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FRIENDS OF SUNSET PARK

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July 21, 2010

The Honorable Henry A. Waxman
House of Representatives
8436 W. 3rd Street, #600
Los Angeles, CA 90048

Dear Congressman Waxman,

We strongly urge you to insist that the FAA prepare a full Environmental Impact Statement (EIS) regarding proposed changes to the departure flight path at Santa Monica Airport (SMO). And we hope that you will oppose allowing the 250-degree option, based on safety and noise concerns.

We also want to thank you for your letter of May 11, 2010 to FAA Administrator J. Randolph Babbitt. It urged the FAA to suspend a change in flight departure procedures at Santa Monica Airport that had caused serious noise and disruption for communities living near the airport. The change in departure flight path was part of a 180-day FAA "test" that ended on June 8, 2010.

We notice that although you urged the FAA "to immediately suspend the test" and asked for a response from Mr. Babbitt "as soon as possible," the FAA administrator did not suspend the test, and he waited until June 7, 2010 to reply to your letter. We consider Mr. Babbitt's failure to suspend the test, and his long-delayed response to your letter until the end of the test period, an arrogant display of lack of respect for a senior member of Congress who speaks for his 650,000 constituents.

When he finally got around to writing to you, Mr. Babbitt stated that "taxi-out times at LAX have decreased by 50 seconds per plane" with the 250-degree test for departures at Santa Monica Airport (SMO). I.e., he thought that the test seemed to be a successful way of balancing "the needs of the communities we serve and the needs of pilots and airlines."

Meanwhile, back in Santa Monica, 17,000 households, 15 preschools, 3 elementary schools (1,023 students), 1 middle school (977 students), 2 high schools (3,181 students), and 1 community college (35,229 students), all of which lie under the 250-degree heading, were impacted by the noise and safety risks caused by low-flying airplanes. This 250-degree heading test didn't seem "sensitive" to our needs, nor did it seem to promote safety, one of the FAA's primary missions.

There are a number of things that concern us:

1. Lack of information – During the 180-day test, residents kept logs of low-flying airplanes and filed 7,500 complaints. The FAA is supposed to analyze those complaints, but officials

tell us that they only keep flight records for 45 days. How they can possibly analyze the validity of the complaints without flight data for the entire 180 day test period?

2. Obstructionism – Resident filed 7,500 complaints and their logs showed many, many more planes flying low overhead than the 8–12 per day estimated by the FAA. SMO had 115,000 operations last year and, from the large numbers of planes we observed, we can only conclude that that VFR as well as IFR pilots were being told by air traffic controllers that they could fly over Santa Monica instead of taking the Penmar Golf Course route, which was agreed upon in the 1984 Settlement Agreement.

When residents requested flight data for the 180-day test period to verify the actual number of flights over our neighborhood, the FAA replied that it would charge us \$99,630 in advance for that information. If they can avoid sharing that data with us, the FAA will be able to get away with “invalidating” all complaints that don’t correspond to IFR flights. (This is what they did in the “Interim Review.”)

3. Invalid conclusions in FAA Interim Review – The FAA’s interim report claimed an 85% reduction in departure delays. Their analysis is specious. Delays under 15 minutes are not counted, while delays of 15 minutes or more are counted in full.

So, according to the FAA’s method of analysis, if planes were delayed an average of *16 minutes* in one month, and planes were delayed an average of *14 minutes* the next month, the FAA would conclude that they had “eliminated all delays” and had achieved a *100% reduction in departure delays*. This is just plain bad math and cannot yield any percentage values that make sense.

4. FONSI, leading to permanent new flight path, with no public process or right of appeal – If the FAA makes a Finding of No Significant Impact (FONSI) in August, there will be *no public review* period that allows for residents to review all the documents supporting their decision.
5. Interference with ability to earn a living – It’s not just a matter of annoying noise. Residents who work at home were not able to converse with clients by phone, do research online, write, compose music, or carry out other necessary tasks due to the frequent overhead flights.
6. Student learning disrupted – The onset of noise from the planes flying over the various schools that are under the new flight path interfered with effective instruction.
7. Safety risks increased by topography – Two neighborhoods that are at a higher elevation than the SMO runway were especially impacted – the Sunset Park mesa and the hilly section of Ocean Park.

- The west end of the SMO runway is 118 feet above sea level.
- Some Ocean Park homes are 135 feet above sea level.
- Some Sunset Park homes are 174 feet above sea level.

Pilots who were instructed to turn to the new 250-degree heading when they reached 400 feet above sea level ended up *less than 250 feet above some of our homes*. Meanwhile, Penmar Golf Course (under the 1984 Agreement flight path) is only 46 feet above sea level.

We feel that our safety and quality of life are being traded for the convenience of airline companies who all want their planes to take off from LAX at prime time, rather than spreading out departures.

8. Additional safety concerns – There are several flight schools at SMO. There is no minimum aeronautical knowledge or experience requirement for the issuance of a student pilot certificate, only medical requirements. And, the minimum age requirement for student pilots to *fly solo* is to be at least 16 years of age. http://www.faa.gov/pilots/become/student_cert/
9. A history of plane crashes – According to the National Transportation Safety Board online database, (<http://www.nts.gov/ntsb/query.asp>) there have been *92 plane crashes associated with SMO since 1964*. The latest one was on July 1, 2010, when a prop plane lost power and crashed into Penmar Golf Course, killing the pilot. If the pilot had been following the 250-degree heading, his plane would have crashed in Sunset Park, a neighborhood of homes, schools, and playgrounds.

Again, Congressman Waxman, we ask you to oppose the 250-degree option based on obvious safety and noise concerns. At a minimum, we strongly urge you to insist that the FAA prepare a full Environmental Impact Statement (EIS) regarding the 250-degree departure flight path from Santa Monica Airport before attempting to make it permanent.

Sincerely,

Zina Josephs, President
(on behalf of the Board of Directors)
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FOSP is a city-recognized neighborhood organization in Santa Monica. We have 760 current paid members, 1,358 residents on our mailing list, and we flyer our newsletters to 7,000 households in the 90405 zip code. Our boundaries are Lincoln Blvd. on the west, Pico Blvd. on the north, the east city limits (Centinela), and the south city limits (Airport Avenue/Dewey/Ozone). Santa Monica Airport lies within the boundaries of our neighborhood.

FOSP: Schools located under the FAA "test" IFR 250 heading departure flight path from Santa Monica Airport

1. K-12 public schools
2. Santa Monica College
3. Publicly-funded pre-schools
4. Independent pre-schools

SMMUSD K-12 schools – October 2008 CBEDS enrollment figures:

Will Rogers Elementary – (2401 14th St.) – 526

John Muir Elementary – (2526 6th St.) – 304

Santa Monica Alternative School House – (2525 5th St.) – 193

John Adams Middle School – (2425 16th St.) – 977

Olympic High School – (721 Ocean Park Blvd.) – 115
Santa Monica High School – (601 Pico Blvd.) – 3066

Total: 5,181 students

2. Santa Monica College – (1900 Pico Blvd. – the south side of the campus borders Pearl St. between 16th and 20th)

Fall 2009 enrollment figures from the California Community Colleges Chancellor's Office:

35,229 students

3. Publicly-funded Preschools – approximate enrollment for 2010-2011 from Judy Abdo, Director, Child Development Services, Santa Monica-Malibu Unified School District:

John Adams Child Development Center – (2320 17th St.) – Head Start/California State Preschool Program/General Child Care – 65

Pine Street Child Development Center (734 Pine St. – on the Olympic High School campus)

Head Start/California State Preschool, Los Angeles Universal Preschool – 100

Will Rogers Learning Community – (2401 14th St.) – Head Start/California State Preschool Program/School-Age Child Care – 100

Washington West Preschool – (2802 4th St.) – Head Start/California State Preschool Program/Los Angeles Universal Preschool – 80

Total: 345 pre-school children

4. Independent Preschools:

The Children's Place – (235 Hill St.)

Circle of Children – (1515 Maple St.)

The First School – (1733 Ocean Park Blvd.)

First Step – (2650 2nd St.)

The Growing Place – Marine Park campus – (1406 Marine St.) – 42 infants, toddlers, and preschoolers

The Growing Place – Ocean Park campus – (401 Ashland Ave.) – 78 preschoolers

Hill An' Dale Family Learning Center – Old Firehouse – (2801 25th St.)

Mt. Olive Lutheran Pre-school – (1343 Ocean Park Blvd.)

Newpath Montessori School – (1962 20th St.)

Smartstart Pre-School – (2505 Lincoln Blvd.)

Total enrollment: TBD