

## Tyler Reince

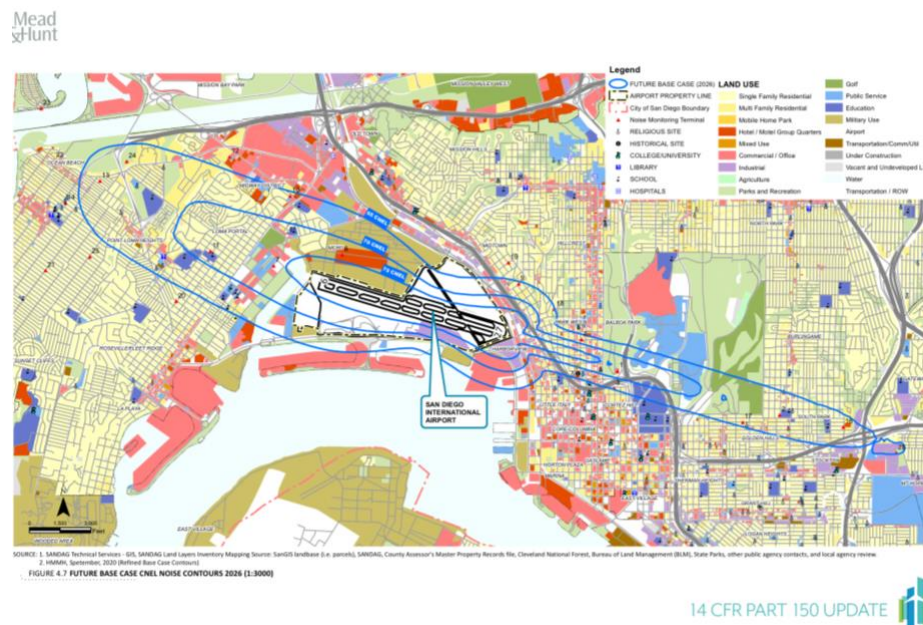
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**Subject:** FW: Input to ANAC August 2026  
**Attachments:** Input to ANAC August 2026.pdf

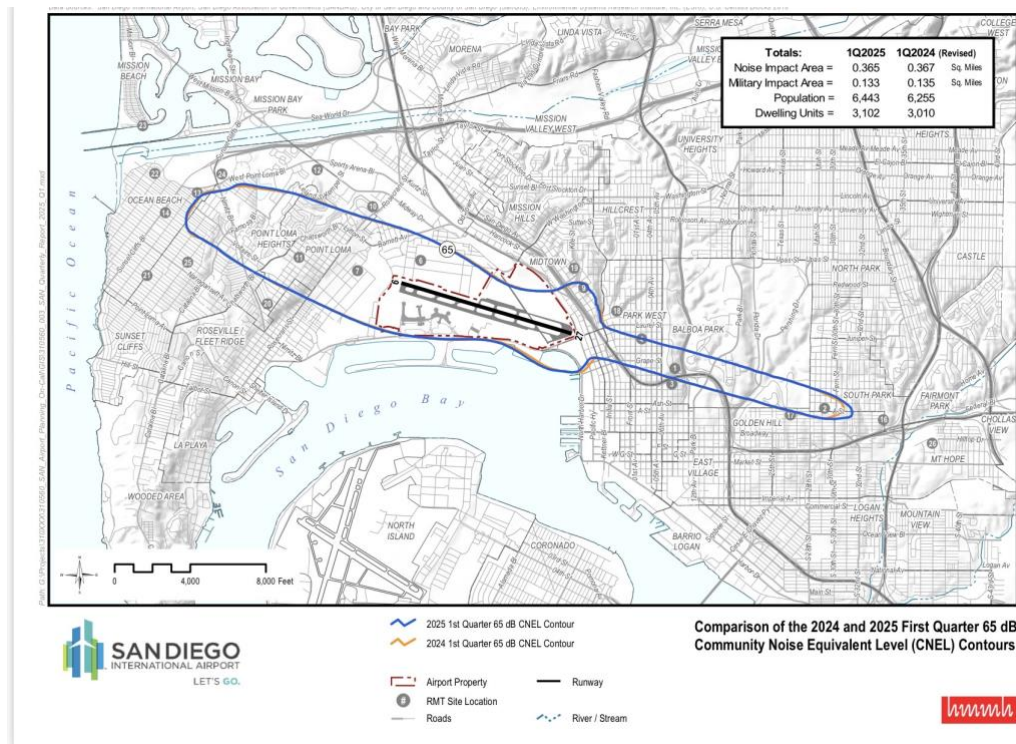
**From:** Gary Wonacott <[wildcatwonacott@gmail.com](mailto:wildcatwonacott@gmail.com)>  
**Sent:** Wednesday, August 19, 2026 10:46 AM  
**To:** SDCRAA clerk <[clerk@san.org](mailto:clerk@san.org)>  
**Subject:** Input to ANAC August 2026

Please distribute to all ANAC members.

During the most recent Part 150 Study, two key years were used, 2018, to establish the baseline, and 2026, the out year prediction. The 2026 contour, shown below, was about 6 square miles, a fifty percent increase in the size of the contour compared to the 2018 value. The most recently published CA Title 21 65 dB CNEL, Q4 2025, is shown for comparison



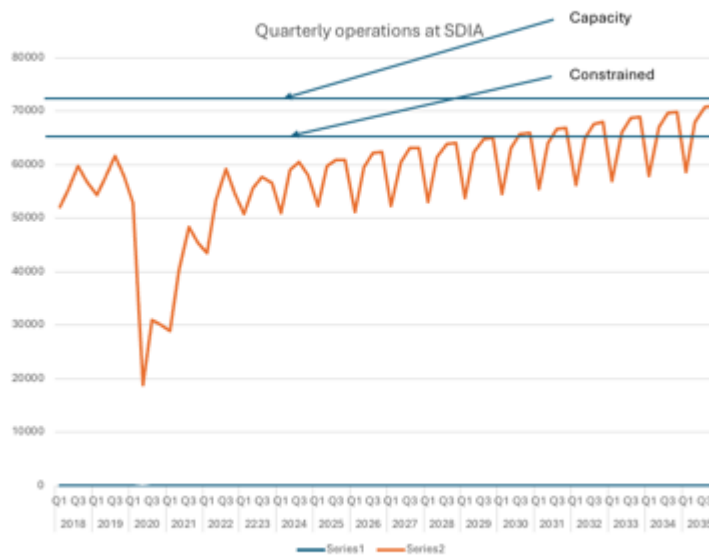
below. There is a dramatic difference between what was used in the Part 150 for the 2026 projection and the most current contour in Q4 2025. The Part 150 was performed in the 2020 time period, so how could the 2026 prediction be so far off. There was consideration made for revising the 2026 prediction in light of the impact of the pandemic, but the decision was made to move forward with the 2026 prediction. In retrospect, this was not a good decision, as it completely distorted the study environment.



Several reasons are provided in the text to explain the large discrepancy between the 2026 prediction the reality of 2026, including the pandemic. Now, the pandemic had a profound impact on number of daily operations, but as shown in the figure below, there was a rapid return to normal operation levels and slope. The bottom line is that the 2026 65 dB used in the Part 150 was a grossly overly conservative prediction. But why was the prediction so conservative? Only the airport authority has the answer to this question.

The figure below shows the seasonality effect on operations, which illustrates the consequences of using annual operations as the metric for establishing airport capacity. The more realistic limit would be the

quarterly value of 72,500. On this basis, the airport will achieve capacity in the near future, and is now in the constrained operations range



## Official historical measurement for context

In the airport's Part 150 Noise Exposure Map study (2018 existing conditions, the most recent detailed full-contour calculation publicly documented in that form):

- The 65 CNEL contour contains approximately **2,640 acres**.
- That equals **4.125 square miles**.

(A projected 2026 future contour in the same study was larger at ~3,881 acres / ~6.1 sq mi due to higher forecast operations.)

## Estimation from the map provided

The shape and scale on the 4Q 2025 map are consistent with those historical contours:

- Scale bar = 8,000 feet (~1.5 miles).
- East-west length of the blue contour (Ocean Beach / Point Loma tip to the thin eastern tail near South Park / Golden Hill) is roughly 4.5–5.3 miles.

- Average north–south width is roughly 0.8–1.1 miles (wider near the airport and Point Loma, narrower in the eastern lobe).

A simple ellipse approximation using those dimensions yields ~3.5–4.5 square miles, centering near **~4 square miles**. This matches both your visual estimate and the documented Part 150 value for a comparable contour.

**Bottom line:** The total area enclosed by the elongated 65 dB CNEL contour is approximately **4 square miles** (most precisely referenced historically as 4.125 sq mi / 2,640 acres). The much smaller NIA number on the map is a different, more narrowly defined regulatory metric.

**The projected 2026 contour (~3,881 acres / ~6.1 sq mi) was based on an operations forecast that has not materialized.**

## **What the Part 150 study assumed**

In the 14 CFR Part 150 Noise Exposure Map update (submitted ~2022, using 2018 as the existing-conditions base year):

- 2018 actual total operations: **225,570**
- Projected 2026 total operations: **258,785** (roughly +15%)
- Commercial/cargo operations were forecast to rise from 212,430 to 247,105

The study explicitly stated that the larger future contour resulted from this increase in aircraft operations (and the associated fleet mix). No major changes in flight tracks, runway use, or procedures were assumed.

## **What has actually happened**

By 2024–2025, total annual operations remained near or only modestly above the 2018 level (one documented 2024 figure is ~225,300). Even with record passenger volumes in 2025 (~25.3 million), the number of aircraft movements has not approached the 259,000 level assumed for the 2026 contour. Quarterly data from the 2025 noise reports annualize in the low-to-mid 200,000s range.

## **Likely primary cause of the overestimate**

**Overly optimistic operations growth in the underlying aviation forecast.**

The 2026 numbers came from a 2019 Aviation Activity Forecast Update (LeighFisher), which was prepared before the full effects of the COVID-19 pandemic and the subsequent slower-than-expected recovery trajectory were clear. Although the Part 150 study included some pandemic-related sensitivity discussion and noted that the chosen forecast was reasonably consistent with the FAA's 2021 Terminal Area Forecast at the time, the actual recovery in *operations* (as opposed to passengers) has been more muted.

Secondary contributing factors that further kept the real contour smaller:

- Faster-than-projected fleet modernization (higher share of quieter Airbus NEO and Boeing MAX aircraft, which produce less noise per operation).
- Possible differences in modeling (the Part 150 used an earlier version of AEDT; current quarterly contours use AEDT 3g with corrected runway data).

In short, the contour-area projection was driven almost entirely by an operations forecast that proved too high. Real-world activity levels through 2025 have stayed much closer to the 2018 baseline that produced the ~4.1 sq mi (2,640-acre) contour, which is why today's elongated 65 dB CNEL contour remains near that size rather than expanding toward 6 sq mi.

## Tyler Reince

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**Subject:** FW: SDIA Operations Seasonality

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

**Sent:** Sunday, August 30, 2026 12:14 AM

**To:** SDCRAA clerk <[clerk@san.org](mailto:clerk@san.org)>; Gloria Henson <[glohenson@san.rr.com](mailto:glohenson@san.rr.com)>

**Subject:** SDIA Operations Seasonality

The consultants during the Part 150 Study estimated the annual capacity at 290000+ operations, but this ignores the substantial seasonality in San Diego and SDIA. The best way to measure how close SDIA is to capacity, would be on an hourly basis, or 46.7 hourly operations. It is recommended that this metric be used to session capacity.

A quarterly measurement is also useful, although non-conservative. The graph below shows the quarterly number of operations obtained from the quarterly reports to the State of California. Even on the basis of a quarterly criterion, and assuming the same quarterly growth in operations, SDIA reaches capacity in 2030 or 2031.

The other assumption is that adding gates in the new T1 does not, as claimed by the Airport Authority, increase capacity. The Airport Authority can speak to this assumption.

Gary Wonacott  
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