



City of  
**Santa Monica**®

**Rod Gould**  
*City Manager*

Office of the City Manager  
1685 Main Street  
PO Box 2200  
Santa Monica, CA 90407-2200

August 19, 2010

William C. Withycombe  
Regional Administrator, AWP-1  
P.O. Box 92007  
Los Angeles, California 90009

Dear Mr. Withycombe:

Thank you for your letter of August 6, 2010. I appreciate your assurance that the FAA will review and analyze the data compiled during the test of the proposed change to instrument flight rules (IFR) departure procedures for piston-powered aircraft departing Santa Monica Airport.

However, the issue is not just review of past data. Rather, from the City's perspective and this is shared by the City's residents and other public institutions, the issue is that the FAA should make no decision to embark on a permanent departure change of the type just tested until such time as there has been a thorough understanding of all of its potential impacts. In other words, the FAA should not proceed further until a complete Environmental Impact Statement is prepared and analyzed by all affected parties. The National Environmental Policy Act requires nothing less. As with all potentially significant environmental projects, it is imperative that everyone involved be fully informed of all of this project's impacts before a final decision is made and most certainly before the tested project is allowed to become permanent.

I strenuously urge you to also fully take into account the many complaints and community concerns as part of that process. As you know, the City also forwarded to your office the extensive citizen complaints that City staff received during the course of the test. Additionally, many community members and organizations have expressed to our staff, the Airport Commission and the City Council serious doubts about both the methodology used to analyze the data as well as the findings of the interim report. Those concerns should also be fully addressed in your analysis.

Beyond your operational analysis of the proposed IFR departure procedures are the fundamental environmental issues that, along with safety, have been at the heart of the community's concerns. We continue to receive extensive communications from residents, community groups and local institutions (such as the schools) regarding noise and pollution as well as safety concerns associated with the proposed routing.

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The overwhelming negative operational impact reported by the community in the area affected by the test, as well as this ongoing level of concern by such a large number of persons and organizations, make it imperative that the FAA conduct a full and complete a full environmental impact study prior to any consideration of a permanent change to piston-powered instrument flight rules departure procedures at Santa Monica Airport. Equally essential, as I noted in my previous letter, is that the City and its residents be allowed to participate in an open and transparent process and be given the opportunity to review and comment on any proposed change in IFR departure procedures before it is implemented.

A recurring complaint by citizens is that they have felt completely disenfranchised by the FAA from the review and decision making process, even though they are the ones most directly affected by the action of the FAA. It furthers the highest public interest for public agencies and bodies to have a transparent and inclusive process, particularly in matters as deeply felt as this.

Could you please clarify the FAA's intention as regards a full Environmental Impact Statement and including public process if it chooses to consider a permanent change to IFR departure procedures for piston-powered aircraft departing Santa Monica Airport? Thank you kindly in advance.

If you have any questions or desire additional clarification regarding the City of Santa Monica's position relative to this matter, please don't hesitate to contact me at (310) 458-8301, or our Airport Director, Bob Trimborn at (310) 458-8772.

Sincerely,



Rod Gould  
City Manager

cc: Mayor and City Council  
Airport Commission  
Honorable Henry Waxman  
Honorable Jane Harman  
Marsha Moutrie, City Attorney  
Bob Trimborn, Airport Director