

of Transportation

Federal Aviation Administration

NOV 0 5 2019

Western-Pacific Region
Office of the Regional Administrator

777 S. Aviation Blvd., Suite 150 El Segundo, CA 90245

Kimberly Becker President and CEO San Diego International Airport Authority PO Box 82776 San Diego, CA 92138

Dear Ms. Becker:

Thank you for your letter dated August 19, 2019, on behalf of the Airport Noise Advisory Committee, requesting the Federal Aviation Administration (FAA) move Noise Dots #4 and #5 farther south. The FAA welcomes the opportunity to address the issues raised by the committee.

The National Airspace System is extremely complex, especially in the San Diego area, due to the proximity of Mexico. Moving these Noise Dots south would impact San Diego International Airport (SAN) Runway 27 departures, North Island Naval Air Station (NZY) and Brown Field Municipal Airport (SDM) arrivals and departures, and Tijuana International Airport (MMTJ) arrivals. The impacts are detailed below.

SAN departures are sequenced with eastbound departures from NZY and SDM. SAN departures are often turned just south of Fort Rosecrans, allowing them to outrun the NZY and SDM departures. That turn allows the NZY and SDM departures to proceed to the east and out of conflict with additional SAN departures. If SAN aircraft are extended to the proposed Noise Dots #4 and #5, the departures from NZY and SDM would have to be vectored out over the ocean and then turned back eastbound into the subsequent traffic departing SAN. The change would reduce the airspace available for vectoring and separation by about 1.4 miles (from 10 miles to 8.6) between Noise Dot #5 and the Mexican airspace boundary. The reduction is significant since the required separation from an international boundary is three miles laterally, and it is almost half of that distance.

When traffic volume is heavy, the flow of traffic is often managed by requiring a specified distance between aircraft. Southern California Terminal Radar Approach Control may vector aircraft to split the distance restriction with SAN, producing a most-efficient means of meeting the restriction. Without the ability to vector the departure aircraft, SAN would be solely responsible for imposing the restriction, losing efficiency, and causing delays.

Arrival aircraft to NZY, SDM, and MMTJ descend along and through the SAN departure routes. Turning the SAN departures just south of Fort Rosecrans ensures the necessary spacing between aircraft and allows the descent of the arrival aircraft.

Although the request to move Noise Dots #4 and #5 south would impact the safe and efficient flow of air traffic in the San Diego area, the FAA wants to stress that we value public input and are committed to addressing community concerns and working collaboratively with all stakeholders.

Thank you for this opportunity to review and respond to your concerns.

Sincerely,

Raquel Girvin

Regional Administrator