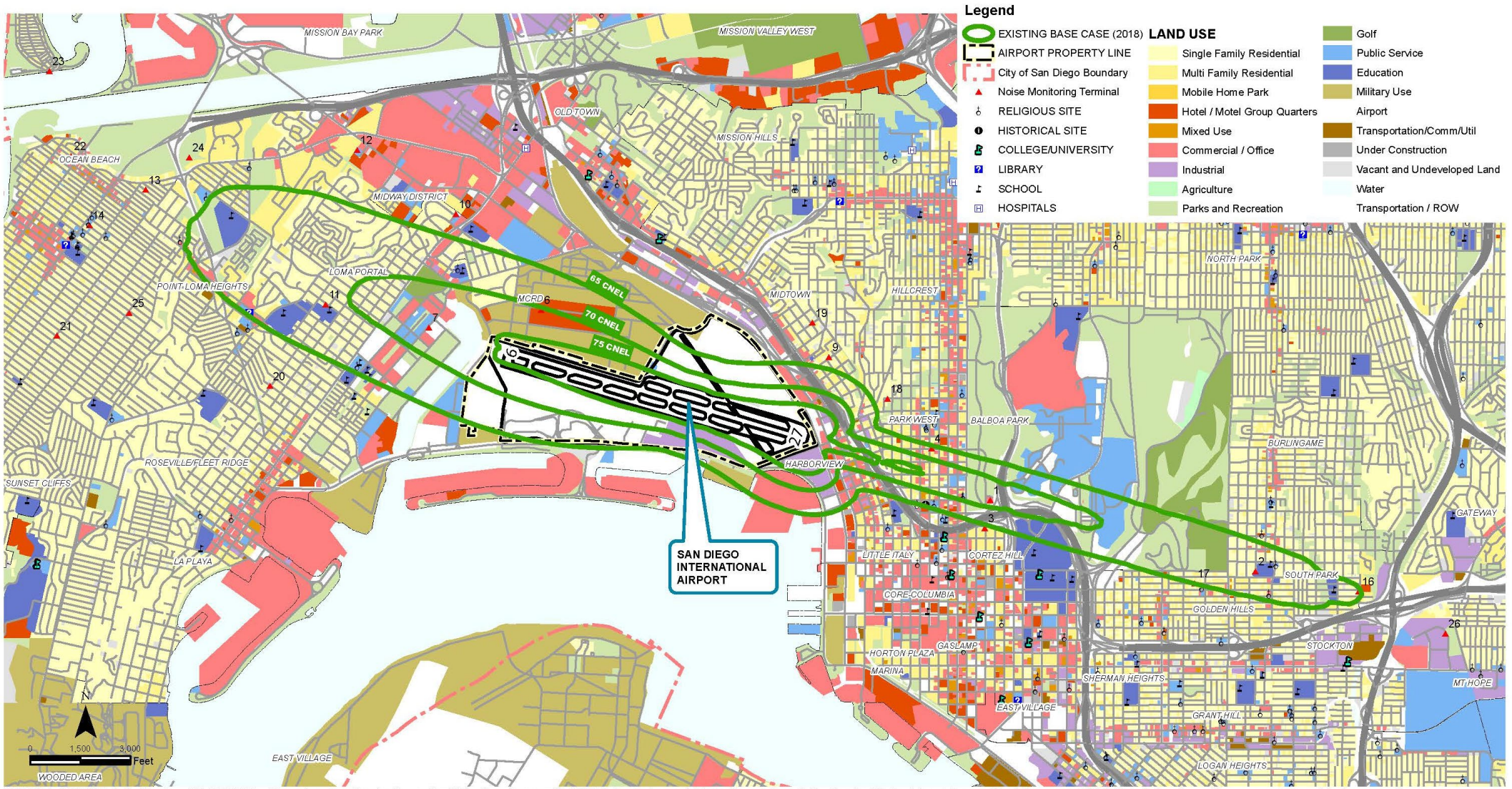
# Existing NEM (2018)




SOURCE: 1. SANDAG Technical Services - GIS, SANDAG Land Layers Inventory Mapping Source: SanGIS landbase (i.e. parcels), SANDAG, County Assessor's Master Property Records file, Cleveland National Forest, Bureau of Land Management (BLM), State Parks, other public agency contacts, and local agency review.
2. SDIA ANOMS 2019 and associated appendices. 3. HMMH, September, 2020 (Refined Base Case Contours).

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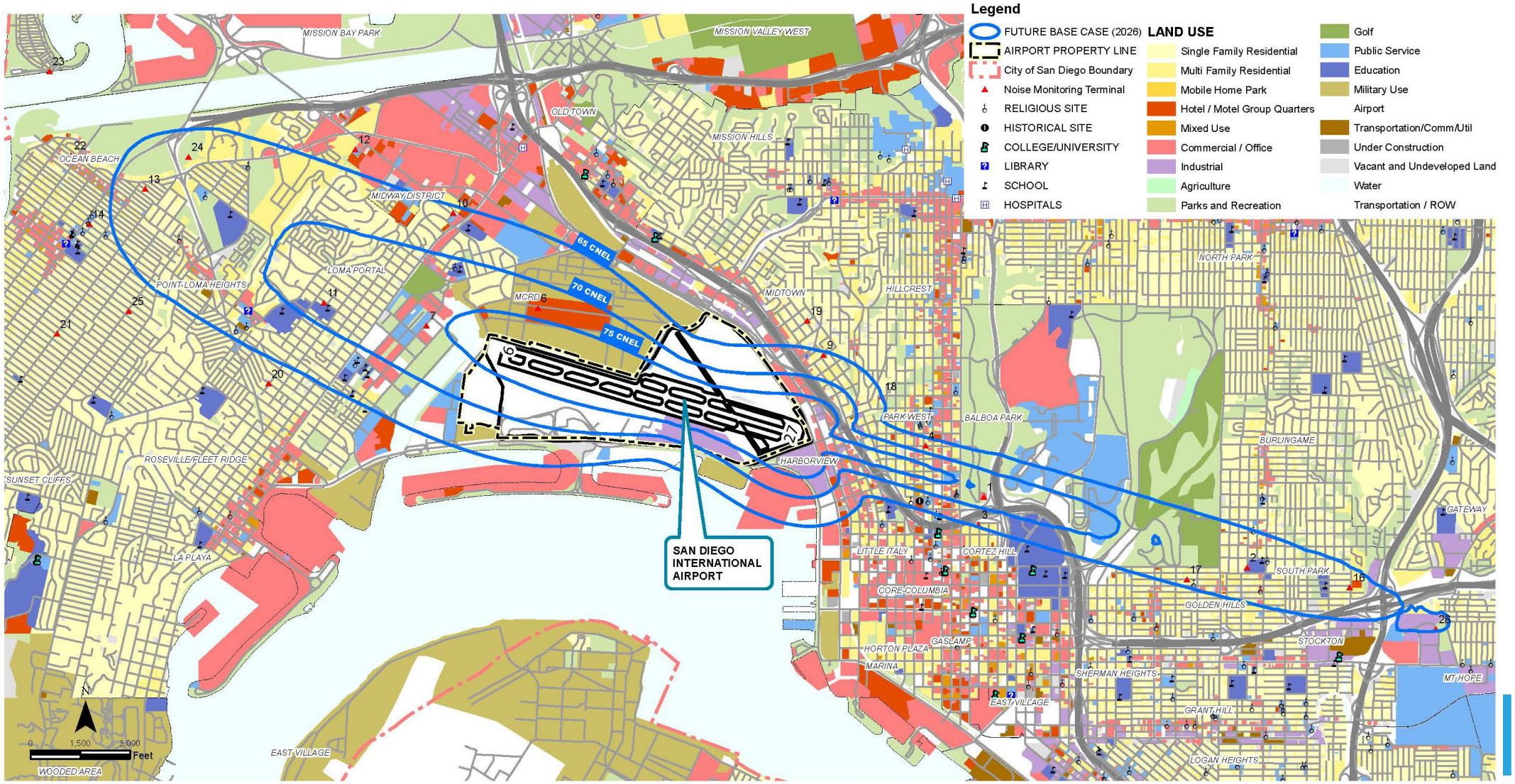
# Future NEM (2026)






SOURCE: 1. SANDAG Technical Services - GIS, SANDAG Land Layers Inventory Mapping Source: SanGIS landbase (i.e. parcels), SANDAG, County Assessor's Master Property Records file, Cleveland National Forest, Bureau of Land Management (BLM), State Parks, other public agency contacts, and local agency review.
2. HMMH, September, 2020 (Refined Base Case Contours)

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# Population and Housing Units Base Case: 2018 and 2026



| 2018 | Population | Housing Units |
|---|---|---|
| 65 dB CNEL and greater | 16,188 | 7,805 |
| 70 dB CNEL and greater | 1,907 | 1,236 |
| 75 dB CNEL and greater | 178 | 131 |

| 2026 | Population | Housing Units |
|---|---|---|
| 65 dB CNEL and greater | 30,976 | 15,149 |
| 70 dB CNEL and greater | 5,173 | 2,642 |
| 75 dB CNEL and greater | 699 | 515 |

**Source:** US Census 2010, Mead & Hunt Land Use Analysis, 2020; HMMH Contours, 2020.

**Note:** These numbers include homes that have been sound attenuated or were built after October 1, 1998 and therefore considered compatible (Approx. **4,300** homes have been sound attenuated through 5/28/20)

**Contours are cumulative (i.e. 65 dB CNEL includes all homes within the 65, 70 and 75 contours)**

# Categories of Recommendations

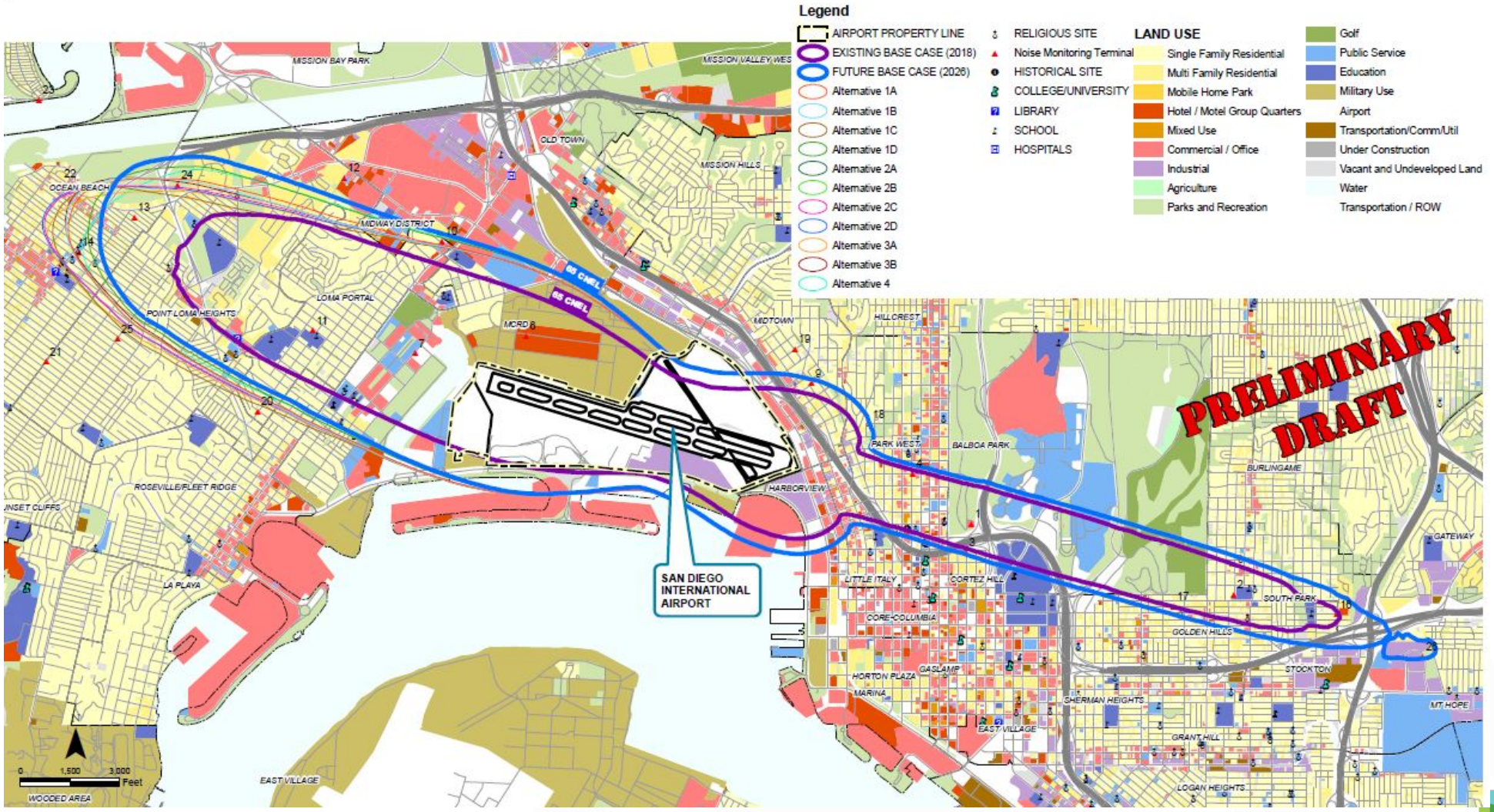
- **Operational and Facility Recommendations**
- **Land Use Recommendations**
  - Preventative: Land Use Restrictions
  - Remedial: Sound Attenuation (Quieter Home Program)
- **Administrative Recommendations**

# Operational Recommendations

- **Concentrated non-compatible land uses around the airport limit alternatives that can be recommended**
  - Modeling indicates most procedure heading changes would either elongate or shift the 65 CNEL contour encompassing new non-compatible land uses
- **No alternatives that shift noise are recommended**

# Operational Alternatives Comparison



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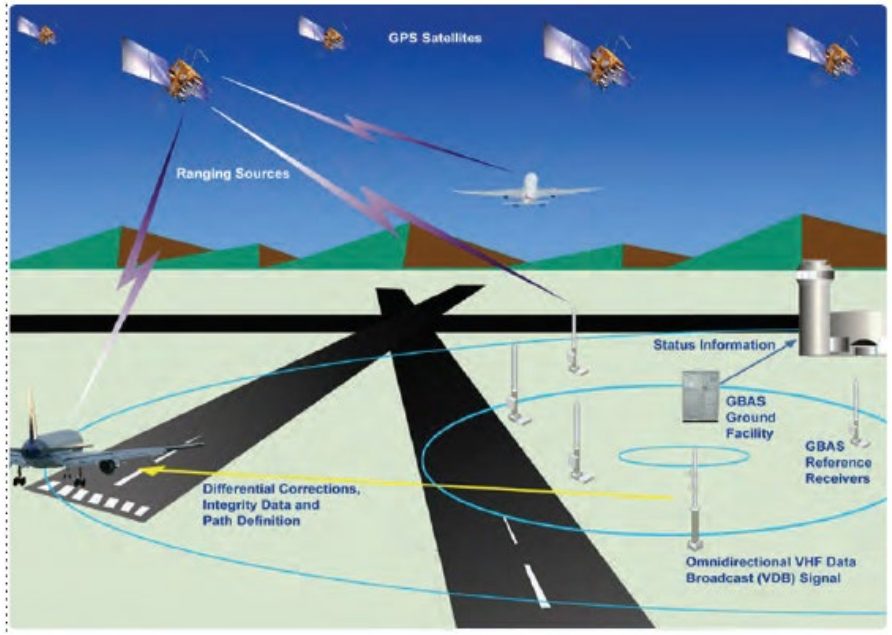
# FACILITY RECOMMENDATION – Ground Based Augmentation System (GBAS)






- GBAS can provide precision lateral and vertical guidance for multiple runway ends
- Allows for more repeatable and precise paths and consistency with 3.5-degree glidepath
- Reduction/elimination of level segments during the descent, requiring less engine thrust
- Could provide reductions of 1-2 dBA on east side approach
  - Less than 5 dBA is typically not "perceived" by the human ear
  - However, cumulative changes and consistency could result in long term benefits

SAN NOISE STUDY

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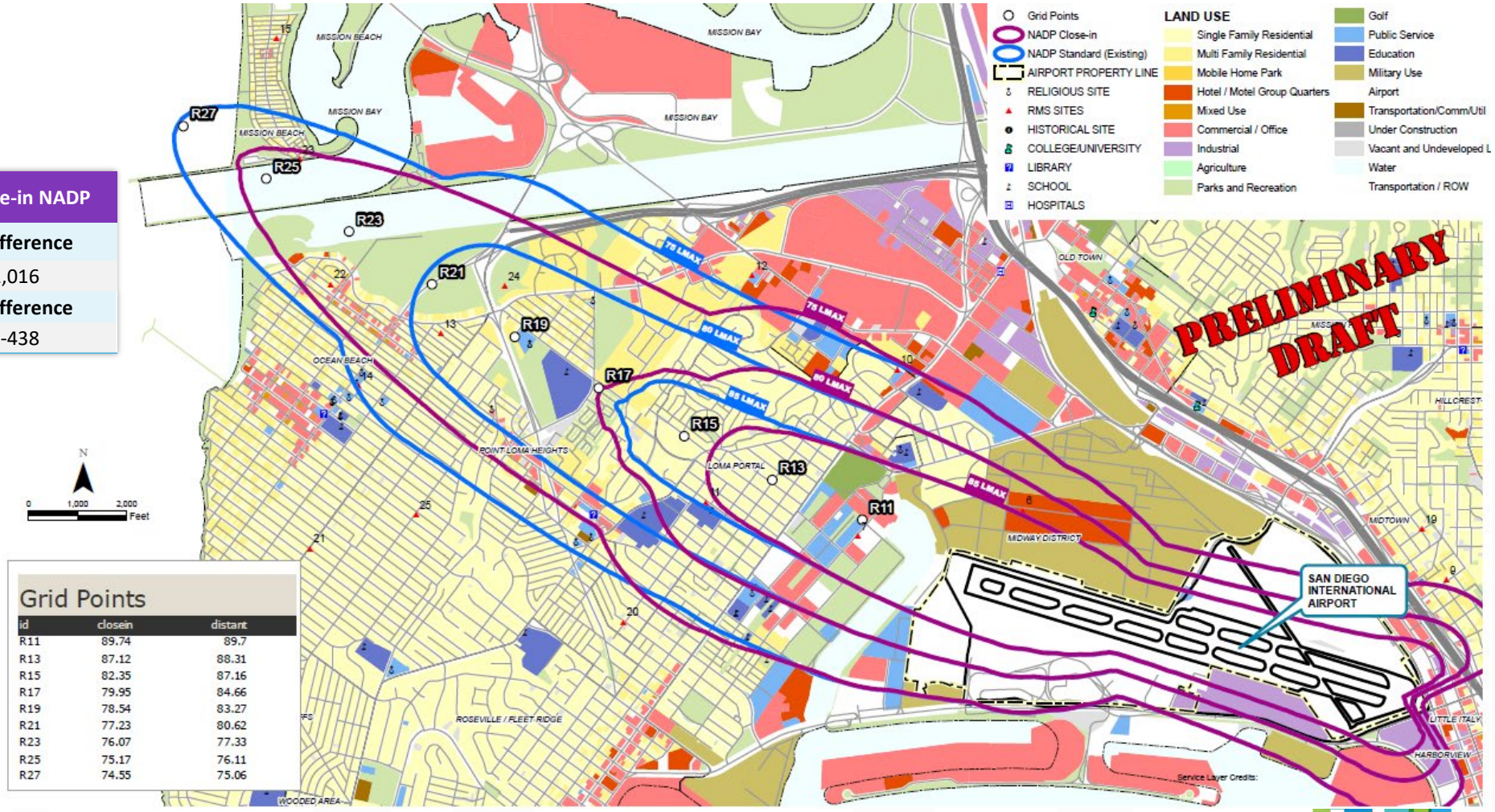
# Climb Profile - Modification to Noise Abatement Departure Procedure (NADP): LMAX Analysis

| | Distant NADP (Existing) | Close-in NADP |
|---|---|---|
| | **Population** | **Difference** |
| **> 85 Lmax** | 2,048 | -1,016 |
| | **Housing Units** | **Difference** |
| **> 85 Lmax** | 877 | -438 |




Grid Points

| id | closein | distant |
|---|---|---|
| R11 | 89.74 | 89.7 |
| R13 | 87.12 | 88.31 |
| R15 | 82.35 | 87.16 |
| R17 | 79.95 | 84.66 |
| R19 | 78.54 | 83.27 |
| R21 | 77.23 | 80.62 |
| R23 | 76.07 | 77.33 |
| R25 | 75.17 | 76.11 |
| R27 | 74.55 | 75.06 |

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# Administrative Recommendations

- **Continued measures**
  - Continued Support of Aircraft Noise Office and Program Manager
  - Update Airport Noise and Operations Monitoring System (ANOMS)
  - Communicate Noise Issues with Airlines
  - Provide Airport Use Regulations
  - Continue Completing California Quarterly Noise Reports
  - Update Noise Exposure Maps, every 5 years
  - Update NCP as needed
- **Updated Measures**
  - Continue Fly Quiet Program with updates
- **New Measures**
  - Implement Portable Noise Monitoring

# Land Use Recommendations

- **Continued measures**
  - Support compatible land use development: Local jurisdictions
  - Compatibility Planning Process: Local jurisdictions
  - Support of San Diego County Airport Land Use Commission (ALUC)
- **Updated Measures**
  - Continuation of Quieter Home Program
    - Residential and non-residential insulation

# Summary of Public Comments

- **Public Hearing held on April 8th**
- **Reviewed comments and recommendations with TAC/CAC (April 13th)**
- **Summary of Committee Public Hearing and Comment Period (to date)**

# Next Steps of Study

- **Gather comments through the end of the public comment period (today)**
- **Respond to all substantive comments for inclusion in the Study**
- **Requested action: ANAC submit to Airport Authority Board (today)**
- **Airport Authority Board (June 3rd)**

SAN NOISE STUDY

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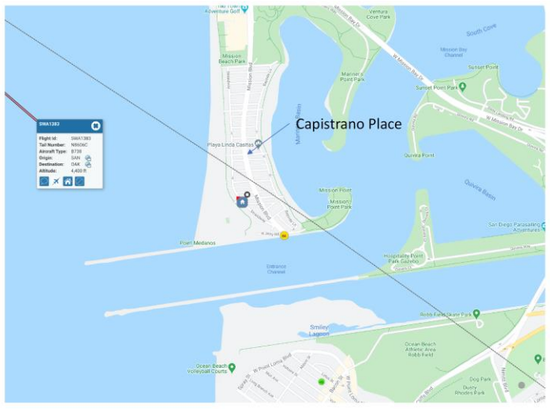
# Questions & Comments

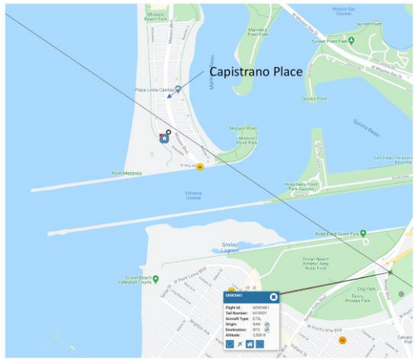
✈ **https://sannoisestudy.com/**

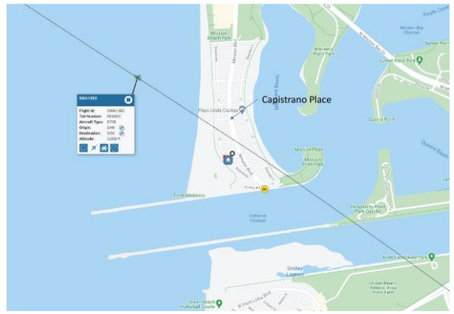
SAN NOISE STUDY

## SAN DIEGO INTERNATIONAL AIRPORT TITLE 14 CODE OF FEDERAL REGULATION PART 150 STUDY UPDATE RESPONSE TO COMMENTS MATRIX

| DATE | NAME | COMMENT SOURCE | TOPIC | COMMENT # | COMMENT<br>NOTE: COMMENTS ARE TAKEN DIRECTLY FROM SUBMITTAL AND NO SPELLING, GRAMMAR OR SENTENCE STRUCTURE CHANGES ARE MADE. | RESPONSE |
|---|---|---|---|---|---|---|
| March 10, 2021 | Gary Wonacott | Email to Consultant | 290 Vector Departure | 1 | I would hope to think that you were caught in the middle. It seems clear to me, and perhaps this was not revealed to you in the beginning, that the noise abatement office did their best to eliminate the post 10 pm departures on the 290 vector and move them to the PADRZ SID. Mike Tarlton and I both heard Steve state that PADRZ would be used for the initial leg, for example for BROCK. And, it should have all stopped there, except for our Mission Beach representative who sat on her thumbs, even when Tarlton questioned the impact on Mission Beach.<br>I was awakened last night by an AA departure on the 290 headed to Miami that was about as loud as is possible. Of course, the departure crossed over Mission Beach to my north. We will see, but I think in the long term, this has to change.<br><br>Airport Authority assumptions found inaccurate!<br>(Noise analysis is complex; geometry is not)<br>• Objective is to replace PADRZ with a departure south of the peninsula<br>• Small distances require accurate assumptions<br>• Airport Authority assumptions were grossly biased against Mission Beach and in favor of moving the post 10 pm 290 departures to PADRZ<br>• Calls from Mission Beach residents at least temporarily stopped the Airport Authority<br>• Data from Publics Records Request confirm inaccurate assumptions by the Airport Authority<br>• Need to keep pressure on Airport Authority to review their assumptions publically and to perform sensitivity studies to show effect of inaccurate assumptions<br><br>We need PADRZ replaced<br><br>  <br>  | Section 7.2 of Chapter 7, *Operational Alternatives*, describes all of the operational alternatives evaluated in the Title 14 Code of Federal Regulations (CFR) Part 150 Study Draft Report. The alternatives were based on an evaluation of the San Diego International Airport (SDIA) Airport Noise Advisory Committee (ANAC) recommendations, comments received from members of the Technical Advisory Committee and Citizen Advisory Committees (TAC/CAC), and input provided by attendees at the first public workshop held November 21, 2019. Based on recommendations and comments received, 12 operational alternatives were evaluated. None of the operational alternatives evaluated for the 14 CFR Part 150 Study involved moving all departures between 10:00 p.m. and 6:30 a.m. to the PADRZ Area Navigation (RNAV) Standard Instrument Departure (SID) flight route.<br><br>The commentor is referencing a proposed flight procedure developed under the Air Traffic Flight Procedure Evaluation effort for eastbound departures between 10:00 p.m. and 6:30 a.m. This proposed procedure would direct the aircraft on the same route as the PADRZ SID from Runway 27 to a waypoint over the ocean 1.5 nautical miles away from the shoreline, then turn left on an RNAV route heading to the ZZOOO waypoint. This proposed procedure was put on hold, per ANAC and TAC/CAC recommendation, until completion of the 14 CFR Part 150 Study operational alternative assessment.<br><br>As described in Section 7.4 of the Title 14 CFR Part 150 Study Draft Report, the majority of the operational alternatives evaluated result in the shifting of noise from one area of the community to another. The purpose of the 14 CFR 150 Study is to reduce the number of people and non-compatible land uses within areas exposed to noise levels at or higher than 65 decibels-A-weighted (dBA) Community Noise Equivalent Level (CNEL), so shifting the area of noise exposure at or higher than 65 CNEL from one residential/non-compatible land use area to another does not meet the intent of the study. As stated in Section 7.4, the San Diego County Regional Airport Authority's (SDCRAA) Consultant Team (consultants) recommended not moving forward with any of the operational alternatives that shift the 65 CNEL contour over new non-compatible land uses.<br><br>As a result of the consultant's recommendations, the ANAC requested an assessment of potential impacts due to implementation of the proposed eastbound RNAV SID from the Air Traffic Flight Procedure Evaluation between 10:00 p.m. and 6:30 a.m. The noise modeling assessment indicated that if the eastbound departures are moved to follow the PADRZ RNAV SID path from Runway 27 to the shoreline, people and non-compatible land use would be newly exposed to levels at or higher than 65 CNEL. Based on the purpose of the 14 CFR Part 150 Study stated above, this change is not recommended by the consultants.<br><br>Please note that the commenter did not reference the attached graphics in the comment. The first and fourth graphics appear to address concerns related to the ground noise model track locations developed for the FAA's Aviation Environmental Design Tool (AEDT) noise model. Refer to Comment #4D below related to the ground noise model tracks developed for the 14 CFR Part 150 Study. The second, third and fourth graphic shows selected tracks for a unique flight, but no context as to the intent of each graphic. The sixth graphic shows the commenter's projections related to nighttime operations categorized by direction. The commenter did not indicate the intent of the information and the source and methodology used to derive the result. The last graphic appears to show an Area Navigation (RNAV) Standard Instrument Departure (SID) routes, but does not indicate if it is one of the alternatives evaluated in the 14 CFR Part 150 Study. |

**(CONTINUED)**

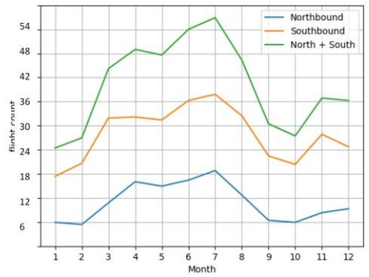

Capistrano Place

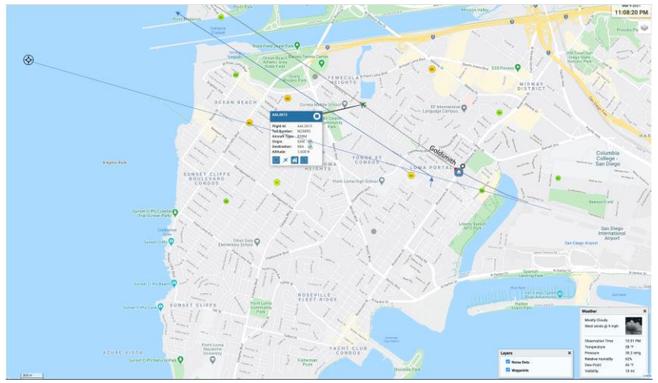

Capistrano Place


Avg PADRZ 2018
Avg PADRZ 2019
Capistrano Pl
Authority data PADRZ FP4
Authority data PADRZ Port 130

**(CONTINUED)**

Full year 2018 data distribution extrapolated to 2026 54 peak nightly projections




| | | | | | | |
|---|---|---|---|---|---|---|
| March 11, 2021 | Solutions (a.k.a. Gary Wonacott) | Website Submittal | Operation Alternatives | 2A | 1.FPA and Part 150 studies - Disappointing that after four years and hundreds of thousands of taxpayer dollars spent, that we have nothing to show for it. PADRZ SID was a problem when it was implemented in 2017, and it still is. It is incredulous to me that some compromise could not be worked out by the Airport Authority Noise Abatement Office that would satisfy all of the parties. Equally unbelievable is that the Noise Abatement Office personnel did not put more effort into identifying specific noise abatement options specifically for the Part 150 before it started, rather than rely solely on the ANAC Subcommittee recommendations. | Section 7.2 of Chapter 7, *Operational Alternatives*, describes all of the operational alternatives evaluated in the 14 CFR Part 150 Study. As required under 14 CFR Part 150, community input into reducing and mitigating aircraft noise exposure levels at or higher than 65 CNEL is required. The alternatives were based on the ANAC recommendations, as well as comments received from members of the TAC/CAC and input provided by attendees at the first public workshop held November 21, 2019. SDCRAA staff also proposed several alternatives related to facility (i.e., the Global Based Augmentation System [GBAS]), land use (i.e., refinement to the Quieter Home Program [QHP] eligibility criteria) and noise management measures (i.e., expansion of the Fly Quiet Program). In summary, there were 30 alternatives evaluated (including 12 operational alternatives) in the 14 CFR Part 150 Study that were suggested by SDCRAA staff, ANAC, TAC/CAC and community members.<br><br>Based on recommendations and comments received, 12 operational alternatives were evaluated. The consultant and SDCRAA staff considered the recommendations and comments and developed specific proposed routes that would meet the purpose of each of the 12 alternatives: to reduce the number of people and non-compatible land uses to aircraft noise levels at or above 65 CNEL. This required extensive effort in evaluating the feasibility of each procedure related to safety, procedure design criteria, and operational viability, which was evaluated in terms of effects on efficiency and capacity of the airfield or airspace.<br><br>As described in Section 7.4 of the Title 14 CFR Part 150 Study Draft Report, the majority of the operational alternatives shifted noise from one area of the community to another. The purpose of the 14 CFR 150 Study is to reduce the number of people and non-compatible land uses within areas exposed to noise levels at or higher than 65 CNEL and |

| | | | | | | |
|---|---|---|---|---|---|---|
| | | | | | | **(CONTINUED)**<br>not create new non-compatible land uses, so shifting the area of noise exposure at or above 65 CNEL from one residential/non-compatible land use area to another does not meet the intent of the study. Therefore, the consultants recommended not moving forward with any of the operational procedure alternatives that result in shifting the 65 CNEL noise exposure contour over new non-compatible land uses.<br><br>As a result of the recommendations, there was no recommended change to the initial departure path from Runway 27 for the PADRZ RNAV SID. The 14 CFR Part 150 aircraft noise modeling analysis concluded that any adjustments or movements of the departure flight paths would result in non-compatible and people newly exposed to 65 CNEL or higher levels due to the existing development west of SDIA. SDCRAA understands the noise concerns of Mission Beach related to the PADRZ RNAV SID, but It is important to note that the focus of the 14 CFR Part 150 Study was to assess non-compatible areas exposed to aircraft noise levels at or higher than 65 CNEL. Areas such as Mission Beach are exposed to levels below 65 CNEL based on the Noise Exposure Maps (NEMs) for both 2018 and 2026 provided in Section 4.2 of the Title 14 CFR Part 150 Study Draft Report. It is important to note that the submittal of the 14 CFR Part 150 Study is just one milestone in SDCRAA's commitment to work with neighboring communities in finding ways to address aircraft noise. The SDCRAA's Noise Office will continue to work with communities exposed to levels below 65 CNEL like Mission Beach to identify additional ways to reduce aircraft noise. |
| March 11, 2021 | Solutions (a.k.a. Gary Wonacott) | Website Submittal | 290 Vector Departure | 2B | 2. I believe much effort was wasted, time and money, attempting to eliminate the 290 nighttime noise abatement agreement departure and move these aircraft to PADRZ SID. In addition, I also believe this in effect forced the consultants to compromise their integrity by falsifying the assumed positions for the 290 and PADRZ flight tracks. I will be forwarding a hard copy of a Power Point presentation by mail. | The commenter is referencing a proposed departure procedure that was designed as part of the Air Traffic Control Flight Procedure Evaluation study. Refer to the response to Comment #1 regarding the alternatives evaluated under the 14 CFR Part 150 Study and the proposed departure procedures under the Air Traffic Control Flight Procedure Evaluation study.<br><br>The commentor's assertion that the consultants were forced to compromise their integrity by falsifying the assumed positions for the 290 and PADRRZ flight tracks is false, erroneous, and unsubstantiated.<br><br>The commenter's statement related to an attempt to eliminate the "290 nighttime noise abatement agreement" is not correct and was not recommended in the 14 CFR Part 150 Study. |
| March 11, 2021 | Solutions (a.k.a. Gary Wonacott) | Website Submittal | Ground Noise Model Track | 2C | 3. Correction of the more representative backbone tracks for the 290 and PADRZ would have yielded changes from the baseline to the alternatives that would have met any criterion for change in shape and size of the 65 dB CNEL. This was simply a failure of the program management. | The commenter indicates a correction is required to provide a more representative backbone ground noise model track that represents the average annual day location of radar tracks following the nighttime 290 heading procedure and the PADRZ RNAV SID. Based on the methodology applied to calculate the average annual ground noise modeling track locations described in Section 4.1.5 of the Title 14 CFR Part 150 Study Draft Report, the tracks are considered to be a reasonable representation of average annual conditions in 2018; therefore, no changes are needed. |
| March 30, 2021 | KP | Website Submittal | Noise Abatement Procedure Alternatives | 3 | Thank you for the report. Since I believe this study was about finding ways to reduce the number of people and non-compatible land uses impacted by noise from SAN, all of the Operational Procedure "Alternatives" - but especially 1C, 2A, 2B, 2C, 2D and 4- did nothing to abate noise in the surrounding area. In fact, they only appear to make the noise issue worse by spreading out the air traffic and taking less advantage of flying over the Mission Channel. To that end, I think that it is wise to recommend not moving forward with any of the operational procedure alternatives (1A, 1B, 1C, 1D, 2A, 2B, 2C, 2D, 3A, 3B, or 4) The NADP Close-in Departure Alternative did show a potential benefit and appears to be a reasonable step in the right direction towards abating noise. Therefore and based on my understanding of this report, I support the consultants' recommendation of moving forward with the Close-in NADP Alternative. | As described in Section 7.4 of the Title 14 CFR Part 150 Study Draft Report, the majority of the operational alternatives evaluated result in the shifting of noise from one area of the community to another. The purpose of the 14 CFR 150 Study is to reduce the number of people and non-compatible land uses within areas exposed to noise levels at or higher than 65 CNEL, so shifting the area of noise exposure at or higher than 65 CNEL from one residential/non-compatible land use area to another does not meet the intent of the study. As stated in Section 7.4, the SDCRAA consultants recommended not moving forward with any of the operational alternatives that shift the 65 CNEL contour over new non-compatible land uses.<br>The consultants did recognize potential benefits to the Close-in NADP climb profile described in Section 7.4 related to single event noise levels, which are estimated as the peak noise level of an aircraft overflight noise event, referred to as Lmax. While the Close-in NADP (departure thrust cutback at 1,500 feet above field elevation [AFE]) shows a reduction in the Lmax results, the required metric for 14 CFR Part 150 studies is DNL (CNEL for California). Furthermore, Lmax reductions would not likely result in a noticeable change to the 65 CNEL contour. Although the Close-in NADP is not expected to reduce the 65 CNEL noise exposure area, the NADP is listed as a noise abatement procedure recommendation in Section 9.2 due to the expected reduction in single event levels. This recommendation builds on the mature noise program at the airport, providing potential single event benefits. |
| March 31, 2021 | Gary Wonacott | Email to Consultant | 290 Vector Departure | 4A | I have a number of issues that I have listed below:<br>1. It is clear to me and others that the Airport Authority contrary to their going in statements intended to eliminate the illegal 290 nighttime noise abatement agreement post 10 pm vector departure and replace it with a new nighttime SID, likely one associated with BROCK. | Refer to response to Comment #1 regarding the alternatives evaluated under the 14 CFR Part 150 Study and the proposed RNAV SID for eastbound departures between 10:00 p.m. and 6:30 a.m. under the Air Traffic Control Flight Procedure Evaluation study. |
| March 31, 2021 | Gary Wonacott | Email to Consultant | Nighttime Northbound Departures | 4B | 2. The BROCK nighttime departure was chosen to increase support from the La Jolla and Bird Rock population. | The "BROCK" nighttime departure procedure referenced by the commentor is one of two RNAV SIDs proposed under the Air Traffic Flight Procedure Evaluation study for northbound jet departures from Runway 27 between 10:00 p.m. and 6:30 a.m. This procedure was not a proposed operational alternative under the 14 CFR Part 150 Study. The proposed procedure was intended to address ANAC Recommendation 14 to reduce noise levels for the La Jolla and |

| | | | | | | |
|---|---|---|---|---|---|---|
| | | | | | | **(CONTINUED)**<br>Pacific Beach area, which are exposed to aircraft noise levels lower than 65 CNEL. The proposed procedure design from the Air Traffic Flight Procedure Evaluation study does not change the departure path over communities from Runway 27 to the shoreline. |
| March 31, 2021 | Gary Wonacott | Email to Consultant | TAC/CAC | 4C | 3. Debbie Watkins was maintained as the Mission Beach representative in spite of a petition signed by one hundred or more residents to have her replaced; during the course of the program she served the Airport Authority as a communication barrier. | Comment acknowledged. Refer to Section 10.1 of the Title 14 CFR Part 150 Study Draft Report regarding the committees. |
| March 31, 2021 | Gary Wonacott | Email to Consultant | Ground Noise Model Tracks | 4D | 4. Data obtained from a public record request I submitted shows that the consultants used backbone departure tracks for the 290 and PADRZ that are too close together compared to substantial data we analyzed going back to 2012. While the distances are small as well as the errors in the consultants assumed tracks, the number of nighttime operations assumed for 2026 is 54, a very large number, especially when the 10 dB penalty is added. These incorrect assumptions undermine the validity of most of the analyses performed by the consultants. Best case would be for the consultants to perform a sensitivity study to quantify impact of the assumed tracks. | The commenter references the ground noise model tracks used in the Federal Aviation Administration's (FAA) Aviation Environmental Design Tool (AEDT) aircraft noise model. As stated in Section 3.8 of the Title 14 CFR Part 150 Study Draft Report, AEDT models civilian and military aviation operations and is required by FAA to be used for 14 CFR Part 150 Study aircraft noise analysis. The program includes standard aircraft noise and performance data for hundreds of aircraft types that can be tailored to the characteristics of specific individual airports. Input such as the ground noise model tracks are inputs developed by the user of AEDT. Section 4.1.2 describes a critical requirement under Title 14 CFR Part 150: it requires the calculation of "Annual Day/Night Average Sound Level (DNL)" values. This metric is the daily noise exposure averaged over a year, typically a calendar year. (Note: per FAA Order 1050.1F, CNEL may be used in lieu of DNL in California to replace DNL for the purposes of airport planning; DNL adds a penalty to nighttime aircraft operations (between 10:00 p.m. and 7:00 a.m.) and CNEL includes the nighttime penalty and adds a penalty to aircraft operations during evening hours from 7:00 p.m. to 10:00 p.m.). AEDT produces levels of aircraft noise exposure based on an "average annual day" of aircraft operations. Actual operations and radar track data from SDCRAA's Airport Noise and Operation Management System (ANOMS) for the entire year of 2018 was used to calculate the average annual day operations and ground noise model tracks.<br><br>Section 4.1.5 of the Title 14 CFR Part 150 Study Draft Report and Appendix E, *Noise*, provides a summary of the development of the ground noise model track locations and track use. Model tracks were developed by a reputable firm with 40 years of aircraft noise modeling experience using a standard industry method, which entailed analyzing all radar data from SDCRAA's ANOMS and splitting the flight tracks into similar and manageable groups. This was first done by separating tracks by phase of flight (e.g., arrival or departure) and then by runway. Following this, the flight tracks were separated by each flight's destination direction, such as north, south, or west. Finally, the flight tracks were analyzed and split into groups according to their degree of similar geometry. The groupings were defined based on radar track flows over areas currently exposed to aircraft noise levels at or higher than 65 CNEL or areas that could potentially be exposed to these aircraft noise levels in the future.<br><br>The Runway 27 jet departure radar tracks following the PADRZ and CWARD RNAV SID routes were grouped together. Runway 27 jet departure radar tracks assigned the ECHHO and MMOTO RNAV SID routes or directed north by Air Traffic Control were grouped separately. The eastbound jet departures between 10:00 p.m. and 6:30 a.m. that are instructed to turn 290 degrees were grouped separately from other eastbound radar tracks. The other eastbound jet departures from Runway 27 were grouped to represent the ZZOOO RNAV SID departures. There were a total of 11 radar groups identified for Runway 27 jet departures.<br><br>Modeling ground noise model tracks for an average annual day by developing center tracks (backbones) and side-tracks on both sides of the center track (sub-tracks) to represent a swathe of tracks assigned to a group is a standard industry practice. The total average annual day operations associated with the group of radar tracks are distributed between the backbone track and subtracks. It is standard practice to use the radar data to define only the backbone track and then develop sub-tracks equal width on both sides of the backbone track to represent the width of the group of radar tracks. The distribution of the movements across the width of the radar track group is then described by a specific distribution function – usually a Gaussian type symmetric normal or "bell curve" distribution (i.e., for a ground noise model track with three tracks, the backbone would be 68.26 percent, the left sub-track would 15.87 percent and the right sub-track would be 15.87 percent).<br><br>The ground noise model tracks were developed for each radar data group using proprietary spatial analysis tools developed specifically to calculate distribution of radar tracks along a given group and calculate the average location of radar track points over the ground along the radar track group path. For example, a 'backbone' ground noise model track for Runway 27 departures on the PADRA RNAV SID was calculated based on average location of all radar data in the group along the full path of data. Each of the backbone tracks were then assigned one or two 'dispersion' sub tracks on either side of the backbone, for a total of three or five tracks (one backbone and two or four dispersion) for each geometrically similar group. The ground noise model tracks are provided in Section 4.1.5 of the Title 14 CFR Part 150 Study Draft Report. |

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| | | | | | | **(CONTINUED)**<br>The commenter compares the noise model tracks developed for the 14 CFR Part 150 Study to other years of radar data based on an unknown radar data source for multiple years that were grouped in a manner not described by the commenter. The baseline year for the 14 CFR Part 150 Study is 2018. Based on the methodology applied to calculate the average annual ground noise modeling track locations, the tracks are considered to be a reasonable representation of average annual conditions in 2018; therefore, no changes are needed. Note that the focus of the 14 CFR Part 150 Study was to assess non-compatible areas exposed to aircraft noise levels at or higher than 65 CNEL. Areas such as Mission Beach are exposed to levels below 65 CNEL based on the NEMs for both 2018 and 2026, which are provided in Section 4.2 of the Title 14 CFR Part 150 Study Draft Report.<br><br>The 54 average annual number of operations for nighttime departures for 2026 indicated by the commenter is correct and depicted in Table 4.4 of the Title 14 CFR Part 150 Study Draft Report. The number of operations for 2026 are based on the FAA-approved forecast described in Chapter 2, *Forecasts*, and Appendix D, *Forecast*, of the Title 14 CFR Part 150 Study Draft Report. |
| March 31, 2021 | Gary Wonacott | Email to Consultant | Ground Noise Model Tracks | 4E | 5. While we have no proof, other than intuition, it seems likely that using the correct backbone tracks would greatly reduce change the results:<br>a. Moving the 290 departures to PADRZ would result in much greater CNEL changes in Mission Beach, although the consultant refused to show the CNEL changes for Mission Beach even for their own incorrect assumptions using the FPA 2018 operations.<br>b. All of the alternatives that moved both PADRZ and the 290 south of the peninsula using the correct backbone departure tracks would result in substantially smaller changes in the 65 dB CNEL.<br>c. Even pre-COVID, the assumption of increasing from 11 to 54 nighttime departures is far too large. It's wrong and should never have been approved by the FAA. There is simply no market for this number of post 10 pm departures. Although there were never any analyses presented to the public, the consultants must have looked at this effect early on. It is incredulous that that Noise Abatement Office personnel would agree to use this number unless it supported specific objectives of the AA. | Refer to the response to Comment #4D for a discussion of methodology to develop the ground noise model tracks and the forecast number of nighttime departures for 2026. Note that the focus of the 14 CFR Part 150 Study was to assess non-compatible areas exposed to aircraft noise levels at or higher than 65 CNEL. Areas such as Mission Beach are exposed to levels below 65 CNEL based on the NEMs for both 2018 and 2026 provided in Section 4.2 of the Title 14 CFR Part 150 Study Draft Report. |
| March 31, 2021 | Gary Wonacott | Email to Consultant | Operation Procedure Alternatives | 4F | 5. There were two analyses of the case where the current nighttime departures on 290 were moved back to ZZOOO. In the first case, there was no change in the 65 dB CNEL, which was concluded to be wrong. In the second case, there was a small change, which is difficult to believe given that the majority of the 290 departures were moved over from ZZOOO. It is not clear why this case was run or presented other than to terrify the residents living due west of the runway, potentially making them more pliable to a compromise. It didn't. | The commentor is referencing Alternative 4, which is an operational alternative that was proposed by a TAC/CAC member. The first analysis was based on the first version of the 2026 average annual conditions, which did not account for the appropriate assignment of nighttime departures on the ground noise mode track representing the eastbound departures that occur between 10:00 p.m. and 6:30 a.m. The second analysis included the correct number of nighttime operations on the ground noise model track, which was higher compared to that included in the first analysis. The alternative analysis described in Chapter 7 is based on version 2 of the 2026 noise exposure conditions.<br><br>As described in Section 7.3 of the Title 14 CFR Part 150 Study Draft Report, the goal for Alternative 4 is to distribute Runway 27 departures during nighttime noise abatement hours (10:00 p.m. to 6:30 a.m.) based on flight direction. Distributing the nighttime departures would reduce CNEL noise exposure levels for those residing under the current nighttime noise abatement procedure, which turns all aircraft to the right on a heading ranging between 290- to 293-degrees magnetic after departing Runway 27. Instead of turning eastbound departures to the right on a 290-degree magnetic heading, these flights would be assigned the ZZOOO RNAV SID for eastbound departures between 10:00 p.m. and 6:30 a.m. The noise modeling analysis identified a shift in noise, resulting in newly impacted non-compatible land uses (approximately 450 new housing units within the 65 CNEL, and 100 new housing units within the 70 CNEL to the south and west over Point Loma and Ocean Beach). Therefore, the alternative was not recommended by the consultants. |
| March 31, 2021 | Gary Wonacott | Email to Consultant | 14 CFR Part 150 Process | 4G | 6. The FPA/Part 150 studies were mismanaged. Each study should have had its own separate evolution from start to end. However, the FPA was used to establish the issues and the recommendations, while the Part 150 was used to assess the impact of the potential noise abatement solutions. The Airport Authority failed in the strongest way to initiate the study by identifying issues and potential noise abatement options specifically addressing the 65 dB CNEL. For this reason alone, the Part 150 did not meet the minimum requirements set by the FAA. | The 14 CFR Part 150 Study for SDIA meets the requirements defined in 14 CFR Part 150. As discussed in Section 6.4 of the Title 14 CFR Part 150 Study Draft Report, the outcome of a 14 CFR Part 150 study is to define a balanced and cost-effective program for reducing land uses non-compatible with existing and future noise levels, which are described in Chapter 4, *Existing and Future Noise Exposure*. The 14 CFR Part 150 Noise Compatibility Program (NCP) process focuses on the development of alternatives that can be implemented to address noise associated with aircraft operations. The objective is to explore a wide range of feasible land use measures, aircraft operational measures, and facility measures along with administrative actions, seeking accommodation of both airport users and airport neighbors within acceptable safety, economic, and environmental parameters. Section 6.4 contains a general description of potential noise abatement and mitigation measure and the resulting alternatives or actions that may be considered for SDIA. While issues and recommendations were identified during the Air Traffic Flight Procedure |

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| | | | | | | **(CONTINUED)**<br>Evaluation study, the 14 CFR Part 150 Study process considered feedback and input from TAC/CAC and the general public collected during the process as documented in Appendix J, *Public Coordination*.<br><br>Table 6-1 in Section 6.4 lists all the applicable alternatives that are required to be considered in a 14 CFR Part 150 Study according to Section B150.7(b). However, due to the unique conditions and considerations at SDIA, many of these alternatives have already been implemented or are not feasible. Table 6-1 includes an explanation why an alternative is or is not brought forward into the analysis. The alternatives that were brought forwards are further described in Chapter 7, O*perational Alternatives*, and Chapter 8, F*acility, Land Use, and Program Management Alternatives*. |
| March 31, 2021 | Gary Wonacott | Email to Consultant | 290 Vector Departure | 4H | 7. Not surprising, at no time did the Airport Authority acknowledge that the 290 nighttime noise abatement agreement is illegal, since there was never an environmental assessment performed for the change of departures from ZZOOO (or its predecessor) to the 290 vector. An environmental assessment, whether it is called a NEPA, or a 1050, is absolutely required. The Airport Authority must now move the post 10 pm departures back to ZZOOO, since it was shown that there is little impact on those residents living under the ZZOOO departure track, and it is only fair given that Mission Beach must already accommodate the nighttime departures on PADRZ. | The nighttime noise abatement measure referenced by the commenter has been in place for over 30 years. This 14 CFR Part 150 Study did evaluate an alternative to distribute nighttime departures from Runway 27 called Alternative 4. Refer to response to Comment #4F related to Alternative 4 that suggests moving eastbound departures on the ZZOOO RNAV SID between 10:00 p.m. and 6:30 a.m. |
| March 31, 2021 | Gary Wonacott | Email to Consultant | 290 Vector Departure | 4I | 8. Complaints have been filed with the FAA, that has never rejected the claim of illegality; after the Part 150 is completed, then decision will be made to address this extreme impact on Mission Beach residents | Comment acknowledged. |
| April 1, 2021 | Cat Sparling | Website Submittal | Existing Noise Exposure | 5 | Moved into University City nine months ago, working from home the whole time. The overhead noise has gotten worse every month and has us reconsidering the area, even having been aware of the noise before signing. Seems like it will only get worse from here | Comment acknowledged. The consultant team recommends contacting the SDIA Noise Office to discuss your concerns related to aircraft noise caused by aircraft at SDIA. SDCRAA expects operations to continue to increase as the economy and travel industry recovers from the COVID-19 pandemic. Information on ongoing efforts to address aircraft noise concerns can be found at https://www.san.org/Airport-Noise. You may also reach out to the SDIA Noise Office who can provide information related to the specific operations that are associated with the commenter's concerns. The SDIA Noise Office can be contacted at 619-400-2660. |
| April 8, 2021 | Gary Wonacott | Email to Consultant | Source of Error in Modeling | 6 | The AEDT analysis was used to quantify the change in shape and size of the new 65 dB CNEL relative to the old one. Every analysis has multiple sources of error.<br><br>Please list all of the potential sources for error for the most recent analysis evaluating the move of the 290 departures to PADRZ for nighttime departures?<br><br>Please quantify the magnitude of the potential error for each of the error sources?<br><br>Which of these error sources have a statistical nature and which ones are deterministic?<br><br>Describe how these error sources are combined and the impact on the final numbers of new ins and outs.<br><br>Did you run any sensitivity analyses to quantify the magnitude of the change of the results as a function of each error source.<br><br>Would it be fair to say that the final numbers for size and shape of the 65 dB CNEL contour could be as much as 10 percent?<br><br>What is the sensitivity of the number of new ins and outs to changes in the 65 dB CNEL contour?<br><br>Is it fair to say that the news ins and outs could be off by a factor of 5, or 10 or even 20, or more? | As stated in Section 3.8 of the Title 14 CFR Part 150 Study Draft Report, AEDT is required by FAA to be used for 14 CFR Part 150 studies. The program includes standard aircraft noise and performance data for hundreds of aircraft types that can be tailored to the characteristics of specific individual airports. FAA does not provide any variance or magnitude of error associated with the performance data. Section 4.1.2 describes a critical requirement under 14 CFR Part 150: it requires the calculation of "Annual Day/Night Average Sound Level (DNL)" values. This metric is the daily noise exposure averaged over a year, typically a calendar year. (Note: Per FAA Order 1050.1F, CNEL may be used in lieu of DNL in California to replace DNL for the purposes of airport planning; DNL adds a penalty to nighttime aircraft operations [between 10:00 p.m. and 7:00 a.m.] and CNEL includes the nighttime penalty and adds a penalty to aircraft operations during evening hours from 7:00 p.m. to 10:00 p.m.). AEDT produces levels of aircraft noise exposure based on an average annual day of airport operations and does not provide a variance or range of error. FAA, as the developer of AEDT, does not provide sources of error, magnitude of potential error for each source, the impact of any error sources on results, or a sensitivity analysis methodology to assess the magnitude of change as a function of error sources associated with AEDT. FAA requires input to be based on average annual day conditions, which for purposes of the SDIA 14 CFR Part 150 Study, was based on actual flight and radar data from SDIA's ANOMS system. Reliance on an average annual day does not include sensitivity analysis based on variance in operational and weather conditions. Due to the limited information provided by FAA on AEDT variance in noise calculations and FAA's requirement to develop an average annual day input, it is not possible to provide a variance in CNEL contour results and the population and housing counts calculated based on the CNEL contour results, nor is it required for a Part 150 Study. |
| April 8, 2021 | Gary Wonacott | Email to Consultant | Source of Error in Modeling | 7 | Kate:<br>Does this not suggest that also moving the PADRZ to 290 would also not result in very small changes and in fact smaller changes given the distribution at night is much greater going east than on PADRZ. So why not move PADRZ south at night and reduce the noise over SMB?<br>Gary | The commenter references the noise analysis recommended by ANAC as descried in the response to Comment #1 and states a similar but smaller result in noise exposure change would occur if the aircraft on the PADRZ RNAV SID initial flight path from Runway 27 is moved to the ATCT-issued 290 heading flight path. Refer to the response to Comment #2A regarding all the different operational alternatives modeled and results. Due to the densely populated area, the analysis of all the movements conclude that any move of traffic will result in exposing people and non-compatible uses to aircraft noise levels at or higher than 65 CNEL that were not exposed to the same levels under the 2026 |

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| | | | | | **(CONTINUED)**<br>On Apr 8, 2021, at 6:44 AM, Gary Wonacott <gwonacott@hotmail.com> wrote:<br><br>Kate:<br>The AEDT analysis was used to quantify the change in shape and size of the new 65 dB CNEL relative to the old one. Every analysis has multiple sources of error.<br><br>Please list all of the potential sources for error for the most recent analysis evaluating the move of the 290 departures to PADRZ for nighttime departures?<br><br>Please quantify the magnitude of the potential error for each of the error sources?<br><br>Which of these error sources have a statistical nature and which ones are deterministic?<br><br>Describe how these error sources are combined and the impact on the final numbers of new ins and outs.<br><br>Did you run any sensitivity analyses to quantify the magnitude of the change of the results as a function of each error source.<br><br>Would it be fair to say that the final numbers for size and shape of the 65 dB CNEL contour could be as much as 10 percent?<br><br>What is the sensitivity of the number of new ins and outs to changes in the 65 dB CNEL contour?<br><br>Is it fair to say that the news ins and outs could be off by a factor of 5, or 10 or even 20, or more? | **(CONTINUED)**<br>baseline conditions. The consultant concluded that the move stated by the commenter would very likely lead to the same finding. Refer to response to Comment #6 regarding the commenter's statements on error. |
| April 8, 2021 | Paul Grimes | Public Hearing Comment - Transcript | Forecast Fleet Mix | 8 | I'm a former director of schedule planning of PSA, former ANAC member when I worked for Byron Ware (phonetic).<br><br>I'm here today to speak mostly about the large narrow body of fleet projections. There's major miscalculations on these. There are no 737-900s listed. There are no Airbus NEO airplanes listed on any -- on either the 2018 or 2026. 2026, there's only two Maxes, two roundtrip Maxes. So obviously the west side contours have got to be way off to some extent.<br><br>Old technologies aircraft, the current ones -- I'm excluding the Maxes and the NEOs -- are expected to go up by 32 percent, from my calculations, from the 2018 numbers. I'm not sure where those airplanes are coming from since they're out of production, and a lot of them are being retired at this point.<br><br>The 320, for example, is being doubled in the expectations, and the airplane will be 27 years old in 2026. Southwest is buying 737-700s, Maxes, to retire their 737-700s, but you're expecting 80 percent more of them any ways. There's approximately a 10 percent narrow body fleet before the Max and the NEL family at this point. My calculation says it goes up to 35 percent within a few years in this time frame. All of them will not necessarily be delivered.<br><br>So something has to be done to address these problems we have with the -- with this forecast. I see numerous options to try and improve things, but the one that's missing is the big elephant in the room, which is the fleet mix.<br><br>In 1990, the US passed the Airport Noise and Capacity Act, which accelerated the use of stage 2 airplanes in exchange for local airports losing control. Fortunately, we still have our curfew. However, this law has had no effect on the airlines negatively for years, while the restrictions on the airports still remain.<br><br>I hope that the San Diego Regional Airport Authority could work with the local Congressional delegation or someone to come up with a new regulation that would at least require airlines to fly a minimum of their newer-engined airplanes into the airport and also to provide maybe limitations on when those airplanes could be operated, because that's where a lot of the problems are. | The future narrowbody fleet mix for 2026 was based on the forecast conducted in 2018 and completed in April 2019. The forecast for this study was developed as part of a separate concurrent project, the Airport Development Plan (ADP), for 2018 through 2050. The forecast is presented in detail in the 2019 Aviation Activity Forecast Update Technical Report (2019 Forecast Report), included in Appendix D, *Forecast*, of the 14 CFR Part 150 Study Draft Report. The forecast was completed concurrent with the start of this 14 CFR Part 150 Study, so using it as a basis for this study maintains consistency with the other planning studies. Since the onset of the COVID-19 pandemic, operations temporarily have dropped off substantially at the SDIA. The FAA has determined that even though the 2019 approved forecasts do not take into account the COVID-19 pandemic and fleet mix changes made by airlines in response to the pandemic, they are appropriate for use in this Part 150 Study for land use compatibility planning efforts.<br><br>The forecast was conducted using the best available data at the time of the assessment in 2018 and approved by FAA on June 19, 2019. Current airline plans may have changed since the forecast assessment was conducted due to impacts caused by the COVID-19 pandemic and FAA's decision to allow the Boeing 737-MAX to return to operation. As indicated in the comment, the 2026 forecast includes two departures and two arrivals using the Boeing 737-MAX model. There were six arrivals and six departures forecast for the Airbus 320 NEO and 16 arrivals and 16 departures for the Airbus 321 NEO. Table 4.4 in Section 4.1.2 and Table 4 in Appendix E, *Noise*, of the 14 CFR Part 150 Study Draft Report discloses the aircraft types modeled in the FAA's Aviation Environmental Design Tool (AEDT). AEDT Version 2d, the current version of the model at the time the 14 CFR Part 150 Study started, did not have aircraft data for the Airbus 320 NEO and Airbus 321 NEO; therefore, the A320-211 was used as an FAA-approved substitution to represent the Airbus 320 NEO and the A321-232 AEDT aircraft was used to represent the Airbus 321 NEO. The 12 Airbus 320 NEO are indicated in Table 4.4 as 12 operations for the A321-232. The 32 Airbus 320 NEO aircraft are included in the 104 operations modeled for the A320-211. A note was added to Table 4.4 to describe how many of the A321-232 and A320-211 represent the Airbus A320 NEO and Airbus A321 NEO aircraft.<br><br>The FAA Reauthorization Act of 2018, passed by US Congress on October 3, 2018, devotes an entire section (Title 1, Authorizations, subtitle D) to airport noise. Among the 22 provisions enacted in subtitle D, 12 are related to aircraft noise. Section 186 of the FAA Reauthorization Act of 2018, Stage 3 Aircraft Study, requires the General Accountability Office (GAO) to "initiate a review of the potential benefits, costs, and other impacts that would result from a phaseout of covered stage 3 aircraft." "Covered Stage 3 Aircraft" are civil subsonic jet aircraft that cannot meet Stage 4 noise |

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| | | | | | **(CONTINUED)**<br>You're expecting 30 percent growth here. It's not going to come out of the old airplanes. It's going to come out of the new ones, but we've got to do something to keep the noise down.<br><br>So I appreciate your time. Thank you very much. | **(CONTINUED)**<br>level requirements defined in 14 CFR Part 36. GAO completed the review and reported to the US Congress that most large commercial jet airplanes in the United States are certificated at the minimum required stage 3 noise standards, but nearly all of them can meet more stringent noise standards. By analyzing updated data from airlines and aviation manufacturers, GAO estimated that 96 percent of large commercial airplanes can meet stage 4 or 5 standards. For the regional commercial jets, 86 percent are able to meet stage 4 or stage 5 standards. For general aviation jets, 73 percent can meet the more stringent stage 4 or 5 standards. Based on interviews with stakeholders, GAO found that according to some stakeholders, a phase-out of stage 3 airplanes would provide limited reductions in airport noise. Most airplanes for major airlines and the majority of general aviation airplanes are able to meet more stringent stage 4 standards, leaving only a small percentage of stage 3 aircraft in the fleet that do not already meet more stringent noise standards. In addition, operators using aircraft that cannot meet stage 4 would incur high costs in phasing out the aircraft with little reduction in noise levels.[1] The US Congress has not acted further related to covered stage 3 aircraft after GAO's report.<br><br>As stated in Section 9.2 of the 14 CFR Part 150 Study Draft Report, the consultant recommends continuing and expanding the Fly Quiet Program (Program Management Recommendation 4, described in Section 8.4.4). The goal of the program measure is to reduce the effect of single event noise levels and to increase awareness of noise sensitive uses and noise abatement procedures for pilots operating at SDIA. The Fly Quiet Program's purpose is to encourage commercial operators to operate as quietly as possible at SDIA. One of the features of the program is a scoring system that acknowledges those operators that attempt to follow the noise abatement goals of SDIA. The program creates a participatory atmosphere of the operators working with SDCRAA and the community to actively reduce noise by grading a commercial operator's performance and making the scores available to the public via reports. This includes fleet noise quality, which assesses and recognizes airlines who use the more modern and quieter aircraft on a frequent basis at SDIA. Each airline fleet that operates at SDIA is assigned a score based on the noise certification of the aircraft and frequency of use for a given type. High scores are assigned to aircraft that create less effects on the SDIA environs through quieter, newer generation of aircraft. Part 36 noise certification data are used to describe approach, departure, and sideline noise levels. This helps support the tracking of progress of the fleet from louder Stage 3 aircraft to quieter Stage 4 and 5 aircraft. |
| April 8, 2021 | Elizabeth Getzoff | Public Hearing Comment - Transcript | NADP | 9 | I want to support the comments that Paul has obviously put a lot of time into. And it appeared that aside from any mistakes in the forecast, the major thing that's doable is the NADP procedure, and I hope that can be implemented soon. Thank you. | Refer to the response to Comment #8 for a discussion of the fleet mix forecast. The comment related to the recommended Noise Abatement Departure Procedure (NADP) measure (Noise Abatement Recommendation 1) in Section 9.2 of the Title 14 CFR Part 150 Study Report is noted. It is moving forward as a recommendation for implementation. |
| April 8, 2020 | Garry Wonacott | Public Hearing Comment - Transcript | Forecast and Noise Modeling | 10 | I would like to begin by reminding us all that in 2017, when the FAA implemented the NextGen, it concentrated the flow of aircraft over South Mission Beach, and it dramatically increased the noise here.<br><br>That was -- we had a large -- a very large -- increase in complaints, and it was one of the reasons that we ended up with the 22 recommendations to try to find solutions that would move Padres south or find some mitigation measures.<br><br>And so I'm very disappointed that after four years, maybe hundreds of thousands of dollars of taxpayer money and many hours, as Casey said, of community service, we've accomplished virtually nothing.<br><br>I'm also disappointed in the inconsistencies. Also, supporting Paul's point, that in the forecast, there's, to me, a huge, glaring inconsistency under the nighttime departures. I'm comparing 2018 and 2026. In 2018 there are 11 departures at night and in 2026 there are 54.<br><br>So what I was told is that the nighttime covers the period from 10:00 p.m. until 7:00 a.m. the next morning.<br><br>Well, I can guarantee you there are not just 11 departures between 10:00 p.m. and 7:00 a.m. the next day. The 54 is also a huge number. It's a huge increase, and it's really driving this -- the whole 150 Study. | The comment regarding FAA's NextGen efforts and accomplishments for the past four years is noted. Section 9.2 of the 14 CFR Part 150 Study Draft Report describes the consultant's recommendations in addressing aircraft noise levels at or higher than 65 CNEL.<br><br>The forecast for this study was developed as part of a separate concurrent project, the ADP, for 2018 through 2050. The forecast is presented in detail in the 2019 Aviation Activity Forecast Update Technical Report (2019 Forecast Report), included in Appendix D, *Forecast*, of the 14 CFR Part 150 Study Draft Report, and was approved by FAA on June 19, 2019. The 2018 operation levels were based on actual data. The increase in operations between 10:00 p.m. and 6:59 a.m. can be attributed to growth forecast to occur between 6:30 a.m. and 6:59 a.m., as well as growth forecast to occur after 10:00 p.m. due to the constraints described in Section 5.1.1 of the 2019 Forecast Report. For the constrained demand scenario schedules, selected flights in hours that exceeded the limit were shifted to other hours with fewer than 50 operations. This resulted in growth in nighttime operations (those that occur between 10:00 p.m. and 6:59 a.m.) over the forecast period.<br><br>A 2018 screening study referenced in the comment was not conducted for the 14 CFR Part 150 Study. The 2018 Noise Exposure Map and compatible land use findings are described in Section 4.2 of the Title 14 CFR Part 150 Study Report.<br><br>Response to Comment #4D provides discussion of the ground noise model tracks for the nighttime flight patterns that addresses the comment about the positioning of the tracks that cross over Mission Beach. |

[1] US Government Accountability Office, Report to Congressional Committees, *AIRCRAFT NOISE Information on a Potential Mandated Transition to Quieter Airplanes*, August 2020.

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| | | | | | **(CONTINUED)**<br>And yet, under the screening analysis, the 2018 numbers reduced again, which are very, very small and not at all representative of what is in the 2026. So I think there's a huge inconsistency in the screening study that was done and then the final Part 150.<br><br>I'm also certainly at odds with the Airport Authority analysts, or the consultants, when it comes to the position of the 290 as well as the Padres as it crosses over Mission Beach. You show an average distance between those two of about a 10th of a mile. That's nothing.<br><br>Our analyses shows that it's more like almost 0.3 miles. So there's no way that the study can end up with some of the results it did. And I think this really should be looked at because it's such a huge disparate. I think there's still a lot of work to be done. | **(CONTINUED)**<br>We appreciate the time of everyone who participated in the project. Due to the concentration and location of non-compatible land uses, and the one runway system, most of the operational alternatives showed a shift in noise resulting in new non-compatible land uses. While the team understands the frustration in not finding more alternatives that reduce noise within the 65 CNEL, only those that do not create new non-compatible land uses can be brought forward as recommendations because of the purposes of the Part 150 Study. |
| April 10, 2021 | Solutions (a.k.a. Gary Wonacott) | Email to Consultant | General | 11 | Over the next few days, weeks, I will be submitting comments on the following topics:<br>1. 290 versus PADRZ crossing points over MIssion Beach<br>2. Latest analysis quantifying the effect of moving the nighttime noise abatement procedure departures to PADRZ<br>3. The FAA/Airport Authority drive to eliminate the 290 nighttime noise abatement procedure<br>4. The operational data used in the FPA and the Part 150 studies<br>5. The bottom line from four years, hundreds of thousands of dollars of tax payer money and substantial time investments by community residents.<br>6. The evolution of the 290 nighttime noise abatement procedure. | Comment acknowledged. |
| April 10, 2021 | Solutions (a.k.a. Gary Wonacott) | Website Submittal | 14 CFR Part 150 Process | 12 | 7. The breakdown of the Part 150 process – "The Part 150 Program mandates a comprehensive review of all of the all of the alternatives possible for both noise abatement and noise mitigation, and based upon these analysis, a series of recommended actions have been formulated in both the areas of noise abatement and mitigation." (San Diego International Airport Land Use Compatibility Plan FAR PART 150 STUDY, Vol. I – Compatibility Plan, May 1988). Noise Abatement Alternatives Category I – Actions that can be initiated by the District and implemented by it: Use restriction hours; single event noise exposure limits (SENEL) at separate monitors; Noise barriers; Fleet mix conversions or constraints; landing fee charges based on noise. Category II – Action that maybe requested by District, but must be initiated by others Category III – Actions that can be requested by District, but must be approved by FAA: Flight path changes; Revisions to SIDS or STARS, two stage approaches; power cut back procedures; preferential runway systems Noise Mitigation – Land use alternatives The sequence of events over the past four years precluded a comprehensive assessment of noise mitigation and abatement approaches specific to the Part 150 65 dB CNEL. This is particularly disturbing given the large growth in the 65 dB CNEL projected for 2026. I believe that this failure to do a comprehensive Part 150 specific assessment of conditions and potential noise reduction approaches constitutes a failure of the Part 150 Study requirements. | Please refer to response to Comment #4G |
| April 13, 2021 | Solutions (a.k.a. Gary Wonacott) | Website Submittal | Forecast Fleet and Ground Noise Model Tracks | 13 | I understand you would like to wrap up the Part 150, but you must know that every day there are more questions unanswered than the day before, and if these outstanding issues are not addressed the whole process is going to blow up, in an intellectual context. There were numerous issues that were brought up at the workshop that must be addressed. I am going to focus on just one of these, as I have numerous comments coming in the mail that are more comprehensive. But, if this was a jury trial, I would say there is more than just reasonable doubt with regard to the HMMH inputs to the process. Perhaps it might make sense for you to bring a representative in from HMMH to answer these questions themselves rather than for Steve Smith to only take partial ownership of the HMMH work. Let me quickly elaborate: 1) Paul Grimes pointed out a number of deficiencies in the fleet mix recommended by HMMH for the 2026 operations projections, some COVID related, but several that are not. The projections for some aircraft usage increasing substantially even though they are being rapidly retired, prior to COVID, is not defensible. 2) The projection for 11 nighttime departures for 2018 and 54 for 2026 is a glaring inconsistency, so much so, it is difficult to understand how this document was agreed to presumably by your consultants, you and then, perhaps the FAA. On the other hand, HMMH must have broken down the numbers in more detail for your review and approval, which frankly puts you and your staff in an embarrassing position, at best. 3) I think we both know, but perhaps you don't, that there is a substantial difference between the backbone and dispersion tracks provided by HMMH to you and the ones we developed. You might try to claim that HMMH is a very well respected and substantial company with much experience, but then so was Boeing before the MAX, NASA before the o-ring shuttle disaster, and Volkswagen before their quality issues came out. You might also claim that the distances between your numbers and ours are small, but then at the coast Line there is only 1.1 miles distance between nominal ZZOOO and nominal PADRZ. So, tenths of miles of inaccuracy make a big difference. We calculate a 59 percent difference in distances between your crossing points at the coast and ours, which are larger. 4) You might also claim that the consequences of a little error is no big deal, unless you accept that your errors in projected departure locations are the very reason for the small changes in the 65 dB CNEL for the most recent case, and the exaggerated "shift", your term in the CNEL for virtually all of the recommended options. If you put the two crossing points, the 290 and PADRZ right next to one another, as | The commenter references concerns related to the noise model inputs. The first is related to the fleet mix assumed for the forecast 2026 Noise Exposure Map analysis. Refer to the response for Comment #8 related to Mr. Paul Grimes comments on forecast fleet mix. The second concern is forecast nighttime operations. Refer to the response for Comment #10 related to the forecast nighttime operations. The third, fourth and fifth concern were related to the ground noise model tracks. Refer to the response to Comment #4D regarding the development of the ground noise model tracks. Refer to the response to Comment #1 related to ANAC's requested an assessment of potential impacts due to implementation of the proposed eastbound RNAV SID from the Air Traffic Flight Procedure Evaluation between 10:00 p.m. and 6:30 a.m. |

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| | | | | | **(CONTINUED)**<br>HMML did, rather than 0.25 to 0.3 miles apart, then yes, no changes. I doubt HMML even has a clue of the implications of their inputs, or do they? 5) Lastly, what makes your most recent chart an acutely absurd attempt to justify eliminating the 290 nighttime noise abatement agreement and moving these aircraft to PADRZ, is that you don't seem to recognize that the reciprocal should result in even a smaller change. Steve said you tried this in 1D, moving the nighttime PADRZ to 290, but that is simply not true. According to HMMH inputs, the 290 backbone at the coast is well north of where we found the 290 to cross, which is over the SMB lifeguard station. And 1D is even further south; another inconsistency. | |
| April 16, 2021 | Solutions (a.k.a. Gary Wonacott) | Website Submittal | 290 Vector Departure | 14 | If I understand correctly, the open SID 290 would follow the 290 backbone you have been using. In the analysis result below, where the nighttime departures on the 290 are moved to PADRZ first leg, there are minimal changes to the contour with three new INs.Generally, the laws of reciprocity work, so if the nighttime departures were move to the 290, the change in the contour should be less than or equal to what is below. I assume Steve used the 54 departures at night for the analysis below, but unfortunately, HMMH did not break down the 54 into departures to the east or the north (another words, 290 versus PADRZ). If the number follows the 2018 trend, then there are more departures on the 290 by a ratio of three to one compared to PADRZ. The departures east are larger, heavier, louder, and at lower altitude. Therefore, I would expect the change in the contour going the other direction (from PADRZ to 290) to be less. Also, all of the recommendations show the backbone track going to the southern tip of Mission Beach or even farther south, where as, the 290 average crossing, both our estimate and yours are north of the southern tip. In these analyses both the PADRZ and the 290 nighttime moved south, which is much worse than just the PADRZ moving south to the 290. The bottom line is this is all insane that Mission Beach would not be allowed to benefit by moving our nighttime departures to the 290 when I am pretty sure your folks have been claiming that PADRZ and the 290 are one and the same. I also believe that the shift has been over-emphasized in these studies. While I have a very long and good relationship with Nancy, her statement that agreeing to allow the PADRZ nighttime to move to the open SID 290 would set a dangerous precedent derives to a large degree from this overemphasis on the shift as a criterion. I guarantee that the FAA would think this is ridiculous and obviously I plan to lobby the FAA forever on this issue. | The commenter references an amended design of a RNAV SID for nighttime eastbound departures in the Air Traffic Flight Procedure Evaluation project that was put on hold by ANAC until the 14 CFR Part 150 Update process was completed. Refer to the response to Comment #1 regarding the proposed departure procedures under the Air Traffic Control Flight Procedure Evaluation study. Refer to the response to Comment #1 regarding the proposed amended procedure and the noise analysis requested by ANAC to assess the potential exposure effects if the nighttime departures assigned a 290 heading by ATCT are operated along the current PADRZ RNAV SID initial departure path from Runway 27 to the shoreline.<br><br>The commenter proposes to move the PADRZ RNAV SID assigned traffic to the proposed amended 290 ATCT heading design and believes the change in noise exposure would be less. As described in Section 7.4 of the Title 14 CFR Part 150 Study Draft Report, most of the operational alternatives shifted noise from one area of the community to another community. In general, the 14 CFR Part 150 aircraft noise modeling analysis concluded that any adjustments or movements of the departure flight paths would result in non-compatible land use and people newly exposed to 65 CNEL or higher levels due to the existing development west of SDIA. Based on those results, moving the nighttime departures assigned the PADRZ RNAV SID to the proposed 290 ATCT heading RNAV design would most likely lead to people and non-compatible land uses newly exposed to 65 CNEL or higher levels. SDCRAA understands the noise concerns of Mission Beach related to the PADRZ RNAV SID, but It is important to note that the focus of the 14 CFR Part 150 Study was to assess non-compatible areas exposed to aircraft noise levels at or higher than 65 CNEL. Areas such as Mission Beach are exposed to levels below 65 CNEL based on the Noise Exposure Maps (NEMs) for both 2018 and 2026 provided in Section 4.2 of the Title 14 CFR Part 150 Study Draft Report. It is important to note that the submittal of the 14 CFR Part 150 Study is just one milestone in SDCRAA's commitment to work with neighboring communities in finding ways to address aircraft noise. The SDCRAA's Noise Office will continue to work with communities exposed to levels below 65 CNEL like Mission Beach to identify additional ways to reduce aircraft noise. |
| April 18, 2021 | Solutions (a.k.a. Gary Wonacott) | Website Submittal | 290 Vector Departure | 15 | The Airport Authority ANAC is about to vote on recommendations that will be the most impactful, perhaps, of all time, for Mission Beach since the 290 post 10 pm departures were moved from the 275 departure. This decision is being made based on contested data and results with very large voids. I guarantee that if Mission Beach does not get some relief by moving our post 10 pm departures to the proposed Open SID 290, we will not give up. We will begin by requesting documentation on the implementation of PEBLE6, which apparently changed the departures for destinations north from 290 to 293 degrees. | SDCRAA understands the noise concerns of Mission Beach related to the PADRZ RNAV SID, but It is important to note that the focus of the 14 CFR Part 150 Study was to assess non-compatible areas exposed to aircraft noise levels at or higher than 65 CNEL. Areas such as Mission Beach are exposed to levels below 65 CNEL based on the Noise Exposure Maps (NEMs) for both 2018 and 2026 provided in Section 4.2 of the Title 14 CFR Part 150 Study Draft Report. It is important to note that the submittal of the 14 CFR Part 150 Study is just one milestone in SDCRAA's commitment to work with neighboring communities in finding ways to address aircraft noise. The SDCRAA's Noise Office will continue to work with communities exposed to levels below 65 CNEL, like Mission Beach, to identify additional ways to reduce aircraft noise. |
| April 18, 2021 | Solutions (a.k.a. Gary Wonacott) | Website Submittal | 290 Vector Departure | 16 | 4. The drive to eliminate the 290 nighttime noise abatement agreement departures – For several years, the Noise Abatement Office personnel have claimed that either PEBLE SIX or PADRZ were the same, meaning on the same tracks, with the 290 nighttime departure. This was never true. In fact, our radar data clearly shows the PADRZ average at the coast is different from the 290 average by a distance of 0.25 to 0.30 miles. We have a high degree of confidence in our data. I believe that the Part 150 consultants, Mead and Hunt, obtained their operational data tracks from MHHM. Our analysis of the MHHN data I received from the PRR shows that there is a much smaller distance between the average crossing points for the 290 and PADRZ. We also have documents obtained from a PRR that show the noise abatement office prepping their consultants to address certain concerns they are aware of from different communities. At the beginning of the studies, the commitment by the noise abatement office was that the 290 would not be touched; however, at a TAC meeting, Steve Smith described a new potential nighttime procedure that included using PADRZ for the initial leg. The MB TAC representative sat quietly as she did for much of the 4 years of studies regarding this development. Fortunately, one of the other TAC members asked if this was not going to increase noise over MB, twice. The Airport Authority and their consultants continued to push forward with this recommendation even sweetening the pie for the La Jolla and Bird Rock representatives by combining it with BROCK. It wasn't until we pushed back hard that this concept was taken off the table. | The commenter references the accuracy of the ground noise model tracks and the proposed amended RNAV SID procedure for nighttime eastbound departures to be assigned the 290 heading by ATCT. Refer to the response to Comment #1 regarding the amended RNAV SID design using the ATCT issued 290 heading and response to Comment #4D regarding the ground noise model tracks. |
| April 19, 2021 | Solutions (a.k.a. Gary Wonacott) | Website Submittal | 290 Vector Departure | 17 | In today's world there is too much reliance on large, relatively complex noise models, like AEDT, which analysts jump to right off the start line, rather than initially performing analytical studies to gain an understanding of the fundamentals and trends. Apparently all of the nighttime departures were on 290 for decades until 2015 when PEBLE SIX was introduced moving the post 10 pm departures going north to 293. This may have been done to match the actual behavior of pilots rather than push the pilots to conform to the existing 290 vector. So, post 10 pm departures with destinations north were | SDCRAA understands the noise concerns of Mission Beach related to the PADRZ RNAV SID, but It is important to note that the focus of the 14 CFR Part 150 Study was to assess non-compatible areas exposed to aircraft noise levels at or higher than 65 CNEL. Mission Beach are exposed to levels below 65 CNEL based on the Noise Exposure Maps (NEMs) for both 2018 and 2026 provided in Section 4.2 of the Title 14 CFR Part 150 Study Draft Report. It is important to note that the submittal of the 14 CFR Part 150 Study is just one milestone in SDCRAA's commitment to work with |

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| | | | | | **(CONTINUED)**<br>only on the 293 for a couple of years before they were permanently moved to PADRZ. The table below tells interesting story. PADRZ crosses the coast almost 0.2 miles farther north compared to PEBLE SIX. Part of the intent of the FPA was to provide relief for this mistake in the PADRZ final design. So far, it failed. The concentration of aircraft on PADRZ compared to the vector departure is more than a factor of two. This has resulted in a substantial increase in disruption of the quality of life of residents living under the PADRZ. The analysis to move the post 10 pm PADRZ to the 290 was never done; in all of the recommendations, both the 290 and the PADRZ nighttime were moved south, which resulted in a much larger shift of the 65 contour than if only the PADRZ 10 pm was moved to the 290. Another failure. This does not even address the issues pointed out with the HMMH data. But, it is one failure compounding another. DATE SID TIME OF DAY NORTH SOUTH AVG STD AVG STD 2019/7/1-8/31 PADRZ NIGHT 0.35 0.09 0.1 0.12 PADRZ EVENING 0.32 0.07 -0.01 0.18 2016/9/25-9/30 PEBLE SIX NIGHT 0.22 0.16 0.05 0.12 PEBLE SIX EVENING 0.24 0.18 INSUFFICIENT DATA 2014/10/1-10/31 PEBLE FIVE NIGHT 0.27 0.18 0.17 0.14 EVENING 0.29 0.17 -0.14 0.23 ONLY 3 DATA PTS | **(CONTINUED)**<br>neighboring communities in finding ways to address aircraft noise. The SDCRAA's Noise Office will continue to work with communities exposed to levels below 65 CNEL, like Mission Beach, to identify additional ways to reduce aircraft noise.<br><br>The commenter states an analysis of moving PADRZ RNAV SID nighttime traffic (just the initial departure path) to the proposed amended nighttime RNAV SID for eastbound departures 290 ATCT-issued heading path (just the initial departure path). Refer to the response to Comment #14. |
| April 21, 2021 | Anthony M. Stiegler, Esq., Christopher McCann, Len Gross, Ph.D. Deborah Watkins, Alan Harris and Dr. Matthew Price, M.D. | Email to Consultant, and submittal on website | Noise Shifting | 18 | The Part 150 Study proved to be a missed and squandered opportunity to implement meaningful "win/win" noise mitigation procedures that would have reduced dangerous aircraft noise for all communities around the airport without impacting the airport's throughput and efficiency. We are very disappointed that all of the operational alternatives were declined by the SDCRAA's consultants for recommendation to the FAA based on their highly speculative and erroneous "noise shifting" conclusion. This is an error, but hopefully one that can and will be addressed and corrected in five years' time when the Part 150 Study may, and should, be updated. | The 14 CFR Part 150 Study includes 17 recommendations, described in Section 9.2 of the 14 CFR Part 150 Study Draft Report, that can provide meaningful mitigation to residents exposed to noise levels at or higher than 65 CNEL. Notable recommendations that provide meaningful mitigation include the sound attenuation recommendations, which support the prevention of non-compatible land use in areas of noise exposure, and the proposed Noise Abatement Departure Procedure.<br><br>The "noise-shifting" conclusion referenced by the commenters is related to the operational alternatives that are expected to increase aircraft noise exposure levels at or higher than 65 CNEL at non-compatible land uses that were not exposed to 65 CNEL or higher levels without the operational alternative in place. Modeling analysis of noise exposure indicated that new non-compatible land uses would occur with implementation of Alternatives 1A, 1B, 1C, 1D, 2A, 2B, 2C, 2D, 3A, 3B, and 4, and as stated in Section 9.2 of the Title 14 CFR Part 150 Study Draft Report, "…the operational alternatives would result in a shift in noise to newly affected areas within the 65 CNEL, which does not meet purposes of CFR Part 150 and its application." [page 9.7]<br><br>SDCRAA understands the commenters' disappointment related to the operational alternative findings, but it is clear based on the FAA's land use compatibility guidelines described in 14 CFR Part 150 and on Figure 3.8 of the Title 14 CFR Part 150 Study Draft Report that residential and some non-residential land uses (e.g., schools) are not compatible with aircraft noise levels at or higher than 65 DNL (CNEL for California). SDCRAA and the consultants advised members of the CAC and TAC that the intent of the study was to reduce the number of people and area of non-compatible land uses exposed to 65 CNEL or higher levels without impacting people or non-compatible land uses that would not otherwise be exposed to noise levels at or higher than 65 CNEL (refer to the October 25, 2018 TAC/CAC Meeting presentation slide number 12 in Appendix J, *Public Coordination*, of the Title 14 CFR Part 150 Study Draft Report). In other words, the goal is to reduce the number of people and area of non-compatible land use exposed to 65 CNEL or higher while preventing the introduction of noise exposure (over 65 CNEL) to additional people and non-compatible land uses. As indicated by the FAA in a letter to SDCRAA dated October 15, 2020 (available for review in Appendix I, *FAA Noise Shifting Letter*, of the Title 14 CFR Part 150 Study Draft Report), this approach to evaluating recommendations is consistent with FAA Advisory Circular 150/5020-1, *Noise Control and Compatibility Planning for Airports*. Therefore, contrary to the commentors assertion the application of the "noise shifting" criterion is not speculative and erroneous. |
| April 21, 2021 | Anthony M. Stiegler, Esq., Christopher McCann, Len Gross, Ph.D. Deborah Watkins, Alan Harris and Dr. Matthew Price, M.D. | Email to Consultant, and submittal on website | Forecast | 19 | The SDCRAA consultants' recommendations to not advance the Equivalent Lateral Spacing Operations ("ELSO") and the "Three SIDS" noise dispersion alternatives were grounded on fictional and irreparably false assumptions embedded into the forecasted 2026 Noise Exposure Map, the FAA's demonstrably inaccurate operational forecasts and the application of an ad hoc letter that was presented inaccurately as an FAA policy. | All data input into the 2026 Noise Exposure Map noise contour was based on industry standard methods, including the development of a forecast and average annual day operations as well as ground noise model track input to the FAA's AEDT noise model.<br><br>The forecast was developed by a reputable firm with years of experience in forecast development. The forecast is summarized in Chapter 2, *Forecasts*, and details provided in Appendix D, *Forecast*, of the Title 14 CFR Part 150 Study Draft Report. The forecast was developed using the best available data at the time of the assessment in 2018 and approved by FAA on June 19, 2019. Since the onset of the COVID-19 pandemic, operations have dropped off substantially at the SDIA; however, this drop-off is assumed to be temporary. The FAA has determined that even though the 2019 approved forecasts do not take into account the COVID-19 pandemic and fleet mix changes made by airlines in response to the pandemic, they are appropriate for use in this Part 150 Study for land use compatibility planning efforts.<br><br>The average annual day operations and ground noise model flight track inputs were described in Chapter 4, *Existing and Future Noise Exposure,* of the Title 14 CFR Part 150 Study Draft Report. The operations were based on the forecast developed by the forecast consultant included the expected fleet mix and time of day distribution for future year 2026. |

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Section 4.1.5 of the Title 14 CFR Part 150 Study Draft Report and Appendix E, *Noise*, provides a summary of the development of the ground noise model track locations and track use. Model tracks were developed by a reputable firm with 40 years of aircraft noise modeling experience using a standard industry method, which entailed analyzing all radar data from SDCRAA's ANOMS and splitting the flight tracks into similar and manageable groups. This was first done by separating tracks by phase of flight (e.g., arrival or departure) and then by runway. Following this, the flight tracks were separated by each flight's destination direction, such as north, south, or west. Finally, the flight tracks were analyzed and split into groups according to their degree of similar geometry. The groupings were defined based on radar track flows over areas currently exposed to aircraft noise levels at or higher than 65 CNEL or areas that could potentially be exposed to these aircraft noise levels in the future.

The commenter referenced a letter by FAA and claimed it was inaccurately presented as FAA policy. The letter discusses the shifting of aircraft noise exposure levels at or higher than 65 CNEL from one non-compatible area to another not previously exposed to the same levels and is provided in Appendix I, *FAA Noise Shifting Letter*. The letter was referenced in Section 9.2 of the Title 14 CFR Part 150 Study Draft Report to support the statement that shifting noise from one non-compatible area to another does not meet the purpose of 14 CFR Part 150 and its application. The letter was not presented as FAA policy; the letter advises on key issues the FAA considers, which include preventing the introduction of additional people and non-compatible land uses into the 65 CNEL. The letter was referenced to confirm the criterion set at the beginning of this 14 CFR Part 150 Study to not shift noise from one community to another (refer to the October 25, 2018 TAC/CAC Meeting presentation slide number 12 in Appendix J, Public Coordination, of the Title 14 CFR Part 150 Study Draft Report), which is contrary to the purposes of the Part 150 Study and the goal of the SDCRAA of reducing noise and not creating additional non-compatible land uses.

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| April 21, 2021 | Anthony M. Stiegler, Esq., Christopher McCann, Len Gross, Ph.D. Deborah Watkins, Alan Harris and Dr. Matthew Price, M.D. | Email to Consultant, and submittal on website | Forecast | 20 | The SDCRAA and the FAA had the opportunity to adjust the forecasts in this Part 150 Study before concluding it. When invited to reconsider the forecasts recently the FAA chose not to do so.[1] Had the 2026 forecasts been amended to account for the impact of the Covid-19 pandemic on the number of flight operations at San Diego, and/or for the actual fleet mix that will be in use in 2026, the ELSO and Three SIDS alternatives would not have resulted in the shift of any noise to any new households or individuals inside the 65 dB CNEL. The Noise Exposure Maps would have depicted a much smaller 65 dB contour, showing that any alleged shift in noise associated with either alternative would have occurred well outside the 65 dB contour, and would have substantially benefited communities like Mission Beach, which is taking the brunt of all departure traffic under the SoCal Nextgen Metroplex, without doing harm to those living in the 65 dB contour in Ocean Beach and Loma Portal. The principle of noise dispersion in ELSO and Three SIDS across three departure paths would provide the much-requested relief from noise concentration, which is the uniform complaint heard from all communities, from Point Loma to La Jolla. From that perspective the SDCRAA and regretfully San Diego, swung, missed and struck out when presented with the opportunity to get things right in this Part 150 Study, wasting tremendous time and tax payer dollars.<br><br>[1] As reported in the CAC/TAC meeting on April 13, 2021, the SDCRAA specifically asked the FAA whether it wanted to update those forecasts, but the FAA elected not to do so "because we do not want to underestimate the scale of the airline industry bounce back from Covid-19". | The forecast for this study was developed as part of a separate concurrent project, the Airport Development Plan (ADP) for 2018 through 2050. The forecast was conducted using the best available data at the time of the assessment in 2018 and approved by FAA on June 19, 2019. The forecast is presented in detail in the 2019 Aviation Activity Forecast Update Technical Report (2019 Forecast Report), included in Appendix D, *Forecast*, of the Title 14 CFR Part 150 Study Draft Report. The forecast was completed concurrent with the start of this 14 CFR Part 150 Study, so using it as a basis for this study maintains consistency with the other planning studies. Since the onset of the COVID-19 pandemic, operations temporarily have dropped off substantially at the SDIA. The FAA has determined that even though the 2019 approved forecasts do not consider the COVID-19 pandemic and fleet mix changes made by airlines in response to the pandemic, they are appropriate for use in this Part 150 Study for land use compatibility planning efforts. In addition, the FAA stipulated in the FAA Aerospace Forecast Fiscal Years 2020 to 2045 published on March 2020: "As of the preparation of this forecast, the virus and its economic impacts were just emergent, and the range of possible outcomes too wide to include meaningfully in the forecast." [2] Additionally, the Part 150 Study has a built-in review point to reassess potential changes and the SDCRAA has committed to rerunning the NEMs every five years.<br><br>The commenters assertion that if operations were lower and fleet mix was quieter, some of the operational alternatives involving the Equivalent Lateral Separation Operation (ELSO), which are Alternatives 2A, 2B, 2C, 2D, 3A, and 3B, would not shift 65 CNEL or higher noise to people or areas of non-compatible land uses not expected to be exposed to that level of noise under baseline conditions. All of the operational alternatives involving ELSO would locate departures over areas not currently exposed to frequent overflights. Due to the densely populated and developed areas west of SDIA, the likelihood of a change to the initial departure paths from Runway 27 causing the introduction of additional people and areas of non-compatible land uses to be exposed to 65 CNEL or higher levels is very high regardless of the number of operations modeled. Even if operations were reduced to account for the effects of the COVID-19 pandemic, the operations are expected to return in the future and continue to grow possibly at a very high rate of increase. As the analysis described in Chapter 7, *Operational Alternatives*, indicates, the alternatives involving ELSO would eventually expose people and non-compatible land uses to 65 CNEL or higher levels that are not expected to be exposed if the alternatives are not implemented.<br><br>SDCRAA understands that the proposed operational alternatives that involve ELSO could provide relief to communities such as Mission Beach and La Jolla, but these areas are exposed to aircraft noise levels below 65 CNEL, which is not the focus of a 14 CFR Part 150 Study. SDCRAA conducted a detailed evaluation of air traffic procedure concepts designed to address concerns shared by communities such as Mission Beach and La Jolla that would not impact areas exposed to 65 CNEL or higher levels or cause new areas of non-compatibility for areas that are not exposed to 65 |

[2] Department of Transportation, Federal Aviation Administration, *FAA Aerospace Forecast Fiscal Years 2020 to 2045*, March 26, 2020.

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| | | | | | | **(CONTINUED)**<br>CNEL or higher levels. The evaluation and recommendations are described in the *San Diego International Airport Air Traffic Flight Procedure Evaluation* report available at https://www.san.org/Airport-Noise/FAR-Part-150?EntryId=13636. |
| April 21, 2021 | Anthony M. Stiegler, Esq., Christopher McCann, Len Gross, Ph.D. Deborah Watkins, Alan Harris and Dr. Matthew Price, M.D. | Email to Consultant, and submittal on website | Forecast | 21 | 1. The FAA Forecasts' Fleet Mix Assumptions Were Wildly in Error and Impossible to Have Achieved: Mr. Paul Grimes is a former ANAC member, representing San Diego Councilman Byron Wear. As Mr. Grimes noted during the public workshop and comments on April 8, 2021, the FAA's assumptions underlying the forecasts used in San Diego's Part 150 Study are fatally flawed, and disconnected from reality. The fleet mix assumptions in the forecasts were inaccurate and stood no chance of being accurate in light of known aircraft retirements and their replacement with newer quieter planes, even before COVID-19. The 2026 forecasts are incorrectly based on retired Boeing 737's and Airbus320's, but almost no 737 Max planes, Airbus 320 Neo's ("new engine option") or other quieter aircraft. The inaccurate and highly fictionalized fleet mix assumptions alone are enough to undermine the validity of the forecasts and the resulting projected 2026 Noise Exposure Maps. If correct aircraft fleet mix projections were used the size of the 65 dB contour would have been dramatically smaller. Instead, they artificially enlarged the 65 dB contour, which resulted in two consequences: (1) More federal tax payer dollars will be allocated to San Diego's Quiet Home Program to triple-pane the windows of structures that are more than certainly outside the 65 dB CNEL contour; and (2) the ELSO and Three SID proposals were rejected because they allegedly "shifted noise" to new incompatible uses within the 65 dB contour. | Refer to the response to Comment #8 related to the forecast fleet mix for 2026. The commenter indicated one consequence would be the need for additional federal taxpayer dollars to fund the QHP that are within an enlarged 65 CNEL contour (and outside the actual 65 CNEL contour). The commenter is correct that additional homes would potentially be eligible based on the 2026 NEM. As stated in Section 5.2 of the Title 14 CFR Part 150 Study Draft Report, the QHP, a residential sound insulation program, was established by SDCRAA for SDIA. The program and FAA's ongoing goal is to reduce the internal noise levels within an eligible non-compatible residence located within the 65 CNEL or higher to below 45 dBA CNEL inside the home. Eligibility to the QHP requires the home be located within an eligibility boundary based on the 65 CNEL exposure area and have habitable areas inside the home with average noise levels of 45 dB CNEL or greater with all windows closed (refer to Section 1.2.6 of the Title 14 CFR Part 150 Study Draft Report). Section 8.2.2 provides further description of QHP as an updated measure to continue the QHP based on an updated noise exposure contour. The sound attenuation costs for federally eligible properties could be funded primarily by the FAA (approximately 80 percent) with SDCRAA matching the remaining funds. The FAA issues grants from the Airport Improvement Program (AIP). Funds obligated for the AIP are drawn from the Airport and Airway Trust fund, which is supported by user fees, fuel taxes, and other similar revenue sources. The remaining 20 percent share funded by SDCRAA are drawn from curfew violation fees and Passenger Facility Charges (PFC) that are charged on airline tickets. Since a Part 150 Study focuses on mitigation of noise within the 65 CNEL, the QHP provided the biggest benefit for those within the 65 CNEL and the majority of those costs are funded by the FAA.<br><br>Refer to the response to Comment #19 regarding the commenters' consequence related to the operational alternatives analysis results. |
| April 21, 2021 | Anthony M. Stiegler, Esq., Christopher McCann, Len Gross, Ph.D. Deborah Watkins, Alan Harris and Dr. Matthew Price, M.D. | Email to Consultant, and submittal on website | Forecast | 22 | 2. The FAA Forecasts Are Fatally Flawed Because They Fail to Account for any Reduction in Flight Operations Associated with the COVID-19 Pandemic or the Ongoing Reduction in Demand for Business and International Travel.<br><br>The FAA's forecasts are also fatally flawed because they fail to account for the reduction in flight operations associated with the COVID-19 pandemic, and specifically the ongoing reduction in demand for business and international travel, which are unlikely to return to 2018-2019 levels. This failure results in an exaggerated inflated projection of the number of flight operations in San Diego, which in turn increases the size of the 65 dB contour. If accurate projections were used the size of the 65 dB contour would be significantly smaller. With more accurate projections of the anticipated size of the 65 dB contour in 2026, the ELSO and Three SIDS proposals would not have resulted in the shifting of any noise to new incompatible land uses in the 65 dB contour.<br><br>The airline industry's own premier lobby and analyst group, Airlines for America, issued its report through April 13, 2021, showing realistic and significant reductions in demand for both business and international travel. Flight operations came to a virtual standstill in 2020 during the height of the pandemic and are still heavily depressed: domestic travel was still down 36% through April 13, 2021 and through March 2021 international travel was down by 76% below 2019 levels. See https://www.airlines.org/dataset/impact-of-covid19-data-updates/#. Business travel, which makes up only about 12% of all domestic travel but 75% of airline profits has not rebounded and is down 79.4% compared to March 2020. Id. at 28. (https://www.airlines.org/dataset/impact-of-covid19-data-updates/#). Global business spending on travel is not even projected to reach 75% of the pre-pandemic spend rate by 2024. Id. at 30. (https://www.airlines.org/dataset/impact-of-covid19-data-updates/.)<br><br>Indeed, almost every major global company has expressed their concerns over climate sustainability, their carbon reduction targets in the short-term coming years, and their goals to achieve complete carbon neutrality to mitigate the rise in the earth's temperature caused by burning fossil fuels like jet fuel. See, https://www.forbes.com/sites/blakemorgan/2019/08/26/101-companies-committed-to-reducing-their-carbon-footprint/?sh=30918a3a260b.<br>The airline industry's corporate clients and customers are under significant shareholder, internal and customer pressure to reduce employee travel and reduce their overall carbon footprints, which is now considered their fiduciary duty. https://www.blackrock.com/corporate/investor-relations/blackrock-client-letter. Indeed, companies are rethinking in person meetings, the need for business travel for conferences and trade shows, and even the need for office space when platforms like ZOOM work so well and employee productivity has risen since the start of the pandemic.<br><br>The FAA and SDCRAA have ignored these macroeconomic trends in this Part 150 Study, and doing so seriously undermines the validity of the operational forecasts underlying the projected 2026 Noise Exposure Maps. Using correct | Refer to the response to Comment #20 regarding the forecast and the COVID-19 pandemic impact and potential effect on the conclusions related to the Operational Alternatives that include the ELSO heading(s). The FAA determined that the current approved forecast is appropriate for purposes of land use compatibility planning. |

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| | | | | | **(CONTINUED)**<br>adjusted data reflecting reality would have resulted in a much smaller 65 dB contour, and no "noise shifting" associated with the ELSO and Three SIDS proposals. Instead, by magically wishing them away, the forecasts exist in a vacuum of the surreal and were used to artificially and erroneously kill operational alternatives that would have benefitted all stakeholders in a win/win/win scenario. | |
| April 21, 2021 | Anthony M. Stiegler, Esq., Christopher McCann, Len Gross, Ph.D. Deborah Watkins, Alan Harris and Dr. Matthew Price, M.D. | Email to Consultant, and submittal on website | Noise Shifting | 23 | 3. Alternatives 1A, 1B, 1C, 1D, 2A, 2B, 2C, 2D, 3A, 3B, and 4 should all be advanced to the FAA:<br>The SDCRAA's decisions to not advance Alternatives 1A, 1B, 1C, 1D, 2A, 2B, 2C, 2D, 3A, 3B and 4 to the FAA in the Part 150 Study are all based on one overriding rationale: that the operational alternatives would "shift noise" by mere blocks or an insubstantial number of households within the 65 CNEL contour, notwithstanding that they would actually reduce the overall number of households and individuals in the non-compatible land use.<br><br>The "we cannot shift noise" reason given by the SDCRAA is not an actual requirement or FAA policy, but was added only belatedly in response to a unilateral request by the SDCRAA by letter to the FAA with no public input.[2] Nowhere in the FAA's published policies can that justification or rationale be found justifying the rejection of these alternatives. As Quiet Skies La Jolla's consultants pointed out after significant research there is no such published FAA policy.<br><br>All of the Alternatives reduced the total number of households and people living inside the "incompatible land use" where they are exposed to unhealthy jet noise levels. Reducing the number of people exposed to noise that is known to cause cardiac, stress, sleep and cognitive health issues should be and is a principal goal for the FAA under a Part 150 Study. Of course, reducing the size of the 65 CNEL contour would also save millions of dollars of taxpayer money spent sound insulating materials and labor required under the Quiet Home Program for structures that are, in reality, outside the actual 65 CNEL.<br><br>[2] See Part 150 Comments to Consultants Citizen Advisory Committee and Technical Advisory Committee Presentation on May 28, 2020 and Proposal for Modified Equivalent Lateral Spacing Operations Option, by Quiet Skies San Diego and Quiet Skies La Jolla, at pp. 14-15: "We note the consultants' observation and comment that "there is no magical cut off or magic line regarding shifting noise from one community to another, that "shifting noise is a policy decision for the FAA" and that "none of the alternatives would likely be viewed by the FAA as significantly impacting people within the 65 CNEL contour". | Refer to the response to Comment #18 regarding the recommendations made by the consultants related to Alternatives 1A, 1B, 1C, 1D, 2A, 2B, 2C, 3A, 3B, and 4 and the application of the "shift noise" criterion. Refer to the response to Comment #21 regarding the source of funds used for the QHP. The purpose of a Part 150 Study is to reduce the number of non-compatible land uses and to not create any new non-compatible land uses. The definition of the noise compatibility program taken directly from 14 CFR Part 150, as follows. *"Airport noise compatibility program and program mean that program, and all revisions thereto, reflected in documents (and revised documents) developed in accordance with appendix B of this part, including the measures proposed or taken by the airport operator to reduce existing noncompatible land uses and to prevent the introduction of additional noncompatible land uses within the area."*[3] The recommendations follow this guidance from 14 CFR Part 150, and supplemented by the FAA letter regarding noise shifting. The purpose of Part 150 Studies is not to analyze impacts or make determinations of significance. Rather they are voluntary programs, with the purpose of reducing existing non compatible land uses and preventing the introduction of additional non-compatible land uses within the area. Therefore, the introduction of any new non-compatible land uses as a result of a recommendation would not meet this purpose. |
| April 21, 2021 | Anthony M. Stiegler, Esq., Christopher McCann, Len Gross, Ph.D. Deborah Watkins, Alan Harris and Dr. Matthew Price, M.D. | Email to Consultant, and submittal on website | Forecast | 24 | 4. Accurate Forecasts Would Show That No Noise Shifting Would Occur: If the operational alternatives were considered in context of reasonably accurate 2026 projections for flight operations in San Diego, there would likely be no resultant "shifting of noise". Mead & Hunt, the SDCRAA's lead consultant's report states that "modeling indicates most procedure heading changes would either elongate or shift the 65 CNEL contour encompassing new non-compatible land uses". (See CAC/TAC 4.13.21 Meeting Presentation). However, if the Noise Exposure Map was based on realistic assumptions there would be fewer flight operations and they would be quieter based on accurate fleet mix assumptions. Using accurate data would show that (1) the alternatives reduce the number of households and population living within the 65 CNEL and (2) the "noise shift" asserted by the SDCRAA and its consultants would not occur. | Refer to the response to Comment #15 regarding the forecast and potential effect on the conclusions related to the Operational Alternatives results. |
| April 21, 2021 | Anthony M. Stiegler, Esq., Christopher McCann, Len Gross, Ph.D. Deborah Watkins, Alan Harris and Dr. | Email to Consultant, and submittal on website | Update Contours | 25 | We advocate that the rejected alternatives be re-run against an amended and realistic Noise Exposure Map based on realistic fleet mix and operations data. If this request is declined, we advocate that an amended Noise Exposure Map be prepared at the next time it is permissible to update San Diego's Part 150 Study, which we understand to be five years, in 2026. The ELSO and/or the Three SIDS noise dispersion proposals should be implemented based on their objective merits and for the welfare of all those communities, households and individuals living in coastal areas near the San Diego Airport. | Remodeling the Noise Exposure Map (NEM) contours at this time is not recommended for the reasons provided in responses to Comments #13, #14, and #15.<br><br>Program Management Recommendation 9, as described in Section 9.2.6.9 of the Title 14 CFR Part 150 Study Draft Report, proposes to FAA a measure to update of the NEMs or the Part 150 Study, when needed. The general guideline notes that NEMs should be reviewed whenever the actual operations differ by approximately 15 percent or more from the forecasted operations. In addition, anytime there are significant new non-compatible land uses within the 65 CNEL or greater contours, or if there are airport facility changes that may affect the contours, consideration should be given to reviewing the maps. The SDCRAA has committed to updating their NEMs every five years. |

[3] 14 CFR Part 150, *Airport Nosie Compatibility Planning*.

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| | Matthew Price, M.D. | | | | **(CONTINUED)** | |
| April 21, 2021 | R. Casey Schnoor and Mike Tarlton | Email to Consultant and submittal on website | 14 CFR Part 150 Process | 26 | 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.<br><br>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.<br><br>Forcing the completion of the Part 150 with this hard stop on April 13th 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.<br><br>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. | The commenter is correct in stating that the April 13, 2021, TAC/CAC for the 14 CFR Part 150 Study was the last meeting of the Part 150 Study committees. The consultant team received final feedback from TAC and CAC members on the recommendations and Title 14 CFR Part 150 Study Draft Report that was released for public review on March 9, 2021 and comments were accepted through April 21, 2021.<br><br>The commenter indicates concern regarding the lack of specificity with evolving 14 CFR Part 150 recommendations. Recommendations described in Section 9.2 of the 14 CFR Part 150 Study Draft Report are at an appropriate level of detail for FAA to consider approval and to meet 14 CFR Part 150 Study requirements. The FAA is expected to review the Title 14 CFR Part 150 Study Draft Report and the proposed recommendations and indicate approval or no approval to each recommended measure. After FAA announces their determination, SDCRAA will coordinate with the Airport Noise Advisory Committee (ANAC) on appropriate next steps.<br><br>The ANAC was formed in 1981 and is formally adopted as Airport Authority Policy 9.20. The committee has 18 voting members comprising community members and industry stakeholders with technical expertise. The ANAC provides a forum for collaboration and discussion regarding airport noise issues and other related topics, and it is the appropriate advisory committee for SDCRAA to coordinate with and seek advice from regarding noise concerns and implementation of noise reduction measures.<br><br>The commenter suggest that the completion of the 14 CFR Part 150 Study eliminates community involvement in the process of evaluating, refining, and assuring implementation of surviving ANAC supported recommendations because ANAC is not an appropriate source for detailed and technical oversight and does not provide opportunity for dialog with communities. ANAC membership includes the appropriate expertise (FAA representation, airline pilot and flight operations representation) to discuss details and technical topics, as needed. The purpose of ANAC is to represent the communities and stakeholders regarding aircraft noise and work with the Aircraft Noise Office to do so.<br><br>The commenter recognizes that the 14 CFR Part 150 Study lasted longer than planned due to the conduct of analyses of multiple alternatives requested by ANAC and TAC/CAC members prior to and during the study. SDCRAA extended the study to work with stakeholders to assess alternatives to support identification of solutions that would reduce noise exposure levels at or higher than 65 CNEL. The commenter stated that the extended time spent on the assessment was the result of focusing on alternatives pressed by communities exposed to levels lower than 65 CNEL. The consultants evaluated 12 operational measures based on concerns expressed by CAC members representing communities exposed to levels at or higher than 65 CNEL. However, the assessment of the 11 operational alternatives demonstrated that moving departure paths from Runway 27 in any direction to reduce the number of people and areas of non-compatible land use exposed to 65 CNEL or higher resulted in exposing new people and areas of non-compatible land uses to 65 CNEL or higher. Therefore, evaluating slightly different alterations of the alternatives was determined to not be necessary.<br><br>The commenter stated that relocation of noise or "shifting of noise" criterion was announced late in the process. The "shifting noise" criterion was shared with the TAC and CAC at the beginning of the study as stated on Slide 12 of the October 25, 2018, TAC/CAC presentation provided in Appendix J, *Public Coordination.* SDCRAA requested FAA to confirm the application of the criterion, and FAA responded October 15, 2020, (see letter provided in Appendix I, *FAA Noise Shifting Letter*). FAA's response indicated that FAA does consider the same criterion. Therefore, although the confirmation of the "shifting of noise" criterion with FAA occurred in 2020, use of the criterion was announced early in the study in 2018, and as stated in comment response #18, is directly related to the purpose of the 14 CFR Part 150 Study.<br><br>The commenter also indicated that efforts to pursue details in the remaining recommendations related to NADP and GBAS were delayed. Section 9.2.2.1 provides a description of the NADP recommendation (Noise Abatement Recommendation 1: Voluntary Noise Abatement Departure Profile [NADP]). This recommendation involves a noise abatement departure procedure in which aircraft would reduce thrust at approximately 1,500 feet Above the Field Elevation (AFE) to reduce single event levels. This recommendation involves aircraft flying a "Close-in NADP" as defined in FAA Advisory Circular (AC) 91-53. This AC defines two noise abatement departure procedures, one that reduces thrust close to the airport, and one that reduces thrust farther away. These two NADPs give airports the |

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| | | | | | | **(CONTINUED)**<br>flexibility to reduce noise at close-in or farther out locations depending on the land uses under the departure path. As detailed in Chapter 7, the Close-in NADP involves aircraft:<br>1. using full thrust for departure;<br>2. reducing thrust to 85 percent for climb; and<br>3. accelerate once past the shoreline.<br>The airlines, not SDCRAA or FAA, develop the procedures for each of their aircraft types. SDCRAA would be responsible for coordinating the specific procedures with air carriers and discussions with air carriers.<br><br>GBAS is a facility management measure (Facility Management Recommendation 1: Ground Based Augmentation System [GBAS]). As described in Section 9.2.3.1, this alternative focuses on implementing new technology to support future development of new instrument approach procedures. These procedures, which are guided by ground-based equipment in conjunction with Global Position Satellite (GPS), are precise and have more flexibility in design than existing procedures based upon conventional technology; thus, it is anticipated that they will provide opportunities to create noise abatement procedures. It is important to note that this technology is relatively new, it does not use FAA equipment, and majority of aircraft are not equipped to use GBAS yet. Therefore, benefits of the alternative would not be realized (or modeled in sufficient detail) until use of the technology increases in the future. Furthermore, additional options to use GBAS for noise abatement may develop in the future as the technology is implemented and more experience with the technology is gained. Therefore, no operational alternatives relying on GBAS were recommended in the Title 14 CFR Part 150 Study Draft Report. If the GBAS measure is approved by FAA, SDCRAA will consider next steps with advice and input from ANAC as the technology advances and integration of the technology into aircraft becomes more common. |
| April 21, 2021 | R. Casey Schnoor and Mike Tarlton | Email to Consultant and submittal on website | Data Inputs | 27 | 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:<br>▪ 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)<br>▪ 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)<br>▪ Future forecasted operations are heavily overweighted in hours of operation not typically frequented in actual operations by airlines<br>▪ Future forecasted operations are based upon 2018\2019 base operations and have not been adjusted for the severe impacts of the Covid 19 pandemic<br>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. | The commenter notes several areas of flawed data. Please reference the response to Comment #8 regarding the forecast aircraft mix; Comment #10 regarding forecast nighttime operations; and Comment #15 regarding COVID-19 pandemic impacts. Use of U.S. Census data to calculate population and dwelling unit exposure based on aircraft noise contours is an industry standard and is used by the FAA's Aviation Environmental Design Tool (AEDT) to calculate a population exposure report (See Section 5.9.6 of the FAA AEDT Version 2d User Manual available at https://aedt.faa.gov/Documents/AEDT2d_UserGuide.pdf. Based on the information provided in the Title 14 CFR Part 150 Update Draft Report and in the responses, the results are considered accurate and reliable for purposes of land use compatibility planning. |
| April 21, 2021 | R. Casey Schnoor and Mike Tarlton | Email to Consultant and submittal on website | NADP | 28 | **Noise Abatement Departure Procedure ("NADP")**<br>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.<br><br>This is highly unfortunate given this one recommendation has the most potential to positively impact those within the 65 dB CNEL and beyond.<br><br>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). | The commenter indicated that the NADP recommendation seems promising, but the definition remains vague and not adequately reviewed. Please refer to Comment #26 for a description of the NADP recommendation. As stated in Section 9.2.2.1 of the Title 14 CFR Part 150 Study Draft Report, the intent is to reduce single event noise levels with the understanding that the recommendation would not change the overall CNEL noise exposure levels, which is why the measure was rejected in previous 14 CFR Part 150 studies. In addition, the section states that the definition of the Close-In climb profile is under the airline's purview. SDCRAA's role is to recommend the Close-In NADP to users for departures at SDIA and work with the airlines to confirm intent and monitor use of the climb profile. After FAA's review of the 14 CFR Part 150 recommendations, SDCRAA expects to coordinate with ANAC on next steps related to NADP. |

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| | | | | | **(CONTINUED)**<br>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?<br><br>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.<br><br>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.<br><br>This vague approach leaves the Part 150 study, as currently drafted to be incomplete. | **(CONTINUED)**<br>The commenter indicates the information presented was vague. The commenter believes the recommendation description is inadequate as it does not address takeoff performance and it does not assess different thrust cutback altitudes or inputs used in the noise model. The commenter also references page 7.82 of the Title 14 CFR Part 150 Study Draft Report indicating no modeling was done for an NADP with a thrust cutback at a lower altitude that would reduce thrust over more non-compatible areas. Section 7.4 of the Title 14 CFR Part 150 Study Draft Report describes the background of the NADP profiles and FAA approved criteria for airlines to follow as described in FAA AC 91-53A. The AC states that airlines are to be limited to two NADP profiles for each unique aircraft type: a Close-In and a Distant NADP. This limits aircraft operators from creating additional unique NADPs for a specific airport. Therefore, the analysis for this 14 CFR Part 150 Study focused on the existing NADPs in the AC. The content in Section 7.4 does indicate that the Close-In NADP allows for a thrust cutback at an altitude no lower than 800 feet AFE. The analysis for this 14 CFR Part 150 Study recommends a thrust cutback at 1,500 feet AFE based on the surrounding land use environment. The amount of thrust to cutback is not specified because it is determined by the airlines and depends on airline operating procedures and aircraft type. As stated in Section 7.4.2, the typical thrust cutback altitude for the NADP Close-In profile used by airlines is between 1,200 and 1,500 feet AFE with the aircraft remaining in a climb configuration, then fully retracting flaps once reaching 3,000 feet Mean Sea Level (MSL) where the normal climb profile commences. Increasing the distance between the noise source (aircraft) and receptor on the ground is an effective means to reduce single-event noise levels very close to SDIA, so having aircraft climb out quickly to 1,500 feet AFE instead of 800 feet AFE prior to thrust cutback was considered beneficial in reducing single events for areas close to SDIA. Therefore, 1,500 feet AFE was recommended as the preferred altitude for thrust cutback. Based on expertise and professional judgement, cutting thrust back at 800 feet AFE would increase single-events over non-compatible areas very close to SDIA because the aircraft would be lower in altitude. This would eliminate any benefits from reducing thrust at 800 feet AFE. In summary, the information summarized above that was provided in Section 7.4 adequately addresses takeoff performance and demonstrates consideration of different thrust cutback altitudes to a level that is necessary to determine if the measure should be recommended. After FAA review, SDCRAA will coordinate with ANAC on next steps.<br><br>The commenter stated that the Title 14 CFR Part 150 Study Draft Report was inadequate in addressing the inputs used for the noise model. The inputs used to assess the potential of the measure based on single event noise levels (peak level of a sound event – Lmax) are described in Section 7.4.2 of the Title 14 CFR Part 150 Study Draft Report.<br><br>The commenter notes that the 26,000-foot distance from the end of the runway to the shoreline identified on page 7.86 is incorrect. The dimensions provided by the commenter are measured from the departure end of Runway 27 to the shoreline. The AEDT model measures departure distance in feet starting from takeoff roll, which as at the east end of the pavement for Runway 27. From the start of the takeoff roll on Runway 27, the distance to the shoreline is approximately 26,000 feet on average. Therefore, the input to the model is correct.<br><br>The commenter also indicates there is no accountable party for NADP implementation. Section 9.2.2.1 identifies that the airlines are responsible for implementing the NADP measure. As stated, SDCRAA's action would be to coordinate the specific procedures and discussions with air carriers. After FAA completes review of the Title 14 CFR Part 150 Study Draft Report, SDCRAA will seek input from ANAC, which includes community representatives with technical knowledgeable, prior to and during coordination efforts.<br><br>The commenter is correct in stating that FAA approval is not required to pursue the Close-In NADP profile, but it is a recommendation put forth to FAA for consideration in the Title 14 CFR Part 150 Study Draft Report. SDCRAA will consider the timeline for FAA's approval determination and advise ANAC if the determination is delayed and if so, what the appropriate next steps would be. |
| April 21, 2021 | R. Casey Schnoor and Mike Tarlton | Email to Consultant and submittal on website | Operational Alternatives | 29 | **Nighttime Departure Procedure; SID ("Nighttime SID")**<br>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. | The commenter did not identify the specific nighttime departure procedure Standard Instrument Departure (SID); however, it is assumed that the commenter is referencing a proposed modification to an Area Navigation (RNAV) SID proposed as part of the Flight Procedure Evaluation effort. Because the 14 CFR Part 150 Study did not recommend operational alternatives that would modify the initial departure heading from Runway 27 for the daytime and nighttime hours, and because of concerns expressed by ANAC and CAC members related to moving nighttime eastbound departures assigned a 290 heading to a route similar to the PADRZ RNAV SID , the consultant for the Flight Procedure Evaluation proposed a modified design of the nighttime eastbound RNAV SID that was put on hold by ANAC until the 14 CFR Part 150 Study process was completed. The proposed design concept is independent from the 14 CFR Part 150 Study and is not intended to change departure flight patterns over areas exposed to CNEL levels at or |

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| | | | | | **(CONTINUED)**<br>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.<br><br>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<br><br>Procedure, based upon the information provided by Jim Payne (et.al.) from the AA during our recent individual calls.<br>▪ It does not have any materially new information except for:<br>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<br>▪ 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")<br>▪ 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<br>▪ 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)<br>▪ 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<br>▪ It does not represent many of the positive features discussed on the calls, including:<br>1. the historical alignment to True North versus magnetic (i.e. "304 degrees True")<br>2. It does not have any provision for adjustment for future magnetic variation<br>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).<br><br>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. | **(CONTINUED)**<br>higher than 65 CNEL. Therefore, this departure procedure is not described in the Title 14 CFR Part 150 Study Draft Report.<br><br>The commenter notes the proposed procedure should be circulated for evaluation as part of the Flight Procedure Analysis effort. The concept design was shared prior to and presented at joint TAC and CAC meeting held on April 13, 2021, for review and input, which is consistent with previous flight procedure concept reviews. The flight procedure evaluation consultant answered questions from TAC and CAC members. The flight procedure evaluation consultant is expected to present the concept to ANAC to seek further input. Therefore, the proposed design concept was circulated for evaluation and input from TAC, CAC, and ANAC was collected; therefore, a new ANAC Subcommittee to review the proposed concept is not necessary.<br><br>The commenter refers to information provided by Jim Payne from SDCRAA regarding the Eastbound Nighttime RNAV SID concept. Details of the concept were shared with TAC and CAC members at the April 13, 2021, meeting. Waypoint AN14-1 is not new and was included as part of the original design that was put on hold by ANAC. The procedure is only for eastbound jet departures between 10:00 p.m. and 6:30 a.m. when the ATCT amends the ZZOOO RNAV SID and issues a 290 heading when cleared for takeoff. The proposed nighttime RNAV SID for northbound departures that was put on hold by ANAC is a separate procedure and does not change. The commenter is correct in calling the concept a Vector-to-RNAV procedure. ATCT would clear the pilot for takeoff, turn to heading 290, and then join the RNAV SID. The initial path from Runway 27 would be based on the same action conducted today: the pilot would be following a 290-heading based on the heading indicator when deemed safe to turn. The aircraft navigation system would eventually pick up the first waypoint (AN14-1) and begin to direct the aircraft towards it. The waypoint is located along the current average path taken by aircraft issued the 290 heading by ATCT, so the dispersion path remains similar to existing patterns and far enough west to ensure the aircraft does not turn until 1.5 nautical miles west of the shoreline. In order to ensure the similar dispersion and flight path location over the ground, the design should not be based on a magnetic heading as proposed by the commenter. The key variable is the heading issued by ATCT and the point at which the pilot initiates the turn, which is why the concept is based on ATCT issuing a heading.<br><br>The aircraft would turn left, fly by the waypoint, join the first track of the RNAV SID, and continue on the RNAV toward the ZZOOO waypoint. As noted on the presentation shared with TAC/CAC members, on April 13, 2021, this concept would need to be tested during the FAA Performance Based Navigation (PBN) development process to ensure the dispersion over areas exposed to 65 CNEL or higher remains similar to existing dispersion.<br><br>A flight procedure design submitted to FAA for consideration would not have a provision to adjust for future magnetic variations. The commenter is referencing an action that SDCRAA may request to FAA based on monitoring the variation and its effects on flight locations over the ground.<br><br>As previously stated, the flight procedure evaluation consultant presented the concept to ANAC and it was determined to submit the concept to FAA. The consultant believes the concept design is complete for purposes of discussion with the ANAC and consideration for submitting to FAA for review. It is important to note that FAA will conduct an independent design and assessment on the concept with an understanding of the intent, which is to maintain the current flight pattern dispersion west of SDIA and provide a more predictable and repeatable path when transitioning to the east toward the ZZOOO waypoint. The implementation of this published procedure is also expected to reduce right turns at night that direct eastbound departures over La Jolla. |
| April 21, 2021 | R. Casey Schnoor and Mike Tarlton | Email to Consultant and submittal on website | Quieter Home Program | 30 | **Quieter Home Program ("QHP") \ Quieter Non-Residential Program ("QNonRP")**<br>Calculations based upon data within the Draft Part 150 report indicate:<br>**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.<br>**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%.<br><br>This also burdens the AA with a minimum of $3.5 million per year in QHP costs; for the next 31-34 years. | The QHP is a voluntary program started by the SDCRAA through the 14 CFR Part 150 Study process. The timing of insulation and number of homes insulated each year is contingent upon availability of funds (both federal and local). However, the QHP has been very successful in procuring funds from the FAA noise program (and providing the local match) and will continue every effort to do so. It is currently the largest single sound insulation program in the country. |

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| | | | | | **(CONTINUED)**<br>**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.<br>**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.<br><br>This brings the minimum combined annual SDCRAA funding obligation for QHP and QNonRP to $5-6 million over the next 22-31 years.<br><br>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. | |
| April 21, 2021 | R. Casey Schnoor and Mike Tarlton | Email to Consultant and submittal on website | Ground Based Augmentation System | 31 | **GROUND BASED AUGMENTATION SYSTEM ("GBAS")**<br>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.<br>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. | The commenter requests a more refined implementation strategy for GBAS at SDIA to reduce arrival noise for areas exposed to 65 CNEL or higher. Section 8.1.2 indicates that even with GBAS installed at an airport, the number of commercial aircraft that can fly these procedures is currently limited compared with those equipped to fly an Instrument Landing System (ILS) procedure. Therefore, the timeline when use of this technology can substantially affect noise levels is unknown. SDCRAA is expected to coordinate with ANAC after FAA provides their approval determinations for each measure. |
| April 21, 2021 | R. Casey Schnoor and Mike Tarlton | Email to Consultant and submittal on website | Airport Noise Advisory Committee Recommend ations | 32 | **ANAC RECOMMENDATIONS**<br>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.<br><br>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 21st. | Appendix C, *ANAC Recommendations*, of the Title 14 CFR Part 150 Study Draft Report provides a matrix summarizing all the ANAC recommendations and status of each. The matrix will be updated after FAA completes its review of the Title 14 CFR Part 150 Update Draft Report and makes their approval determinations, and after ANAC issues final conclusions on two proposed nighttime departure procedures that are on hold. |
| April 21, 2021 | R. Casey Schnoor and Mike Tarlton | Email to Consultant and submittal on website | Subcommitte e to the Airport Noise Advisory Committee | 33 | **NEW ANAC SUBCOMMITTEE**<br>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).<br><br>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.<br><br>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. | Please refer to Comment #26 related to ANAC and community input. For the reasons explained in the response to Comment #26, a subcommittee to ANAC is not necessary. |
| April 21, 2021 | R. Casey Schnoor and Mike Tarlton | Email to Consultant and submittal on website | General | 34 | 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, | Please refer to response to Comments #21 through #26 regarding the commenter's statements related to the completeness of the Title 14 CFR Part 150 Update Draft Report; accuracy, accountability, and expeditious implementation of the recommendations; modification of NADP, GBAS and the Nighttime Procedure recommendations; and formation of an ANAC subcommittee. |

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| | | | | | **(CONTINUED)**<br>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 | |
| April 21, 2021 | R. Casey Schnoor and Mike Tarlton | Email to Consultant | Attachment to Comment Letter | 35 | Copied below are letters and comments on CAC matters provided to become part of the formal Part 150 public record:<br><br>January ___, 2021<br>Dear Dennis, Sjohnna and Heidi,<br>CC: Kim Becker CEO<br><br>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.<br><br>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…"<br><br>As previously stated, the purpose of the 14 CFR Part 150 study is to:<br>a) Reduce individuals and noncompatible land uses within the 65 dB CNEL and prevent introduction of additional non-compatible land<br>b) Develop a balanced and cost-effective program to reduce noise impacts within the 65 dB CNEL contours while noting that,<br>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.<br>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<br><br>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 db CNEL 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.<br><br>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.<br><br>**UPDATED SPECIFIC REQUESTS:**<br>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. | These comments were attached to the comment letter related to Responses #21 through #29. This was submitted as an attachment to the comment letter. This letter was submitted to SDCRAA prior to the formal 14 CFR Part 150 comment period and were discussed, considered, and integrated as appropriate in the subsequent meetings and Draft Document. The comments related to the operational alternative analysis results and recommendations were considered and are documented in Chapter 7, *Operational Alternatives*, and Chapter 9, *Recommendations*, of the Title 14 CFR Part 150 Update Draft Report. The specific request for NADP and GBAS were considered, and information documented in Chapter 7 for the NADP and Chapter 8, *Facility, Land Use, Program Management Alternatives*, for GBAS as well as response to Comments #23 and #26 for NADP and GBAS, respectively. Strategies to incentivize airlines in using more modern and quieter aircraft is also considered as part of the Fly Quiet Program described in Section 8.4.4 of the Title 14 CFR Part 150 Update Draft Report. Refer to the response to Comment #29 regarding the Nighttime RNAV SID design concept. The comment related to maximizing arrivals to the west is what brought the GBAS measure forward for consideration. Regarding the comment on QHP funding, please refer to the response to Comment #30. Costs to for the recommendation is also described in Section 9.2.4.2 of the Title 14 CFR Part 150 Update Draft Report |

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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. Explore alternatives that result in more Stage 4 and Stage 5 aircraft at SAN using either regulation or carrier incentives
4. 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
5. 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,

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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

Marc Adelman, CAC Member David Kujawa, CAC Member

Robin Taylor, CAC Member Nancy Palmtag, CAC Member

Casey Schnoor, CAC Member

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| April 21, 2021 | R. Casey Schnoor and Mike Tarlton | Email to Consultant | Attachment to Comment Letter | 36 | November 19, 2020<br>Mr. Dennis Probst SENT VIA EMAIL<br>Ms. Sjohnna Knack<br>Ms. Heidi Gantwerk<br>San Diego County Regional Airport Authority<br><br>Dear Dennis, Sjohnna and Heidi,<br><br>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.<br><br>**PART 150 PROCESS**<br>As previously stated, the purpose of the Part 150 study is to:<br>a) Reduce the number of individuals and noncompatible land uses within the 65 dB CNEL<br>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.<br><br>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. | These comments were attached to the comment letter related to Responses #21 through #29. This was submitted as an attachment to the comment letter. This letter was submitted to SDCRAA prior to the formal 14 CFR Part 150 comment period, and these comments were addressed in the subsequent meetings and in the Draft Document. The commenter requested a noise modeling analysis on Alternative 3, which was conducted and documented in Chapter 7 as Alternative 3B. Refer to the response to Comment #22 regarding use of U.S. Census data to conduct population and dwelling exposure analysis. The specific request for NADP was considered and information documented in Chapter 7 for the NADP as well as response to Comments #23. Strategies to incentivize airlines in using more modern and quieter aircraft is also considered as part of the Fly Quiet Program described in Section 8.4.4 of the Title 14 CFR Part 150 Update Draft Report. Refer to the response to Comment #29 regarding the Nighttime RNAV SID design concept. The comment related to maximizing arrivals to the west is what brought the GBAS measure forward for consideration. Regarding the comment on QHP funding, please refer to the response to Comment #30. Costs to for the recommendation is also described in Section 9.2.4.2 of the Title 14 CFR Part 150 Update Draft Report. |

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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.

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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.

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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
f) 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 disbursed 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. Spit 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.

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| | | | | | **(CONTINUED)**<br>**NIGHTTIME LANDINGS**<br>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:<br>a) A thorough review of alternative GBAS's implemented at other US and Intl. airports,<br>b) Designated Noise Abatement Approach Paths (vertically\glide path and horizontally 260-280) that provide dispersion from the set 270 approach<br>c) NextGen: Performance Based Navigation (PBN) Required Navigation Performance (RNP)<br><br>**QHP**<br>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.<br><br>**SUMMARY**<br>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.<br><br>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.<br>Thank you.<br><br>Respectfully submitted,<br>Michael Tarlton, CAC\TAC Member Robert Herrin, CAC Member<br>Marc Adelman, CAC Member David Kujawa, CAC Member<br>Robin Taylor, CAC Member Nancy Palmtag, CAC Member<br>Casey Schnoor, CAC Member<br><br>CC: Kim Becker SDCRAA CEO<br>U.S Senator Diane Feinstein<br>U.S. Congressman Scott Peters<br>San Diego City Mayor Kevin Faulconer<br>San Diego Mayor Elect Todd Gloria<br>San Diego District 2 City Councilmember Dr. Jennifer Campbell<br>San Diego District 1 City Councilmember Barbra Bry | |
| April 21, 2021 | R. Casey Schnoor and Mike Tarlton | Email to Consultant | Attachment to Comment Letter | 37 | **Part 150 CAC Meeting**<br>**May 28, 2020**<br><br>Comments provided by Casey Schnoor, CAC Member:<br><br>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:<br>a) Status of Flight Procedure Analysis recommendations; summarize the initial list of ANAC recommendations, recommendations forwarded, current status, etc.<br>b) Waypoints and Noise Dot references in all route exhibits were requested for context<br>c) CAC member recommendations provided at workshop were not addressed<br>d) Request for additional time for the Part 150 process | These comments were attached to the comment letter related to Responses #21 through #29. This was submitted as an attachment to the comment letter. This letter was submitted to SDCRAA prior to the formal 14 CFR Part 150 comment period and was related to the presentation information shared with CAC members prior to the May 28, 2020 joint TAC/CAC meeting. The comments related to #2, #3, #6, #7 were addressed at the meeting. Links to ANAC recommendations and clarifications to address claimed omissions were addressed at the meeting as each of the alternatives were described. Comments related to the illustration and description of Alternatives were considered for future presentations and the inquiries related to details was presented to members. The NADP alternative was presented at the October 15, 2020 meeting. The presentation slides for the May 28, 202 and October 15, 2020 meetings are available in Appendix J, *Public Coordination*, of the Title 14 CFR Part 150 Update Draft Report. |

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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 in 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

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**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\Flt 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":
    j) 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"

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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\Flt 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)

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| | | | | | **(CONTINUED)**<br>17) Alternative 5<br>a) This was not an ANAC recommendation<br>b) What was the source of this Alternative and why was it considered?<br>18) Alternative 6<br>a) ANAC #21 states "… conduct an engineering analysis of modification to the NADP to assess the potential improvement to noise contours around the airport."<br>b) ANAC Subcommittee discussion included Optimal Profile Climb Flight Procedures (Metroplex EA section 1.2.5.3);<br>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<br>d) The analysis needs to include among other elements:<br>i) ALL NADP's currently implemented at SAN<br>ii) A thorough review of alternative NADP's implemented at other US and Intl. airports<br>iii) Consistency of application and implementation of NADP's at SAN<br>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"<br>v) Departure Thrust Cutback (as referenced at Part 150 meeting 11/2019)<br>vi) Designated Noise Abatement Takeoff/Approach Paths (as referenced at Part 150 meeting 11/2019)<br>vii) NextGen: Performance Based Navigation (PBN) Required Navigation Performance (RNP) (as referenced at Part 150 meeting 11/2019)<br>viii) Power and Flap Settings/CDA procedure (as referenced at Part 150 meeting 11/2019)<br>19) Next Steps:<br>a) Correct or replace the Population to Housing data with reliable approach (see item 7 above)<br>b) Supplement with the Omitted data, analysis, etc. (see items 8b., 16, 18 and others above)<br>c) Address the "transfer of noise" restrictions<br>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<br>e) Provide a thorough summary of the FPA, detailing:<br>i) opening list of recommendations (per ANAC Recommendations list)<br>ii) concluding list of recommendations<br>iii) recommendations transferred to Part 150<br>iv) status of submitted recommendations<br>f) Provide the linkage and procedures to address between deferred FPA recommendations and Part 150<br>g) A thorough review and analysis of NADP alternatives | |
| April 21, 2021 | R. Casey Schnoor and Mike Tarlton | Email to Consultant | Attachment to Comment Letter | 38 | April 10, 2021<br><br>Heidi,<br><br>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.<br><br>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.<br><br>Upon a quick review:<br>▪ 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 | These comments were attached to the comment letter related to Responses #21 through #29. This was submitted as an attachment to the comment letter. This letter was related to the presentation information shared with CAC members prior to the April13, 2021 joint TAC/CAC meeting. Refer to the response to Comment #29 regarding the Nighttime RNAV SID concept design proposed by the flight procedure evaluation consultant. The flight procedure evaluation consultant presented the design and addressed all questions posed by TAC and CAC members. |

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| | | | | | **(CONTINUED)**<br>▪ 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<br>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"<br>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<br>▪ • It is does not appear to be an "Open SID" as AA represented (unless it is undisclosed as a "Radar Vector RNAV SID"?)<br>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<br>▪ 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)<br>▪ 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<br>▪ It does not represent many of the positive features discussed on the calls, including:<br>1. That any reference to a magnetic heading should be revised to the historical 1988 alignment for True North, versus magnetic<br>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<br>▪ 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"<br>▪ 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.<br>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.<br><br>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 13th, and the pending ANAC meeting on April 21st.<br><br>Respectfully,<br>Casey Schnoor | |
| April 21, 2021 | RJ Herrin | Website Submittal | General | 40 | As a resident of Loma Portal, a member of the airport Citizens Advisory Committee, and a former airline pilot, I support the following. The development of a published radar vector RNAV SID to replace the tower issued 290 heading for ZZOOO departures after 10pm. The Ricondo proposal from the CAC meeting on 4/13/21 I believe is a fair compromise meeting the needs of our local community and the aviation community. I also support the modifications to the PADRZ SID departure with the inclusion of BROCK waypoint to help relieve noise issues in the northern beach communities. I also support the funding and use of the GBAS (Ground based Landing System) at SDIA. The ability of the GBAS to allow landings in worse weather conditions than the current technology would benefit the public. On runway 27, GBAS could reduce ATC traffic management issues by minimizing the number of opposite runway operations. It could possibly reduce the number of missed approaches due to weather and the resulting noise effects. I support the evaluation of the use of the NADP1 noise abatement profile at SDIA. I ask the Airport Authority to begin this evaluation process as soon as possible.. The Airport should work with the airlines and encourage them to study various aircraft configuration and thrust reduction altitudes to develop possible NADP1 take-off performance profiles for their fleets used at SDIA that could potentially lower the Lmax noise levels for residents in the departure paths. | The commenter states support for the proposed amended RNAV SID design presented to TAC and CAC at the April 13, 2021 meeting and the proposed concept for northbound departures at night that was put on hold by ANAC until the 14 CFR Part 150 Stud was completed. Both design concepts are proposals under the Air Traffic Procedure Evaluation Study and is not a measure considered for the 14 CFR Part 150 Study. The intent of both designs is to maintain existing traffic overflight patterns for areas exposed to aircraft noise levels at or higher than 65 dBA CNEL and address ANAC recommendations related to traffic near Point Loma, La Jolla and Pacific Beach. The design was presented to ANAC at the May 5, 2021 meeting and ANAC voted to submit these concepts to the FAA. The commenter's statements regarding support for GBAS and NADP1 are noted. Reference the response to Comment #28 and #31 regarding NADP and GBAS, respectively. |
| April 21, 2021 | Paul Grimes | Email to SDCRAA | Forecast Fleet Mix | 41 | I'm Paul Grimes, former manager of schedules - Continental Airlines Futures Planning Department, former Director of Schedule Planning at PSA and former ANAC member representing Deputy Mayor Byron Wear as his staff member between 1995 and 2002. I am very concerned about the narrowbody fleet mix projections in 2026 and beyond in the Study. There | The commenter stated the major points of his comment during the public hearing. Refer to the response to Comment #8 regarding the forecast fleet mix and need for a similar U.S. Congress act to require use of quieter aircraft. The |

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are major miscalculations, major errors or major typos that must be addressed. I have three charts to show the true status of the US narrowbody fleet. The first chart (part150SANfleet3a.pdf) shows the 2018 Historic operations by type and the 2026 Modeled operations by type as presented in the Study.

The 737-900 series is totally missing. UA has nearly 150 of these aircraft and Alaska has 91 – they are used heavily in San Diego by these airlines.

There are no Airbus neo units shown in 2018 or 2026. With only 2 round trips per day modeled for the 737MAX in 2026, MAX and neo technology is totally missing in the 2026 projections. These aircraft are being increasingly used at SDIA today and are very quiet, especially on departure. If the study's fleet mix modeling is being used to create projected contours, the west side of the airport must have higher impacts/contours area than with a realistic fleet mix projection.

Unfortunately, I have been unable to find noise certification numbers for newer aircraft. But, I tracked several days of American's MIA and Delta's JKF redeye operation flown by 737-8Max and 737-800 aircraft. The average reduction in noise from the MAX takeoff was 6.5dB at the first monitor, 9.5dB at the second, 1dB at the third and no change at the fourth monitor. At the noisiest monitors, this is equal to a reduction in noise of about 4 times. In other words, 4 neo/MAX aircraft calculates to equal the noise of 1 current 738/320 departure. Additionally, it sounds to me that noise from MAX/neo aircraft dissipate quicker than 737NG/320 aircraft after passing monitors.

Due to the lack of MAX/neo aircraft projections, the 2026 estimates show current technology aircraft at SDIA are to increase by 32% (some by as much as 80% to 100%) vs. 2018. Where will these aircraft be pulled from to add flying at SDIA since they are out-of-production and being retired? Think about it, how do operations of the out-of production A320 double in SDIA? – these aircraft are being retired and would average over 27 years old in 2026. Southwest is buying 737MAX7s to specifically replace 737-700s, which the study has SDIA projecting to increase by 80% in 2026. I am asking you to find out what is wrong with the numbers, make proper fleet mix estimates and re-run the contour projections.

An additional red flag is the nearly 500% jump in "Night" operations resulting in higher noise impacts/contour predictions. Of course as the runway gets more crowded more flights will be pushed later in the day, but the projection is way too high and must include estimations of services that would never receive a redeye flight due to demand and geography. Takeoffs are limited to 2 hours of "Night" operations and 0630 to 0700 timeframe is choreographed daily (prior to the pandemic) to maximize runway use.

The second chart (part150USfleet.pdf) shows SDIA operators narrowbodied current fleets, new technology orders and options.

The airlines that operate into SDIA today have approximately 10% of their narrowbody fleet in 737MAX or A320Family neo aircraft. With orders and options the number climbs to 35% and this doesn't include retirement of any current technology aircraft.

The last chart (21Part150CalcsUpdate.pdf) shows my estimates of 737MAX and Airbus320 Family neo fleet mix percentages. My criteria projects low, medium and high scenarios that have 23%, 34% and 43% new technology narrowbodies in the fleet of those airlines that serve SDIA – various assumptions on deliveries, options and retirements are made. Obviously deliveries timings are fluid, especially with the pandemic affects, but this compares with an unrealistic 0.7% estimate of MAX/neo aircraft in the study. The percentage error is off the charts. Note that SAN has always 1.) received on average newer aircraft due to loads and stage length 2.) had a downward trend in noise contours as Newer technology aircraft have more than made up for the increased operation. If realistic fleet mix calculations are used, I am pretty confident that contours on the west side would not show an increase. My final concern is that the study goes into many gyrations to reduce the number of people in the 65 CNEL contour. None of the numerous options include working with the FAA/DOT/US Congress to gain some leverage over the airline fleet mix or time of day use.

The Airport Noise and Capacity Act of 1990 accelerated removal of Stage II aircraft in trade for loss of local control over airline scheduling or restrictions like curfews. This law has had no affect on the airlines for years, yet the restrictions on airports remain. We need a new act that would allow incompatible airports like SDIA to limit noisy aircraft to daytime hours, require airlines to operate at or above their MAX/neo fleet percentages and/or restore some local control over operations. From an airline scheduler's viewpoint this can be easily done since US carriers will have hundreds of new technology aircraft available to serve SDIA. Many SDIA flights leave airline hubs for West Coast turns and could be

**(CONTINUED)**

commenter also stated concerns related to the nighttime operations forecast. Refer to the response to Comment #10 regarding the nighttime operations forecast for 2026.

**(CONTINUED)**

swapped with potentially scores of other aircraft. I implore the Study to work with our local Congressional delegation to provide relief of a newer fleet mix to SDIA, an airport that is predicted to grow by 30% or more in the future.

part150SANfleet3a.pdf Chart

| Large Narrowbodies Min 1 movement/day | | 2018 Historic | | 2026 Modeled | | Up/Down Vs. 2018 | | Up/Down % Vs. 2018 |
|---|---|---|---|---|---|---|---|---|
| A319 | | 13 | | 10 | | -3 | | -23.1% |
| A320 | | 39 | | 80 | | 41 | | 105.1% |
| A321 | | 60 | | 104 | | 44 | | 73.3% |
| SubTtl | | 112 | | 194 | | 82 | | 73.2% |
| | | | | | | | | |
| B73G | | 163 | | 294 | | 131 | | 80.4% |
| B738 | | 162 | | 99 | | -63 | | -38.9% |
| B739 | Missing | 0 | | 0 | | 0 | | |
| SubTtl | | 325 | | 393 | | 68 | | 20.9% |
| | | | | | | | | |
| B752 | | 10 | | 10 | | 0 | | |
| B753 | | 2 | | 0 | | -2 | | -100.0% |
| B717 | | 4 | | 2 | | -2 | | -50.0% |
| Old Total | | 453 | | 599 | | 146 | | 32.2% |
| | | | | | | | | |
| A220 | | 0 | | 0 | | 0 | | |
| 319N | | 0 | | 0 | | 0 | | |
| 320N | | 0 | | 0 | | 0 | | |
| 321N | | 0 | | 0 | | 0 | | |
| SubTtl | | 0 | | 0 | | 0 | | |
| | | | | | | | | |
| B37M | | 0 | | 0 | | 0 | | |
| B38M | | 2 | | 4 | | 2 | | 100.0% |
| B39M | | 0 | | 0 | | 0 | | |
| B3XM | | 0 | | 0 | | 0 | | |
| Sub Ttl | | 2 | | 4 | | 2 | | 100.0% |
| | | | | | | | | |
| New Total | | 2 | | 4 | | 2 | | 100.0% |
| | | | | | | | | |
| Total All | | 455 | | 603 | | 148 | | 32.5% |
| | | | | | | | | |
| Current Tech % | | 99.6% | | 99.3% | | | | |
| New Tech % | | 0.4% | | 0.7% | | | | |

(Part150USfleet.pdf Chart (Part 1)

| Airline Fleets | WN | AS | UA | DL | AA | F9 | NK | JB | HA | SY | G4 | Total |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Old Tech | | | | | | | | | | | | |
| A319 | | 10 | 91 | 57 | 153 | 3 | 31 | | | | 36 | 381 |
| A320 | | 46 | 94 | 55 | 48 | 19 | 64 | 130 | | | 73 | 529 |
| A321 | | | | 113 | 218 | 21 | 30 | 63 | | | | 445 |
| **SubTtl** | **0** | **56** | **185** | **225** | **419** | **43** | **125** | **193** | **0** | **0** | **109** | **1355** |
| | | | | | | | | | | | | |
| B73G | 472 | 14 | 53 | | | | | | | 1 | | 540 |
| B738 | 207 | 61 | 141 | 77 | 303 | | | | | 42 | | 831 |
| B739 | | 91 | 148 | 130 | | | | | | | | 369 |
| **SubTtl** | **679** | **166** | **342** | **207** | **303** | **0** | **0** | **0** | **0** | **43** | **0** | **1740** |
| | | | | | | | | | | | | |
| B752 | | | 40 | 111 | | | | | | | | 151 |
| B753 | | | 21 | 16 | | | | | | | | 37 |
| B717 | | | | 45 | | | | | | | | 45 |
| **Old Tech Total** | **679** | **222** | **588** | **604** | **722** | **43** | **125** | **193** | **0** | **43** | **109** | **3328** |
| **New Tech** | | | | | | | | | | | | |
| A220 | | | | 46 | | | | 1 | | | | 47 |
| 319N | | | | | | | | | | | | 0 |
| 320N | | | | | | 63 | | | | | | 63 |
| 321N | | 10 | | | 31 | | 34 | 16 | 18 | | | 109 |
| **SubTtl** | **0** | **10** | **0** | **46** | **31** | **63** | **34** | **17** | **18** | **0** | **0** | **219** |
| | | | | | | | | | | | | |
| B37M | | | | | | | | | | | | 0 |
| B38M | 63 | | | | 41 | | | | | | | 104 |
| B39M | | 4 | 30 | | | | | | | | | 34 |
| B3XM | | | | | | | | | | | | 0 |
| **Sub Ttl** | **63** | **4** | **30** | **0** | **41** | **0** | **0** | **0** | **0** | **0** | **0** | **138** |
| | | | | | | | | | | | | |
| **New Tech Total** | **63** | **14** | **30** | **46** | **72** | **63** | **34** | **17** | **18** | **0** | **0** | **357** |
| | | | | | | | | | | | | |
| **Total Fleet** | **742** | **236** | **618** | **650** | **794** | **106** | **159** | **210** | **18** | **43** | **109** | **3685** |
| | | | | | | | | | | | | |
| **New Tech %** | **8.5%** | **5.9%** | **4.9%** | **7.1%** | **9.1%** | **59.4%** | **21.4%** | **8.1%** | **100.0%** | **0.0%** | **0.0%** | **9.7%** |

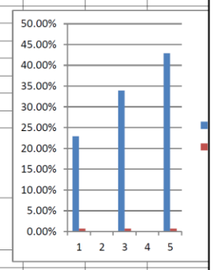
**(CONTINUED)**

Part150USfleet.pdf Chart (Part 2)

| Airline | WN | AS | UA | DL | AA | F9 | NK | JB | HA | SY | G4 | Total |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Orders** | | | | | | | | | | | | |
| 220 | | | | 49 | | | | 69 | | | | 118 |
| 319N | | | | | | | | | | | | 0 |
| 320N | | | | | | 49 | 155 | | | | | 204 |
| 321N | | | | 122 | 70 | 67 | | 56 | 18 | | | 333 |
| 321XLR | | | 50 | | 50 | 18 | | 13 | | | | |
| **SubTtl** | **0** | **0** | **0** | **171** | **70** | **116** | **155** | **125** | **18** | **0** | **0** | **655** |
| | | | | | | | | | | | | |
| B37M | | | | | | | | | | | | 0 |
| B38M | 100 | | 27 | | 31 | 100 | | | | | | 258 |
| B39M | | 68 | 23 | | | | | | | | | 91 |
| B3XM | | | 100 | | | | | | | | | 100 |
| **Sub Ttl** | **100** | **68** | **150** | **0** | **31** | **100** | **0** | **0** | **0** | **0** | **0** | **449** |
| **Ttl Orders** | **100** | **68** | **150** | **171** | **101** | **216** | **155** | **125** | **18** | **0** | **0** | **1104** |
| **Options** | **155** | **52** | **0** | **100** | **0** | **0** | **50** | **0** | **0** | **0** | **0** | **357** |
| | | | | | | | | | | | | |
| **New/opns** | **255** | **120** | **150** | **271** | **101** | **216** | **205** | **125** | **18** | **0** | **0** | **1461** |
| | | | | | | | | | | | | |
| **Ttl w/Opns** | **318** | **134** | **180** | **317** | **173** | **279** | **239** | **142** | **36** | **0** | **0** | **1818** |
| | | | | | | | | | | | | |
| **NTtl w/opns%** | **31.9%** | **37.6%** | **23.4%** | **34.4%** | **19.3%** | **86.6%** | **65.7%** | **42.4%** | **100.0%** | **0.0%** | **0.0%** | **35.3%** |
| | | | | | | | | | | | | |
| **Current NewTech** | 8.5% | 5.9% | 4.9% | 7.1% | 9.1% | 59.4% | 21.4% | 8.1% | 100.0% | 0.0% | 0.0% | 9.7% |
| | | | | | | | | | | | | |
| NewTechIncrease | 23.4% | 31.7% | 18.5% | 27.3% | 10.2% | 27.2% | 44.3% | 34.3% | 0.0% | 0.0% | 0.0% | 25.6% |

21Part150CalcsUpdate.pdf) – Chart 3

| Large Narrowbody Aircraft | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Airline Fleet Unit Counts | | | | | | | | | | | | |
| from Airfleets.com/news articles | Current plus Orders/Options | | Low Estm. | | Mid Estm | | High Estm | | | | | |
| SAN carriers Old Tech Fleet | 3328 | | 3328 | | 3328 | | 3328 | | | | | |
| SAN carriers New Tech Fleet | 357 | | 357 | | 357 | | 357 | | | | | |
| SAN Carriers Total NB Fleets | 3685 | | 3685 | | 3685 | | 3685 | | | | | |
| | | | | | | | | | | | | |
| New Tech Orders | 1104 | | 552 | | 828 | | 1104 | | | | | |
| New Tech Options | 357 | | 0 | | 179 | | 268 | | | | | |
| Total orders+options | 1461 | | 552 | | 1007 | | 1372 | | | | | |
| Total New Tech Fleet | 1818 | | 909 | | 1364 | | 1729 | | | | | |
| | | | | | | | | | | | | |
| Old Tech Retirements | 0 | | 276 | | 671 | | 1029 | | | | | |
| Old Tech Remaining Fleet | 3328 | | 3052 | | 2657 | | 2299 | | | | | |
| Total Fleet | 5146 | | 3961 | | 4020.165 | | 4027.938 | | | | | |
| | | | | | | | | | | | | |
| Percentage New Tech | 35.33% | | 22.95% | | 33.92% | | 42.92% | | | | | |
| SAN Part 150 Estm. 2026 New Tech | | | 0.70% | | 0.70% | | 0.70% | | | | | |
| Percentage vs. Part150 Estimates | | | 3278% | | 4845% | | 6131% | | | | | |
| | | | | | | | | | | | | |
| New Tech Unit addition Criteria | | | 50% New, Zero Options | | 75% New, 50% Options | | 100% New, 75% Options | | | | | |
| Old Tech Retirement Criteria | | | 50% of newly added | | 66.67% of newly added | | 75% of newly added | | | | | |
| | | | | | | | | | | | | |
| | | | | | | | | | | | | |
| New Tech= | a32Xneo, A220 | 737MAX | | | | | | | | | | |




| | | | | | | | |
|---|---|---|---|---|---|---|---|
| April21, 2021 | Jim | Website Submittal | Quieter Homes Program | 42 | Hello, I am a Point Loma resident and submitting my comments on behalf of the residents that live in Pacific Isle Condos at 3050 Rue Dorleans, San Diego, CA 92110. The airplane noise over our community is constant and very loud. Whether its inside the home with windows and doors shut or outside on our patio, its hard to hear each other in conversations, hard to hear the television, phone call conversations, or zoom meetings. The airplane noise is very disruptive and not good for anyone's health or wellbeing. This community needs to be re-evaluated for the Quieter Homes Program. The planes fly | The commenter states that the QHP needs to be re-evaluated to account for the exposure levels experience in the commenter's area. Title 14 CFR Part 150 includes FAA's recommended land use compatibility guidelines, which are reported on Figure 3.8 of the Title 14 CFR Part 150 Study Draft Report. In summary, residential and some non-residential land uses (e.g., schools) are not compatible with aircraft noise levels at or higher than 65 DNL (CNEL for California). Residential can be considered compatible if sound insulated to an acceptable interior level. All residential uses are compatible when exposed to levels lower than 65 CNEL. |

| | | | | | | |
|---|---|---|---|---|---|---|
| | | | | | **(CONTINUED)**<br>directly over our community constantly so I am not sure how you can say we are not in the flight path and that the decibels are not at a disruptive level because they are. The planes regularly operate outside of their curfews which makes it hard to fall asleep at night and wakes us up especially early. I am concerned about the long-term health effects of living under a flightpath; and any increase of air traffic increases our exposure and subsequent risk. SAN needs to take action to make our homes hospitable and not expand the number of flights flying directly over head. We are also very concerned with all of the exhaust coming out of the planes and polluting our community as well. I notice there are no monitoring points near my location. Noise has increased a lot over the past few years and I think this area should have a noise monitoring site. Windows and doors do not suppress the noise at all. The decibels need to be monitored on a regular basis. | **(CONTINUED)**<br>SDCRAA and the consultants advised members of the CAC and TAC that the intent of the study was to reduce the number of people and area of non-compatible land uses exposed to 65 CNEL or higher levels without impacting people or non-compatible land uses that would not otherwise be exposed to noise levels at or higher than 65 CNEL As discussed in Section 6.4 of the Title 14 CFR Part 150 Study Draft Report, the outcome of a 14 CFR Part 150 study is to define a balanced and cost-effective program for reducing land uses non-compatible with existing and future noise levels, which are described in Chapter 4, *Existing and Future Noise Exposure*. The 14 CFR Part 150 Noise Compatibility Program (NCP) process focuses on the development of alternatives that can be implemented to address noise associated with aircraft operations. The objective is to explore a wide range of feasible land use measures, aircraft operational measures, and facility measures along with administrative actions, seeking accommodation of both airport users and airport neighbors within acceptable safety, economic, and environmental parameters. Section 6.4 contains a general description of potential noise abatement and mitigation measure and the resulting alternatives or actions that may be considered for SDIA. The 14 CFR Part 150 Study includes 17 recommendations, described in Section 9.2 of the 14 CFR Part 150 Study Draft Report, that can provide mitigation to residents exposed to noise levels at or higher than 65 CNEL. Notable recommendations that provide mitigation include the sound attenuation recommendations, which support the prevention of non-compatible land use in areas of noise exposure.<br><br>Section 8.2.2 describes the proposed measure to continue the current QHP based on the updated 2026 Noise Exposure Map described in Section 4.2 of the Title 14 CFR Part 150 Update Draft Report. Because the FAA compatibility guidelines maintain the 65 CNEL threshold for compatibility, the proposed measure continues to use this aircraft noise level as one of the eligibility criteria. The exact eligibility boundary would be based on the official NEM. These boundaries are not necessarily required to follow the 65 CNEL or greater contour exactly, but can be determined by the closest reasonable physical boundary (major street, railroad track, highway, stream, etc.) beyond the contour so that blocks are not separated, to the extent possible. Sound insulation of residential units inside the 65 CNEL or greater may be eligible for Federal funding subject to the FAA requirements. In addition, any residences or habitable rooms that were constructed subsequent to October 1, 1998, are not eligible to receive sound attenuation per FAA requirements. Residential units located on commercially zoned parcels are also not eligible to receive sound attenuation per FAA requirements. Additional criteria are described in Section 8.2.2.<br><br>Sections 9.2.4.1 and 9.2.4.2 describe the two recommended measures for FAA consideration that propose sound insulation for non-residential noise sensitive buildings and residential units, respectively. Contingent upon FAA funding, the habitable rooms in eligible structures within the 65 CNEL or greater noise contour would be sound insulated with a minimum 5 dB noise reduction for owners that are eligible and volunteer for the program. To be eligible for sound insulation, the structure must be a noise sensitive land use located within the approved 65 CNEL or greater noise eligibility boundary, experience measured interior noise levels of 45 dB or higher, meet code, and must have been constructed prior to October 1, 1998. Residential units located on commercially zoned parcels are also not eligible to receive sound attenuation per FAA requirements.<br><br>The proposed eligibility boundary with residential uses is illustrated in Figure 9.3, Figure 9.4, and Figure 9.5 of the Title 14 CFR Part 150 Update Draft Report. Based on Figure 9.4, the Pacific Isle Condos appears to be located within the proposed potential eligibility boundaries. If the recommendation is approved by FAA, SDCRAA will review and formalize the eligibility boundary based on the 2026 Noise Exposure Map, which could include the Pacific Isle Condominiums. The structure would also need to be evaluated to determine if all eligibility criteria are met before one can consider it eligible. |
| April 21, 2021 | Dave Kujawa | Website Submittal | Dispersion | 43 | After reflecting on my time on the CAC as a representative of Ocean Beach, I feel that the whole process was unfairly driven by those outside the 65CNEL. In other words, it was too focused on appeasing those north of the airport. Ocean Beach and the immediately surrounding areas are far more affected by airport noise on a daily basis. Never was there serious consideration taken to spread the noise more fairly. The current flight tracks concentrate noise over an otherwise beautiful beach community. I think all people under the flight path would understand and tolerate a few flights a day directly over their home. But the concentration of the noise over certain homes is unfair. Never was a latitudinal spread over ocean beach honestly considered. And, other departure procedures (e.g. NADP) that would help those under the 65CNEL were only given late and cursory consideration. While a lot of modeling was done, there was not enough modeling directed to ideas that would spread or fan out the noise or model different vertical thrust ideas so as to be less of an intrusion to those under the current flight paths. In addition, the CAC meetings were often needlessly over-technical and by the time many of its members realized what was going on, it was too late. I encourage all people under the flight path | The commenter states that the process was driven more by communities exposed to aircraft noise levels lower than 65 CNEL and did not focus more on spreading noise more fairly to reduce noise for communities exposed to levels at or higher than 65 CNEL. Please refer to the response to Comment #2A related to the process and all of the operational alternatives evaluated and reasons why they were not recommended. Included in the 12 operational alternatives (Alternatives 3A and 3B) were procedure concepts that looked to disperse or spread-out noise.<br><br>SDCRAA understands the noise concerns of Ocean Beach related Runway 27 departure noise, but It is important to note that the focus of the 14 CFR Part 150 Study was to assess non-compatible areas exposed to aircraft noise levels at or higher than 65 CNEL. Many operational alternatives were examined in this Part 150 Study and the last several Part 150 Studies competed to date to assess if any could further abate noise in the area. Additionally, one of the most impactful recommendations is the potential eligibility for sound insulation in the 65 CNEL and greater contours, which expands the potential eligibility for additional non-compatible land uses in Ocean Beach. |

**(CONTINUED)**

to speak up, demand more from the airport authority, and not let those who live far from the airport dominate the conversation. Respectfully submitted - Dave Kujawa

**SOURCE:** Ricondo & Associates, Inc., and Mead & Hunt, May 2021.