City of Santa Monica

Information Item

Date: June 15, 2010

To: Mayor and City Council

From: Robert D. Trimborn, Airport Director

Subject: City Response to the Federal Aviation Administration's Test of Proposed Instrument Flight Rules Departure Procedures for Piston Powered Aircraft.

Introduction

This report provides background information and an overview of efforts to develop alternatives and quantify the impacts of the Federal Aviation Administration's (FAA) proposed change to piston-powered instrument flight rules (IFR) departures on the affected neighborhoods. The report also discusses next steps and the implementation of new web site features to enhance transparency of aircraft operations and improve customer service and responses to noise related complaints.

Background

The aviation aspects of aircraft operations at Santa Monica Airport (SMO) and use of the nation's airspace is regulated by the federal government through the Federal Aviation Administration (FAA). The City of Santa Monica does not control air traffic operations or tests of flight track procedures at Santa Monica Airport – those fall exclusively within the purview of the FAA and our federal legislators.

Los Angeles International Airport (LAX) and SMO are located close together. The proximity of both airports require the FAA to closely monitor and sequence IFR departures to ensure that aircraft do not conflict with one another and proper separation criteria is maintained. Compounding the issue is the alignment of the runways. The LAX runways are aligned on a heading of 250 degrees while the SMO runway is aligned 210 degrees – this creates a 40-degree convergence angle between the extended

centerlines of the runways, necessitating very specific and precise coordination between the two facilities.

In 2009, a change in FAA air traffic control procedures and protocols caused delays at LAX while slower moving piston-powered aircraft were departing SMO on IFR flight plans. The change also caused delays for piston-powered aircraft departing SMO on IFR flight plans. The LAX north runway departures were effectively shut down during piston-powered IFR departures from SMO.

In an effort to reduce IFR departure delays at both airports, the FAA developed a proposed change to the IFR departure procedures at SMO that altered the flight track of piston-powered IFR aircraft. The test procedure required piston-powered IFR departures to turn to a heading of 250 degrees (a 40-degree turn to the right) just after departure. The exact location varied, but generally speaking participating aircraft turn to the new heading at an altitude of about 400 feet above mean sea level and near the vicinity of the Penmar Golf Course. This takes the aircraft in the general direction of the Santa Monica Pier and over areas of the City that have historically experienced few aircraft departures. The FAA advised the City that an average of 16 piston-powered aircraft per day would use the test procedure (out of an average of 153 daily SMO departures). According to the FAA, the test did not affect other SMO aircraft operations; existing flight tracks for jet aircraft would not be altered nor would the recommended flight tracks for visual flight rules (VFR) traffic change.

It was anticipated that the FAA would make a presentation to the Airport Commission and City Council to detail the reasons behind the need to conduct a test of the proposed new procedure, to receive public input and respond to concerns regarding potential negative impacts prior to its implementation; however, FAA decided to forego a formal public briefing process and moved forward with the test.

Staff expressed disappointment to the FAA that it had chosen not to conduct a public hearing in this regard; however, staff continued to work with the FAA to stay abreast of any technical issues or changes related to the test and pass along this information to

the City Manager, the Airport Commission, and the public. Airport staff acted as an interface with the FAA during the test period to ensure that all public concerns were recorded and delivered to the FAA.

The 180 day test began on December 10, 2009 and ended on June 8, 2010. Almost immediately after the test first started, residents in the area stated that they had noticed an increase in air traffic, but were unaware of the FAA test and did not know they were able to submit complaints. In March, residents contacted the City expressing their concern about the test and lack of public outreach by the FAA to the impacted neighborhoods. The City stepped in and promptly mailed over 17,000 informational postcards to residents and businesses informing them about the test and how to file a noise complaint with the FAA.

The FAA test has been criticized by both the City and Congressman Waxman for failure to include community outreach prior to implementation. Congressman Henry Waxman urged the FAA to suspend the test, reevaluate its proposed change in the piston-powered IFR departure procedures at SMO, and embark on a more transparent and acceptable public outreach and educational program. The FAA declined to alter its position and continued with the test.

Discussion

On June 8, 2010 the FAA completed its 180 day test to determine whether or not the new flight track procedure would reduce IFR departure delays at both Santa Monica Airport (SMO) and Los Angeles International Airport (LAX). Since the beginning of the test in December of 2009, staff has received numerous complaints and concerns from the public regarding the test procedure's negative impact on the community. Staff also received complaints that more aircraft were using the new flight track than the number of IFR departures indicated by the FAA; some allege that the visual flight rules (VFR) flight tracks also changed as a result of the test. These concerns/complaints primarily relate to excessive noise, flight tracks, safety, and frequency of departures.

Airport Commission Action

Without FAA participation, the Airport Commission held a public hearing on November 23, 2009 to advise the public of the FAA test and take public comment and input. Subsequently, during the April 26, 2010 Airport Commission meeting, several members of the public suggested that the City conduct additional analysis of the test procedures to quantify the negative impacts on the affected community. These suggestions related to the noise generated by the aircraft participating in the test, a review the history leading up to the test, and the development of possible alternative courses of action for the City. Subsequently, the Airport Commission requested that staff place the item on the May 24, 2010 Airport Commission Agenda for review and consideration.

The Airport Commission considered a recommended course of action during a special meeting at the Ken Edwards Center on May 24, 2010. The Commission took public input from over 30 residents who expressed significant objections and concerns to FAA's proposed change in the IFR flight tracks for piston-powered aircraft. The general consensus expressed was the FAA would not accurately characterize the negative impact on the community. As a result of this public input, the Airport Commission passed a motion to recommend to City Council that outside consulting firms be hired to analyze the flight track data to develop alternative courses of action, quantify the noise impact, and add flight track information on the Airport's web site.

Specifically, the Airport Commission recommended that the City Council:

- Retain the services of an aviation firm specializing in aviation law and technical operational matters to review the history leading up to the test currently underway [which subsequently concluded on June 8, 2010] and to advise the City regarding possible alternative courses of action that have be taken by the FAA to remedy the situation that it has found necessary to address and consequently leading to the 250˚ turn matter. The Analysis should include both Instrument Flight Rules (IFR) and Visual Flight Rules (VFR) flight paths and distinguish the effect of both on noise in the affected communities and also

examine if the change in flight path is a deviation from the 1984 agreement between the City of Santa Monica and the FAA.

- Retain the services of an aircraft noise modeling firm to quantify the noise impact from the FAA test on the affected neighborhoods.
- Approve the expenditure of funds to include near real time Santa Monica Airport flight track information to the Airport's web site. The data from the tracking should be retained, all of it, so it is available for analysis at a later date.

Staff Response

In response to the comments and concerns expressed by the public, and the Airport Commission's subsequent action, staff commenced an expedited process of selecting qualified consulting firms to quantify the impact of the proposed IFR flight track.

Staff has identified the firm ASRC Research and Technology Solutions who specializes in technical and operational matters related to IFR flight tracks to conduct an analysis of the FAA's proposed change in the IFR flight track and advise the City regarding possible alternative courses to remedy the situation. The analysis will include the review of both IFR and VFR flight tracks and distinguish the effects of both on noise in the affected communities. ASRC has extensive experience in environmental analysis and master planning for airports, regional planning agencies, states, and counties throughout the United States. They are uniquely qualified to review air traffic procedures and flight tracks and do so as a routine part of their work. Due to the specialized nature of the work, the firm will be retained without a competitive process

Staff has also retained the services of Landrum and Brown Consulting to quantify and model the noise impact from the aircraft that participated in the FAA test. All of the necessary information related to the number of aircraft that participated in the FAA test and their flight paths have been captured in the Airport's Noise Management System.

In addition, the Lochard Corporation will install near-real time flight track information on the Airport's web site. Lochard, a division of Brüel & Kjær, will provide their WebTrak service to enable the staff to enhance its community and pilot outreach programs. WebTrak is a subscription based service and is the unique single-system that airports use to deliver the greatest improvement in demonstrating transparency and in positively engaging with the community over noise impact. WebTrak enables the community to see actual flight tracks in a form that is easily comprehendible, and allows for the exploration of particular concerns, plus complaints can be electronically filed through the system.

Environmental Review

Staff has received numerous complaints and concerns from the public regarding the test procedure's negative impact on the community. These concerns primarily relate to excessive noise, flight tracks, safety, and frequency of departures. Residents also filed noise complaints related to VFR air traffic that they believe have changed. The City is committed to addressing these concerns with the FAA. All of the telephone and email correspondence received from the public is being compiled by staff and submitted to the FAA, unchanged, on a monthly basis. The public has until June 15, 2010 to submit comments/ concerns/ complaints to Airport staff.

The IFR departure test was conducted in accordance with the provisions of the National Environmental Policy Act (NEPA). Following the 180-day test period, the FAA will evaluate the operational data and public response to determine if the proposed flight track change will significantly improve safety and efficiency. The FAA will then determine the next course of action which could range from a categorical exclusion (which would allow for the immediate adoption of the new procedure) or begin a full and complete environmental review of the change prior to its permanent implementation.

Next Steps

Staff is in the process of compiling the final noise/operational concerns submitted by the public during the test period. The City Manager will send a cover letter transmitting the data to the FAA expressing the City's desire that the FAA conduct a full environmental impact study of any permanent change to piston-powered instrument flight rules departure procedures at Santa Monica Airport. The City Manager will insist on the inclusion of the City and its residents in reviewing any proposed change before final departure procedures are decided.

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