

-Submitted Via Email-

From: Richard A. Ziskind RICHARD.A.ZISKIND@saic.com
To: Sara Hassert
Subject: Comment on FAA Action McCarran International Airport
Date: Tue 2/28/2006 2:00 PM

Please accept the attached comments for the docket.

Attachment:

Comments on FAA plan for right turn on eastbound flights from Las Vegas Mccarran International Airport

RICHARD ZISKIND PHD, PRESIDENT CANYON GATE HOMEOWNERS ASSOCIATION

Based upon reading of the draft environmental assessment, I offer the following comments on behalf of the board of directors of the Canyon Gate Homeowners Association:

- 1. Because of the profound environmental impact to a large metropolitan population, a conclusion of no significant impact (FONSI) would be inappropriate. The population that would now be exposed to additional aircraft noise is enormous. Therefore, on that impact alone, an EIS should be required. Furthermore, the EIS should consider a more comprehensive analysis of the current #3 alternative modification to the proposed action.

S2-1

- 2. The current analysis of alternative #3 (eastbound departure flying 10 miles west of the airport before turning east) was dismissed in total primarily because the FAA requires all analysis to conform to a 40:1 distance-to-climb ratio. This limits the distance that can be traveled west upon takeoff. However since it should be noted that the GPS aided navigation capability is an enabler of the right hand turn; it should also be appreciated that advances in aircraft climb capability should enable an innovative approach which suggests an augmentation to alternative #3 should be considered.

S2-2

Specifically, aircraft should be differentiated according to their thrust and climb capability in order to expand the right turn distance further west. Safety considerations drive the 40:1 rule however this rule places all aircraft in the category of the least capable commercial equipment. It is well known that most general aviation and much of the commercial aviation inventory considerably outperforms that requirement.

Therefore a revised alternative #3 would be to determine what set of aircraft could fly to 10 miles west before turning and what set turn according to the 40:1 rule. The resultant analysis is likely to show that a considerable reduction could be made to the 30% estimate of flights that would turn right at approximately 6 miles west. In addition, this approach could also enable left turns to be treated similarly resulting in a decrease in overall population impact.

Conclusions: an EIS should be developed under the present circumstance; or analysis of a revised alternative #3 should be conducted and, dependent upon the significance of the reduction of the percent of aircraft projected to make a right turn at 6 miles, it may be possible to revise the draft ea and reach a conclusion of FONSI.

Dr. Ziskind is a licensed professional engineer, has published on noise propagation in the atmosphere, and was responsible for staff performing on relevant FAA contracts.