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September 7, 2015

SoCal Metroplex EA  
FAA, Western Service Center - Operations Support Group  
1601 Lind Avenue SW  
Renton, WA 98057

Subject: Federal Aviation Administration (FAA) Southern California Optimization of Airspace and Procedures in the Metroplex (SoCal Metroplex) Draft Environmental Assessment (EA) Document

Dear Sirs/Madams:

Although I am an elected member of the Peninsula Community Planning Group ("PCPB") and chair of its Airport Subcommittee, I am writing this letter of comment as a private citizen.

The timing of the deadline for submittal of comments on the Federal Aviation Administration (FAA) Southern California Optimization of Airspace and Procedures in the Metroplex (SoCal Metroplex) Draft Environmental Assessment (EA) Document ("EA") did not allow for the opportunity for consideration by the PCPB. This was unfortunate, as matters concerning the San Diego International Airport in general and airport noise in particular are of great concern in our community. Any changes to airport operations and departure/arrival paths generally result in a great deal of interest and concern in our community. As such, I would respectfully request an additional extension of the deadline for comments to allow for discussion at our regularly scheduled September 17, 2015, meeting.

I would like to thank FAA staff and Mr. Rob Henry, in particular, for their flexibility in extending the comment period to allow for additional time to review and consider the EA and supporting documents. This project is extremely complex, and the additional time and the additional workshop held for community members allowed for a greater understanding of the project and its potential for impacts on our community.

Although the additional workshop and extended deadline for comments were appreciated there were still aspects of the environmental review of this project I do not believe were successful in allowing for meaningful public comment as required by the National Environmental Policy Act. For example, a hard copy, although promised, was never available in the Point Loma Public Library, limiting access to the documents to on-line review. In addition, I was never able to successfully access the google earth maps and noise impact data that were purported to be at found the following site: [SoCal Metroplex Draft EA Noise Analysis Grid Points - San Diego County](#).

My primary concern has to do with the replacement of the POGGI Standard Instrument Departure (“SID”) with the SAN IIBEE SID. The proposed IIBEE SID utilizes the proposed new ZZOOO waypoint. While we were led to believe at the public workshop that the proposed new waypoint and procedure would not result in dramatically different departure routes, we are concerned that the revised procedure would result in an increase in the number of “early turns” experienced by members of our community located generally southerly of the 275 degree departure route. Using this waypoint is likely to result in a generally more northerly departure path than the previous POGGI SID.

I recognize that, as stated in the EA, the FAA will only recognize an increase in noise as significant if analysis shows that the proposed action will cause noise sensitive areas to experience an increase in noise of DNL 1.5 dB or more at or above DNL 65dB noise exposure when compared to the no action alternative for the same timeframe. However, the proposed IIBEE SID has the potential to introduce households not currently experiencing aircraft noise to new sources of noise. I would note that one of the major categories of noise complaints received by the San Diego County Regional Airport Authority involves “early turns,” i.e., planes departing on Runway 27 crossing back over the Point Loma peninsula rather than southerly of the tip of Point Loma. The proposed IIBEE SID has the potential to increase the number of early turns and early turn complaints relative to the POGGI SID.

Thank you for the opportunity to provide comments on the SoCal Metroplex EA. I can be reached at (619) 222-1450 or [pbwebb3@cox.net](mailto:pbwebb3@cox.net) if you have any questions regarding my comments.

Sincerely,

Paul B. Webb