



May 24, 2016

Mr. Michael P. Huerta  
Administrator  
United States Federal Aviation Administration  
800 Independence Avenue, SW  
Washington, D.C. 20591

Re: San Diego Flight Operations at Lindbergh Field and Southern California TRACON

Dear Administrator Huerta:

We are writing to present our concerns, findings, and recommendations as they relate to recent flight operations at San Diego International Airport (SAN). This letter is a formal follow-up to your telephone conversation with Representative Scott Peters (CA-52) on April 5, 2016, that focused on the overwhelming number of complaints that our offices have received over the past eight months. We believe that there are workable and relatively simple solutions to resolve the distress the residents of San Diego are experiencing, and that can be implemented with your cooperation.

**I. Request for FAA Investigation into Flight Operation Noise Reduction**

During the 2015 comment period of the Southern California Metroplex (SoCal Metroplex) Draft Environmental Assessment, San Diegans and their elected officials repeatedly commented on the increase in noise and impacts from departing flights on their communities. The concerns reached a crescendo on October 6, 2015. FAA Regional Administrator Glen Martin attended a forum to discuss proposed changes to operations at SAN as part of the FAA SoCal Metroplex project. Over 700 San Diego residents attended that forum to voice not only their strong opposition to the SoCal Metroplex proposed changes, but to alert the FAA that noise from aircraft has dramatically increased in the months prior. That affects not only residents under the traditional flight paths, but also residents who had never experienced any such impacts. While we eagerly await FAA responses to the public comments submitted in response to the draft environmental assessment associated with SoCal Metroplex, we reiterate our vehement opposition to the proposed removal of the LOWMA waypoint (as stated in previously submitted comment letters by all of our offices and the San Diego County Regional Airport Authority (SDCRAA)). We have enclosed those letters for your reference.

FAA communications were clear before, during, and after this October meeting: only questions or comments specifically related to the changes proposed by the SoCal Metroplex project would be responded to. As such, any questions or comments about noise impacts from operations at SAN were not addressed by FAA staff at this meeting. Further, FAA staff did not appear to record or write down any of the concerns related to the SoCal Metroplex proposal that the

Mr. Michael P. Huerta  
May 24, 2016  
Page Two

community voiced after hours of waiting. Any questions related to current operations at SAN, however, were written down so that SDCRAA staff could address them at the conclusion of the FAA staff's appearance. Enclosed you will find Rep. Peters' letter to Administrator Huerta dated October 30, 2015, in which the community's continued concerns are highlighted. Rep. Peters' office received a response via telephone that the issues contained in that letter were related to SoCal Metroplex and, by law, could not be addressed because the comment period for the Draft Environmental Assessment was closed. The lack of responsible community engagement was shocking to us as elected officials, as well as members of the community.

In the months following, complaints about SAN operations to our offices increased exponentially: the Mission Beach community is concerned with early turn departures to the north; Point Loma is concerned with early turn departures to the south; Clairemont, Bay Park, and La Jolla are concerned with arrivals encroaching on neighborhoods that were never before impacted. And every community is concerned with seemingly lower and louder flights over their homes.

SDCRAA has taken many positive steps forward in response to community concerns and we respectfully ask that the FAA and Southern California Terminal Radar Approach Control (SCT) act correspondingly. We recently learned that the FAA is conducting an "Initiative to Address Noise Concerns of Santa Cruz/Santa Clara/San Mateo/San Francisco Counties." (Enclosed). While we understand that the three international airports studied in this initiative present a high degree of complexity as it relates to flight operations, we request the FAA to give equal consideration to the current conditions at SAN and the communities surrounding it by investigating ways to reduce noise impacts from daily flight operations.

## **II. NOISE DOT AGREEMENT HISTORY / LOCATION OF NOISE DOTS**

In 1998, then-Congressman Brian Bilbray and then-San Diego City Councilmember Byron Wear worked with the FAA Regional Administrator, the FAA Regional Executive Manager, SCT, Lindbergh Tower representatives, National Air Traffic Controller Association representatives, and others to establish the Noise Dot Agreement (NDA). Its purpose then and now is to control departure routes from SAN and minimize impacts to surrounding communities.

The result, which was further documented by an audit performed by the California State Auditor in October 2000, was that FAA/SCT implemented "new procedures [that] direct aircraft 1.5 miles west of the shoreline before turning south. Aircraft are also directed so they do not cross Point Loma until as far south as Fort Rosecrans National Cemetery. The FAA representatives have also made assurances that Lindbergh Field air traffic controllers direct departing aircraft to a 275- or 290-degree heading when cleared for takeoff." (California State Auditor Report, October 2000, pg. 24) (Enclosed). Further, the audit states that air traffic control will direct aircraft to "fly through a departure gate about two miles wide." (California State Auditor Report, October 2000, pg. 26).

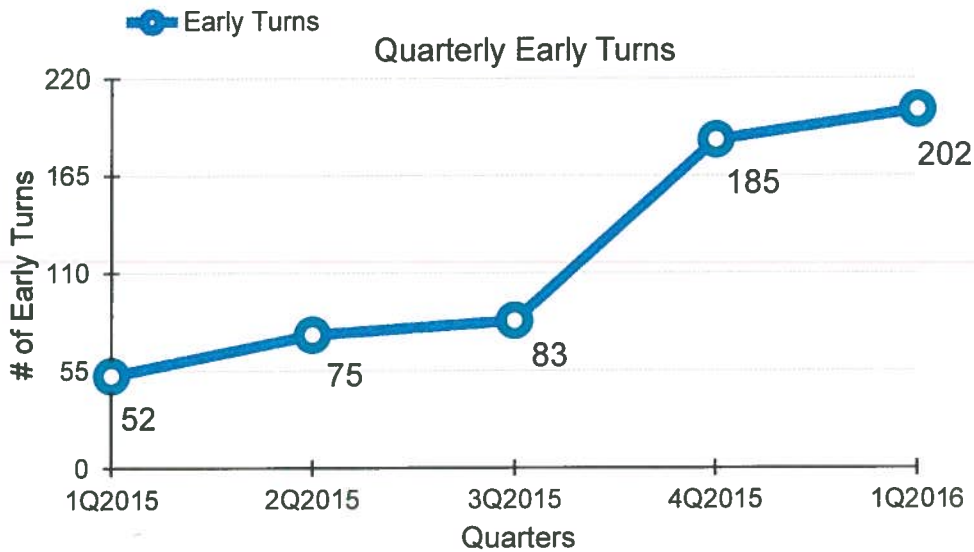
In late 2015, SCT officials admitted to Mayor Kevin Faulconer and Representative Scott Peters that the NDA had not been properly emphasized to air traffic controllers, and they committed to improving their adherence to the agreement.

In January 2016, at the SDCRAA Airport Noise Advisory Committee (ANAC) meeting, SCT officials asserted that supervisors had re-briefed all of their air traffic controllers on the NDA. Yet, community concern continued to mount that operations had not improved. In response to these concerns, Representative Scott Peters requested that SCT disclose the current latitude/longitude coordinates of the noise dots. With the help of SDCRAA staff, we discovered that the NDA, in its current form, differed from the original agreement in two ways (Enclosed is a map that illustrates these differences). First, a new noise dot was added on a 295-degree heading to protect the residents of Mission Beach from noise from northbound flights. Second, a noise dot was shifted northward, which allows eastbound, left-turn flights flying over the southern portion of the peninsula to come closer to the residential areas and Point Loma Nazarene University. No one involved in this issue has been able to discover when these changes were made, nor who authorized them. The current location of these noise dots demonstrates to our communities that the Federal government unilaterally chose not to honor agreements that were entered into in good faith with community and stakeholder input. As SAN continues to grow and increase operations, it is now more important than ever to ensure that the NDA is accurate and adhered to.

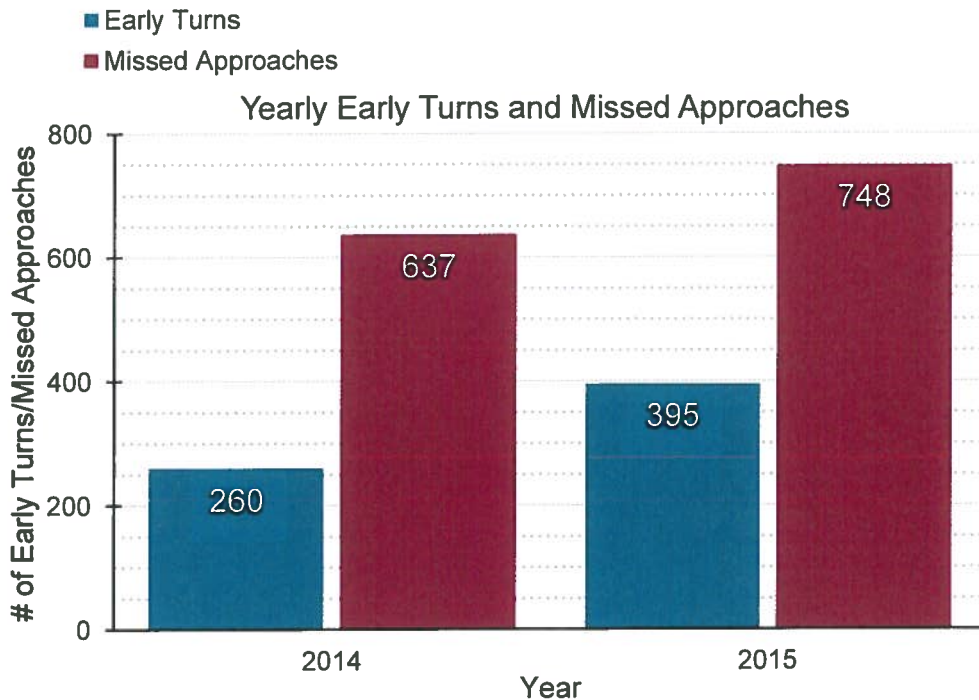
At the April 2016 SDCRAA Board meeting, the Board voted to request that the FAA/SCT abandon its noise dot on a 258-degree heading and begin using the more restrictive 265-degree dot to measure early turns and non-compliance with the NDA, consistent with SDCRAA practices. Following that meeting, we were pleased to hear that the FAA/SCT has tentatively agreed to move the left gate dot coordinate back to its original 265-degree heading, pending budgetary and procurement process delays. We support the SDCRAA Board's actions on this topic. However, as data in the next section will show, adherence to the NDA has dropped dramatically and such adherence is paramount to ensure continued peaceful coexistence with communities surrounding SAN.

### **III. Current SoCal TRACON Operations**

The public perception is that of a dramatic increase in lower, closer and louder SAN departures and arrivals, along with ever increasing violations of the NDA. Data, as publicly documented by ANAC, demonstrates material increases in Early Turn NDA violations, as well as increases in missed approaches. While we recognize that missed approaches often occur due to safety considerations, they represent significant impacts to the community, as they are routed on a 250-degree heading that takes airplanes over a densely populated area of the Point Loma peninsula. These conditions have continued to grow at a significantly disproportionate rate to total airport operational increases. According to the early turn data from the first quarter of 2016, we are on track for over 800 early turns, which would represent a 105% increase from 2015. For your reference, SAN operations have only increased by 1% from 2014 (191,028) to 2015 (193,236).



Source: San Diego County Regional Airport Authority Airport Noise Advisory Committee 4/15/2015, 7/9/2015, 10/21/15, 1/20/2016 and 4/20/2016 Member Meeting Package



Source: San Diego County Regional Airport Authority Airport Noise Advisory Committee 1/20/2016 and 4/20/2016 Member Meeting Package

The data above indicates significant negative trending, which we believe is primarily the result of air traffic controller decision-making. We ask that SCT work to create and implement performance-based measures for air traffic controllers that would effectively reduce early turns and missed approaches.

Mr. Michael P. Huerta  
May 24, 2016  
Page Five

Thank you for your attention to these issues. We respectfully request that the FAA give due consideration to the San Diego International Airport and the communities that surround it by investigating and implementing ways to reduce noise impacts from daily flight operations and work with SCT to create and implement performance-based measures that would effectively reduce early turns and missed approaches.

We look forward to an update on how your agency will address critical noise concerns in San Diego.

Sincerely,



Scott Peters  
Member of Congress  
52<sup>nd</sup> District of California



Kevin L. Faulconer  
Mayor  
City of San Diego



Greg Cox  
Supervisor, First District  
County of San Diego



Lorie Zapf  
Councilmember, District 2  
City of San Diego