SAN DIEGO COUNTY
REGIONAL AIRPORT AUTHORITY

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May 28, 2010

Mr. Suhail Khalil
[redacted]
San Diego, CA 92106

Dear Mr. Khalil:

We received your e-mail regarding seven airport-related concerns. We offer the following responses to each concern:

1. **Airport Land Use Commission - Support direction to Mayor to appoint City District 2 Representative as a voting member of Airport Authority (letter attached)**

Cal. Pub. Util. Code Section 170010 provides: "(a) The board of directors shall consist of nine members, appointed as follows: (1) The Mayor of the City of San Diego shall appoint three persons, two of whom shall be subject to confirmation by the City Council of the City of San Diego. The persons appointed pursuant to this paragraph shall be residents of the City of San Diego and not less than one shall be an elected official of the City of San Diego. For purposes of this subdivision, an "elected official of the City of San Diego" means the Mayor and members of the City Council of the City of San Diego." Thus, state law grants the Mayor of San Diego the discretion to appoint the elected official of his or her choice as a voting member of the Authority's Board. The Airport Authority does not have the power to amend the statute. That can only be done by the California State legislature. Also, I would note that a District 2 resident, Mr. Paul Robinson, was recently appointed to the Board by the Governor.

2. **Regional Aviation Strategic Plan - Request Town Hall Meeting to update community on process and status**

Staff has already coordinated with the Peninsula Community Planning Board for a June 17 public presentation and open discussion regarding the RASP and any other airport topics that the public would like to discuss. Also, the most current RASP information is available on-line at http://www.san.org/sdcraa/airport_initiatives/rasp/default.aspx, and the public is always welcome at the RASP committee meetings. The next meeting is scheduled for September 23, at 1:30 p.m.

3. **Terminal Development Program - Publish baseline CO2 emissions to measure impacts to our community and define "Green Build"**

Staff has already prepared a baseline inventory of criteria pollutants and Scope 1, 2 and 3 Green House Gas (GHG) emissions, along with the plan for reducing those emissions. GHGs include, but are not limited to, carbon dioxide (CO_2), although they generally are presented as CO_2 equivalents (CO_2e). The GHG reporting is consistent with the requirements of AB32 and the Memorandum of Understanding with the California Attorney General (AG MOU). The Environmental Impact Report (EIR) prepared for the Airport Master Plan, which was adopted in May 2008, includes a complete and thorough analysis of the baseline and project-related emissions. The EIR is available on-line at http://www.san.org/sdcraa/airport_initiatives/master_plan/eir.aspx.

For a definition of the "Green Build," we can go to the Authority's website: *"The Green Build will pursue Leadership in Energy and Environmental Design (LEED) silver certification. Goals of the project's sustainable design include decreased water usage, reduced energy consumption and use of alternative energy sources.*
Created by the US Green Building Council, LEED is an internationally recognized green building certification system that will help verify that The Green Build is developed with an emphasis on several key areas, including energy savings, water efficiency, emissions reduction, improved indoor environmental quality, and stewardship of resources. LEED certification is a complex process, but the Airport Authority is committed to protecting the airport's unique urban setting." For more information on the Green Build, please go to the following link:
http://www.san.org/sdcraa/airport_initiatives/green_build/Default.aspx

4. **Air Quality Management Plan - Address SDIA incentives for commercial & general aviation to invest in stage four aircraft (Fly Quiet & Green)**

A possible "incentive" presently envisioned to address future use of quieter aircraft is a comprehensive "Fly Quiet" program submitted as a proposed element of the Authority's Noise Compatibility Program (Part 150) update that will be submitted in June 2010, for Federal Aviation Administration evaluation and possible approval. The proposed Part 150 study is available for inspection on the Authority's website at the following link: http://www.san.org/documents/airport_noise/part150/DRAFT_NCP_Text_Jan10_E_Version_comp.pdf.

The specific element is excerpted and attached for your information.

Also, an important element of the Part 150 process was regular public meetings and hearings to ensure openness and transparency. The Authority held six public Noise Technical Advisory Group (NTAG) meetings (January 24, 2008; June 26, 2008; September 18, 2008; January 15, 2009; May 21, 2009; and January 14, 2010), three other public meetings held specifically to gather input (June 26, 2008; March 10, 2009; and January 14, 2010), and a second public hearing (May 13, 2010). Further, a public

comment period has been re-opened. Public comments will be accepted until 5:00 p.m., May 30, 2010. Comments may be made by mail to the Authority offices at SDCRAA, P.O Box 82776, San Diego, CA 92138-2776 or by email to the Authority offices at Part150@san.org.

For clarification purposes, the Air Quality Management Plan focuses on potential air quality impacts associated with criteria pollutants and greenhouse gas emissions resulting from airport operations, which does not include noise impacts. The latter is the focus of the Noise Compatibility Program.

5. **Quieter Home Program (1) - Address consequences to SDIA Title 21 Variance and SDIA Curfew upon completion of program**

Title 21, Section 5012 provides: "The standard for the acceptable level of aircraft noise for persons living in the vicinity of airports is hereby established to be a community noise equivalent level of 65 decibels. This standard forms the basis for the following limitation. No airport proprietor of a noise problem airport shall operate an airport with a noise impact area based on the standard of 65 dB CNEL unless the operator has applied for or received a variance as prescribed in Article 5 of this subchapter." [See PUC 21669]

Title 21, Section 5006 states a legislative finding as follows: "The level of noise acceptable to a reasonable person residing in the vicinity of an airport is established as a community noise equivalent level (CNEL) value of 65 dB for purposes of these regulations. This criterion level has been chosen for reasonable persons residing in urban residential areas where houses are of typical California construction and may have windows partially open. It has been selected with reference to speech, sleep and community reaction."

Title 21, Section 5014, entitled, "Incompatible Land Uses Within the Noise Impact Boundary", provides as follows:

"For the purpose of determining the size of the noise impact area, the following land uses are incompatible:

(a) Residences, including but not limited to, detached single-family dwellings, multi-family dwellings, high-rise apartments or condominiums, and mobile homes, unless: (1) an avigation easement for aircraft noise has been acquired by the airport proprietor, or (2) the dwelling unit was in existence at the same location prior to January 1, 1989, and has adequate acoustic insulation to ensure an interior CNEL due to aircraft noise of 45 dB or less in all habitable rooms. However, acoustic treatment alone does not convert residences having an exterior CNEL of 75 dB or greater due to aircraft noise to a compatible land use if the residence has an exterior normally cognizable private habitable area such as a backyard, patio, or balcony, or, (3) the residence is a high rise apartment or condominium having an interior CNEL of 45 dB or less in all habitable rooms due to aircraft noise, and an air circulation or air conditioning system as appropriate, or (4) the airport proprietor has made a genuine effort as

determined by the department in accordance with adopted land use compatibility plans and appropriate laws and regulations to acoustically treat residences exposed to an exterior CNEL less than 80 dB (75 dB if the residence has an exterior normally occupiable private habitable area such as a backyard, patio, or balcony) or acquire avigation easements, or both, for the residences involved, but the property owners have refused to take part in the program, or (5) the residence is owned by the airport proprietor.

(b) Public and private schools of standard construction for which an avigation easement for noise has not been acquired by the airport proprietor, or that do not have adequate acoustic performance to ensure an interior CNEL of 45 dB or less in all classrooms due to aircraft noise;

(c) hospitals and convalescent homes for which an avigation easement for noise has not been acquired by the airport proprietor, or that do not have adequate acoustic performance to provide an interior CNEL of 45 dB or less due to aircraft noise in all rooms used for patient care;
(d) churches, synagogues, temples, and other places of worship for which an avigation easement for noise has not been acquired by the airport proprietor, or that do not have adequate acoustic performance to ensure an interior CNEL of 45 dB or less due to aircraft noise."

Therefore, based upon the above legal authority, assuming either (1) compliance with the provisions of Section 5014, or (2) the successful good faith completion of the Quieter Home Program thereby resulting in the absence of any incompatible land uses within the SDIA 65 CNEL contour, there would be no continuing legal requirement for the Authority to apply for a variance under Title 21. Second, the completion of the Quieter Home Program would not affect the validity of the SDIA curfew regulation or the duty to enforce it.

6. **Quieter Home Program (2) - Publish reduction of carbon footprint for each home that is sound attenuated**

The Airport Authority is not required to calculate the carbon footprint for each sound attenuated home. There is no calculation performed for each residence on the carbon footprint or the reduction following the attenuation. However, provided below are highlights of the products within the Quieter Noise Program that also effect energy reduction, carbon emissions or the need to condition indoor air due to solar heat gain:

- Windows – QHP replaces existing products with acoustic grade windows with Low-E glazing which block out the sound and are also highly energy efficient and meet CA Title 24 Energy Standard requirements
- Doors - QHP replaces existing products with acoustic grade doors with Low-E glazing (if door has any glass) which block out the sound and are also highly energy efficient and meet CA Title 24 Energy Standard requirements

- Attic Insulation - QHP replaces existing insulation or provides new (if none present) to an R Value of 38, this treatment blocks out the sound and also reduces the demand for Heating/Cooling and meets CA Title 24 Energy Standard requirements
- HVAC Systems - QHP replaces existing equipment or provides new systems (if none or not functioning) that are 90-94% High Efficient and 13 SEER minimum, these systems use less energy than traditional equipment and meet CA Title 24 Energy Standard requirements
- Attic Ventilation – QHP addresses the attic heat load by providing new or additional ventilation components to keep the attic spaces cool and reduce the demand for Air Conditioning to the habitable space below, these vents also help to reduce the risk of mold/mildew within these confined spaces

The above treatments all contribute to sound attenuating the building envelope and thus reduce the demand for energy which in turn lowers carbon emissions. Due to the unique housing stock here in San Diego, the effect of the QHP treatments can vary dramatically from the different neighborhoods to the different type of structures treated. Each building treated by QHP receives a custom design package and some level of energy reduction that is dependent on conditions when the property is inspected.

7. **Airport's Internet-Based Aircraft Flight Tracker – Publish degree of accuracy, add FAA control tower contract phone #, calibrate secondary PASSUR system with primary FAA radar system, obtain FAA certification, enlarge internet map and add overlays (SDIA noise monitors, parks, schools and churches)**

- Product accuracy – According to the vendor (PASSUR), the maximum error in the product is: Altitude - +/- 100 feet, Range +/- 150 feet and Azimuth +/- 0.3 degrees. The information received from the Technical Operations staff at Southern California TRACON states that "the system has an accuracy of +/- 5 ACPs (.44 degrees) for azimuth and .0625 nautical miles (+/-151.8 feet) for range." The original email from FAA regarding the commonality of the radar flight track data is attached for your information. Regarding the possibility of FAA certification of the PASSUR product, FAA advises that no certification is available or contemplated for a flight tracking system intended for information only and not under the positive control of FAA .
- Product enhancement – The contract for the Airport Monitor product is due for renewal later this year. The Authority intends to release a Request for Bid for a new contract, as there are two vendors that might be able to provide similar internet-based flight tracking products. We will ensure that the requested enhancements are addressed in any new product.

- Product limitations – We are in the process of updating the system description (HELP) page with the vendor to more prominently display the system limitations mandated by FAA. A note to that affect was recently added to the scrolling information banner below the display.

Sincerely,

Thella F. Bowens
President/CEO

Attachments

cc: Authority Board
Angela Shafer-Payne

Excerpted from the SAN Noise Compatibility Program DRAFT dated January 2010, Page 60 and 61

3.2.12 PM-3 Design and implement a Fly Quiet Program

Currently, the SDCRAA administers an air carrier recognition program that publicly recognizes air carriers that operate without a single violation in a calendar year of the nighttime departure curfew, which restricts aircraft from departing SAN between 2330 and 0630 (Measure 22). The commendations to the air carriers consist of a framed acknowledgement plaque and mention, by name, in the airport's periodic community newsletter "Noise Matters" and to the Airport Noise Advisory Committee.

This recommended measure is intended to provide a web-based format, updated periodically, to display the results of a formal Fly Quiet Program implemented by the Airport Authority to better recognize all airport users' (air carrier, GA operators, etc.) achievements with all aspects of the SAN noise compatibility measures and better provide the community a thorough perspective of SAN aircraft operations. This supports one of the FAA's stated purposes of a noise compatibility program – "To bring together through public participation, agency coordination, and overall cooperation, all interested parties with their respective authorities and obligations, thereby facilitating the creation of an agreed upon noise abatement plan especially suited to the individual airport location while at the same time not unduly affecting the national air transportation system."

In addition, this program may provide reliable feedback to local air traffic control (ATC) with accurate information pertaining to the compliance of established arrival and departure procedures.

This may assist ATC in honing their procedures to obtain improved compliance, thus minimizing the noise impact to the surrounding communities.

A number of airports have successfully designed and implemented such programs including San Francisco International Airport in California, which have resulted in air carriers striving to be recognized and learning what they must do to succeed with noise abatement at the airport. These programs have become one of many tools that airports and ATC use to help inform the operators of the existing noise abatement programs and inform the public to the successes.

This measure is intended to design and implement the Fly Quiet Program; however, the Airport Authority has already begun to develop ideas about potential elements of their Program, which include:

- current fleet mix by aircraft operator (air carrier, GA operator) vs. ideal fleet mix for SAN
- number of total departures by aircraft operators vs. scheduled operations that may be impacted by the nighttime departure curfew
- number of total departures by aircraft operators vs. number of departures that deviated from IFR departure procedures
- number of total 275-degree heading departures by aircraft operators vs. number of 275-degree heading departures from aircraft likely equipped with satellite-based navigation equipment compared to number of RNAV departures

- number of community complaints in last reporting period by aircraft operator
- number of flight cancellations by aircraft operator for the sole purpose of compliance to the nighttime curfew.

The design will:
- analyze these elements along with others that may surface in the interim
- determine a scoring mechanism to rate each element
- determine a weighting mechanism to provide a relative importance to each element
- develop a rating scheme to rank order each aircraft operator
- develop an implementation and reporting plan to disseminate the information to the various interested stakeholders.

Another key aspect of the Fly Quiet Program will be to provide noise information to the General Aviation and Military aircraft that occasionally use the airport. Some of the possible ideas will be to expand upon the "pilot information handout" to make it more user friendly, to conduct briefings with pilot and user groups, such as the Aircraft Owners and Pilots Association (AOPA), Helicopter International Association (HIA), and National Business Aviation Association (NBAA), and to upgrade the Authority's website to provide these users with the information on how to use the airport as quietly as possible.

Implementation status: This is a new measure.

FAA action required: Approve this measure.

Essential implementation actions and responsible entities: Airport Authority staff with support from consultants as needed, design a metrics-based Fly Quiet Program to adequately and periodically recognize aircraft operators that enhance compliance with the noise abatement procedures and take extra steps to further mitigate aircraft noise exposure to the surrounding communities.

Anticipated costs and funding sources: The estimated cost to design and implement a Fly Quiet Program is estimated between $50,000 and $250,000, depending on the number of metrics/elements tracked in the Program. Program design and implementation is FAA grant eligible under AIP if the FAA approves the program measure. Therefore, the cost of design and implementation is expected to be shared between the FAA (up to 80%) and the Airport Authority.

Estimated schedule: Upon receiving the Record of Approval (ROA) from the FAA, the Airport Authority expects to begin the design and implementation of the Fly Quiet Program within 6 to 12 months. The design may be completed within 12 months and then implementation to follow in 6 to 12 months. Therefore, full implementation of the SAN Fly Quiet Program is expected within two to three years of receiving the ROA.

Frazee Dan

From: Jeff.Tittle@faa.gov
Sent: Wednesday, September 30, 2009 3:05 PM
To: [redacted]
Subject: SAN Airport departure headings

Mr. Frazee,

Reference [redacted] emails.....

SAN has not changed any departure procedures. SAN Tower cross checked departure tracks between FAA tools and the Passur web site. The FAA flight tracks mirror the Passur site flight tracks.

FAA replay shows the 275 departure track crosses the Pacific coast very near Santa Monica Ave.

FAA does not issue a 260 heading as suggested by Mr Purdy.

The departure headings for jets are 275 and 290. The departure heading for propeller aircraft are 250 and 310. The 250 and 310 headings move the propeller aircraft out of the way for faster jet traffic.

A 250 heading is issued when necessary for separation of aircraft. The Authority noise office will confirm that the 250 heading for separation is rarely used.

The accusation that the Authority is sharing inaccurate information with the local residents is in error.

The flight track data is correct on the Passur web site.

(what would he see if he was sitting at Abbott St and Santa Monica Ave? Most likely that the aircraft are directly over head)

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