

U.S. Department of Transportation

Federal Aviation Administration

September 27, 2022

Robert Germann Citizens Against Gillespie's Expansion & Low Flying Aircraft (C.A.G.E L.F.A.) www.cagelfa.com info@cagelfa.com

Dear Mr. Germann,

Thank you for your January 25, 2022, letter to former Administrator Steve Dickson regarding concern for the safety of the surrounding communities of Gillespie Field (KSEE), located in El Cajon, CA. The FAA's mission is to provide the safest and most efficient aerospace system in the world. We have reviewed your questions regarding KSEE and have responded below.

The specific questions outlined in your letter are identified below, along with the response:

1) All aircraft incident reports and/or citations made by the FAA regarding traffic in and out of Gillespie Field Airport.

Complaints of aircraft operations on and in vicinity of Gillespie Field: Calendar Year (CY) 2021 - 16, CY 2016 - 1, CY 2014 - 2, CY 2011 - 3, CY 2010 - 1, CY 2007 - 2, CY 2006 - 1, CY 2005 - 4

Enforcement Actions of aircraft operations on and in vicinity of Gillespie Field: Calendar Year (CY) 2021 – 1, CY 2020 – 5, CY 2019 – 2, CY 2018 – 1, CY 2017 – 1, CY 2016 – 3, CY 2015 – 2, CY 2014 – 1, CY 2011 – 2, CY 2008 – 2, CY 2006 – 2, CY 2004 – 1

Administrative Actions of aircraft operations on and in vicinity of Gillespie Field: Calendar Year (CY) 2021 – 2, CY 2019 – 1, CY 2018 – 2, CY 2016 - 1, CY 2015 – 3, CY 2014 – 9, CY 2011 – 2, CY 2009 – 2, CY 2008 – 6, CY 2007 – 5, CY 2005 – 2

No Actions taken of aircraft operations on and in vicinity of Gillespie Field: Calendar Year (CY) 2015 - 1, CY 2011 - 3, CY 2007 - 1, CY 2006 - 1

Occurrences of aircraft operations on and in vicinity of Gillespie Field: Calendar Year (CY) 2021 – 1, CY 2020 - 1, CY 2019 – 1, CY 2018 – 1, CY 2017 – 1, CY 2014 – 1, CY 2013 – 4, CY 2012 – 2, CY 2011 – 4, CY 2010 – 1, CY 2009 – 2, CY 2008 – 2, CY 2007 – 3, CY 2006 – 2, CY 2005 – 1, CY 2004 – 2

Near Mid-Air Collisions in vicinity of Gillespie Field: Calendar Year (CY) 2021 – 1, CY 2020 - 1, CY 2019 – 1, CY 2017 – 1, CY 2015 – 1, CY 2007 – 1, CY 2005 – 1, CY 2004 – 2 Pilot Deviations of aircraft operations on and in vicinity of Gillespie Field: Calendar Year (CY) 2021 – 15, CY 2020 - 13, CY 2019 – 23, CY 2018 – 21, CY 2017 – 12, CY 2016 – 23, CY 2015 – 18, CY 2014 – 17, CY 2013 – 4, CY 2012 – 5, CY 2011 – 6, CY 2009 – 2, CY 2008 – 3, CY 2007 – 4, CY 2006 – 6, CY 2004 – 2, CY 2003 – 1

Incidents of aircraft operations on and in vicinity of Gillespie Field: Calendar Year (CY) 2020 - 1, CY 2019 - 1, CY 2017 - 1, CY 2014 - 3, CY 2012 - 1, CY 2012 - 5, CY 2011 - 2, CY 2009 - 1, CY 2007 - 3, CY 2006 - 6

Accidents on and in vicinity of Gillespie Field: Calendar Year (CY) 2021 – 1, CY 2019 – 2, CY 2018 – 4, CY 2017 – 2, CY 2015 – 1, CY 2013 – 1, CY 2012 – 1, CY 2010 – 2, CY 2009 – 2, CY 2008 – 1, CY 2007 – 4, CY 2006 – 1, CY 2005 – 1, No further data after 2005.

Of the above indicated accidents, Accidents with Fatalities on and in vicinity of Gillespie Field: Calendar Year (CY) 2021 – Data not available, CY 2018 – 1, CY 2017 – 1, CY 2015 – 1, CY 2012 – 1, CY 2006 – 3 (2 aircraft involved in Mid-air collision near Brown Field), CY 2005– 1, CY 2004 – 1, CY 1997 – 1, CY 1991 – 1, CY 1990 - 2

2) Does the Gillespie Field Airport currently meet all federal, state and local government safety and operation standards as required by the FAA especially for a reliever airport classification? Gillespie Field is now in the process of re-classifying runways 17/35. Why?

It is important to understand the limits of the Federal Aviation Administration (FAA) regulation of airports, as well as the "requirements" as they apply to non-certificated airports like Gillespie Field (SEE). Title 14, Code of Federal Regulations, Part 139, *Certification of Airports*, applies only to airports serving air carrier operations, such as the San Diego International Airport (SAN).

The FAA does not have a specific safety or operational regulation(s) that applies to reliever or other general aviation airports, such as SEE. However, the FAA does have airport design standards and guidelines that apply to civil airports in a series of Advisory Circulars. Those Advisory Circulars do not constitute regulations, and compliance with those airport design standards and guidelines is not mandatory and legally binding in its own right. Conformity with the Advisory Circulars is voluntary, except in the construction of a federally funded airport project. When federal funding is provided, the project must comply with the standards and guidelines contained in the Advisory Circulars unless otherwise approved by the FAA.

All previous federally funded projects at SEE have been completed in compliance with FAA airport design standards, as they existed at the time the projects were completed. Notwithstanding, some aspects of SEE do not meet current FAA airport design standards and guidelines. For example, both FAA and the County of San Diego (County) have identified existing buildings which penetrate the current standards for Runway Safety Area (RSA), Runway Object Free Area (ROFA), Runway Visibility Zone (RVZ), Runway Protection Zone (RPZ) and the Building Restriction Line (BRL) on both ends of Runway 17/35. In addition, Taxiways Alpha and Bravo do not meet current runway separation standards under the current design group.

The aforementioned airport design standards are intended to provide an additional margin of safety for aircraft operations on the ground at the airport. They would have little to no effect on aircraft once they have departed from SEE.

Additionally, on June 28, 2021, the California Department of Transportation, Division of Aeronautics (CALTRANS), inspected SEE. The purpose of the inspection was to ensure that SEE meets all applicable FAA minimum design safety standards and Advisory Circular (AC) criteria, Federal Aviation Regulations, the California Public Utilities Code, section 21001 et seq., California Code of Regulations, Title 21, sections 3525-3560, and all required conditions depicted in the State Airport Permit issued by CALTRANS.

CALTRANS' inspection findings identified obstructions on and near the airport. However, it also applauded the County for initiating its efforts to remove, trim and maintain a group of trees (obstructions) located near the runway threshold and the extended runway centerline at a height not exceeding the approach or transitional surface. CALTRANS urged the County to commence obstruction removal as soon as possible.

CALTRANS also encouraged the County to continue its efforts to gain control of and remove obstructions to secure adequate Runway Safety Areas (RSA) at both ends of Runway 17/35. CALTRANS supports the County's plan to reduce the length of Runway 17/35 to create the required RSA at each runway end.

Given the above, the County is exploring potential solutions to mitigate non-standard conditions at SEE. The County's options include reclassifying Runway 17/35 from its current Airport Design Group from B-II to B-I, which would result in applying different airport design standards, the possibly shortening the runway, and perhaps removing the existing displaced thresholds. Once the County finalizes its proposal, it must update its Airport Layout Plan for SEE and submit that plan to the FAA for our review and possible approval. For further information about the proposed reclassification of runways at SEE, we suggest you contact the County.

3) Has Gillespie Field Airport had any issues meeting federal safety and operation standards and regulations? If so, at what point, what were the concerns and how were they mitigated?

See our response to question 2 above.

4) Who is responsible for conducting safety training for those who have access to the airport and/or fly aircraft? How is safety training conducted and how often?

All pilots who operate to or from KSEE must have a valid and current pilot certificate and applicable medical certificate or qualification, and they must meet the recent flight experience requirements prescribed by FAA regulations in Chapter 1 of Title 14 of the Code of Federal Regulations (14 CFR parts 1 – 199). For example, pilots must have a flight

review every 24 calendar months per 14 CFR § 61.56(c) and take ground and flight training under 14 CFR § 61.56(a). This training includes a review of current regulations and a demonstration of maneuvers and procedures applicable to that pilot's certificate. In addition, the FAASTeam, operated by the FAA's Flight Standards Service, offers thousands of voluntary in-person and online seminars/webinars and training events, including seminars/webinars and training on pilot training, knowledge, and recency of experience. For example, over the last 12 months, the San Diego FSDO FAASTeam has provided over 45 training and educational events specific to KSEE, which over 1800 people attended.

5) How frequently do aircraft incidents and accidents occur on, in route to, or around the communities surrounding Gillespie Field since it was established?

FAA databases indicate 354 incidents/complaints/accidents associated with Gillespie Field since 2005. Item 1 has a detailed description of these events.

6) How do flight incident/crash/fatalities data and the frequency of accidents from Gillespie Field Airport compared to other similar general aviation reliever airports?

Two databases used to identify the number of accidents at Gillespie Field Airport and neighboring airports of similar size. Data was collected from the FAA Accident and Incident Database and the National Transportation Safety Board database. The information is provided below

	CMA	CRQ	LGB	ONT	SEE	SMO	SNA	VNY	WHP	TOTAL
2010	4	1	3	3	3	1	4	2	3	24
2011	3	2	3	0	4	2	5	6	1	26
2012	6	1	4	1	3	2	4	3	1	25
2013	2	1	6	2	4	1	5	3	2	26
2014	4	2	4	0	8	2	2	4	1	27
2015	6	6	7	4	1	2	5	10	4	45
2016	6	3	2	1	10	3	5	4	1	35
2017	3	2	5	2	8	2	5	5	2	34
2018	2	0	4	0	4	2	7	8	2	29
2019	2	2	0	0	4	1	2	1	3	15
2020	4	1	1	1	1	0	2	4	3	17
2021	5	4	2	0	7	2	0	4	0	24
_	47	25	41	14	57	20	46	54	23	327

7) What are the safety requirements of Gillespie Field as a reliever airport to San Diego International Airport? Are those standards being fulfilled?

The FAA's airport design standards for public use airports can be found in FAA Advisory Circular 150-5300-13, "Airport Design." As mentioned in our response to question 2, the County is working with FAA on addressing certain non-standard conditions at SEE.

8) What does the topographical location and residential density surrounding an airport have on safety evaluation of a reliever airport? Gillespie Filed Airport is in a valley surrounded by mountains with short runways.

Topography is one of the factors evaluated when initially selecting a viable location for an airport. Generally, airport usage and airfield configurations may be limited by the surrounding natural terrain and are considered in airport design. In certain circumstances, improvements on existing airfield infrastructure or implementation of flight procedures may help mitigate challenges associated with terrain and obstructions on the ground during takeoff and landing operations. However, FAA does not have land use planning or zoning authority. The local land use jurisdiction determines the feasibility of proposed development and residential density when permitting residential development near airports.

9) What process and/or procedures occur after such incidents to ensure that all operational safety standards were met before, during and after aircraft crashes in relationship as a "reliever airport?"

The aircraft mishap/incident practices, policies, procedures, and protocols are part of the formal mishap/incident investigation. In the fact-finding and determination of causal factors, all operational aspects would be factored into the mishap/incident investigation. A formal aircraft mishap/investigation report is completed to include causal findings, and ibased on objective findings; future safety recommendations are developed and disseminated.

We hope this response addresses your concerns. The FAA's mission is to provide the safest, most efficient aerospace system in the world. We will continually strive to improve the safety and efficiency of flight in this country.

If you have any questions or if we can be of further assistance, please contact my office at (424) 405-7000.

Sincerely,

Tamara A. Swann

Tamara A. Swann Regional Administrator (A)