

SAN DIEGO COUNTY REGIONAL AIRPORT AUTHORITY

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September 3, 2015

SoCal Metroplex EA
Federal Aviation Administration
Western Service Center - Operations Support Group
1601 Lind Avenue SW
Renton, WA 98057

Re: San Diego County Regional Airport Authority Comment on Draft SoCal Metroplex
Environmental Assessment

To Whom It May Concern:

The San Diego County Regional Airport Authority (Authority) appreciates the Federal Aviation Administration (FAA) providing the opportunity to review the proposed work product of the SOCAL Metroplex activity. Understanding the scope, timing, costs, and logistics involved in an endeavor as large as the SoCal Metroplex, the Authority recognizes and appreciates the efforts of Lynn Ray, Vice President Mission Support FAA, for bringing greater clarity to the proposed changes in the San Diego area through extended meetings, presentations, and reviews.

As the national aviation infrastructure expands to meet the NextGen goals, the FAA has a difficult and critical task of balancing the needs of all those affected. Over the last decade, airspace and flight procedure development has shifted from individual activities of limited scope to regional developments through Metroplex projects. The stakeholder group for Metroplex included Air Carrier Operators, Air Traffic Control, Military, Corporate Jet operators, and other parties whose business models participate in national daily flight operations. To date, airport agencies, such as the Authority, have not been stakeholders in either individual or regional airspace projects. However, the airports are on the "front line" with the community and we directly and regularly interact with people that are most impacted by FAA projects such as Metroplex. Airport staff must understand the details of the project so we can properly address inquiries that are directed to us. Involvement with the Airports can also provide critical information to the FAA that can influence the success of airspace projects. Our



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involvement is integral to successful implementation of FAA projects such as the SoCal Metroplex.

Upon review of the draft Environmental Assessment for the SoCal Metroplex (Draft EA) project for the San Diego International Airport (Airport), our comments are as follows:

1. The proposed replacement of the POGGI departure (IBBEE) removes the LOWMA waypoint south of Pt. Loma. In today's environment, some aircraft bypass LOWMA and thus fly over the community of Pt. Loma as a result. The permanent removal of LOWMA may increase these flights and move both noise and visual disturbance further to the north of Cabrillo Point. Both the current RNAV and conventional SIDs have the noise abatement goals included in their design. Since the proposed IBBEE RNAV SID does not contain the LOWMA waypoint south of Point Loma, the Authority is concerned that this may make compliance with the Airport's existing noise abatement procedures more difficult to achieve. We would suggest the FAA consider retaining the LOWMA waypoint to ensure the Airport's noise abatement procedures can be maintained to limit aircraft flying over the Pt. Loma community.
2. While the new arrival procedure from the northwest follows a similar path to the current procedure, the proposed COMIX RNAV STAR is further south than the existing BAYVU RNAV STAR. Our concern is that the new path is shifted away from the historical flight path that has been used for flights arriving from the northwest, which may result in shifting of noise patterns. We believe it would be more prudent to leave the path at its historical location currently between LCOVE and STEP N waypoints.
3. The proposed RNP approach to Runway 27 may result in a concentration of traffic over a much narrower path causing a reduction in today's pattern of traffic dispersion. The path also turns sooner and over a higher population density than occurs with a majority of aircraft flying the current radar vector flight paths. The FAA offered an unofficial estimate that 40% of future aircraft would utilize the RNP approach. We believe this estimate represents a reasonable benchmark for a more in-depth evaluation of the procedure. The Authority requests the FAA advise when the projected utilization of this procedure will exceed 40% in order to allow an opportunity to provide input on the observed impact/benefit of the procedure post implementation.
4. The Draft EA utilizes the Day Night Average Noise Level (DNL) noise metric. While this is a widely utilized metric for noise metrics across the nation, the FAA has accepted (FAA Order 1050.1F) the Community Noise Equivalent Level (CNEL)

metric in lieu of DNL for California projects. The CNEL metric weighs evening hours (7:00 p.m. to 9:59 p.m.) in addition to nighttime hours in the DNL metric. The residents of our community are familiar with the CNEL metric and we believe that since the FAA has utilized the CNEL metric in other California projects, for consistency the noise analysis should be re-done utilizing the CNEL metric.

5. The Authority further requests:
 - a. A 180-day post-implementation evaluation period to assess actual impact/benefit of the procedures as compared to the projected noise levels in the Environmental Assessment; and
 - b. The FAA retain the existing (pre-Metroplex) flight procedures during this review to allow a fallback option should an unanticipated adverse impact occur from the Metroplex procedures; and
 - c. If the Authority determines there is an adverse impact resulting from the implementation of the proposed procedures, the Authority will be included in collaborative efforts to resolve issues revealed during this 180-day evaluation period.

6. The Authority requests stakeholder status in future flight procedure development within San Diego County.

We believe that the FAA has achieved the desired efficiencies for Air Traffic Control and operators through the SoCal Metroplex project. We are grateful for the opportunity to provide input from the ground perspective and await a response to our concerns.

Sincerely,



Thella F. Bowens

President/CEO

San Diego County Regional Airport Authority