

RESPONSE TO WRITTEN COMMENTS ON THE DRAFT HILTON HEAD ISLAND AIRPORT FAR PART 150 STUDY

1. The FAR Part 150 study did not recommend new noise abatement routes, thus, no flight corridor changes have been made as a result of the study. The analysis indicated that any modifications to the flight corridors would just result in the shifting of noise from one community to another. The study evaluated the existing voluntary noise abatement corridors and found them to be appropriate for noise abatement. The issue does not seem to be the voluntary procedures themselves but the aircraft (from time to time) not following the proposed procedures. Not following procedures can be caused by weather or other air traffic in the area but it can also be caused by the lack of knowledge of what the procedures are. In that regard, recommendation 5 involves the preparation of a Noise Compatibility Plan Brochure that identifies the overall noise abatement program at the Airport. This brochure would be made available to all who fly into or out of the Airport, those that control the flight of aircraft at the airport, and those who plan land uses around the airport and to the general public. The intent of this recommendation is to inform, educate, and encourage pilots to adhere to the voluntary noise abatement routes to the greatest extent possible.

2. Aircraft (especially light general aviation aircraft) need to arrive and depart into the wind. Thus, if the wind is coming from the north, aircraft take off over the church and if it is coming from the south, arrivals would come over the church. Although some air carrier aircraft can operate with a slight tail wind, it is not considered to be a safe operation for light general aviation aircraft. The Study recommends offering sound insulation for the St. James Baptist Church to reduce the impact of aircraft noise levels inside the church.

It is recommended that aircraft follow the noise abatement procedures. Not following procedures can be caused by weather or other air traffic in the area but it can also be caused by the lack of knowledge of what the procedures are. In that regard, recommendation 5 involves the preparation of a Noise Compatibility Plan Brochure that identifies the overall noise abatement program at the Airport. This brochure would be made available to all who fly into or out of the Airport, those that control the flight of aircraft at the airport, and those who plan land uses around the airport and to the general public. The intent of this recommendation is to inform, educate, and encourage pilots to adhere to the voluntary noise abatement routes to the greatest extent possible.

3. Comment noted. No runway extensions are proposed in the FAR Part 150 Study.

4. Comment noted.

5. We acknowledge that safety is a concern of residents; however the FAR Part 150 Study process evaluates procedures that are intended to reduce noise exposure on residential and other noise sensitive uses in proximity to the Airport. Establishing mandatory flight paths compromises the safe and efficient management of the airspace will not be accepted or approved by the FAA. Recommendations are included in the FAR Part 150 Study that are intended to improve the adherence of the voluntary noise abatement procedures including the development of a brochure to inform, educate, and encourage pilots to adhere to the current voluntary noise abatement routes to the greatest extent possible.

The expansion of the 55 DNL in the future is due to the projected increase in aircraft operations forecast to occur in the future. Recommendations have been included in the FAR Part 150 Study that are intended to reduce noise levels to the greatest extent possible on residents surrounding the airport. This includes providing information to pilots to show where noise sensitive areas are located and emphasize the importance of following noise abatement procedures. The Airport cannot restrict the number of aircraft that operate at the facility. They must, by law, allow them to land. The intent of using the 65, 60 and 55 DNL for land planning purposes is to reduce future noise sensitive development below the close-in flight corridors or, if noise sensitive development is allowed, to provide proper notification of the existence of aircraft overflight and noise.

6. The FAR Part 150 Study recommends the continued use of the current voluntary noise abatement flight tracks that place aircraft over water and away from Indigo run (including the tennis courts and pool area) to the greatest extent possible. Recommendations are included in the FAR Part 150 Study that are intended to improve the adherence of the voluntary noise abatement procedures including the development of a brochure to inform, educate, and encourage pilots to adhere to the current voluntary noise abatement routes to the greatest extent possible.

7. Comment Noted

8. The "survey" that the commenter refers to is assumed to be the noise monitoring effort. The noise monitoring took place on April 12, 2006 at the Suningdale Park/Pool in the Indigo Run Plantation. The specific monitoring location within Indigo Run was not determined by the Airport or the consultant, it was determined utilizing public input at the March 13 Community Relations Committee Meeting.

9. The first question raised by the commenter involved restrictions on aircraft using the airport (stopping the "old" noisier planes from using the facility). As stated on Page 8-6 of the FAR Part 150 Study, as a result of the Airport Noise and Capacity Act of 1990 (ANCA), no new use-restrictions at Airport facilities can be implemented without a thorough demonstration of need, a detailed analysis of the restriction and its consequences, and approval by the FAA. Such restrictions could include partial or full curfews, restrictions in use based on the certified noise level of an aircraft, capacity limits on the number of aircraft that can use the facility, monetary fines or other similar measures. If any form of use restriction is proposed, a FAR Part 161 process (entitled

Notice and Approval of Airport Noise and Access Restrictions) would need to be accomplished. The level of noise exposure surrounding HXD does not warrant recommending access restrictions or curfews and any restriction, if proposed, would not be approved by the FAA.

In order for the Airport to operate, it cannot “stop all overflights by all airplanes.” What the Airport can do and has done is to establish voluntary noise abatement procedures that, when followed, would go, as the commenter suggested, to the greatest extent over water. The commenter also implies making the voluntary procedures mandatory. Requiring that mandatory flight paths be followed compromises the safe and efficient management of the airspace will not be accepted or approved by the FAA. Recommendations are included in the FAR Part 150 Study that are intended to improve the adherence of the voluntary noise abatement procedures including the development of a brochure to inform, educate, and encourage pilots to adhere to the current voluntary noise abatement routes to the greatest extent possible.

The last comment suggested the Airport, airlines and private jet owners promote newer modeled aircraft. The study concurs. The newer model jet and propeller aircraft are often quieter than older aircraft. This transition to newer aircraft will occur as older models reach their useful life and are replaced by the newer fleet.

10. The maps included in Chapter 5 represent the primary flight corridors into and out from the airport. It is recognized that aircraft will fly outside these corridors for various reasons including air traffic, weather and pilot discretion. We acknowledge that safety is a concern of residents; however the FAR Part 150 Study process evaluates procedures that are intended to reduce noise exposure on residential and other noise sensitive uses in proximity to the Airport.

Establishing mandatory flight paths compromises the safe and efficient management of the airspace will not be accepted or approved by the FAA. Recommendations are included in the FAR Part 150 Study that are intended to improve the adherence of the voluntary noise abatement procedures including the development of a brochure to inform, educate, and encourage pilots to adhere to the current voluntary noise abatement routes to the greatest extent possible.

11. The land use base mapping used on Figure 5-5 was provided by the Town of Hilton Head Island. In terms of reducing ground generated noise at golf courses and residential areas, the study included an evaluation of noise barriers. However, the study showed that a noise barrier would not be effective in providing a meaningful reduction for residents adjacent to the airport. This is due to the distance the barrier would have to be from the arriving and departing aircraft to meet other FAA height restrictions.

12. Banning certain types of aircraft or placing restrictions on pilots will not be accepted or approved by the FAA. The study reviewed the voluntary noise abatement procedures established at the airport and concurred that they are appropriate to use for noise abatement. The issue is not with the noise abatement procedures but in the

adherence to these procedures. Recommendations are included in the FAR Part 150 Study that are intended to improve the adherence of the voluntary noise abatement procedures including the development of a brochure to inform, educate, and encourage pilots to adhere to the current voluntary noise abatement routes to the greatest extent possible.

13. Aircraft engine noise, on arrival, departure, and reverse thrust are included in the modeling analysis. The study included an evaluation of noise barriers. However, the study showed that a noise barrier would not be effective in providing a meaningful reduction for residents adjacent to the airport due to the distance the barrier would have to be from the arriving and departing aircraft to meet other FAA height restrictions. We acknowledge that safety is a concern of residents; however the FAR Part 150 Study process evaluates procedures that are intended to reduce noise exposure on residential and other noise sensitive uses in proximity to the Airport.

14. The Queen Chapel A.M.E. Church located on Beach City Road is outside of the 65 DNL contour. FAA land use guidelines indicate that all land uses outside the 65 DNL are compatible with the affects of aircraft noise. The St. James Baptist Church is located inside the 65 DNL and based on the guidelines is an incompatible use. Thus, commendations have been made in the FAR Part 150 study to offer insulation to the St. James Baptist Church.

The Pineland Mall, Banks, restaurants and shops, and industrial areas at the south end of the runway are within the 65 DNL. However, FAA guidelines indicate that industrial and commercial property (including banks, restaurants and shops) are compatible land uses. Therefore no mitigation for these properties has been proposed. All areas surrounding the airport (including Palmetto Hall) were considered as part of the study.

All aircraft that were observed during the three and a half hours of monitoring have been listed in Appendix F and summarized on Page 7-2.

To help ensure prospective residents are aware of the proximity to the airport, the Town of Hilton Head Island has established an Airport Overlay District. The current Airport Overlay district defines the Discretionary Noise Level as the area between the 60 and 65 DNL noise contours. Within this area, a notice is placed on the plats that states the property is subject to noise that may be objectionable. The limits of the district are based on contours prepared in the mid 1990's when the airport had about twice as many operations as the do today and extend from approximately Broad Creek to Port Royal Sound (see Figure 9-1). Operations at Hilton Head Island Airport are forecast to grow in the future. Changing the Discretionary Noise Level to the area between the 55 and 65 DNL contours prepared as part of this study will slightly reduce geographic area covered by the Discretionary Noise Level District which results in fewer properties being subject to the notice while still providing notice to prospective residents. See Figure 9-2 for a comparison of the current and proposed district limits.

We acknowledge that safety is a concern of residents; however the FAR Part 150 Study process evaluates procedures that are intended to reduce noise exposure on residential and other noise sensitive uses in proximity to the Airport.

As stated on Page 8-6 of the FAR Part 150 Study, as a result of the Airport Noise and Capacity Act of 1990 (ANCA), no new use-restrictions at Airport facilities can be implemented without a thorough demonstration of need, a detailed analysis of the restriction and its consequences, and approval by the FAA. Such restrictions could include partial or full curfews, restrictions in use based on the certified noise level of an aircraft, capacity limits on the number of aircraft that can use the facility or other similar measures. If any form of use restriction is proposed, a FAR Part 161 process (entitled Notice and Approval of Airport Noise and Access Restrictions) would need to be accomplished. The level of noise exposure surrounding HXD does not warrant recommending access restrictions or curfews and any restriction, if proposed, would not be approved by the FAA.

15. All information provided by the commenter, including the attachments has been included in the public comment section of the FAR Part 150 Study.

The Savannah/Hilton Head Island Airport is located approximately 30 miles from Hilton Head Island. This FAR Part 150 Study has been prepared to addresses the noise exposure on the areas surrounding the Hilton Head Island Airport.

As stated on Page 1-1 of the Draft FAR Part 150 Study, the Study has been prepared on behalf of the airport neighbors to provide the opportunity for the aviation industry, affected political jurisdictions and Airport neighbors to work together in the evaluation of potential noise reduction options and compatible land use planning initiatives. The Study documents the Airport's existing and anticipated future noise conditions, determines if the current voluntary operational noise mitigation procedures are achieving their desired effect, and identifies other opportunities to reduce aircraft-related noise impacts on the communities surrounding the Airport.

The phrase "In order to continue to be pro-active in addressing concerns of residents..."has been included on Page 1 to reflect to the efforts by the County and Airport personnel related to noise mitigation efforts that were initiated prior to the start of this FAR Part 150 Study.

The certification page in Chapter 6 relates specifically to the development of the Noise Exposure Maps (noise contours). While Wilbur Smith Associates was the prime consultant and assisted with elements of the document, ESA was the firm that had the oversight in the preparation of the Noise Exposure Maps.

Public comments received during the development of the study, both verbal and written, were considered and helped formulate the recommendations. All comments and questions presented at the Public Hearing and those submitted following the hearing

specifically related to the FAR Part 150 Noise Study are being responded to in this section and will be included in the document sent to the FAA for review.

Input received from CRC members during the development of the study were taken into consideration in formulating the recommendations of the study. Input was received from CRC members at the workshops, CRC meetings, and at the public hearing.

Recommendations have been included in the FAR Part 150 Study that are intended to inform, educate, and encourage pilots to adhere to the current voluntary noise abatement routes to the greatest extent possible. These procedures recommend that aircraft avoid noise sensitive areas (including Port Royal) to the greatest extent possible.

The flight paths shown in the FAR Part 150 Study represent the primary corridors aircraft currently follow into and out from the airport. It is recognized that aircraft do fly over Port Royal Plantation and outside of the corridors shown in the study due to pilot discretion, wind, weather, and other aircraft activity in the area.

Input received from the noise hotline did show that individuals had concerns that pilots were not always observing the noise sensitive zones. This input was taken into consideration.

As stated previously, recommendations have been included in the FAR Part 150 Study that are intended to inform, educate, and encourage pilots to adhere to the current voluntary noise abatement routes to the greatest extent possible.

Local tower personnel have had substantial interaction with those residents who have concerns about noise and overflights and continue to inform, educate, and discuss issues with the public.

We acknowledge that safety is a concern of residents; however the FAR Part 150 Study process evaluates procedures that are intended to reduce noise exposure on residential and other noise sensitive uses in proximity to the Airport.

16. Public comments received during the development of the study were taken into consideration in formulating the recommendations of the study. Responses to comments were provided verbally at the public workshops, CRC presentations, at the public hearing, and in the responses included in this section. .

As stated previously, all noise abatement procedures are voluntary. Mandatory flight tracks and other forms of restrictions (curfews, fines for violations, etc.) will not be approved or implemented by the FAA. The study recommends additional steps to inform, educate, and encourage pilots to adhere to the current voluntary noise abatement routes to the greatest extent possible

Public comments were received at all public workshops, AAB and CRC presentations, at the public hearing, and following the hearing.

17. We acknowledge that safety is a concern of residents; however the FAR Part 150 Study process evaluates procedures that are intended to reduce noise exposure on residential and other noise sensitive uses in proximity to the Airport.

While it is up to the airport proprietor to develop and promote the use of their noise abatement procedures, the pilot in command has the ultimate control of his/her aircraft. FAA, while it manages the safe and efficient use of the airspace, cannot implement or enforce mandatory procedures or restrictions. The study recommends additional steps to inform, educate, and encourage pilots to adhere to the current voluntary noise abatement routes to the greatest extent possible.

The Noise Exposure Maps were posted on the web in June 2006. The Noise Compatibility Program was made available on the web and at the library in early October 2006, and was available for review at the public hearing on October 24, 2006. Comments on the document were received until November 7, 2006.

The noise complaint information identified in the FAR Part 150 study was based on the logs provided by the airport.

The Noise contours in Figures 5-4 and 5-4 are based on the primary flight corridors shown in Figures 5-1 through 5-3. It is recognized that aircraft do fly outside these corridors based on wind, weather and pilot in command.

The design, publication and dissemination techniques of the noise compatibility plan brochure should be formulated by the local entities who are involved in the day to day operation of the airport to achieve the most effective results. At Hilton Head Island Airport, this can include board members, airport management and operations personnel, tower representatives, local FBO's, local pilots, CRC members and the public.

The study appreciates the commenter's thought and efforts related to modifications, and additions to Table 12.1. The proposed recommendation related to the town's airport overlay district does not involve any type of land seizure. If the FAR Part 150 study recommendation that suggests changing the Discretionary Noise Level District from the 60 to 55 DNL were implemented by the town, the number of parcels subject to a notification would actually reduce from what is required under the town's current ordinance. An additional Figure has been prepared to demonstrate this (Figure 9-2). The intent of the recommendation is to inform prospective residents that are close in to the airport (primarily in line with the runway from Port Royal Sound to Broad Creek).

The primary flight corridor maps developed as part of the FAR Part 150 Study (Figures 5-1 through 5-3) were developed based on observations, tower personnel and resident input and information shown on the "Chief Yeager Map" referenced by the commenter.

The noise contours prepared have included aircraft overflights over Indigo Run, Port Royal, Hilton Head Plantation and other surrounding areas. As noted previously, aircraft do fly outside the primary corridors due to wind, weather, air traffic activity levels, and pilot in command discretion. However, within the limits of the 65 DNL contour, aircraft arrivals are almost exclusively in line with the runway as modeled.

18. Comment Noted.

19. We acknowledge that safety is a concern of residents; however the FAR Part 150 Study process evaluates procedures that are intended to reduce noise exposure on residential and other noise sensitive uses in proximity to the Airport. The noise modeling assumed no vegetation or other impedances that blocked the propagation of the sound generated from the aircraft engines.

20. The noise complaint information received via the noise hot line was considered and helped formulate the study recommendations (see page 8-2).

21. Comment Noted.

22. Recommendations have been included in the FAR Part 150 Study that are intended to reduce noise exposure on the communities surrounding the airport (including Port Royal).