

UNITED STATES DEPARTMENT OF TRANSPORTATION  
FEDERAL AVIATION ADMINISTRATION

DOCKET NO. FAA-2015-0783

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NOTICE OF PROPOSED RULEMAKING  
STANDARD INSTRUMENT APPROACH PROCEDURES, AND TAKEOFF  
MINIMUMS AND OBSTACLE DEPARTURE PROCEDURES;  
MISCELLANEOUS AMENDMENTS

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**COMMENTS OF  
THE CALIFORNIA AIRPORTS COUNCIL**

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May 28, 2015

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Docket Operations, M-30  
U.S. Department of Transportation  
1200 New Jersey Avenue SE.  
Room W12-140  
West Building Ground Floor  
Washington, DC 20590-0001

**RE: Notice of Proposed Rulemaking Eliminating Standard Instrument Approach Procedures at Specified Airports, Docket Number FAA-2015-0783**

On behalf of the California Airports Council (CAC), we write to inform you of our strong concern regarding the Notice of Proposed Rulemaking eliminating ground-based non-directional beacon (NDB) and very high frequency, omnidirectional radio (VOR) range Standard Instrument Approach Procedures (SIAPs) at specific California airports.

It is the intent of the FAA to decrease the volume of SIAPs within the national airspace to reduce the complexity and cost of operations as new technologies for area navigation (RNAV) instrument approach procedures are introduced. In many cases, airports will face minimal impacts with the removal of SIAPs calculated by the FAA's criteria (79 FR 36576). However, there are airports that will suffer significantly adverse operational and cost-prohibitive impacts on aircraft operators, military aircraft, flight schools, transient aircraft operators, and fixed based operators.

The removal of VOR instrument approach procedures would require aircraft, without modern equipment, to commute further distances to airports with accommodating approaches. The added commute would have a significant - possibly prohibitive - impact on flight training costs. For example at the Arcata-Eureka Airport in Northern California, there will only be two VOR IAPs available in the county if their runway 14 VOR IAP is removed. The closest VORs are at the Crescent City and Redding Airports. This could increase flight costs \$200-\$300 per flight to practice a different IAP. Further, in reviewing the list of VOR approaches to be removed, a majority of the VOR approaches in the Southern California basin are listed.

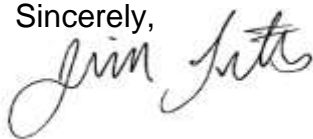
Many private aircraft operators share the flight school's sentiment as they also do not have advanced navigational equipment installed in their aircraft. Private aircraft operators are concerned for two notable reasons. First, private operators would incur additional operating costs to maintain currency by having to fly further to practice instrument approach procedures capable by the equipment in their aircraft. Second, and more significant, is the concern for the accessibility airport to aircraft operations without GPS equipment during periods of instrument meteorological conditions (IMC) if the certain approaches are unavailable.

On the topic of accessibility, there would be a significant adverse effect on Navy/Marine Corps tactical jet aircraft and the businesses that serve these entities. For example, at the Long Beach Airport, the only compatible instrument approach procedure for N/MC tactical jets is the runway 30 VOR/Tactical Air Navigation System (TACAN) which has been proposed for elimination. VMFAT-101, in addition to other squadrons, would no longer be able to utilize Long Beach without the SIAP. Other airports fear due to certain IAP removals, they will have to purchase a TACAN to support military and emergency flight services.

This is a time of transition for many aviation businesses and private operators as the national air space system moves to NexGen technologies. We support the efforts of the FAA to monitor and assess the redundancy of available technologies but we strongly suggest that the FAA provide an opportunity for airports to retain certain IAPs if removal poses significant impacts on businesses and operators. We want to avoid impacts that will affect the availability of airports and flight operations, both of which are consequences that have incalculable costs.

We thank you for the opportunity to submit our comments on this rulemaking. We strongly urge you to thoroughly review the effects of the proposed SIAP eliminations and provide airports an opportunity to continue VOR IAPs through an application process.

Sincerely,

A handwritten signature in cursive script that reads "Jim Lites".

Jim Lites  
Executive Director