



CITY OF NEWPORT BEACH

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April 22, 2013

Mr. David Soumi
Acting Regional Administrator
FAA Western-Pacific Region
P.O. Box 92007
Los Angeles, CA 90009

RE: Development of an RNP Departure for John Wayne Airport (Orange County, CA)

Dear Mr. Soumi:

In response to the FAA's offer to the City of Newport Beach to review the proposed RAWLZ RNAV departure, the City and GE Aviation/Naverus have conducted an analysis of recently published criteria related to performance-based navigation (PBN) instrument procedure design, the technical issues related to design and implementation of PBN departure procedures, and the legal challenges surrounding operations at John Wayne Airport.

The City believes that as a part of the FAA's NextGen plan, an opportunity exists to improve upon the long-standing issues related to noise mitigation at John Wayne Airport by modifying the proposed RAWLZ RNAV departure to take advantage of the recently published FAA Order 8260.58 *PBN Instrument Procedure Design criteria*. The City respectfully requests that the FAA consider the following:

- Develop the proposed RAWLZ RNAV departure using the RF leg type to design an RNP departure that follows the center of the Back Bay from the departure end of the runway to open water. The path should be designed to avoid the populated areas on both the east and west side of the bay. The city of Newport Beach, through community engagement, could provide appropriate detail to the procedure designers as to the desired location of the path.
- All elements of the modified departure should conform to the criteria used to design the current proposed RAWLZ departure with the following exceptions:
 - Waive the required departure leg types to allow for a series of RF legs beginning not later than 1.0 NM past the departure end of the runway and extending out towards the proximate location of the current STREL waypoint.
 - Construct the RF legs and obstacle evaluation area (OEA) in accordance with FAA Order 8260.58, Volume 6, Chapter 1.3.3 with waivers as necessary to allow for a combination of connected, opposite direction RF legs.

- Ensure that the design path remains within the lateral bounds of the current departures being flown at JWA.
- Publish the procedure as an RNP-1 with the additional procedure note: "RF required."
- Operators could be authorized to fly the procedure via OPSPEC C063. Air carriers currently flying RNAV departures at JWA should already have this authorization.
- The procedure should qualify as a Categorical Exclusion under FAA Order 1050.1 SEC 311. This could be substantiated during the design and review process through the use of historical radar data.

The proposed modifications should not require a substantially higher level of coordination and review with airspace managers and stakeholders than the current proposed RAWLZ RNAV departure. The majority of air carriers flying RNAV departures at JWA are currently equipped with the enabling avionics to fly a departure procedure with RF legs.

We look forward to your consideration of this input. We suggest having a discussion on how we could develop a project framework and establish the mechanism that the City should use to define and communicate the location of the desired flight path.

Please do not hesitate to contact us at 949-644-3001 (please ask for City Manager Dave Kiff).

As always, thank you for your continued concern for communities affected by flight paths.

Sincerely,



KEITH D. CURRY
Mayor of Newport Beach

cc: Members of the Newport Beach City Council
Members of the Newport Beach Aviation Committee
US Congressman John Campbell
US Congressman Dana Rohrabacher
Mr. John M.W. Moorlach, Orange County Supervisor
Mr. Alan Murphy, John Wayne Airport
Thomas Hatch, City Manager of Costa Mesa
John Pietig, City Manager of Laguna Beach