City of
Santa Monica®

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October 8, 2015

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

Re: City of Santa Monica Additional Comments to the Southern California Metroplex Draft Environmental Assessment.

To whom it may concern:

On September 1, 2015 the Federal Aviation Administration (FAA) released additional material to further clarify the draft Environmental Assessment (draft EA) for the Southern California Metroplex project (SoCal Metroplex). This letter presents the City of Santa Monica's comments on the new material.

The new material released on Sept. 1st show the grid values on a Google Earth aerial. There is an inconsistency between these grid values and proposed flight paths described for Santa Monica Airport (SMO). SMO departures to the west currently proceed on runway centerline to the coast which are proposed to change as part of the draft EA with the introduction of a new turn prior to the coastline. Additionally, the draft EA introduces a new arrival from the west to runway 03. This proposed arrival is not a straight in approach but rather it follows a trajectory that is north of the centerline to the runway and therefore it impacts an area that is not currently impacted by aircraft operations.

These turns should be reflected in the associated grid values of noise as shown on the Google Earth base maps with a change in the Day Night Average (DNL), but the grid values reflect no change in the DNL which strongly suggests that the inputs used to conduct this noise analysis were incorrect.

One example is grid point ID GRID00000709001952 located at latitude 33.99984 and longitude -118.478787, a point under the new proposed flight departure route that shows a no action alternative of 53.6 dB DNL, and a proposed action of 53.6 dB DNL. This represents a 0 dB DNL change in noise. It is not plausible to have no noise impact and seems to indicate that the Noise Integrated Routing System (NIRS) modeling prepared for this draft EA failed to account for the new right turn prior to the coast line. Furthermore,

the City believes that using a 0.5 nm grid spacing may be too large to reflect changes in noise to this proposed flight track change.

The City respectfully requests as part of revisions to the EA that the FAA provide a map, in Google Earth, that shows the flight tracks used for the no action NIRS modeling and the proposed action NIRS modeling to verify that the NIRS model had the correct input to calculate the noise changes to the DNL.

Additionally, the draft EA's choice of graphics does not allow the City or anyone else to have the ability to determine the impacts from the changes of the flights destined for LAX and which overfly Santa Monica. As an informational report, the draft EA is seriously lacking, seemingly deliberately so. By masking necessary information, the draft EA does not allow for informed and considered decision making. It is the City's belief that one of the draft EA's main weakness is the poor graphics and its inability to allow for someone to compare relevant data such as the before and after flight tracks.

At the scale and level of detail of this graphically challenged EA, the proposed flight paths seem to overlay the existing flight paths, suggesting that there is no difference between the two. But the existing paths are drawn to be so wide and over inclusive that this observation may be illusionary and actually not reflect the reality that the public will experience after the change. If the tracks move by even a few blocks, it would not be apparent in the EA graphics, but the public may very well notice the significance difference in real time experience, generating many complaints and protests, similar to what was experienced during the 250 degree heading test.

Given that this draft EA does not provide for adequate information or graphical representations for the City to determine the areas impacted by LAX flights, the City can only conclude that this omission and the format chosen were intentional and represent deliberate efforts to hide that the proposed changes in the LAX procedures may have a significant impact on the residents of the City of Santa Monica.

Again, the City appreciates the opportunity to comment on the Metroplex Draft Environmental Assessment.

Sincerely,

Martin Pastucha
Director of Public Works/Airport Director

Cc: City Manager
City Attorney
Airport Manager