



# Information Item

**Date: September 3, 2015**

To: Mayor and City Council

From: Martin Pastucha, Director of Public Works/Airport Director

Subject: City's Response and Airport Commission's Recommendations to the Federal Aviation Administration's Draft Environmental Assessment of the Southern California Metroplex Project.

## **Introduction**

This information item provides a follow up to the June 11, 2015 Information Item [Summary of June 10, 2015 Release of the Federal Aviation Administration's Southern California Metroplex Draft Environmental Assessment](#) (EA) regarding the Federal Aviation Administration's (FAA) Southern California Metroplex (SoCal Metroplex) project. A summary of the City's response to the FAA's draft EA is included. The Airport Commission's recommendations to the City Council which were derived from the Commission's Workshop on the SoCal Metroplex are also included in this update. Finally, this item includes staff's proposed steps to identify an option of applying for a waiver that would allow for aircraft departures to the west to mirror the current departure course to the shoreline and then fly to the north once the SoCal Metroplex Project moves forward to implementation.

## **Background**

The SoCal Metroplex Area covers a large geographic area: north to Santa Barbara, south to San Diego, and east to Palm Springs. The FAA's main objective is to develop procedures that improve airspace efficiency and reduce fuel consumption, air emissions, and travel time. For Santa Monica Airport (SMO), the biggest impact of the proposed procedures presented in the draft EA is the operational standard that aircraft must have a three mile separation in order to allow for independent departures between LAX north runways and SMO. This would decouple the two airports. Currently, aircraft

departures from these two airports must be coordinated because current procedures provide for less than the three mile separation at the shoreline required by federal regulations. The FAA has determined that decoupling is the most effective means to reduce idling and fuel consumption by aircraft currently awaiting coordinated arrivals and departures between SMO and LAX North Runways.

As specified in the previous Information Items on [June 4, 2015](#) and [June 11, 2015](#), the FAA published a draft EA on June 10, 2015 for the SoCal Metroplex and held public workshops, with opportunity for public comment, including one held in Santa Monica on June 17, 2015 at the Santa Monica Main Public Library. The draft EA process provides for a comment period where the public can submit comments directly to the FAA. These comments will then become part of the federal record. The FAA extended the deadline to submit comments to the draft EA from the original deadline of July 10, 2015 to September 8, 2015.

## **Discussion**

In formulating a response to this draft EA staff held a workshop on August 25, 2015 as part of the Airport Commission meeting. Staff invited neighborhood organizations interested in the Airport, with invitations extended to Los Angeles Councilman Bonin's office, and Representatives Lieu and Bass offices.

In this workshop, staff provided an overview of its proposed response to the inconsistencies found in the draft EA. Staff also presented a proposal to undertake a study to develop a westerly departure procedure that meets the FAA's safety criteria to utilize as a basis for a waiver from the current procedure. In addition, Commissioner Joseph Schmitz presented his analysis of the FAA's SoCal Metroplex Project.

## **Draft EA Comments**

Staff is in the process of preparing a response letter to be incorporated as part of the federal record prior to the September 8, 2015 deadline for comments. In this letter, staff will emphasize the following inadequacies found within the draft EA document and

request that the FAA address these shortfalls prior to the certification of the EA and implementation of any proposed SoCal Metroplex procedures.

### Document Format

The draft EA for the SoCal Metroplex project is required under the National Environmental Policy Act (NEPA). It is a legal document prepared under the NEPA guidelines developed by the FAA with the primary goal of public participation through disclosure to the public. This draft EA is a very complex document that would be difficult for any lay person to understand, and it is entirely inadequate for the purposes for which it is intended. As a public document this draft EA fails to adequately demonstrate what is currently occurring and how it will change in the future.

The new proposed routes lack a clear comparison with the old routes. The objective of Exhibit 3-7 and Exhibit 3-8 (Attachment 1) is to show the No Action Alternative and the Proposed Actions; yet these exhibits appear blank unless the reader has sufficient working knowledge of the software required for viewing (Adobe Acrobat) to enable layers, select layers, and view the layers in question. There is no appendix or web location that shows the routes.

Even then, the routes shown in Exhibits 3-7 and 3-8 are broad outlines of areas on a map of useless scale. The scale of the map has insufficient resolution to identify the locations of any of the procedures proposed for any of the airports. The average reader cannot determine if a proposed route affects their home or not. Moreover, since this is the only place in the draft EA where the routes are mapped, and they are shown in such broad areas, the draft EA could conceivably be used now or in the future to provide environmental clearance for any route that falls within these broad areas.

### Metrics Used for the Noise Analysis

The noise analysis within the draft EA is based solely on the Day Night Average Noise Level (DNL) noise metric. There are many problems with this approach. First the State of California, in its Airport Noise Regulations, adopted a stricter standard metric of

Community Noise Equivalent Level (CNEL). Historically the FAA has allowed the use of CNEL in California and, in fact, permits CNEL within its own NEPA guidelines.

While FAA Order 1050.1E is not clear as to whether it is a requirement to use CNEL in California since this draft EA covers only California airports, ignoring the CNEL method widely adopted and used in this state indicates that the FAA has no intention to take noise impacts seriously in its draft EA. As of July 16, 2015, after this draft EA was first published, FAA Order 1050.1E was replaced by FAA Order 1050.1F and it should not have any material effect on the document. Moreover, Section 14.1a from FAA Order 1050.1E indicates that an initial noise analysis during the draft EA process should be accomplished. There is no indication in the draft EA that this required initial analysis was performed.

The draft EA relies on the FAA policy of defining a significant impact as any change that causes an increase of 1.5 decibels (dB) for any noise sensitive land use within the 65 DNL noise contour. The meaning and significance of the 1.5 dB threshold is commonly misinterpreted in presentations to the public and in particular in its presentation within this EA. The interpretation, which this EA makes no attempt to correct, is that any change that does not exceed this threshold will be perceived as trivial by the public, if perceived at all. Recently, there have been communities exposed to noise level changes below this threshold that have raised concerns; and yet the draft EA is silent on the community responses that may occur as a consequence to the proposed action.

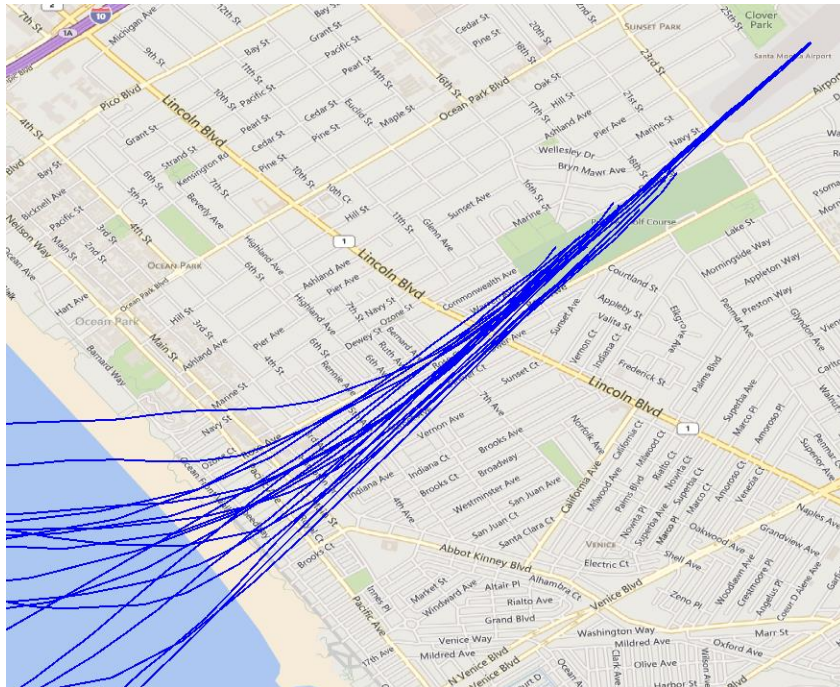
The FAA recognizes the limitations of DNL as an explanatory metric and that it is often misunderstood by the public. FAA Order 1050.1E allows for the use of supplemental metrics for complex projects (such as single event metrics or a number of events above a threshold metric) so that the public can better understand what is being proposed, and so that decision makers can better understand the nature of the change in noise being proposed.

The DNL analysis presented in the draft EA is inadequate for predicting which, if any, of the route changes will illicit widespread community complaints. There are metrics that could be used for this purpose and the draft EA is deficient for not exploring such supplemental analyses. This project warrants the use of supplemental metrics. This draft EA is deficient because it does not provide additional supplemental noise metric analysis so that all, including the public and the decision makers, will understand just what the consequences of these proposed changes mean.

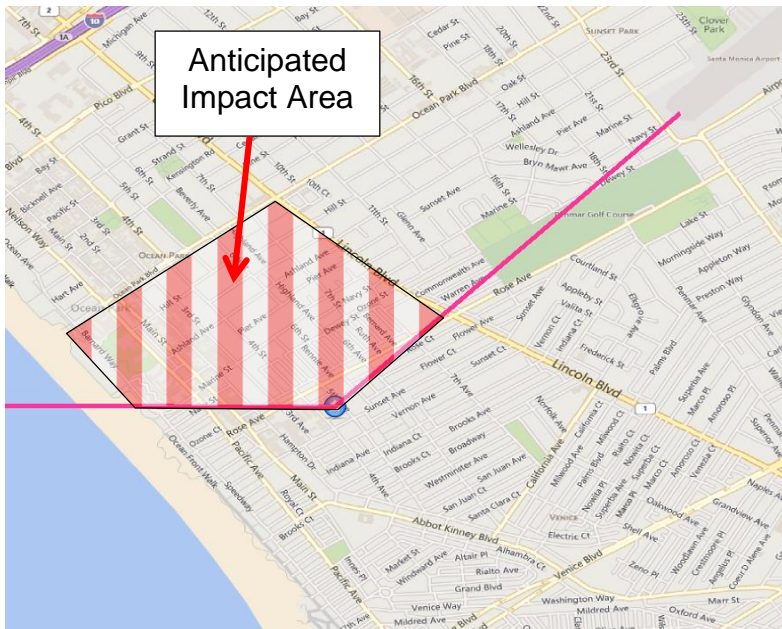
#### Design Alternative Departure Procedure

In the June 11, 2015 Information Item staff reported that the FAA had not finalized the details of the route and thus did not provide the City with the exact longitude and latitude coordinates of the proposed instrument flight rule (IFR) departure procedure to the west, which accounts for about 33% of all operations from SMO. Currently, this procedure requires that aircraft hold for clearance from the SMO tower after coordinating activity with LAX North Runways. When cleared, aircraft fly straight off the runway heading to the west and begin turning at the shoreline.

The FAA has provided staff with the latitude and longitude of the waypoint or the location that aircraft will have to initiate their turn to the north. This waypoint is located halfway between Lincoln Blvd and the shoreline (depicted below as a blue circle on the map). According to staff's correspondence with the FAA, aircraft will be required to initiate their turn to the north prior to this location. Staff anticipates that the FAA's proposed departure to the west will impact the neighborhood south of Ocean Park Blvd, west of Lincoln Blvd and North from Rose Avenue, which will route departing aircraft over the Santa Monica hills and increase safety risks because this new proposed route will, in effect, shrink the safety margin. The diagrams below illustrate the City's concerns:



Current Flight Tracks (August 30, 2015)



Runway 21 - Proposed Departure Procedure

Although the City supports the goal of saving fuel and reducing idling time while aircraft await clearance, it does not support the modifications to the departure that would change headings on takeoff from the current heading, by which aircraft fly directly to the

coast. The proposed heading would route aircraft over Ocean Park and the 4<sup>th</sup> Street hillside terrain, which could impact safety as well as residents' quality of life.

Accordingly, staff strongly supports and is advocating for a waiver from the three mile separation rule, a rule established by the federal government in earlier years that did not account for GPS technology that renders these concerns obsolete.

In order for the FAA to consider and successfully issue a waiver, staff will acquire the services of a reputable firm with experience in airspace design to analyze the departure procedure to the west that is proposed in the draft EA, and if possible, design an alternative procedure that mirrors the current IFR departure procedure, addresses the safety concerns contained in the FAA regulations, and meets the goal of the FAA in decoupling SMO and LAX. Based on this analysis, a draft waiver request will be submitted to the FAA prior to the commencement of the FAA testing of the Metroplex Departure Procedures, slated for early spring 2016.

#### Airport Commission Recommendations

During their August 25, 2015 meeting the Airport Commission made several recommendations to the City Council in response to the Metroplex project.

The first recommendation, unanimously approved by the Airport Commission, was as follows: A letter be written to the FAA Administrator (with copies to Congressional Representatives Lieu and Bass) that the City Council notes that the FAA SoCal Metroplex plan presumes operational control of SMO for ongoing, unrestricted jet operations, and thus the City Council:

- Re-asserts Santa Monica City ownership of the "Western, Non-Aviation Parcel" – effective June 30, 2015.
- Intends that the Western Parcel be returned to non-aviation use. This action will preclude present jet and turboprop operations at SMO.
- Objects to continue use of SMO other than as an FAA-compliant (approximately) 3,000 foot aircraft runway.
- Notes that the (overarching) FAA goal – to expedite LAX arrivals and departures is best met by no jet or turboprop operations at SMO.

The second Airport Commission recommendation was passed by a 3-1 vote and recommends that the City Council direct staff to report:

- The extent and dimensions of risks to the City of Santa Monica as Proprietor, and
- The liabilities posed for the City of Santa Monica by present SMO jet and turboprop operations including those posed by incoming or transiting passengers and cargo operations.

Lastly the Airport Commission recommended by a unanimous vote that the City Council consider directing staff to hire a consultant to determine, or make recommendations, whether:

- A 3,000 foot runway will preclude SMO from being part of the Metroplex and will a 3,000 foot runway de-conflict SMO from LAX; and
- The western parcel can be used to create runway safety areas for the proposed 3,000 foot runway.

On September 1, 2015, the FAA held an informational briefing for government officials, which staff attended, to learn about the SoCal Metroplex Project. In this meeting the FAA introduced new material including maps layered on Google Earth in the hopes of providing additional clarity to the Exhibits portrait in the form of Adobe maps in the draft EA. As mentioned above the use of the Adobe maps made it difficult for a layperson to understand and inadequate for the purposes that they were intended. Staff requested an extension to the deadline to submit comments in order to allow time for staff and consultants to analyze the new material. The FAA staff present in this meeting did not have the authority to extend the comment period, but asked that staff submit this request through the draft EA's comment section.

Culver City representatives approached staff and proposed that Santa Monica and Culver City jointly request this extension. Staff from Congressman Lieu's office were also present at this meeting. City staff requested the Congressman's help in acquiring an extension for the City.



Staff will be submitting comments on the draft EA for SoCal Metroplex Project within the timeline provided prior to the September 8, 2015 deadline and request that the FAA extend the deadline for the comment period so that the City can supplement its initial comments. The comments and recommendations of the Airport Commission, while related to the Metroplex implementation, will be appropriately addressed in a separate letter to the FAA if the City Council makes such a recommendation.

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Attachment 1 – Draft EA Exhibit 3-8 Proposed Procedures Plots