



October 5, 1988

Mr. Raymond F. Bladine
Deputy City Manager
City of Phoenix
125 East Washington St.
Phoenix, AZ 85004-2342

Dear Mr. Bladine:

The Phoenix Planning Department was kind enough to forward a copy of the revised response to the 28 recommendations of the Ad Hoc Task Force on Scottsdale Airport. While the Phoenix Aviation Department notes it can now support 19 of the 28 recommendations, many of their changes include qualifying statements that carry the same message as their first response. Specifically, the imposition of operating restrictions at airports must be approached with constraint, good judgement, and an awareness of the impact such actions will have on safety and commerce.

Only Recommendation No. 3 represents a complete reversal. As you will see from Scottsdale's response to that item, the calm wind runway change does not seem to be in the best interests of the citizens of Northeast Phoenix. No matter which way aircraft turn after departing Runway 21, they will overfly the City of Phoenix. It is interesting to note that the City of Phoenix specifically requested Runway 03 be designated the calm wind runway on September 29, 1977.

Following are individual responses to the 28 recommendations:

1. **RECOMMEND** ... "that a standard left-hand turn be made by all aircraft that take off from Runway 21 (to the southwest)."

PHOENIX AVIATION DEPARTMENT RESPONSE: "This recommendation to re-examine a left hand turn on Runway 21 can be supported although a simple shifting of overflights from one impacted population to another is not always a solution to the problem. Whenever possible, aircraft should depart off runways in the direction where less people would be impacted by aircraft noise or overflights. This item should be re-examined in light of current land use patterns. The Federal Aviation Administration will have to coordinate and approve any necessary airspace changes.

THE CITY OF SCOTTSDALE concurs with the comments of the Phoenix Aviation Department to the extent that shifting overflights is not always a solution to the problem. The recommendation further states that whenever possible, aircraft should depart off runways in the direction where fewer people would be impacted by aircraft noise or overflights. This is, in fact, the case because Runway 03 is the calm wind runway. Additionally, the majority of the aircraft that depart to the southwest overfly the vacant land west of Scottsdale, north of Thunderbird. The Phoenix response states that, "this item should be re-examined in light of current land use patterns." Inasmuch as there is so much land west of Scottsdale Road that is vacant, the pattern should remain as is.

In any event, as stated in Scottsdale's original response dated August 10, this item cannot be pursued for several reasons--not the least of which is the conflict with Sky Harbor arrivals and the fact that three previous reviews determined that the existing patterns should be left as is.

2. **RECOMMEND** ... "that a non-standard right-hand turn for Runway 3 (landing from the southwest) be investigated."

PHOENIX AVIATION DEPARTMENT RESPONSE: "This recommendation can be supported although a simple shifting of overflights from one impacted population to another is not always a solution to the problem. This item should be re-examined in light of current land use patterns. The Federal Aviation Administration will have to coordinate and approve any necessary airspace changes.

THE CITY OF SCOTTSDALE RESPONSE: Please refer to Item One.

3. **RECOMMEND** ... "that if and when, as recommended, a standard left-hand turn is implemented on Runway 21 and a standard right-hand turn on Runway 3, the 'calm wind runway' designation should be changed from Runway 3 to Runway 21."

PHOENIX AVIATION DEPARTMENT RESPONSE: "This recommendation can be supported although it would have the affect of placing practically all operations over Scottsdale solely because the airport belongs to that City. Regardless, these procedures would have to be coordinated with and approved by the FAA.

THE CITY OF SCOTTSDALE concurs with the Phoenix Aviation Department to the extent that these procedures would have to be coordinated with and approved by the FAA. However, Scottsdale does not concur with the recommendation itself. Over the past five years, three different tests were undertaken which studied the concept of designating Runway 21 as the calm wind runway. In all three, northeast Phoenix residents objected to the realignment. No matter which way departing aircraft turn, the departure end of Runway 21 is over the City of Phoenix. To have as many airplanes as possible depart over Phoenix when they could otherwise go over the desert makes no sense at all.

4. **RECOMMEND** ... "that Touch-and-Go, Stop-and-Go, and Low-Approach operations be restricted to: a) 8 a.m. to 6 p.m. Monday through Friday and, b) 10 a.m. to 5 p.m. Saturdays and, c) prohibited on Sundays and holidays; and further recommend that the City of Scottsdale take necessary steps to achieve the complete relocation of Touch-and-Go operations to remote desert airstrips with appropriate support facilities."

PHOENIX AVIATION DEPARTMENT RESPONSE: "This recommendation can be supported to the extent that training activities are restricted to the hours of 6 a.m. to 9 p.m. daily which is in line with the current Scottsdale ordinance. Complete relocation of training activities to remote airstrips would be too restrictive. Nighttime training is a FAA requirement and must be scheduled one hour after sunset and one hour before sunrise."

THE CITY OF SCOTTSDALE concurs with the comments of the Phoenix Aviation Department. A nighttime curfew banning touch and go activities from 9:30 p.m. to 6 a.m. is already in place. It may be interesting to note that Scottsdale Airport is the only airport in the Valley that has a restriction on touch and go activity.

5. **RECOMMEND** ... "that 'restricted aircraft', based on the 1985 Scottsdale Airport Master Plan and Noise Compatibility Program for Scottsdale Municipal Airport, (Part 150 Study) 'ANCLUC studies' excessive noise criteria, shall be required to land on Runway 21 (from the northeast) and depart on Runway 3 (to the northeast); i.e., 'head-to-head' operations for such flights shall be implemented if aircraft and ground technological limitations do not preclude implementation. Non-restricted aircraft shall go 'head-to-head' if aircraft and ground technological limitations do not preclude implementation."

PHOENIX AVIATION DEPARTMENT RESPONSE: "This recommendation is supported to the extent stipulated in Scottsdale Airport's Part 150 Master Plan report in which specified "restricted aircraft" are to follow the policy. Scottsdale should pursue the study's recommendation. "Head-to-head" operations for all other (non-restricted) aircraft would be difficult for the air traffic controllers and pilots and would severely limit airport capacity."

THE CITY OF SCOTTSDALE concurs with the comments of the Phoenix Aviation Department. This recommendation was made in the Part 150 Study. FAA's response to this item was that they would recommend approval of such a measure if BRITE radar were in place at the airport. BRITE radar will be installed following completion of the new air traffic control tower. This procedure, as recommended by the Part 150 Study, will be implemented at that time.

6. **RECOMMEND** ... "that the Scottsdale Airport, with the construction of the new tower, installation of the microwave landing system, and installation of an electronic noise monitoring system, establish definitive and strict guidelines that require as many takeoffs to the northeast and landings to the southwest as possible to minimize approaches and takeoffs over residential areas and schools in both Phoenix and Scottsdale."

PHOENIX AVIATION DEPARTMENT RESPONSE: "This recommendation mixes a variety of items addressed elsewhere in the report. These restrictions would require the airport to run "head-to-head" operations on all aircraft. Please refer to the responses to recommendations 5, 9, and 14, and the exceptions cited."

THE CITY OF SCOTTSDALE concurs with the comments of the Phoenix Aviation Department. A microwave landing system (MLS) is scheduled for installation at Scottsdale by the FAA. This will aid in minimizing noise impacts. The concept of requiring as many take offs as possible to the northeast is already in place, since runway 3 is the calm wind runway.

7. **RECOMMEND** ... "that Scottsdale Municipal Airport install noise-suppression barriers and noise-suppression landscaping next to the road at the southwest end of its runway."

PHOENIX AVIATION DEPARTMENT RESPONSE: "This recommendation can be supported if cost effective means for reducing actual noise exposure is achieved. This method for noise reduction has limited value at most airports. If it can be effective at Scottsdale, then it should be included in a noise abatement program."

THE CITY OF SCOTTSDALE concurs with the comments of the Phoenix Aviation Department. This recommendation will be pursued.

8. **RECOMMEND** ... "that a nighttime curfew be established from 10 p.m. a.m. daily."

PHOENIX AVIATION DEPARTMENT RESPONSE: "A full nighttime curfew would impose a significant restriction on the economic viability of aviation in the Phoenix metropolitan area. Scottsdale Airport, as well as City of Phoenix Airports and others in the metropolitan area, could be harmed by such a restriction."

THE CITY OF SCOTTSDALE concurs with the comments of the Phoenix Aviation Department. This action was considered when the Environmental Impact Study was conducted in the late '70s and when the Part 150 Study was conducted in 1985 and was rejected.

9. **RECOMMEND** ... "that in addition to establishing a full or limited nighttime curfew, as proposed, Scottsdale Airport shall implement a policy whereby all planes landing or taking off after 6 p.m. will try to use the runway that will create less noise impact on Phoenix residents."

PHOENIX AVIATION DEPARTMENT RESPONSE: "Although the Task Force has not clearly spelled out what they are recommending in this item, a limited nighttime curfew can be supported with restricted noisier jets landing on Runway 21 and departing on Runway 3 as indicated in the response to recommendation no. 5.

THE CITY OF SCOTTSDALE concurs with the comments of the Phoenix Aviation Department. This recommendation is already in place. Runway 3 is designated as the calm wind runway which has the effect of directing as much traffic as possible to the northeast towards the McDowell Mountains.

10. **RECOMMEND** ... "that owners of all Stage 1 and 2 aircraft based at Scottsdale Airport be given six months to modify their aircraft with a Hush Kit, or Part 36 compliant engine(s), if commercially available. If the kit or engine is available and the owner elects not to purchase the kit or engine, they shall not be allowed to use Scottsdale Airport."

PHOENIX AVIATION DEPARTMENT RESPONSE: "This recommendation is confusing since Stage 2 noise certificated aircraft are compliant with existing Federal noise regulations Part 36. For the most part, hush kits or quiet engines are unavailable for the types of aircraft applicable to this recommendation. Therefore, it would be difficult to support because it places an excessive economic burden on airport users and could be considered discriminatory by the Federal government. Many aircraft manufacturers have developed flying techniques that can help pilots fly noisier business jets in a quieter manner. These quiet flying techniques should be instituted whenever possible in lieu of banning these jets completely.

THE CITY OF SCOTTSDALE concurs with the comments of the Phoenix Aviation Department.

11. **RECOMMEND** ... "that owners of aircraft types/models that do not or cannot meet the new airport noise limits, be notified in advance (nationwide) that they will be subject to possible civil and administrative remedies and/or exclusion from the airport for noise violations."

PHOENIX AVIATION DEPARTMENT RESPONSE: "This recommendation, without the imposition of specific noise limits, can be supported. Proper notification to pilots of airport noise restrictions that are instituted is a valid endeavor.

THE CITY OF SCOTTSDALE RESPONSE: The Phoenix Aviation Department notes their support of this recommendation as long as it does not carry with it the imposition of specific noise limits. Since this recommendation calls for noise limits, it cannot be supported by either the Phoenix Aviation Department or the City of Scottsdale.

12. **RECOMMEND** ... "that the Scottsdale Airport aggressively publish educational information and regulations regarding noise abatement procedures at the airport through normal aviation journals and manuals."

PHOENIX AVIATION DEPARTMENT RESPONSE: "Any effective means for promoting air safety and noise mitigation with pilots is commendable and these efforts are supported."

THE CITY OF SCOTTSDALE concurs with the comments of the Phoenix Aviation Department.

13. **RECOMMEND** ... "that the City of Scottsdale establish reasonable maximum aircraft noise limits to reduce aircraft noise in the surrounding residential community with both General Airport (maximum decibel) and individual aircraft type, performance-based single-event noise exposure level (SENEL) limits be set and enforced."

PHOENIX AVIATION DEPARTMENT RESPONSE: "There are approximately 3,200 airports which currently meet criteria which would allow for Federal airport development funding. Of those 3,200 airports, only 17 have instituted a use restriction based upon single event noise levels. Ten out of seventeen of those airports are located in California where State legislation on airport noise limits exists. The implementation of single event noise limits would be very expensive to operate since it would require a permanent fixed noise monitoring system and additional staffing to administer the program."

THE CITY OF SCOTTSDALE concurs with the comments of the Phoenix Aviation Department.

14. **RECOMMEND** ... "that a computerized sound monitoring system, including noise monitoring stations that completely surround the airport, be installed as soon as possible, and that the information gathered be provided to appropriate agencies/committees to initiate correction action."

PHOENIX AVIATION DEPARTMENT RESPONSE: "A portable computerized monitoring system can be utilized to provide the requested noise data around the Scottsdale Airport. Such a system can provide information at a reasonable cost. Use of a portable noise monitoring program would also provide the flexibility to utilize equipment for monitoring of various sites upon requests of community residents."

THE CITY OF SCOTTSDALE concurs with the comments of the Phoenix Aviation Department. Noise monitoring equipment is carried in the Airport's Five Year Capital Improvement Program. This recommendation, as modified by the Phoenix Aviation Department, will receive further consideration.

15. **RECOMMEND** ... "that all aircraft based at or operating from Scottsdale Airport be required to have a Mode C Altitude-Reporting Transponder, which provides controllers with such flight data as aircraft position and altitude."

PHOENIX AVIATION DEPARTMENT RESPONSE: "This item lies outside the purview of airport operations since it is Federally pre-empted. This is currently being addressed in the Federal rules making process."

THE CITY OF SCOTTSDALE concurs with the comments of the Phoenix Aviation Department.

16. **RECOMMEND** ... "that existing and future Scottsdale City ordinances, to impose fines and/or imprisonment for violations of aircraft-related ordinances with escalating penalties for multiple offenders, be strictly enforced."

PHOENIX AVIATION DEPARTMENT RESPONSE: "This can be supported to the extent that any offenders of Scottsdale City ordinances should be treated in a just and equitable manner."

THE CITY OF SCOTTSDALE RESPONSE: As noted in the Phoenix Aviation Department response date July 7, this recommendation goes far beyond any reasonable means for airport noise reduction. Nevertheless, the City of Scottsdale agrees that offenders of Scottsdale City Ordinances should be treated in a just and equitable manner.

17. **RECOMMEND** ... "that anyone who is found guilty of three noise violations in three years, be required to take his aircraft and leave the airport for not less than one year."

PHOENIX AVIATION DEPARTMENT RESPONSE: "If the City of Scottsdale imposes rules or ordinances, then any violators of these rules or ordinances should be treated in a just and equitable manner."

THE CITY OF SCOTTSDALE concurs with the comments of the Phoenix Aviation Department.

18. **RECOMMEND** ... "that a noise abatement program and one full-time Noise Abatement Officer position, with additional evening staff, be established at Scottsdale Airport to monitor violations around the clock and to ensure pilot education in these areas."

PHOENIX AVIATION DEPARTMENT RESPONSE: "Experience with Sky Harbor Airport would indicate that a half-time position with flexible work hours could fulfill Scottsdale Airport's requirements. Therefore, additional staffing can be supported to this extent. The airport can always increase staffing hours if shown to be needed."

THE CITY OF SCOTTSDALE has had a noise abatement program in force at the airport since 1978. It is reviewed and updated frequently. The City of Scottsdale does not feel additional staff would have any effect on reducing noise. Programs currently in effect at the airport are believed to be thorough and effective.

RECOMMEND ... "that an Administrative Hearing Board, including Phoenix representation, be set up to adjudicate violations at Scottsdale Airport.

PHOENIX AVIATION DEPARTMENT RESPONSE: "A court system already exists to adjudicate violations of ordinances and laws. Also, the Scottsdale Airport has a Noise Abatement Committee, including a representative for Phoenix which monitors noise abatement programs. This committee seems adequate for this task.

THE CITY OF SCOTTSDALE concurs with the comments of the Phoenix Aviation Department.

RECOMMEND ... "that the City of Scottsdale maintain its airport current status and not seek a full or limited Part 139 Permit."

PHOENIX AVIATION DEPARTMENT RESPONSE: "There is no direct relationship between the FAA Part 139 certificate and aircraft noise. Some aircraft operating under Part 139 are quieter than aircraft currently using airport.

THE CITY OF SCOTTSDALE concurs with the comments of the Phoenix Aviation Department.

21. **RECOMMEND** ... "that the City Council of Scottsdale reaffirm the 60,000 pound gross weight limit on aircraft using Scottsdale Airport and that limit be strictly enforced."

PHOENIX AVIATION DEPARTMENT RESPONSE: "Although this restriction is supported, weight factors of aircraft are not necessarily correlated with noise levels produced by aircraft. Some heavier aircraft over 60,000 pounds are quieter than lighter aircraft that are able to utilize the airport under Scottsdale's current weight restriction.

THE CITY OF SCOTTSDALE concurs with the comments of the Phoenix Aviation Department as they relate to comparison to aircraft weight and noise. There is no comparison.

22. **RECOMMEND** ... "that the Arizona Department of Transportation, at the urging of Phoenix and Scottsdale City governments, conduct a study to determine how much liability and property damage insurance is needed by Individual owners and require these amounts, and that the Cities of Phoenix and Scottsdale support State legislation imposing mandatory aircraft insurance requirements.

PHOENIX AVIATION DEPARTMENT RESPONSE: "Currently, ADOT is studying this matter to determine requirements for liability and property damage insurance. This study would examine the need for as well as the amount of insurance to be required. It is anticipated that ADOT's recommendation would be supported.

THE CITY OF SCOTTSDALE concurs with the comments of the Phoenix Aviation Department.

23. **RECOMMEND** ... "that a copy of all aircraft owners' liability and property damage insurance be presented to the City of Scottsdale at time of tiedown and/or where hangar fees are paid."

PHOENIX AVIATION DEPARTMENT RESPONSE: "Reference above No. 22 recommendation. It is anticipated that the State's position on the means to obtain insurance verification would be supported.

THE CITY OF SCOTTSDALE concurs with the comments of the Phoenix Aviation Department.

RECOMMEND ... "that the Maricopa Association of Governments establish a permanent joint citizens' committee, made up of representatives from the Cities of Phoenix and Scottsdale, to monitor compliance with and update Recommendations 1 through 28."

PHOENIX AVIATION DEPARTMENT RESPONSE: "Scottsdale Airport already has a Noise Abatement Committee which includes a representative from Phoenix. This committee seems adequate to monitor noise.

THE CITY OF SCOTTSDALE concurs with the comments of the Phoenix Aviation Department.

RECOMMEND ... "that a written legal agreement be entered into by Scottsdale and Phoenix that would make all of these recommendations legally binding, and subject to penalties upon violation."

PHOENIX AVIATION DEPARTMENT RESPONSE: "A Letter of Agreement can establish a mutually agreed upon noise abatement programs between the two municipalities. It is questionable whether or not such an agreement can be legally binding due to Federal pre-emption regulations and airport proprietary rights.

THE CITY OF SCOTTSDALE concurs with the comments of the Phoenix Aviation Department.

27. **RECOMMEND** ... "that the City of Phoenix Planning Commission consider establishing a 'noise overlay district' upon existing zoning regulations which would require additional sound insulation and other noise attenuation measures for new development within a 65 dBA+ noise contour."

PHOENIX AVIATION DEPARTMENT RESPONSE: "The nationally accepted methodology for regulation of compatible land use planning and zoning utilizes a standard called the Day-Night Sound Level (DNL) which is expressed in decibels and is commonly referred to as Ldn. The noise overlay concept is supportable for noise impacted areas above 65 Ldn, not 65 dBA. Additional technical studies would be required to determine the need for such a program in Phoenix. Sound insulation programs could prove to be ineffective in the Arizona climate with doors and windows open during many months of the year.

THE CITY OF SCOTTSDALE concurs with the comments of the Phoenix Aviation Department.

RECOMMEND ... "that the Mayor and City Council of Phoenix vigorously explore all potential legal remedies. It is further recommended that, following the exploration of potential legal remedies, the Mayor and City Council appoint a Negotiations Task Force to pursue the implementation of this Task Force's recommendations with the City of Scottsdale.

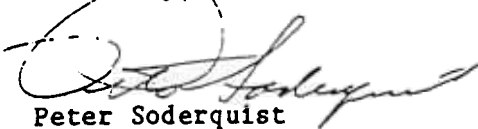
"It is further recommended that if a satisfactory agreement with Scottsdale that achieves the underlying purpose of the Task Force's recommendations then cannot be reached, the Mayor and City Council should take whatever legal measures are necessary to achieve those objectives and preserve the quality of life of Phoenix residents."

PHOENIX AVIATION DEPARTMENT RESPONSE: "A thorough analysis of the scope and seriousness of any potential remedial action is necessary to assure that these actions are fair and reasonable as they relate to specifically defined problems.

THE CITY OF SCOTTSDALE concurs with the comments of the Phoenix Aviation Department.

If you would like additional information or require clarification of some of our responses, please contact me. Again, it is a pleasure to work with you to address the mutual issues of our Cities.

Sincerely,



Peter Soderquist
Airport Director
Scottsdale Municipal Airport