

## Reince Tyler

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**Subject:** FW: Public Comment - Appeal of the CLSSY SID

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**From:** Gary Wonacott <[wildcatwonacott@gmail.com](mailto:wildcatwonacott@gmail.com)>

**Sent:** Friday, April 25, 2025 12:05 PM

**To:** SDCRAA clerk <[clerk@san.org](mailto:clerk@san.org)>

**Subject:** Public Comment - Appeal of the CLSSY SID

Please distribute to the ANAC members.

In the 3-6 year time period, the airport will be at capacity. At that point or earlier, the County will begin to lose revenue associated with increased operations (perhaps a billion dollars annually). The number of operations can be increased, but only by changing or eliminating the curfew from 11:30 pm to 6:30 am.

The introduction of CLSSY that moves all departures from 10 pm to 7 am from ZZOOO over OB to the channel in proximity to Mission Beach decreases the potential for legal resistance to the curfew elimination by mitigating the nighttime noise impact on the one group in OB that might fight the Airport Authority.

In the meantime, , the CLSSY SID NEPA denies due process to the residents of Loma Portal, Pt. Loma, the Midway District, and Mission Beach. I have included multiple files for consideration by the committee.

Gary Wonacott

731 Avalon Court

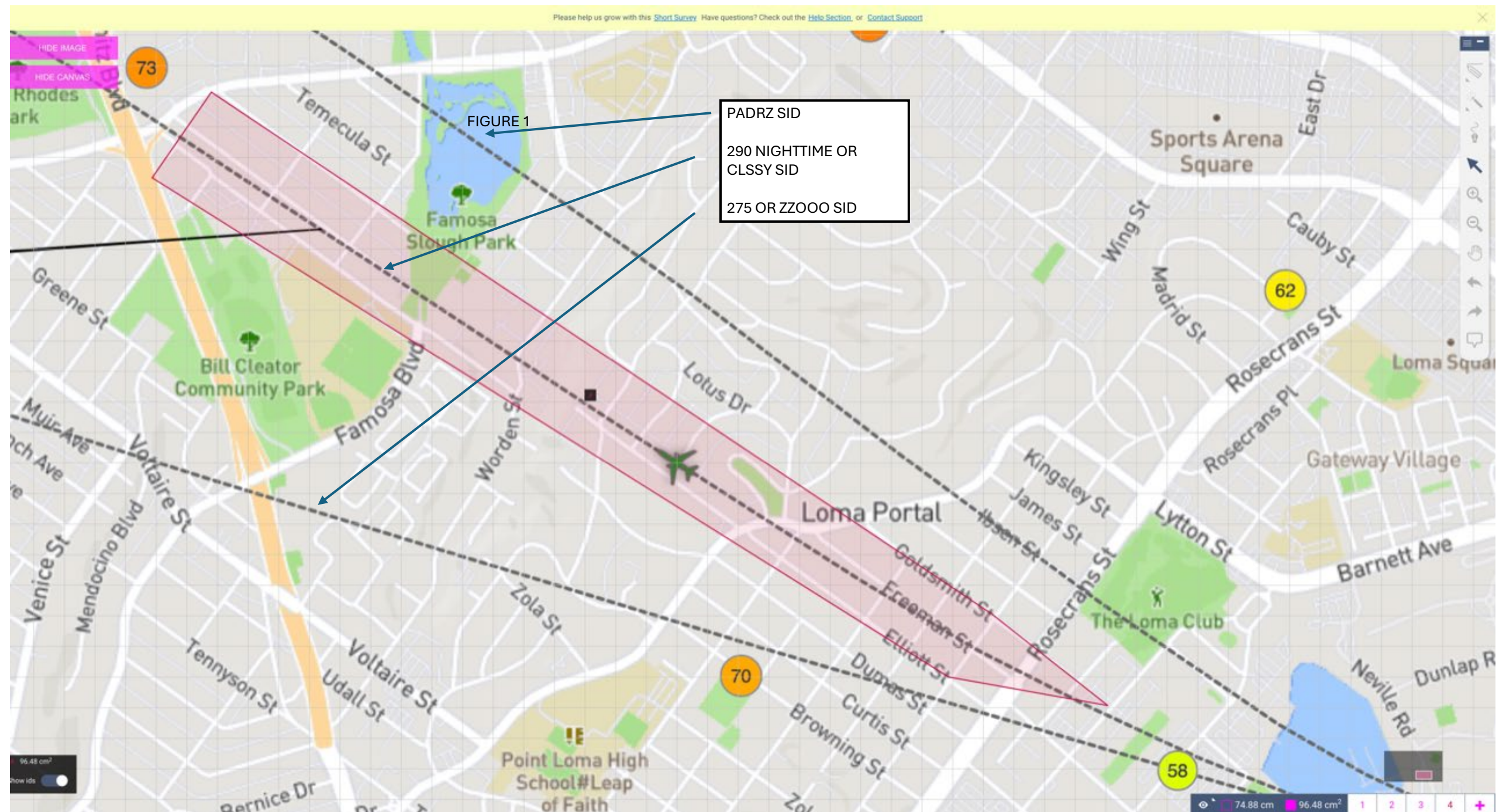
San Diego CA 92109

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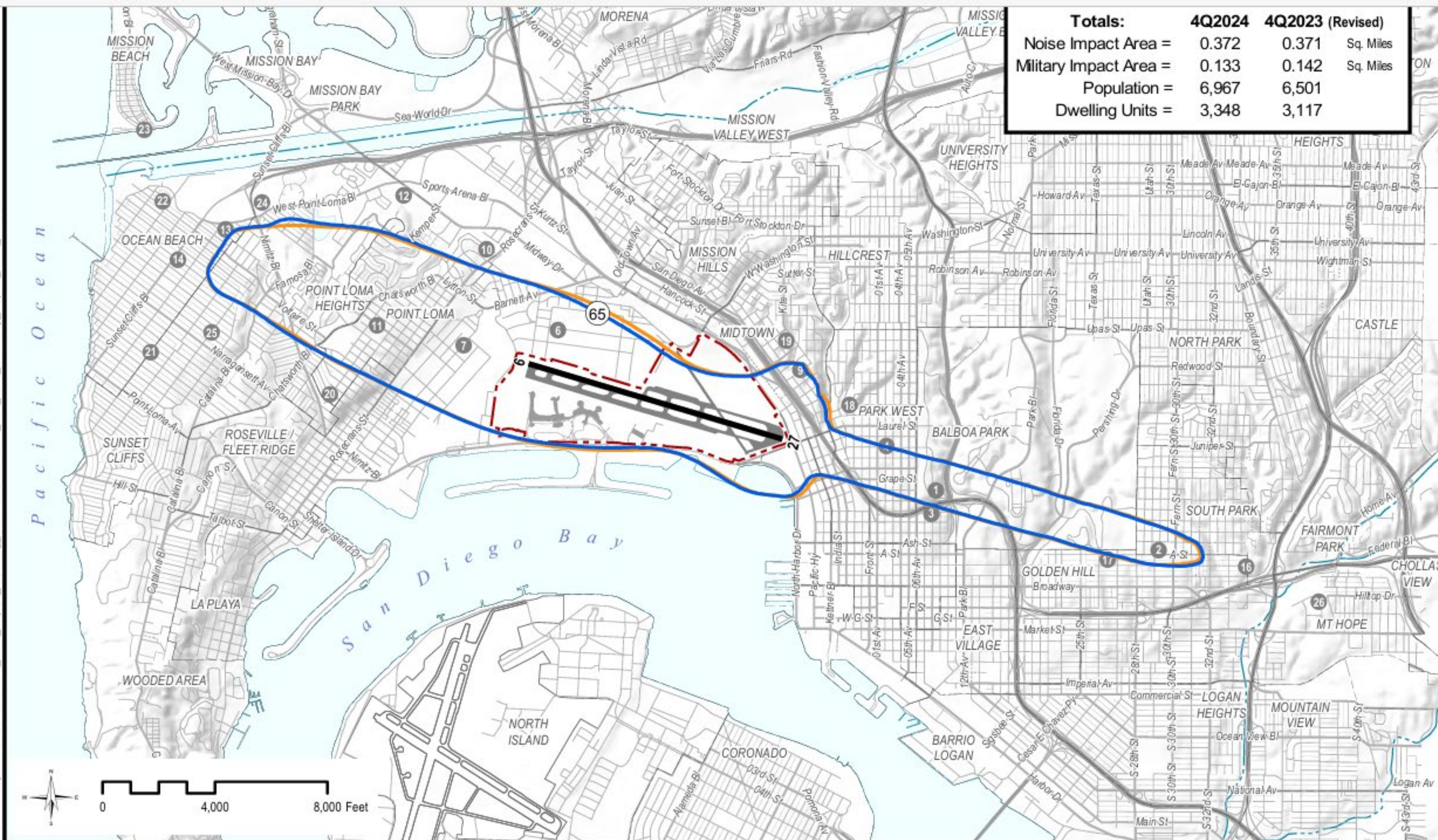
FIGURE 1

AIRCRAFT IN GREEN IS ON 295 NIGHTTIME DEPARTURE; THE BOTTOM LINE IS THE ZZOOO SID; MOVING FROM ZZOOO (275) TO 290 IMPACTED EVERYONE WITHIN THE ROSE COLORED RECTANGLE; ALSO SEE FIGURE 9 FOR BIGGER PICTURE OF THE IMPACTED AREAS.

Those living close in to the end of the runway are dramatically impacted by the post 10 pm shift of the track from the 275 to the 290 tracks. These people were never notified of this change nor were they given the opportunity to provide feedback to the City, the Port, or the FAA ATC.







- 2024 4th Quarter 65 dB CNEL Contour
- 2023 4th Quarter 65 dB CNEL Contour (Revised)
- Airport Property
- # RMT Site Location

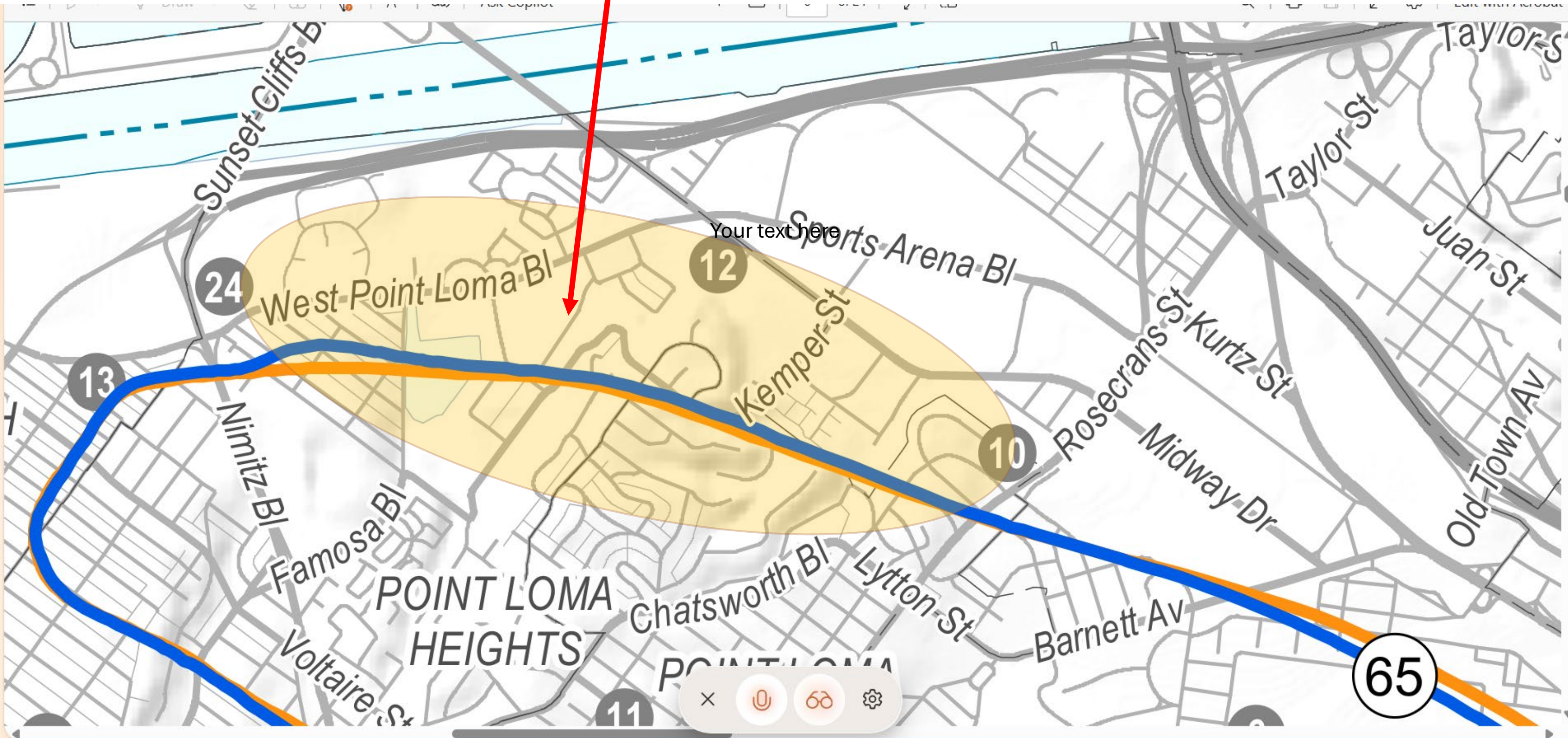
## Comparison of the 2023 (Revised) and 2024 Fourth Quarter 65 dB Community Noise Equivalent Level (CNEL) Contours

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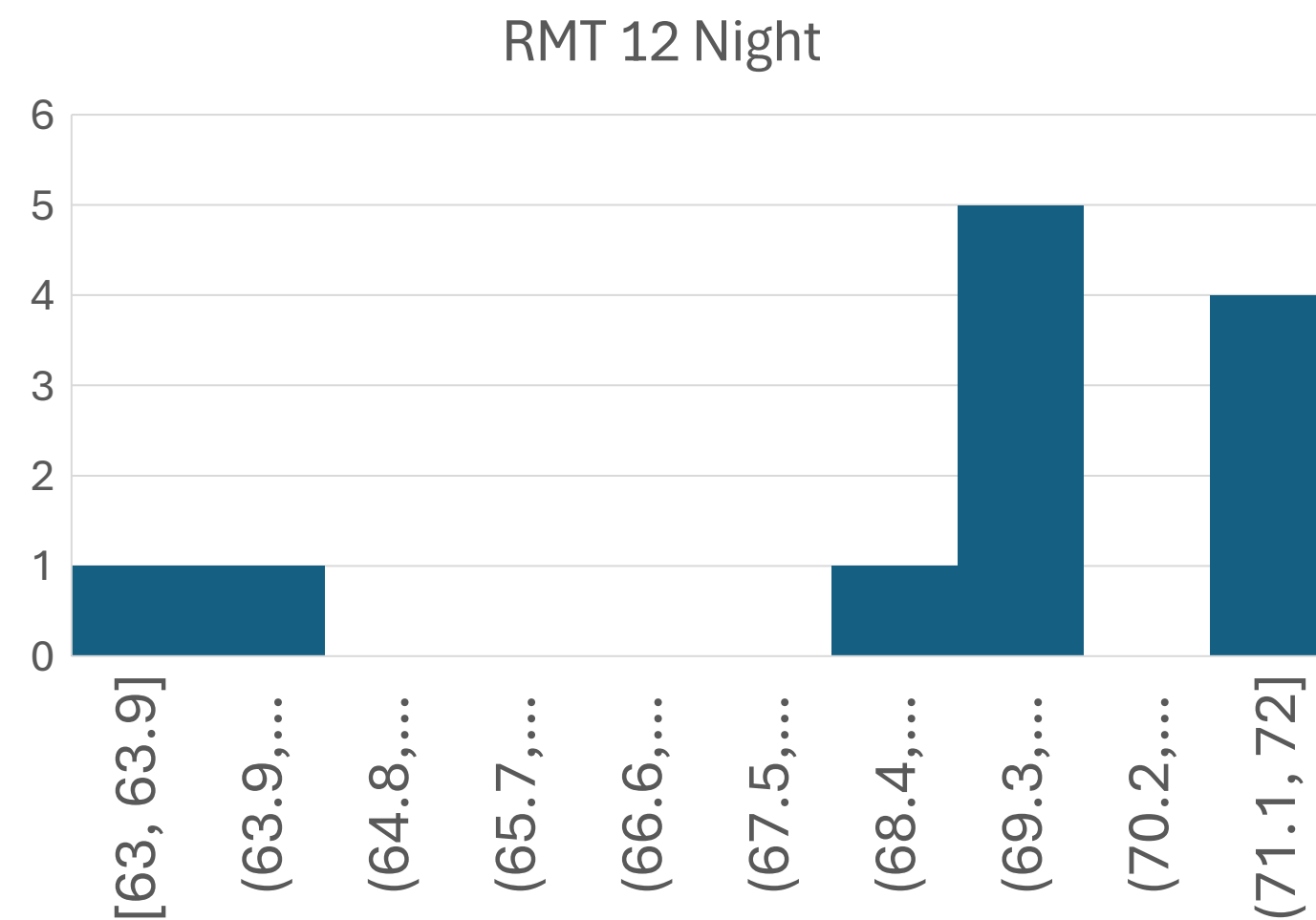
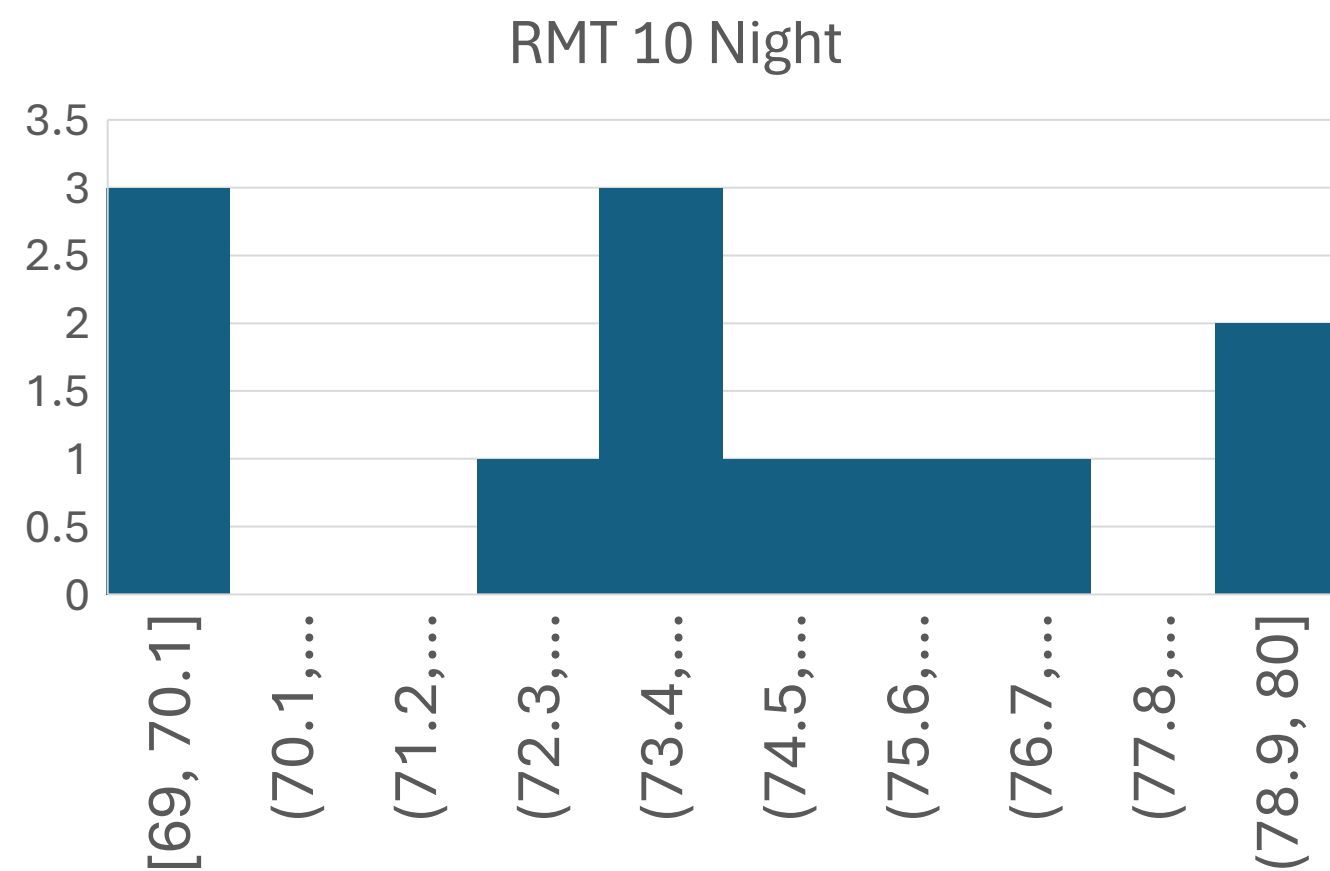
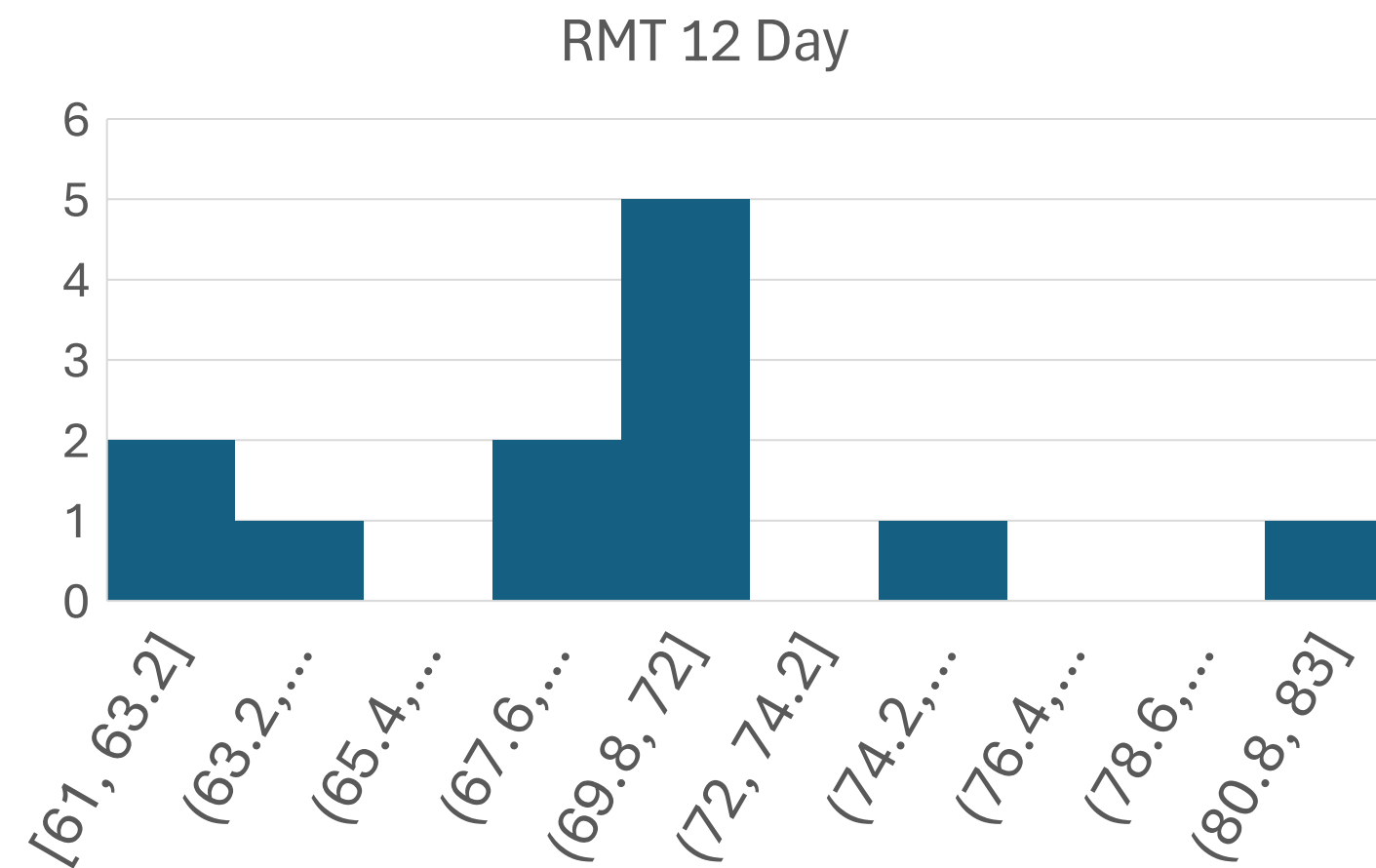
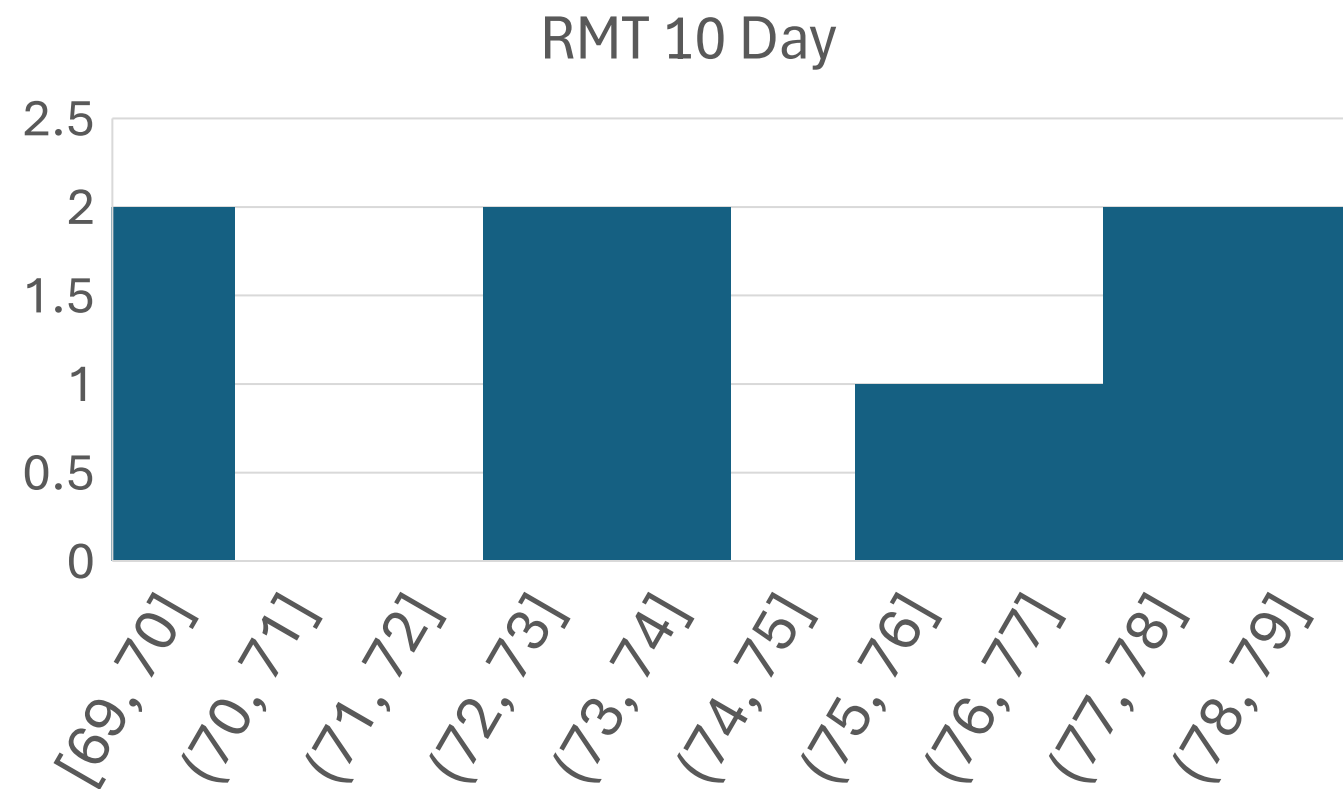




# Area of multifamily affordable housing

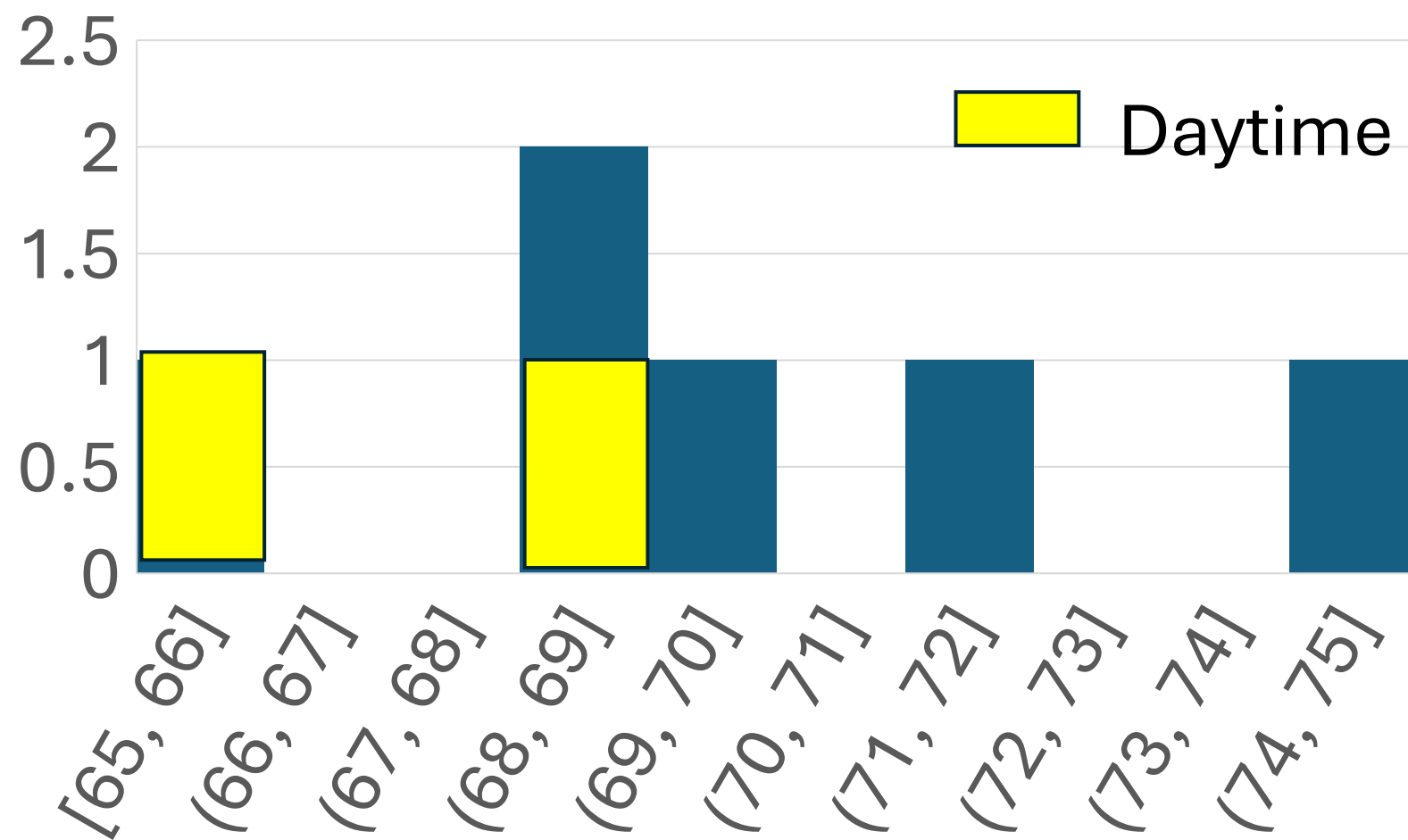








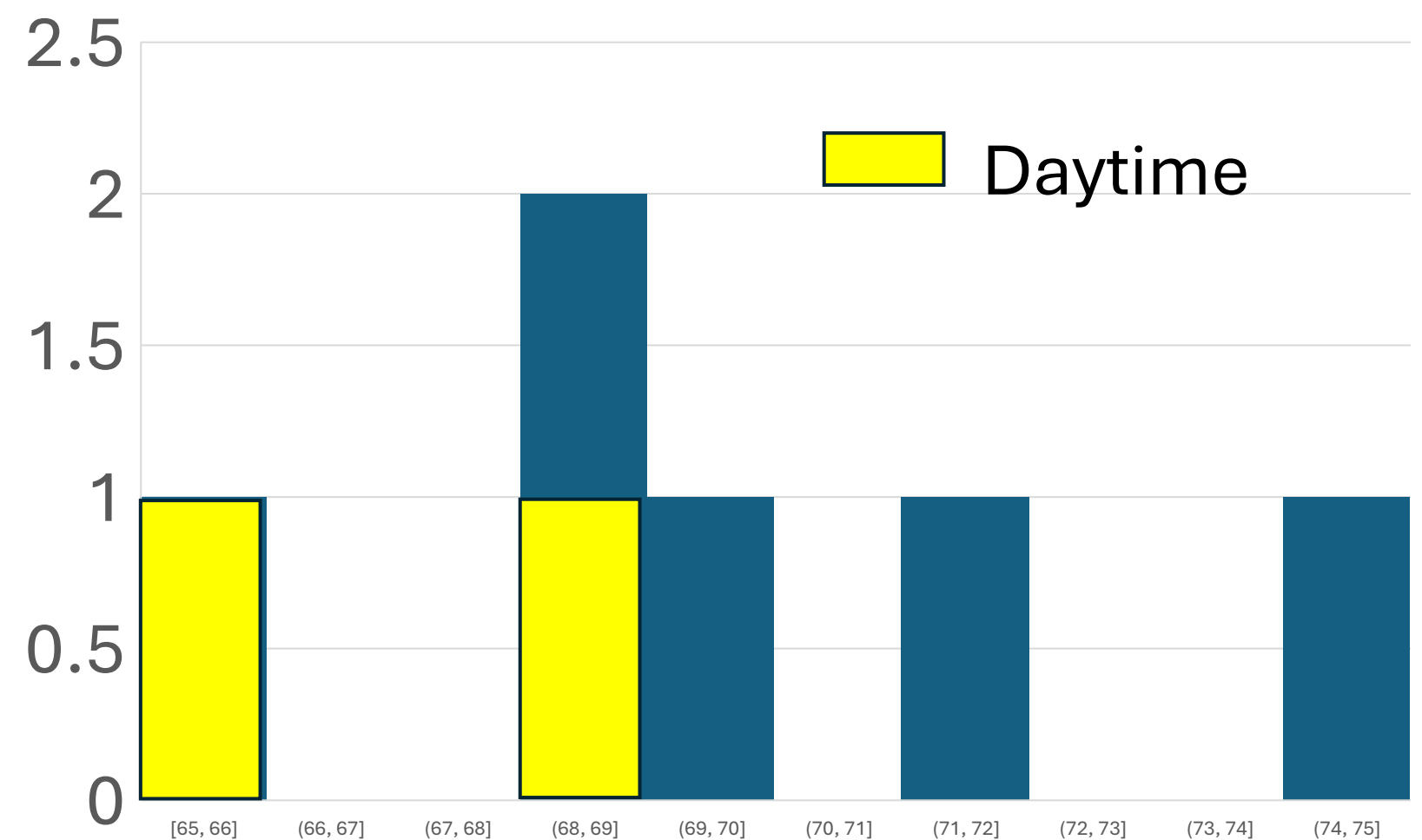
## RMT 12



- These two noise monitors are located in the multifamily affordable housing areas in the Midway District.
- The nighttime departures shift the noise closer to the Midway District.
- The daytime noise level trend is for lower magnitudes for this relatively small magnitude of measurements.

RMT 12

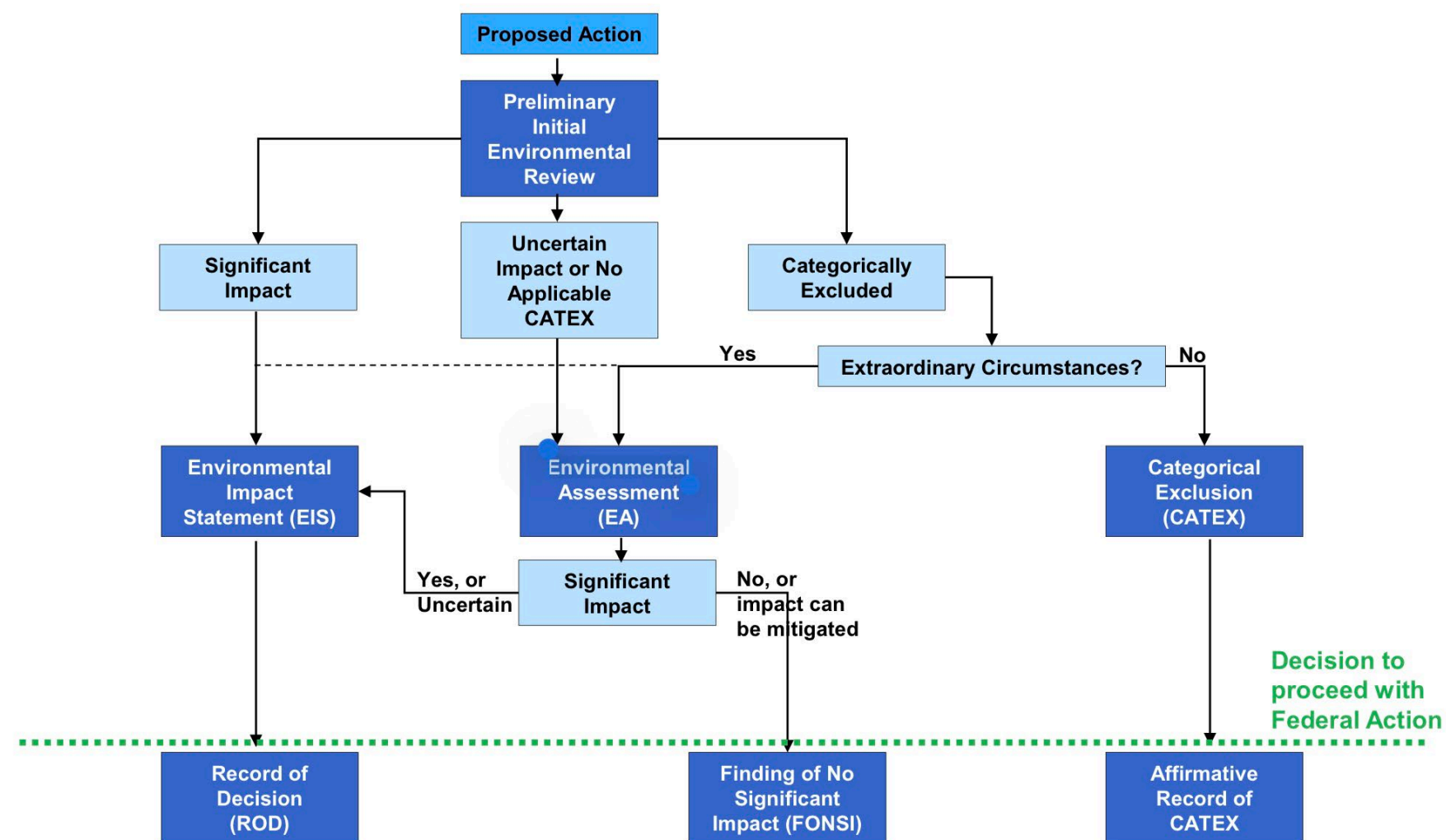
- The bottom line is that departures on the CLSSY SID, previously the 290 nighttime noise abatement departure, result in higher noise levels in areas to the north and west of the airport, for example in Midway Rising.





# NEPA Process

FIGURE 2





EXCERPT OF MINUTES OF JUNE 5, 1979  
OF THE BOARD OF PORT COMMISSIONERS  
OF THE SAN DIEGO UNIFIED PORT DISTRICT

LINDBERGH FIELD-  
AIRPORT CURFEW REGULATIONS

Chairman Bowler stated that the City Council of San Diego had just taken a vote on a recommendation concerning the airport curfew for Lindbergh Field. He asked Councilman Bill Lowery to report the action of the Council. Councilman Lowery informed the Board that the City Council, with one dissenting vote and two members absent, voted six to one to approve a resolution urging the Port Commissioners to extend the curfew at Lindbergh Field one hour, 30 minutes at each end, resulting in a curfew from 11:30 p.m. to 6:30 a.m.; that the existing regulations regarding Part 36 aircraft (aircraft that meet the Federal Noise Standard into the mid-1980's) continue in effect; and that a grace period of 15 minutes be granted at each end of the curfew for planes that are either ready to take off or in the approach flight pattern.

It was moved by Commissioner Smith and seconded by Commissioner Wolfsheimer that the Board adopt a curfew extension in the same manner that the City of San Diego has recommended, calling for an extension of one hour, 30 minutes at each end, from 11:30 p.m. to 6:30 a.m.; with a 15-minute grace period to be granted only for planes that are scheduled to take off or land before the curfew and that the planes taking off during the grace period should be loaded and ready to go by 11:30 p.m.; that the FAR Part 36 regulations would apply only to landing aircraft; and that these regulations are to take effect in 90 days, and these regulations are to be distributed in the meantime to the Federal Aviation Administration and other interested agencies. Commissioner Ruehle moved that the motion be amended to change the 11:30 p.m. time to 12:00 midnight. The motion was seconded by Commissioner Creaser, but failed for lack of a majority affirmative vote, the vote being as follows: Yeas-Bowler, Creaser and Ruehle. Nays-Cohen, Leyton, Smith and Wolfsheimer. The original motion was adopted by the following vote: Yeas-Cohen, Leyton, Smith and Wolfsheimer. Nays-Bowler, Creaser and Ruehle.

I HEREBY CERTIFY that the foregoing  
is a true and authentic copy of the  
original thereof.

WILLIAM R. HUNT, Clerk  
San Diego Unified Port District

By Sally Lombardo  
Deputy Clerk

Date JUN 18 1979

FIGURE 3

FLIGHT PATH CHANGES  
MADE WITHOUT  
ENVIRONMENTAL  
ASSESSMENT NEPA OR  
1050



FIGURE 4

FLIGHT PATH CHANGES  
MADE WITHOUT  
ENVIRONMENTAL  
ASSESSMENT NEPA OR  
1050

20

SAN DIEGO UNIFIED PORT DISTRICT

DOCUMENT NO. 13619

FILED APR 1 1981

MICROFILM NO.

OFFICE OF THE CLERK

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NOISE ABATEMENT IMPLEMENTATION PLAN

FOR

SAN DIEGO INTERNATIONAL AIRPORT

- LINDBERGH FIELD -

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SUBMITTED IN PARTIAL FULFILLMENT OF  
VARIANCE ORDER L-18484, EFFECTIVE SEPTEMBER 14, 1980

PORT OF SAN DIEGO  
UNIFIED PORT DISTRICT

SAN DIEGO UNIFIED PORT DISTRICT  
P.O. Box 488  
San Diego, California 92112

March 1981



FIGURE 5

FLIGHT PATH CHANGES  
MADE WITHOUT  
ENVIRONMENTAL  
ASSESSMENT NEPA OR  
1050

#### OVERVIEW

The following is submitted by the San Diego Unified Port District as owner and operator of San Diego International Airport (Lindbergh Field), in partial fulfillment of Variance Order L-18484, effective September 14, 1980. Since the third variance above was issued only for six months ending March 14, 1981, the Port District applied on February 12, 1981 for a new variance under the procedures developed by the California Department of Transportation.

In particular, this Plan has been developed in response to Variance Condition 2, under which the Board of Port Commissioners, on February 17, 1981 identified as a "lesser goal" a non-compatible noise impact area based upon the January 1, 1986 criterion CNEL level of 65 dB.

In connection with the consideration of the Noise Abatement Implementation Plan by the Board of Port Commissioners of the San Diego Unified Port District at a public hearing on March 17, 1981, the Draft Plan was also simultaneously submitted on March 6 to the Federal Aviation Administration (FAA) and Civil Aeronautics Board (CAB) for review and statement of concurrence or objections, if any, before final transmittal to the California Department of Transportation. Neither FAA nor CAB staff raised any objections.



FIGURE 6

FLIGHT PATH CHANGES  
MADE WITHOUT  
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ASSESSMENT NEPA OR  
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#### RESTRICTED NUMBER OF OPERATIONS

The number of major (greater than 75,000 lbs.) aircraft jet operations (either landing or takeoff) for the calendar year 1986 shall not exceed 87,000 unless the Board of Port Commissioners expressly consents to additional operations.

#### CONTROL OF FLIGHT PATHS AND AIRCRAFT OPERATIONS

Control of aircraft on the ground and in flight is at the discretion of the pilot as regulated by the Federal Aviation Administration (FAA). The prevailing noise abatement operational procedures are expected to be continued unless a more effective means is developed and implemented by the FAA. To achieve the 1986 non-compatible noise impact area, it is necessary that the 1979 flight pattern be maintained (approximately 90 percent departures on Runway 27 of which 30 percent continue straight out, while 70 percent are cleared for a heading of 295 degrees after takeoff; approximately 90 percent arrivals occur on Runway 27 and 10 percent on Runway 9, primarily on the basis of weather conditions).

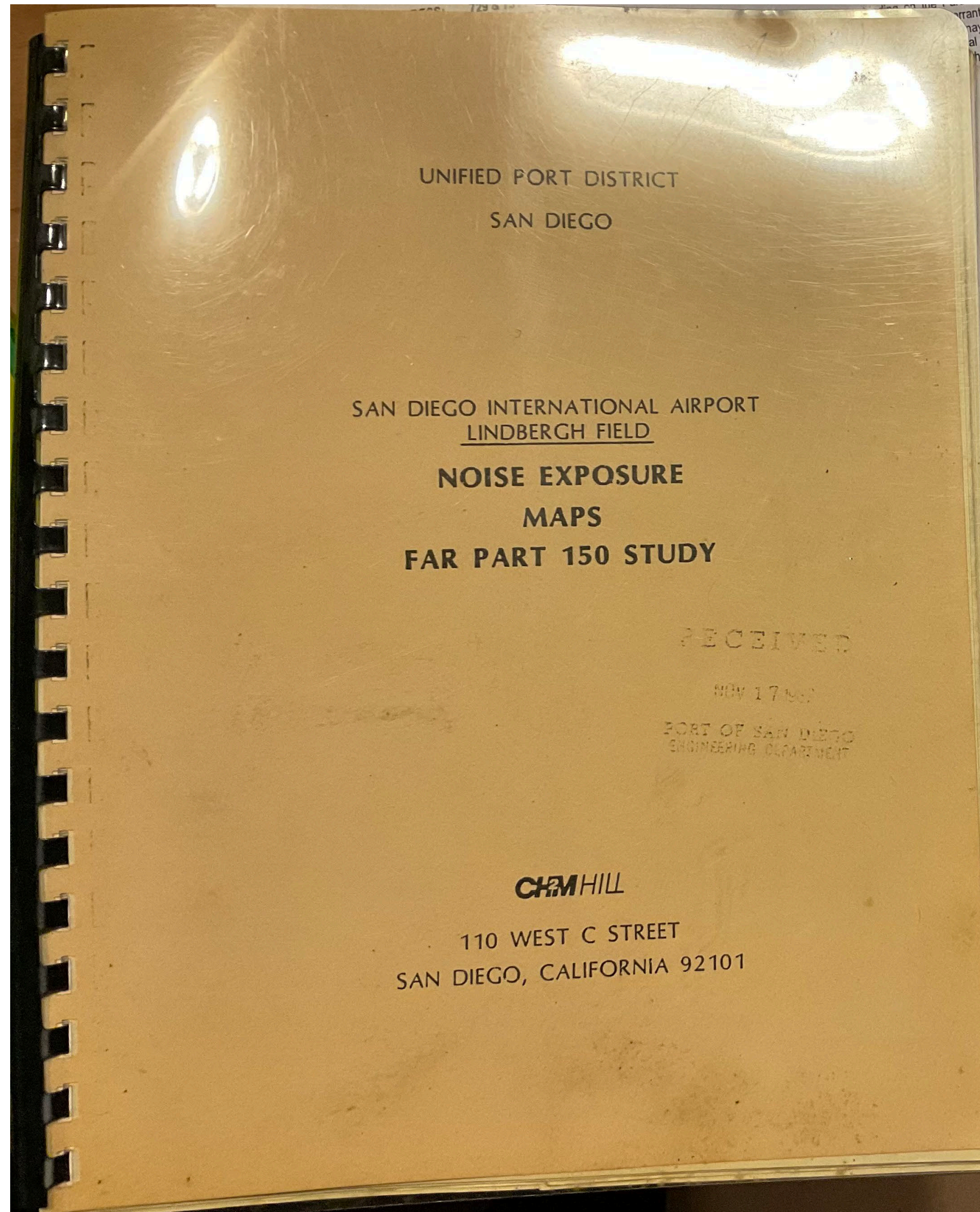
FAA operational noise abatement procedures are directing all aircraft departing Runway 27 after 10 p.m. to a heading of 295 degrees.

By voluntary agreement, no military operations or practice involving Lindbergh Field are carried out during the nighttime period.



FIGURE 7

FLIGHT PATH CHANGES  
MADE WITHOUT  
ENVIRONMENTAL  
ASSESSMENT NEPA OR  
1050





FLIGHT PATH CHANGES  
MADE WITHOUT  
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FIGURE 8

in Table 13 in the report. The aircraft flight tracks, aircraft profiles, runway utilizations, and percentages of flights per day, evening, and night periods were the same as used in developing the CNEL contours for 1984.

FLIGHT PATHS

Figure 1 shows the aircraft takeoff flight tracks and Figure 2 the landing flight tracks. Multiple arrival and departure paths have been used to simulate the dispersion of flight paths that occurs.

"Straight-out" departures on Runway 27 are simulated by three tracks. Right-turn departures on Runway 27 are also simulated by three tracks. Approaches on Runway 27 are simulated by six arrivals paths. Arrivals on Runway 9 are simulated by a single straight-in path. Left-turn departures on Runway 9 are simulated by 16 paths reflecting the different turn radii for aircraft of different sizes and different speeds.

NUMBER OF OPERATIONS

The average number of daily takeoffs of air carrier jet aircraft used to develop the CNEL contours for CY 1984 is shown in Table 1. Also shown is the average number of takeoffs for 1985.

The average number of air carrier takeoffs or landings per day, evening, and night periods, is shown in Table 2. The average number of commuter aircraft and business jet takeoffs or landings per day is shown in Table 3.

The distribution of air carrier aircraft by trip length and by day, evening, and night periods was determined by review of the aircraft flight schedules published by the Port of San Diego and the "Official Airline Guide" for the months of February and August 1984.

FLIGHT PATH DISTRIBUTION

The distribution of aircraft on the different flight paths is based upon the monthly airline schedules, consideration of the trip destinations, and time of day of departures. Ninety four percent of the departures are assumed to be to the west and 6 percent to the east. The assignment of aircraft to Runway 27 takeoff flight paths is based upon aircraft destination and time of the day. For day and evening flights, aircraft with eastern destinations were assigned to straight-out departure paths. All nighttime departures on Runway 27 were assigned to the right-turn path. Aircraft departing to the north were assigned to the right-turn paths.



FIGURE 9

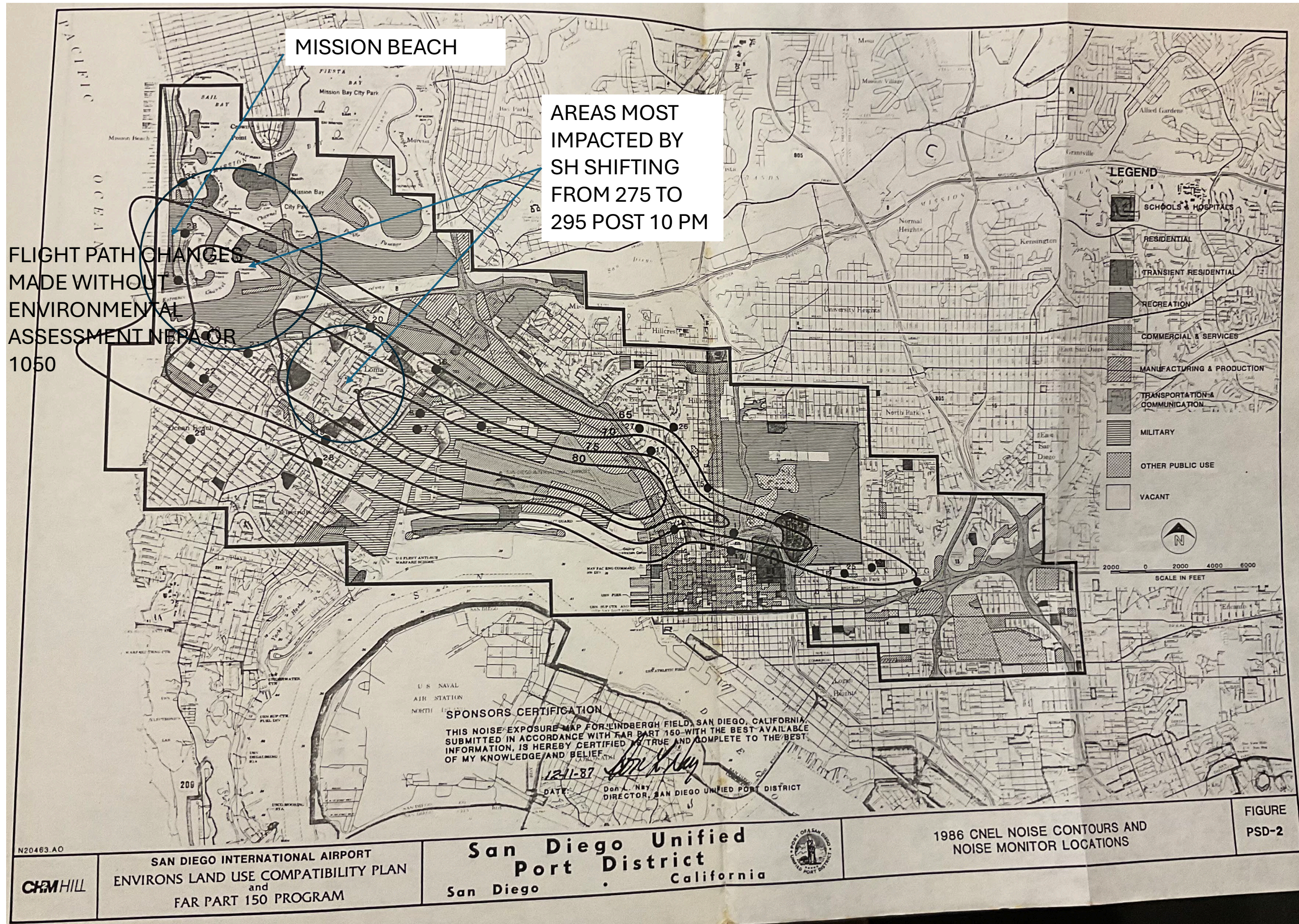




Figure 10 (Resolution passed unanimously)

### Mission Beach Town Council Resolution: Aircraft Noise over Mission Beach

The Mission Beach Town Council (MBTC) on behalf of the Mission Beach community is deeply concerned with the possibility of additional aircraft being routed over Mission Beach and the associated noise impact on our community. Therefore, we urge the FAA, the San Diego County Regional Airport Authority, and all involved local organizations to restrict any changes to aircraft routing policy and the departure curfew policy that would negatively impact our community. The Mission Beach Town Council is requesting the following measures be supported to protect our community from additional undue aircraft noise pollution:

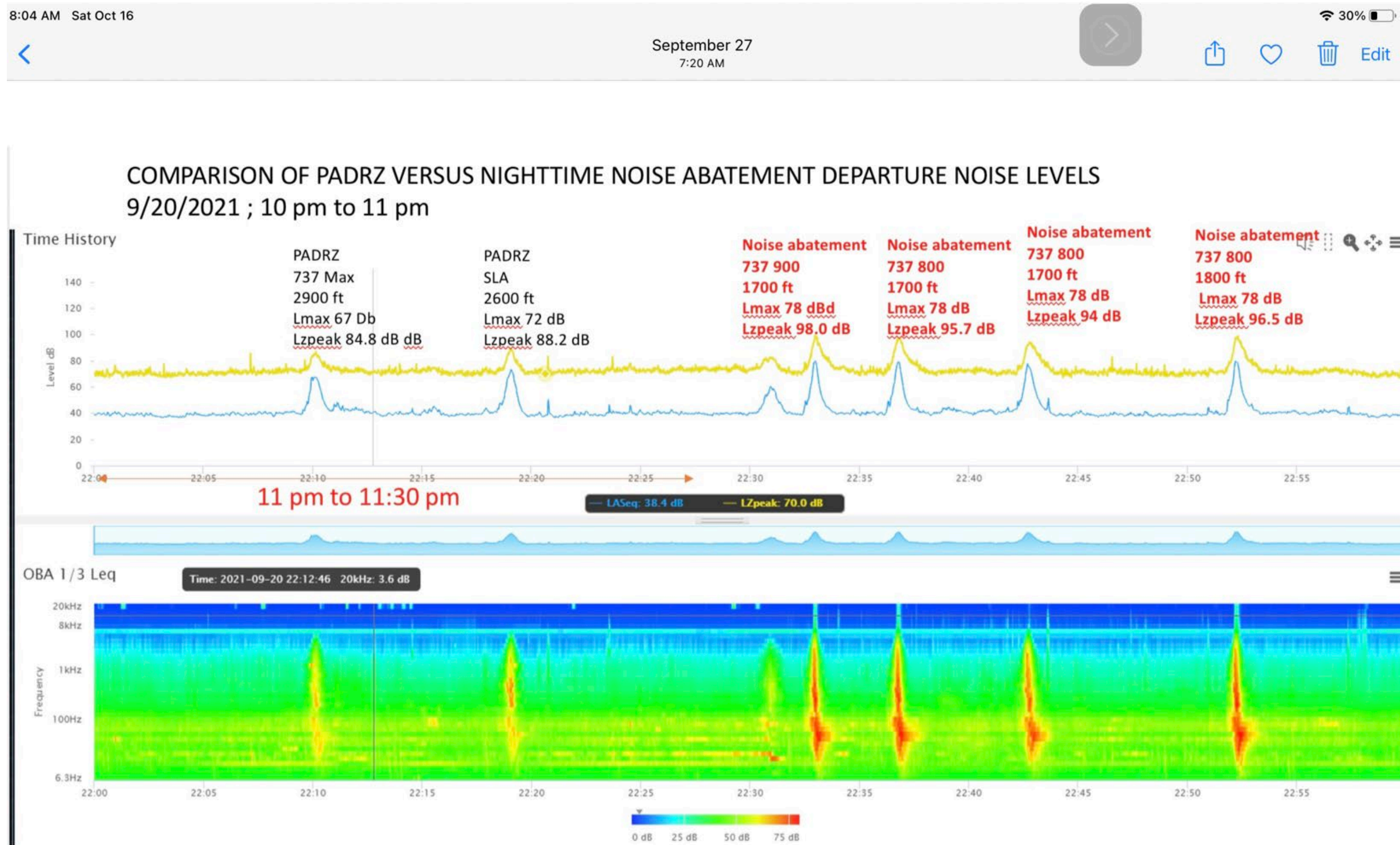
1. Restrict any policy alterations to the current aircraft departure curfew period which includes the hours from 11:30pm to 6:30 am as defined in the San Diego County Regional Airport Authority Code 9.40, Airport Use Regulations. Relaxing this curfew period would introduce an unwarranted disturbance to our community during typical sleeping hours.
2. Restrict any policy alterations to the Nighttime Noise Abatement Procedure. This procedure is in effect during the hours of 10:00 pm and 6:30 am and is stipulated in the San Diego Tracon & Lindbergh Tower LOA – Interfacility Coordination and Control Procedures dated 4/13/1987. This procedure requires departing aircraft to follow a heading of 290° vs 275° guiding the aircraft down the San Diego River channel and avoiding the communities of Ocean Beach and Mission Beach during nighttime hours. Any change to this procedure that routes additional traffic over Mission Beach would introduce an unwarranted disturbance to our community during typical sleeping hours.
3. ***In the interest of protecting the Nighttime Noise Abatement Procedure from unanticipated changes that would negatively impact Mission Beach, we are requesting that this procedure be adopted as a “formal” FAA departure route employing the proper due process for making flight path changes from 275° to 290°. Although this “non-formal” route has been utilized consistently since 1987, it still exists only as a “Letter of Agreement” not subject to the due diligence required of a formal departure route. We are respectfully requesting that the FAA formalize this route including all required impact studies and considering all concerns and interests of the affected communities.*** We are also requesting that this formal departure route that currently uses a heading of 290° be updated to adjust for the Polar Drift (magnetic north shift) that has occurred since 1987 that now brings aircraft over the southern tip of Mission Beach which were intended to fly down the center of the San Diego River channel.

By preserving the curfew, preventing additional traffic over Mission Beach during nighttime hours, and advocating for the proper due process, we aim to protect the community from excessive noise and maintain the quality of life for residents. It is crucial that we work collaboratively with the FAA, airport authorities, and local organizations to ensure that the concerns of Mission Beach residents are heard and addressed.



FIGURE 11

- Noise measurements made at my house using Larson-Davis portable noise measurement system.



Although the nighttime noise abatement agreement departures are more fanned out, the noise levels in SMB are far more impacted by the nighttime noise abatement agreement departures.



# ASSESSMENT OF THE CLASSY SID ON THE MIDWAY DISTRICT (MIDWAY RISING PROJECT)

G WONACOTT

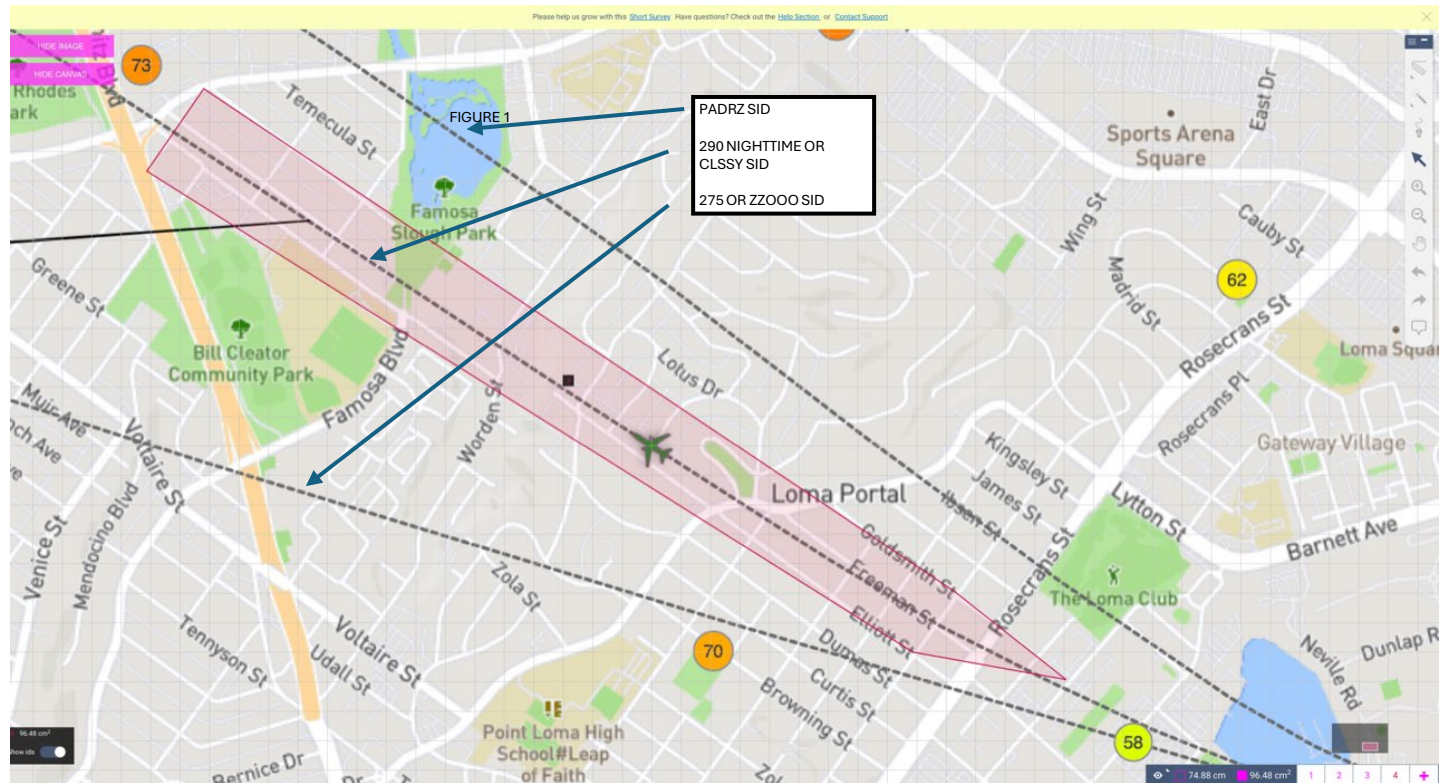
March 28 2025



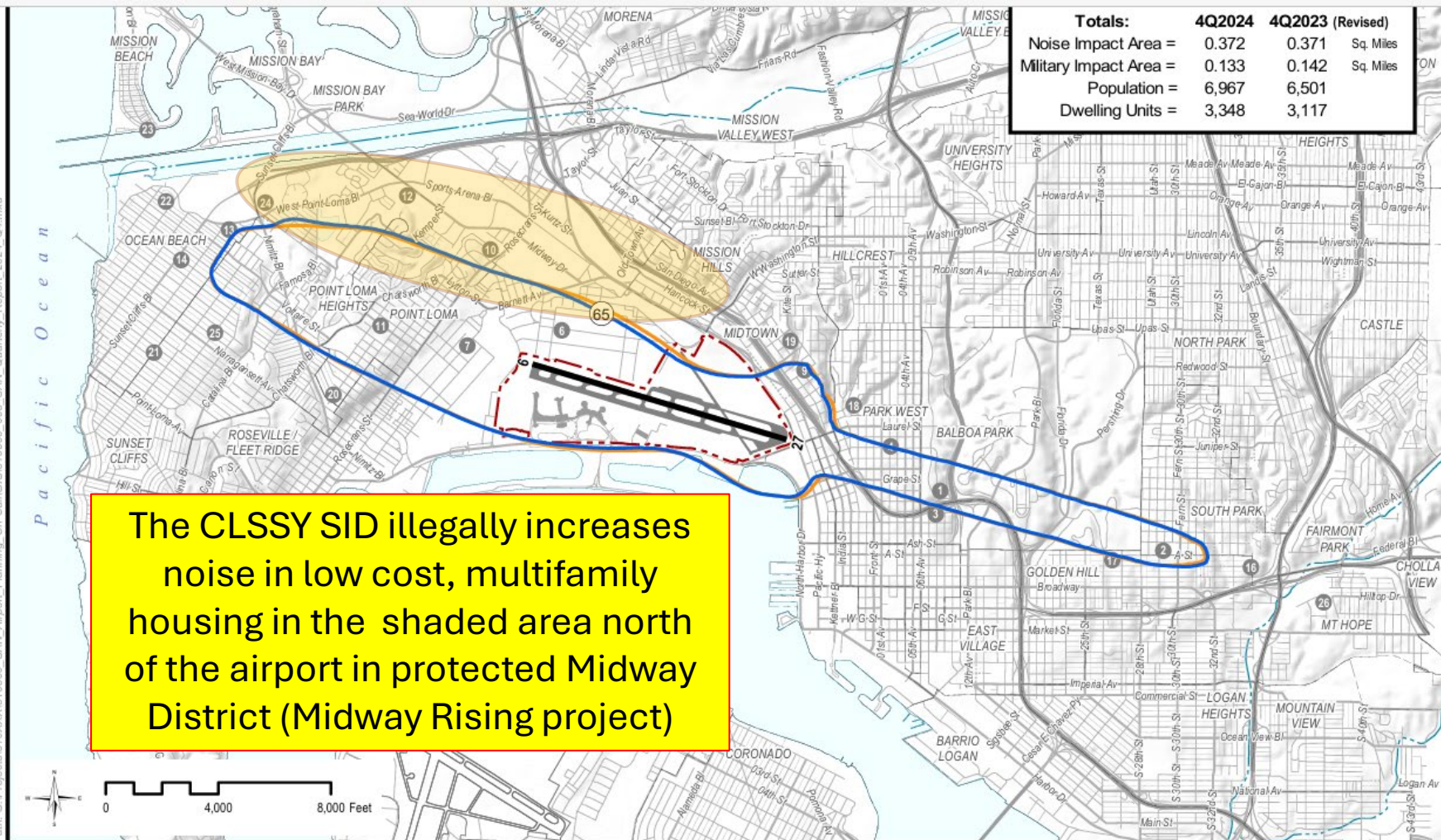
FIGURE 1

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Those living close in to the end of the runway are dramatically impacted by the post 10 pm shift of the track from the 275 to the 290 tracks. These people were never notified of this change nor were they given the opportunity to provide feedback to the City, the Port, or the FAA ATC.







- 2024 4th Quarter 65 dB CNEL Contour
- 2023 4th Quarter 65 dB CNEL Contour (Revised)

- Airport Property
- RMT Site Location

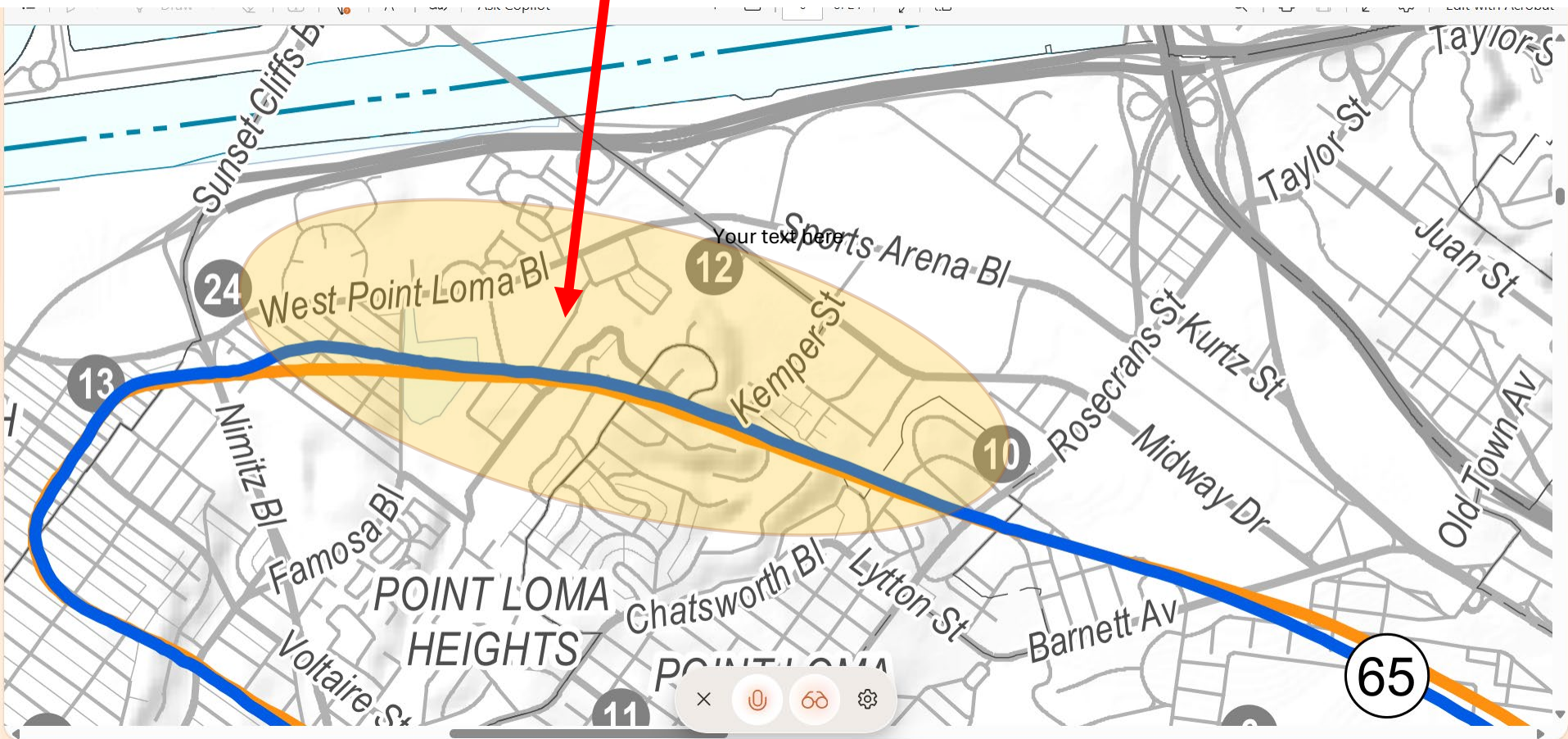
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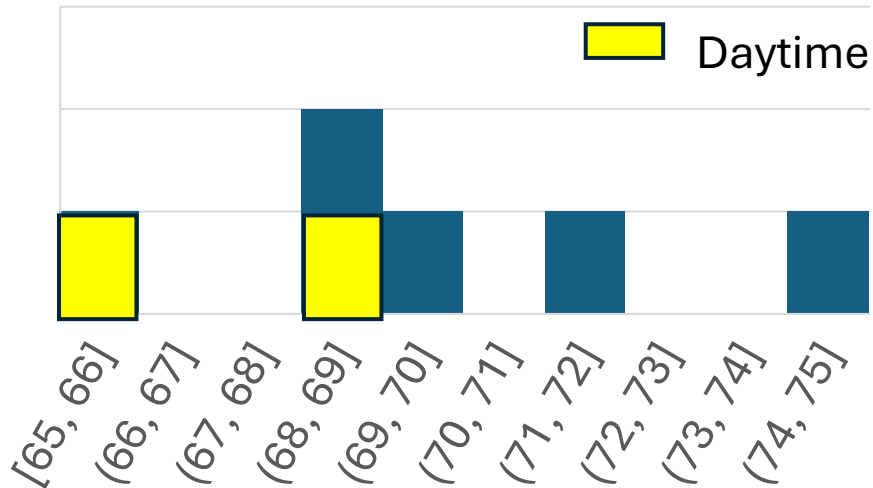


Area of multifamily affordable housing





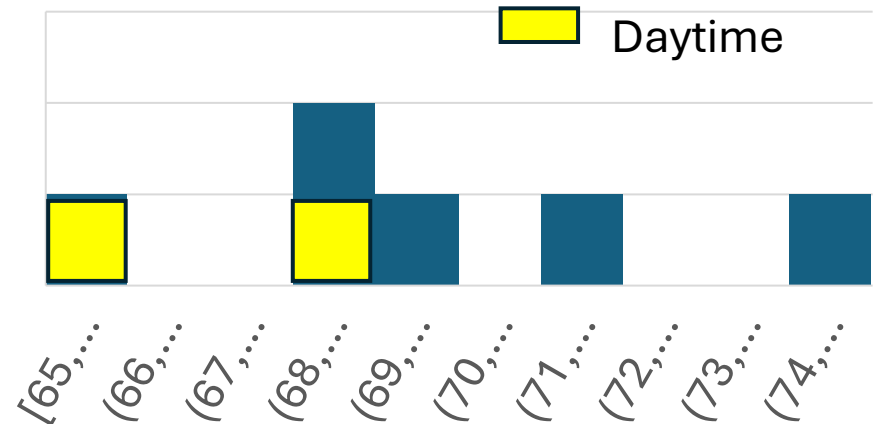
## RMT 12



The bottom line is that departures on the CLSSY SID, previously the 290 nighttime noise abatement departure, result in higher noise levels in areas to the north and west of the airport, for example in proposed Midway Rising project.

- These two noise monitors are located in the multifamily affordable housing areas in the Midway District.
- The nighttime departures shift the noise closer to the Midway District.
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## RMT 12





## Reince Tyler

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**Subject:** FW: SDIA projected to hit operational limit in 2028 - Distribute to ANAC Members

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**From:** Gary Wonacott <[gwonacott@hotmail.com](mailto:gwonacott@hotmail.com)>

**Sent:** Tuesday, April 29, 2025 1:26 PM

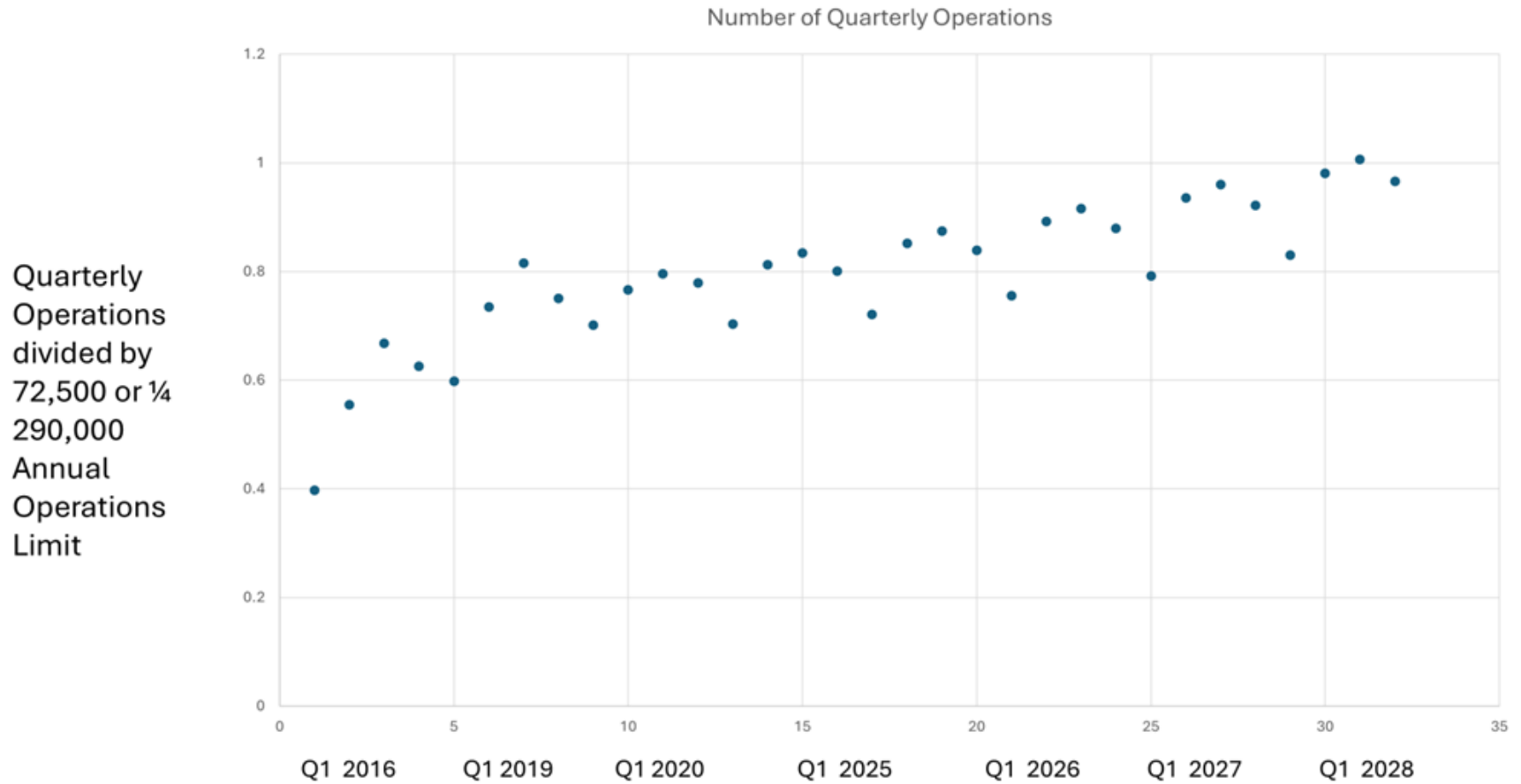
**To:** SDCRAA clerk <[clerk@san.org](mailto:clerk@san.org)>

**Subject:** SDIA projected to hit operational limit in 2028 - Distribute to ANAC Members

During the most recent Part 150 Study, the consultant determined that the annual capacity of SDIA is 290,000, but because of seasonality, it is more appropriate to base the calculations on a quarterly basis. The chart below the seasonality, which is very repeatable. Based on the projections, the airport will be constrained in the next couple of years, although, with the addition of the 11 new gates, the capacity will be incrementally increased. The only other way to increase the capacity is to change or eliminate the curfew.



## San Diego International Airport based on current trends reaches saturation in early 2026





## Reince Tyler

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**Subject:** FW: CLSSY SID for both ZZOOO and PADRZ nighttime (Please add to public comment for May meeting)

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**From:** Gary Wonacott <[gwonacott@hotmail.com](mailto:gwonacott@hotmail.com)>

**Sent:** Sunday, May 18, 2025 6:36 PM

**To:** SDCRAA clerk <[clerk@san.org](mailto:clerk@san.org)>

**Subject:** CLSSY SID for both ZZOOO and PADRZ nighttime (Please add to public comment for May meeting)

Now that there is a CLSSY SID, what used to be the 290 departure, which the Airport Authority claimed frequently was the same as PADRZ SID, what would be the impact of moving those on PADRZ to CLSSY for the nighttime departures?

Gary Wonacott

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## Reince Tyler

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**Subject:** FW: NADP considerations - Please add to Public Comments for tomorrow's meeting.

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**From:** Gary Wonacott <[wildcatwonacott@gmail.com](mailto:wildcatwonacott@gmail.com)>

**Sent:** Tuesday, May 20, 2025 4:42 PM

**To:** SDCRAA clerk <[clerk@san.org](mailto:clerk@san.org)>

**Subject:** NADP considerations - Please add to Public Comments for tomorrow's meeting.

To the San Diego International Airport Noise Advisory Committee:\*\*

During the previous quarterly meeting, there was extensive discussion regarding the Noise Abatement Departure Procedure (NADP) and its potential impact on runway capacity, particularly during morning hours. At these times, a high volume of departures occurs, as virtually every gate is used for overnight aircraft storage. This number will further increase when the new terminal adds 11 additional gates. The key question remains: To what extent will capacity be affected, and do the benefits of noise mitigation outweigh the added departure time?

It was noted that the inclusion of NADP would not reduce the 65 dB CNEL but could potentially lower single-event noise impacts. Given recent trends in noise mitigation research, greater emphasis is being placed on single-event noise criteria.

To explore this issue further, flight data from May 19 was analyzed using Webtax for two time periods: 6:30–7:00 AM and 10:00–11:30 PM. A primary concern is whether the time penalty remains the same for consecutive departures on the same Standard Instrument Departure (SID) route (e.g., ZZOOO, CLSSY, or PADRZ) compared to alternating departures between different SIDs. As an example, of the 25 departures between 10:00 and 11:30 PM, five were consecutive departures on the same SID (e.g., CLSSY followed by another CLSSY departure, or PADRZ followed by another PADRZ departure). This information is part of the flight plan and should be accessible to Air Traffic Control (ATC). Apart from the first departures of the day, efforts are typically made to alternate between different SIDs.

On the day evaluated, there were 29 operations between 6:30 and 7:00 AM—equating to 58 operations per hour. This exceeds both ATC's recommended operational limits and the figures indicated by analysis. Given that safety is the highest priority, operational pressures may be compromising safety at SDIA.

In conclusion, if the potential delay from NADP implementation is 15 to 20 seconds per departure, and this delay primarily affects consecutive departures on the same SID, then the only period where this would be a concern is between 6:30 and 7:15 AM. Since alternating departures is already common practice throughout the rest of the day, adding a 15-to-20-second interval between departures in the early morning hours would be a prudent safety measure.

I would suggest that a subcommittee be formed to meet with the Noise Abatement Office personnel at John Wayne Airport given their extensive investigations of NADP. Finally, I would like to thank Ms. Henson, the Mission Beach representative on ANAC, for inadvertently bringing this issue to my attention.



Gary Wonacott  
Mission Beach