

Peninsula Community Planning Board

3667 Voltaire Street, Post Office Box 6883

San Diego CA 92166

Charles J. Mellor, Chair

November 18, 2010

Senator Christine Kehoe
California State Senate – 39th District
2445 5th Avenue, Suite 200
San Diego, CA 92101

RE: Joint Legislative Audit Committee – request to audit San Diego International Airport's compliance with Title 21 Variance

Dear Senator Kehoe,

We have data-backed evidence that demonstrates San Diego County Regional Airport Authority (SDCRAA) is in direct violation of its Title 21 Variance relative to Noise Standards. Since the last Joint Legislative Audit Committee (JLAC) finding on October 13, 2000, the total aircraft operations at Lindbergh Field (KSAN) has significantly increased and departure projections through 2030 increase exponentially. At this rate, Lindbergh will reach its maximum operating capacity for a single runway by 2030.

The Peninsula's impacted neighborhoods within KSAN noise influence areas are well documented by SDCRAA and online at: <http://www.pcpb.net/airport.html>. The abnormally high rate of missed approaches in clear visual conditions, controller initiated "early turns," and increased utilization of 250 degree departure heading has significantly expanded adversely affecting noise impacted area since JLA's audit in 2000. Pilots must increase power when turning in order to maintain altitude, which increases noise impacts. Increased noise from these violations has not been accompanied by additional equipment to adequately monitor the expanded impacted areas to ensure compliance with Title 21 variance noise standards. KSAN is one of the few major metropolitan area airports to NOT have defined noise abatement procedures for their departing aircraft. Figure 4 from the CA State Audit 2000 (enclosed) does not define specific instrument rated fixed positions in space for aircraft to adhere to. Please find a CD enclosed with actual flight data on a missed approach October 8, 2008 for your reference.

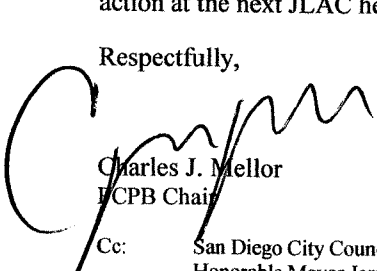
Impacted Communities need to know the following:


1. How does CalTrans enforce noise violation?
2. What means do impacted communities have to engage independent watch-dog groups to ensure SDCRAA compliance, transparency, and accountability?
3. What technical support outside of SDCRAA does JLA rely on for procedures, policies, and data to implement noise abatement measures?


The three departures procedures (enclosed) define the lateral boundaries for KSAN departures. We believe that ALL departures should remain within the confines of the attached boundaries unless declaring an emergency.

Our findings conclude SDCRAA does not comply with Title 21 Variance obligations under **Noise Standards**; sec.5001 55db minimum noise levels and thresholds, sec .5024 auditing/certifying noise monitoring systems, and sec.5033 KSAN Noise Monitoring Plan. KSAN excessive missed approaches have caused additional noise impacts south of established noise contour boundaries with no monitoring systems in place. We would greatly appreciate you presenting our evidence to the JLA for immediate action at the next JLAC hearing.

Respectfully,


Charles J. Mellor
PCPB Chair

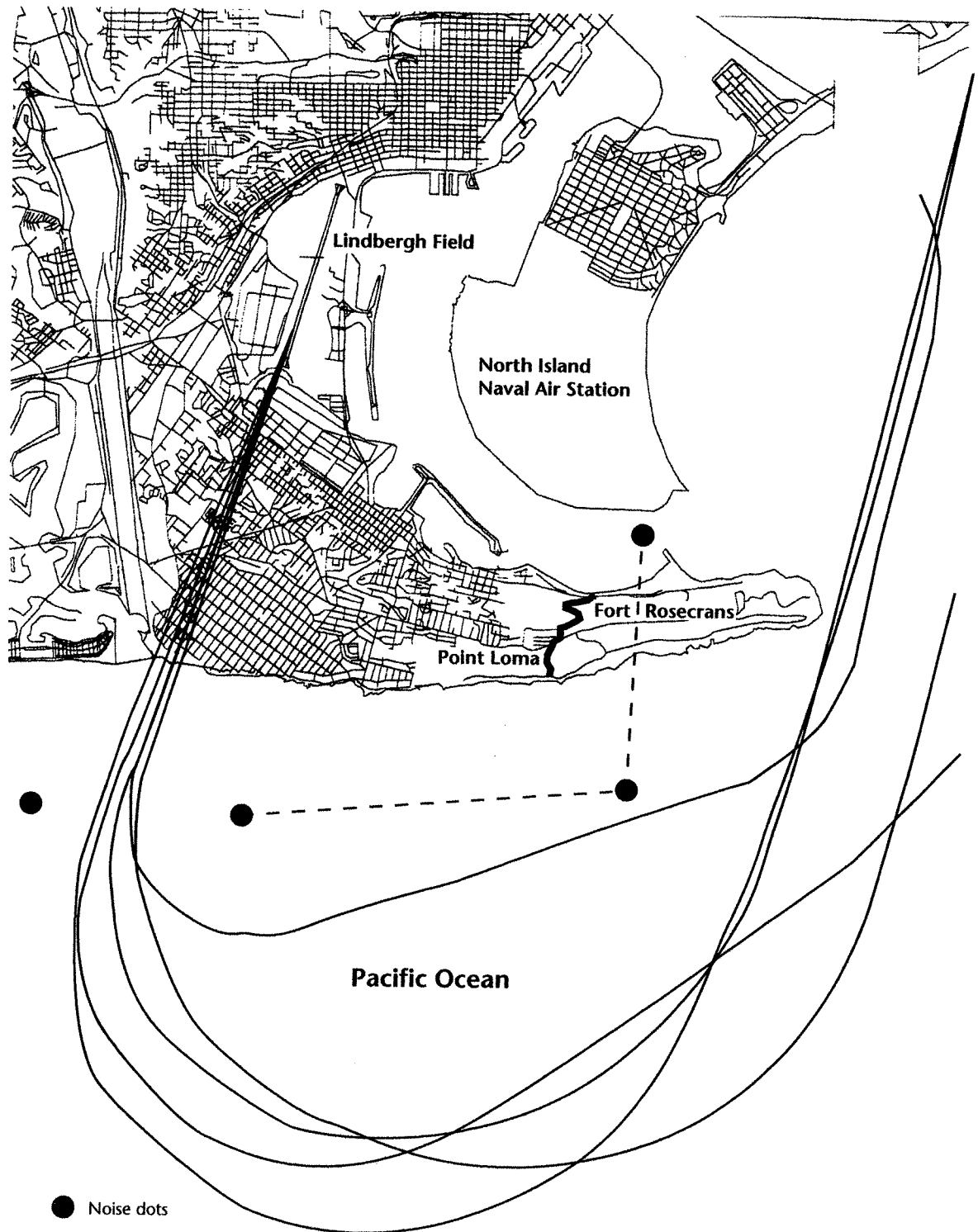

Robert MacCulloch
PCPB Airport Subcommittee Chair


Suhail Khalil
PCPB Airport Subcommittee Co-Chair

Cc: San Diego City Council
Honorable Mayor Jerry Sanders
San Diego Regional Airport Authority
California Department Of Transportation – Division Of Aeronautics
San Diego County Board Of Supervisor – Noise Hearing Board
Congresswomen Susan Davis – 53rd District
San Diego Community Planners Committee

FIGURE 4

Noise Dots Redirect Air Traffic Away From Point Loma



Source: San Diego Unified Port District Airport Noise Management Office.

PEBLE THREE DEPARTURE

SL-373 (FAA)

SAN DIEGO INTL (SAN)
SAN DIEGO, CALIFORNIA

ATIS 134.8
CLNC DEL
125.9
GND CON
123.9
LINDBERGH TOWER
118.3 338.225
SOCAL DEP CON
WEST 119.6 363.1

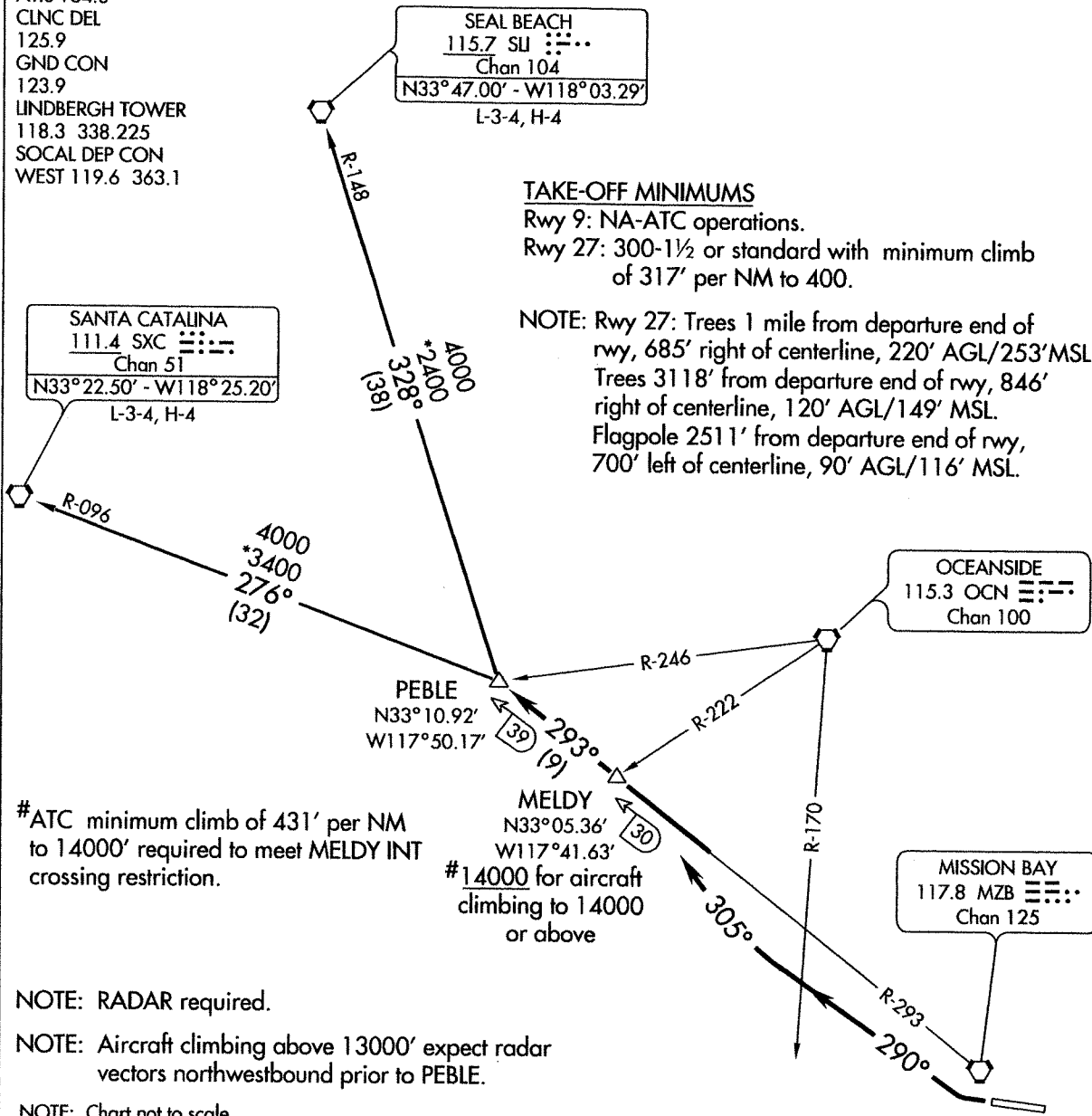
SEAL BEACH
115.7 SLI
Chan 104
N33°47.00' - W118°03.29'
L-3-4, H-4

SANTA CATALINA
111.4 SXC
Chan 51
N33°22.50' - W118°25.20'
L-3-4, H-4

TAKE-OFF MINIMUMS

Rwy 9: NA-ATC operations.
Rwy 27: 300-1½ or standard with minimum climb of 317' per NM to 400.

NOTE: Rwy 27: Trees 1 mile from departure end of rwy, 685' right of centerline, 220' AGL/253' MSL. Trees 3118' from departure end of rwy, 846' right of centerline, 120' AGL/149' MSL. Flagpole 2511' from departure end of rwy, 700' left of centerline, 90' AGL/116' MSL.



#ATC minimum climb of 431' per NM to 14000' required to meet MELDY INT crossing restriction.

#14000 for aircraft climbing to 14000 or above

NOTE: RADAR required.

NOTE: Aircraft climbing above 13000' expect radar vectors northwestbound prior to PEBLE.

NOTE: Chart not to scale.

DEPARTURE ROUTE DESCRIPTION

TAKE-OFF RUNWAY 27: Climbing right turn via heading 290° until crossing OCN VORTAC R-170, then turn right via heading 305° to intercept and proceed via via MZB VORTAC R-293 to PEBLE INT. Aircraft climbing to 14000' or above, cross MELDY INT at or above 14000'. Then via (transition) or (assigned altitude). Maintain assigned altitude.

SANTA CATALINA TRANSITION (PEBLE3.SXC): From over PEBLE INT via SXC R-096 to SXC VORTAC.

SEAL BEACH TRANSITION (PEBLE3.SLI): From over PEBLE INT via SLI R-148 to SLI VORTAC.

SW-3, 18 NOV 2010 to 16 DEC 2010

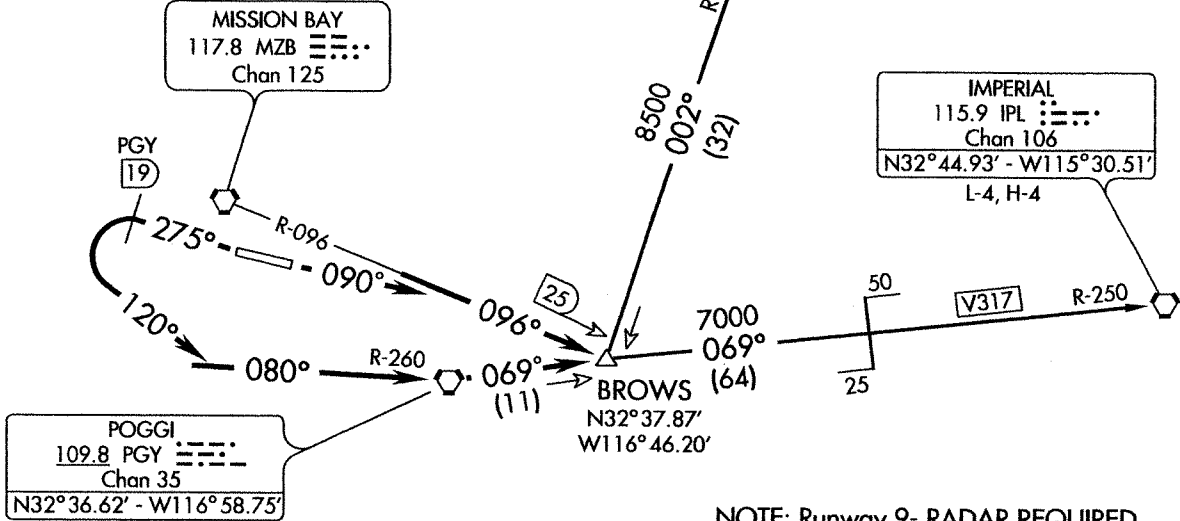
SW-3, 18 NOV 2010 to 16 DEC 2010

BORDER FIVE DEPARTURE

SL-373 (FAA)

SAN DIEGO INTL (SAN)
SAN DIEGO, CALIFORNIA

ATIS 134.8
CLNC DEL 125.9
GND CON 123.9
LINDBERGH TOWER
118.3 338.225
SOCAL DEP CON
RWY 27 125.15 317.55
RWY 9 124.35 279.625



NOTE: Runway 9- RADAR REQUIRED.
NOTE: Runway 27- DME REQUIRED.

TAKE-OFF MINIMUMS

Rwy 9, 300-1 with minimum climb of 610' per NM to 1900.
Rwy 27, 300-1½ or standard with minimum climb of 317' per NM to 400.

TAKE-OFF NOTES

Rwy 9: Trees 792 feet from departure end of runway, 142 feet left of centerline, 60' AGL/99' MSL.
Antenna 740 feet from departure end of runway, 302 feet right of centerline, 62' AGL/82' MSL.
Antenna 1946 feet from departure end of runway, 969 feet left of centerline, 126' AGL/192' MSL.
Trees 1377 feet from departure end of runway, 285 feet left of centerline, 80' AGL/135' MSL.
Trees 4625 feet from departure end of runway, 1414 feet left of centerline, 250' AGL/385' MSL.
Rwy 27: Trees 1 mile from departure end of runway, 685 feet right of centerline, 220' AGL/253' MSL.
Flagpole 2511 feet from departure end of runway, 700 feet left of centerline, 90' AGL/116' MSL.

NOTE: Chart not to scale.

DEPARTURE ROUTE DESCRIPTION

TAKE-OFF RUNWAY 9: Climb via heading 090° to intercept and proceed via MZB R-096 to BROWS INT. Then via (transition) or (assigned route). Maintain assigned altitude.

TAKE-OFF RUNWAY 27: Climb via heading 275° until PGY 19 DME, then turn left via heading 120° to intercept and proceed via PGY R-260 and R-069 to BROWS INT. Then via (transition) or (assigned route). Maintain assigned altitude.

IMPERIAL TRANSITION (BRDR5.IPL): From over BROWS INT via PGY R-069 and IPL R-250 to IPL VORTAC.

JULIAN TRANSITION (BRDR5.JLI): From over BROWS INT via JLI R-182 to JLI VORTAC.

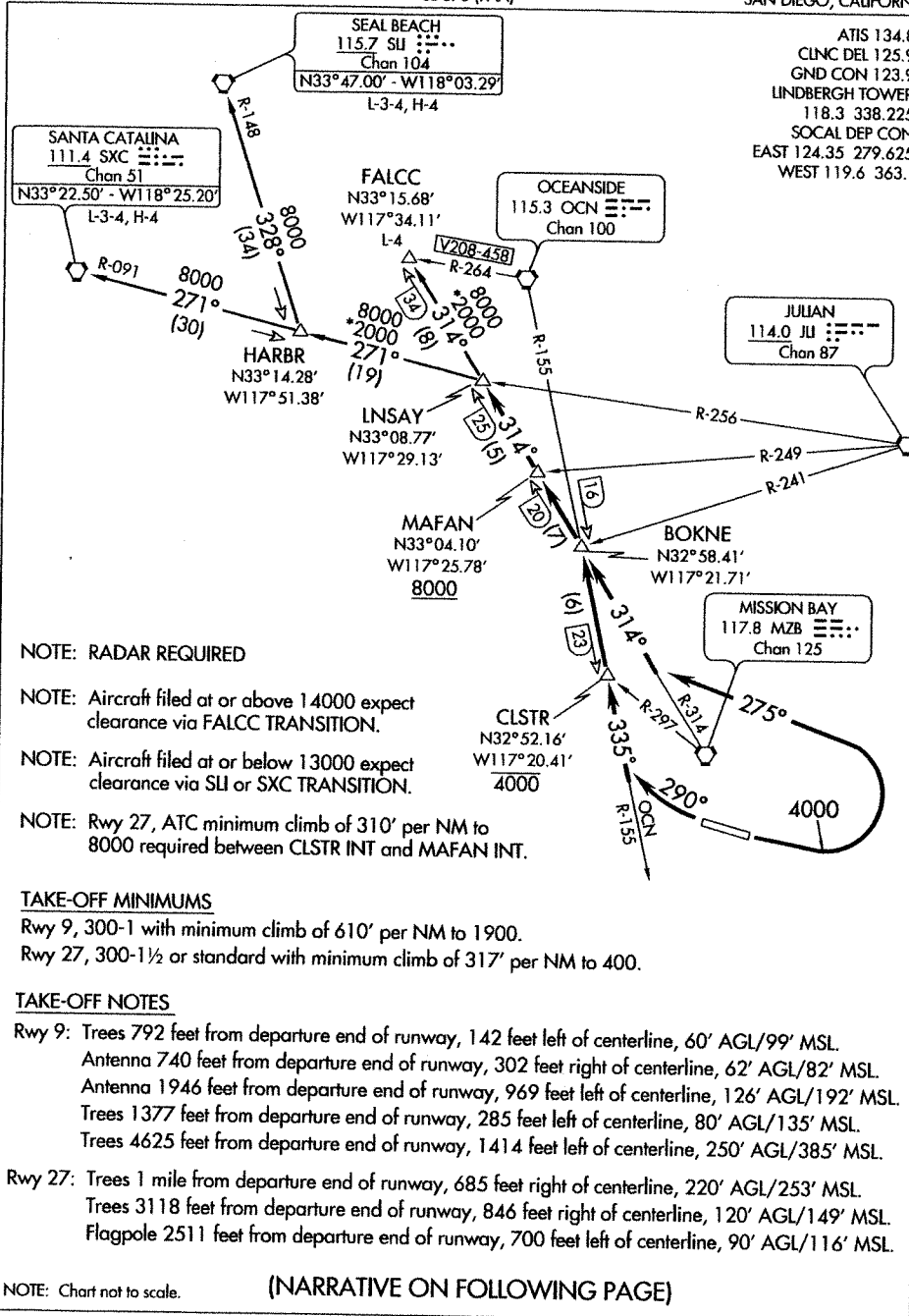
SW-3, 18 NOV 2010 to 16 DEC 2010

SW-3, 18 NOV 2010 to 16 DEC 2010

(LNSAY2.LNSAY) 09183
LNSAY TWO DEPARTURE

SL-373 (FAA)

SAN DIEGO INTL (SAN)
 SAN DIEGO, CALIFORNIA



SW-3, 18 NOV 2010 to 16 DEC 2010

SW-3, 18 NOV 2010 to 16 DEC 2010

- NOTE: RADAR REQUIRED
- NOTE: Aircraft filed at or above 14000 expect clearance via FALCC TRANSITION.
- NOTE: Aircraft filed at or below 13000 expect clearance via SLI or SXC TRANSITION.
- NOTE: Rwy 27, ATC minimum climb of 310' per NM to 8000 required between CLSTR INT and MAFAN INT.

TAKE-OFF MINIMUMS

- Rwy 9, 300-1 with minimum climb of 610' per NM to 1900.
- Rwy 27, 300-1½ or standard with minimum climb of 317' per NM to 400.

TAKE-OFF NOTES

- Rwy 9: Trees 792 feet from departure end of runway, 142 feet left of centerline, 60' AGL/99' MSL.
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(NARRATIVE ON FOLLOWING PAGE)

LNSAY TWO DEPARTURE
 (LNSAY2.LNSAY) 09183

SAN DIEGO, CALIFORNIA
 SAN DIEGO INTL (SAN)