

Quiet Skies La Jolla, Inc.

A 501(c)(4) Non-Profit Public Benefit Corporation

San Diego County Regional Airport Authority

Attention: Ted Anasis

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Re: San Diego County Regional Airport Authority's Recirculated Draft Environmental Impact Report addressing the Proposed Airport Development Plan

This letter is submitted by Quiet Skies La Jolla, Inc.

We address here the San Diego County Regional Airport Authority's (SDCRAA) release of its "Recirculated Draft Environmental Impact Report" ("DEIR") on September 19, 2019, that purportedly corrects faults within the initial DEIR release in the Fall of 2018 and addresses the proposed \$3 billion Airport Development Plan ("ADP") and its impact on commercial jet noise.

Background of the ADP

The SDCRAA's ADP proposes a currently unfunded \$3Billion project to add 11 new gates, an undefined number of additional overnight jet parking places, a new Airport Administration office and improvements including restaurants and stores to enhance the customer experience at Terminal 1 of our airport. However, the ADP does nothing to mitigate the increasing jet noise that will affect the surrounding communities as a consequence of this expansion, including and specifically La Jolla.

The DEIR

The DEIR notes that there will be very "significant but unavoidable harm" to human health associated with the ADP, caused by increased jet noise due to more frequent flight operations during all hours, including significant risks of human physiological harm, stress, cardiac issues and cancer. The DEIR also discloses that the ADP will cause atmospheric environmental harm from greenhouse gas emissions and damage to environmentally sensitive areas and biodiversity. The DEIR acknowledges that the FAA Reauthorization Bill of 2018 requires the FAA to study these issues, but then concludes that the human health issues are "too speculative" to consider and dismisses them from further consideration in the DEIR and ADP. We disagree. The FAA and SDCRAA have it exactly backwards. Before spending \$3B+ on an airport improvement project that coincidentally enables and accelerates the airlines to reach maximum capacity at

SDIA sooner, the studies should be conducted and assessed first, before the ADP progresses—and the damage to human health and the environment is irreversible.

SDCRAA concedes that project implementation would cause a 3db or more increase in noise sensitive areas starting as early as 2024, due to a substantial increase in flight operations from the current average of 36 flights per hour now to an average of 50 per hour. That means communities surrounding the airport and its departure and arrival flight paths, including Point Loma, La Mesa, Kensington, North Park, Golden Hill, Mission Beach, Ocean Beach, Pacific Beach, La Jolla and others, where noise levels have traditionally been around 40-45db or less, will be substantially impacted. Any additional jet overnight parking places will essentially guarantee a corresponding increase in the number of early departing flights in the 6:30 a.m.—9:00 a.m. window, and a corresponding number of increased arrivals at night, including after 11:30 p.m. when there is no curfew on arrivals. Perhaps worse, the SDCRAA also reveals that “implementation of the proposed project would cause a substantial increase in the number of night-time flight operations that produce Sound Exposure Levels (“SELS”) sufficient to awaken an increasing population starting in 2024, which would be significant and unavoidable”. It is questionable how this is consistent with SDCAA’s CEO Kim Becker’s stated commitment to “[b]eing a good neighbor to surrounding communities, especially when it comes to noise mitigation”.

The DEIR and SDCRAA argue that the increase in flight operations at SDIA would occur, with or without the ADP, because airlines will pack more flights into the SDIA schedule to meet customer demand, regardless of whether the airport is expanded. Yet the SDCRAA also concedes that the ADP and its 11 new gates and the new additional “Remain Overnight” jet parking places would enable SDIA to reach maximum capacity much faster.

The Adverse Impacts to Human Health from Jet Noise and the ADP

The DEIR and SDCAA data note, but accept, that if the ADP moves forward, the 65db-75db noise contour directly around the airport will significantly expand, dramatically impacting 15,000 additional residents by 2026 and that the “noise would be significant and unavoidable”. The noise will not stop at the airport boundaries: it will carry over to the surrounding communities and clearly, the increased noise is not good for humans, and in particular the residents of La Jolla.

Sleep Disturbance, Cardiovascular Disease, Cancer and Cognitive Learning Issues Associated with Jet Noise

The DEIR admits that there are sleep disturbance, stress and cardiology issues associated with jet noise, but dismisses them. Buried in the DEIR is the statement that while a “relationship between noise and health effects seems plausible, it has yet to convincingly be demonstrated” and “it is not known whether changes in pulse rate and blood pressure cause harm or are a sign of harm”. The medical community, which is eminently more qualified to opine than the self-interested FAA and SCRAA, thinks otherwise. Indeed, the DEIR even notes that a 2018 World

Health Organization (“WHO”) study strongly recommended reducing noise exposure levels produced by aircraft to below 45db during the daytime and below 40db at night, because of the causal relationship between noise and cardiovascular disease, sleep disturbances, cognitive impairment, adverse birth outcomes, mental health and quality of life. Remarkably the DEIR only addresses the probability of being awakened by jet noise but conveniently provides no data about the inability to begin the sleep cycle until after jet noise from departures subsides at 11:30 p.m. each night. The DEIR further notes that the implementation of the ADP “would result in a significant cancer risk human health impact”, which is “significant and unavoidable”. The DEIR further says that the human perception of “annoyance from noise depends on frequency” and that noise adversely affects children’s’ school performance for reading ability, concentration, motivation and long-term learning retention.

The DEIR dismisses the impact of noise pollution on health. In fact, an increasing number of studies demonstrate a strong and significant association between residential day-night equivalent noise levels and cardiovascular health. It is well established that aircraft noise, particularly at night, dose-dependently stimulates adrenaline release and impairs endothelial function, a key player in the development of cardiovascular disease, and that this process occurs in response to noise independently of whether or not there is an annoyance reaction. (Schmidt FP, Basner M, Kroger G, Weck S, Schnorbus B, Muttray A, Sariyar M, Binder H, Gori T, Warnholtz A and Munzel T. Effect of nighttime aircraft noise exposure on endothelial function and stress hormone release in healthy adults. *Eur Heart J.* 2013;34:3508-14a.) In a recent comprehensive review of the topic published in the well-regarded and high-impact *Journal of the American College of Cardiology*, Münzel et al state that "more and more large studies of high quality" find that noise, including that from air traffic, "is associated with coronary heart disease and stroke, as well as with major risk factors for cardiovascular disease, most importantly hypertension and metabolic disease" (Münzel et al, *J Am Coll Cardiol* 2018; 71:688-97). The authors further propose noise abatement measures to mitigate noise exposure throughout the day and night that include changing the descent and other flight procedures. The World Health Organization (WHO) guidelines for air traffic noise "strongly recommend" reducing noise levels produced by aircraft to below 45 dB, as aircraft noise above this level is associated with adverse health effects; for night noise exposure, the WHO "strongly recommends reducing noise levels produced by aircraft during night time to below 40 dB, as night-time aircraft noise above this level is associated with adverse effects on sleep" (WHO Housing and Health Guidelines. Geneva: World Health Organization; 2018. Table 8.11).

SDCRAA’s Disregard of the FAA Reauthorization Act of 2018

The DEIR notes that the FAA’s Reauthorization Act of 2018, requires additional noise studies to be completed, including a “health impact study” for many airports across the U.S., including San Diego International Airport. Inexplicably, however, the DEIR concludes that the California Environmental Quality Assessment (CEQA) Guidelines authorize an agency “who finds a particular impact too speculative after a thorough investigation, to note this conclusion and terminate the discussion of the impact”. The SDCRA then unilaterally concludes: “The

discussion above shows that, at this time, the effects of noise on cardiovascular health at noise levels below 65 CNEL are too speculative for further evaluation in this CEQA document”, and proposes to plow ahead with the ADP in the face of serious and compelling scientific and peer-reviewed medical journal research that raise substantial concerns for human health linked to aircraft noise. The SCRAA’s proposed path forward is shamelessly irresponsible and grossly negligent at a minimum.

Ongoing Plans to Mitigate Jet Noise Have Been Ignored by the DEIR and ADP

The DEIR is particularly troubling in light of the ongoing Flight Path & Procedure and Analysis and Part 150 Studies, which are evaluating proposed solutions to mitigate jet noise arising from SDIA. The initially proposed procedures include a requirement for departing jets to fly further west over the ocean, away from our beach and coastal communities, before turning north or south. We are fortunate to live next to the Pacific Ocean and it should be used to San Diego’s advantage. Planes can fly more directly away from the coast and over the ocean, thereby minimizing the disturbance and health issues visited on the communities they serve. Flying shorter routes closer to the coast only saves the airlines a few dollars in jet fuel and is strong evidence of greedy corporate airline and SDCRAA economic policies being placed ahead of human health concerns and the individuals on the ground.

Further study by these agency and community committees will also be performed and are projected to be completed in 2021, including the request by Quiet Skies La Jolla, Inc. that the “handshake agreement” requiring all departing flights from SDIA in the evening and/or night time hours be routed north away from Point Loma, be rescinded such that flight traffic during these hours be evenly distributed between Point Loma and the coastal communities to the north of the airport, including La Jolla. Quiet Skies La Jolla specifically requests that the "night-time noise abatement procedure" for SDIA be rescinded and replaced with an even-handed approach in which all flights during "nighttime noise abatement hours", occurring at least after 10:00 p.m. until 6:30 a.m., fly the standard daytime procedures. La Jolla, Mission Beach, and Pacific Beach should not bear the disproportionate brunt of night-time flight operations and the associated noise.

Given the objective medical data reported thus far, the ADR must address these real and imminent health risks as air traffic volume from SDIA increases. First, the procedure recommendations in the Part 150 currently being evaluated must be adopted before moving forward with the ADR. Second, as the ADR will further exacerbate the inordinate impact of the "hand-shake" night-time noise abatement procedure on the communities of Mission Beach, Pacific Beach, and La Jolla (which direct all departing traffic on a northerly heading after 10pm), this procedure should be disbanded and daytime departure procedures should be followed throughout the time of airport departing operations prior to the adoption of the ADR. Third, the SDIA's commitment to a nighttime curfew on departures before 6:30 a.m. and after 10pm should be re-avowed and memorialized in writing, and appropriate limitations to the number of arriving flights after 11:30 p.m. and before 6:30 a.m. should be proposed.

The referenced studies and process should proceed to conclusion before the DEIR and ADP are further considered, let alone before they move forward. The solutions from these studies should be required conditions before any EIR for the ADP is approved. The surrounding communities' interests for quiet, healthful living must be placed ahead of the airlines' and SDCRAA's desire to maximize their revenue and profit by building out the airport to reach maximum capacity as soon as possible.

The correct order should be (1) assess and implement all proposals to materially mitigate jet noise that affects the community, (2) gather and assess the medical evidence regarding the health, sleep and cognitive risks of the proposed San Diego Airport expansion, and (3) and only after steps 1 and 2, then consider whether to expand the airport operations that will increase the frequency of flight operations and the associated noise. SDCRAA and the FAA have the process exactly backwards.

Very truly yours,

/Anthony M. Stiegler/

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