

Concerned Residents Against Airport Pollution

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The Honorable J. Randolph Babbitt
Federal Aviation Administration
800 Independence Avenue, SW
Washington, DC 20591

Regarding: September 23, 2009 reply to [my August 17, 2009 letter](#) to you I received from Nancy LoBue, Acting Assistant Administrator for Policy, Planning, and Environment, regarding Santa Monica Airport (SMO)

Dear Administrator Babbitt:

There are several areas of [Ms. LoBue's letter](#) I feel need addressing.

To clarify the political boundaries, Santa Monica Airport sits at the southeast border of the City of Santa Monica and abuts the City of Los Angeles. Although residents in Santa Monica do experience the smell of jet emissions, the vast majority of the odors carried by the prevailing winds travel into Los Angeles neighborhoods. This impact on Los Angeles adds complexity to the politics of addressing SMO related concerns on the local, state, and national levels of government.

Although Concerned Residents Against Airport Pollution supports the City of Santa Monica's efforts to enhance SMO safety concerns by banning category C & D aircraft, we feel that the City does not go far enough in addressing the communities' concerns with regard to air pollution from jet and turboprop operations. Unfortunately, the FAA's proposed safety enhancements would have a negligible effect on reducing the jet and turboprop exhaust odors that the community experiences.

Ms. LoBue made reference to two studies 1) The South Coast Air Quality Management District's (SCAQMD) "Airports Study" and, 2) The U.S. Environmental Protection Agency's (EPA) study on lead emissions from piston engine aircraft. She also commented about the FAA's limited jurisdiction regarding air quality studies unless they are related to compliance with the [National Environmental Policy Act \(NEPA\)](#).

1. As I am a member of the SCAQMD Airports Study Working Group, representing community interests, I can attest that the following was clearly established:
 - The Airports Study is not designed to quantify acute or chronic health risks.
 - The Airports Study is not designed to address odors associated with jet and turbo-prop emissions.

I understand that in order to address the health risks and odor concerns of the impacted communities surrounding SMO, it would be appropriate to perform a modeling study/simulation which would include a robust set of data relating to aircraft field operations. I continue to communicate with Dr. Phillip Fine, the lead SCAQMD scientist for the referenced Airports Study.

2. Dr. Fine suggested to Dr. Matthew Lakin from the U.S. EPA that he contact me to assist with monitor locations for their lead study. Although it is certainly important to investigate lead impacts from piston engine aircraft, the community has been most interested in having the obvious jet/turboprop emissions addressed. The jet emission odors are unique, apparent, and very disconcerting.

Regarding the FAA's jurisdiction on air quality studies, there are three points I would like to draw to your attention.

1. When the City of Santa Monica and the FAA entered into the Santa Monica Airport Agreement in 1984, total annual jet operations were about 1,000. They grew to over 18,000 in 20 years. To accommodate more jets, there have been physical changes such as runway enhancements and new fixed based operations at SMO. Would that not support the contention that these changes did indeed "expand or reconfigure capacity" therefore, subjecting SMO to scrutiny under NEPA?
2. It is my understanding that the FAA granted a March 7, 1991 communication from the City of Santa Monica requesting a departure procedure change that required time separation from Los Angeles International Airport (LAX) departures. The result was increased frequency and duration of air traffic control delays which keep SMO jets idling for longer periods. This greatly increased the time that odors of jet emissions permeate the downwind communities adjacent to SMO. Can the FAA now return to the previous departure procedure; thereby offering some immediate relief to SMO neighbors from the jet/turboprop emissions?
3. To underscore the community concerns, I direct you to a Department of Transportation/FAA interdepartmental memo dated 5-26-89 and filed 12-10-90, [copy attached](#), which states under section d. Critical Jet Blast Areas, "In addition to safeguarding the ILS guidance information from surface traffic interference, the system must be protected from long term deterioration resulting from accumulation of jet engine exhaust residue on the radiation and monitor antennas. Since prolonged exposure to jet fumes is dangerous to the health of personnel working on the systems, it is also necessary to minimize this deleterious effect. Therefore, no jet aircraft shall be permitted to park or hold within 300 feet of the ILS equipment shelters, the localizer antenna array, or the glide slope antennas. This distance is measured from the individual ILS component to the nearest aircraft engine, with the latter's jet exhaust directed to the component." It is documented that homes are situated less than 300 feet from both ends of SMO's runway.

I very much appreciate the comment in Ms. LoBue's reply letter that the FAA would be glad to cooperate with efforts by the City of Santa Monica, the EPA or the local or regional air quality regulatory authorities to pursue studies regarding potential health and environmental impacts from aircraft operations to the community near SMO. As mentioned above, a robust set of data relating to aircraft field operations would be an appropriate first step in performing a modeling study/simulation to address the health risks and odor concerns of the impacted communities surrounding SMO. Having the FAA's assistance in gathering this data would be very helpful.

Thank you and I look forward to your reply.

Martin Rubin

Director,
Concerned Residents Against Airport Pollution

c: Senator Barbara Boxer
Congresswoman Jane Harman
Congressman Henry Waxman
CA Assemblyman Ted Lieu
Los Angeles Councilman Bill Rosendahl
Nancy LoBue, Acting Assistant Administrator for Policy, Planning, and Environment
Dr. Phillip Fine
Dr. Mark Witten