



**DEPARTMENT OF THE AIR FORCE  
502D AIR BASE WING  
JOINT BASE SAN ANTONIO**



23 September 2024

MEMORANDUM FOR CITY OF SAN ANTONIO

FROM: 502 ABW/CMI

JBSA Installation Mission Sustainment

2080 Wilson Way

Fort Sam Houston, TX 78234

SUBJECT: Joint Base San Antonio review of Zoning Case Z-2024-10700193

1. Zoning Case Z-2024-10700193 has been reviewed by JBSA- LAK organizations. JBSA does not object with this request; however, there are additional comments for consideration in planning and development.
  - a. This area lies within and adjacent to the Kelly Field runway's South APZ-I, an area having a "significant risk factor" for accidents.
  - b. The entire subject location is within the 65 plus Db DNL Noise Contours generated from flying activity on JBSA LAK. Per the 2019 JBSA Lackland AFB AICUZ Study, Table A-2, Recommended Land Use Compatibility for Noise Zones, SLUCM No. 10, Residential uses are NOT recommended for these Noise Zones. Although local conditions regarding the need for housing may require residential use in these zones, residential use is discouraged in DNL 65- 69. Expect regular, increasing noise levels as the turns of aircraft in the local flight pattern (arrivals/departures) lies directly over the subject property.

The absence of viable alternative development options should be determined, and an evaluation should be conducted locally prior to local approvals indicating that a demonstrated community need for the residential use would not be met if development were prohibited in these zones. Existing residential development is considered as pre-existing, non-conforming land uses.

Where the community determines that these uses must be allowed, noise attenuation measures to achieve outdoor to indoor Noise Level Reduction (NLR) of at least 25 decibels (dB) in DNL 65-69 should be incorporated into building codes and be considered in individual approvals.

Normal permanent construction can be expected to provide an NLR of 20 dB, thus the reduction requirements are often stated as 5, 10, or 15 dB over standard construction and normally assume mechanical ventilation, upgraded sound transmission class ratings in windows and doors, and closed windows year-round. Additional consideration should be given to modifying NLR levels based on peak noise levels or vibrations.

NLR criteria will not eliminate outdoor noise problems. However, building location, site planning, design, and use of berms and barriers can help mitigate outdoor noise exposure particularly from ground level sources. Measures that reduce noise at a site should be used wherever practical in preference to measures that only protect interior spaces.

[https://www.jbsa.mil/Portals/102/Documents/Environmental%20PA/JBSA\\_Lackland\\_AICUZ\\_100\\_FINAL\\_Oct%202019.pdf](https://www.jbsa.mil/Portals/102/Documents/Environmental%20PA/JBSA_Lackland_AICUZ_100_FINAL_Oct%202019.pdf)

- c. Any proposed exterior construction plans, construction or alteration projects which include vertical elements (equipment: cranes, towers: communication or water) may require FAA review to verify no hazard to flight navigation prior to issuance of any construction permits.

FAA CFR Title 14 Part 77 Notice Criteria Tool that can be utilized to aid in FAA notification requirements can be found here:

<https://oeaaa.faa.gov/oeaaa/external/gisTools/gisAction.jsp?action=showNoNoticeRequiredToofForm>

Further FAA guidance is also available here:

[https://www.faa.gov/documentLibrary/media/Form/FAA\\_Form\\_7460-1\\_042023.pdf](https://www.faa.gov/documentLibrary/media/Form/FAA_Form_7460-1_042023.pdf)

- d. To mitigate potential interference with existing JBSA operational systems, please coordinate with 502 CS Spectrum Manager prior to use of any Spectrum dependent systems (i.e.: two-way radio communications, or any type of wireless technologies) during construction. If applicable, coordination requested by facility user prior to installation/use of any Spectrum dependent commercial or manufacturing equipment.
- e. The FAA recommends criteria of land-use practices in their Advisory Circular 150/5200-33C, Hazardous Wildlife Attractants on or Near Airports, which is applicable to properties within five miles of JBSA-Kelly Field. To reduce the exposure to aircraft-wildlife strikes, please use the link below to access this publication and use the information to help reduce wildlife-attractant features near airports. Unwavering consideration for this aviation safety hazard is vital.

[https://www.faa.gov/airports/resources/advisory\\_circulars/index.cfm/go/document.current/documentnumber/150\\_5200-33](https://www.faa.gov/airports/resources/advisory_circulars/index.cfm/go/document.current/documentnumber/150_5200-33)

- 2. Point of contact for this action is Sean R. Greszler, AICP, 502 ABW/CMI. He can be reached at 210-808- 7549 or by email at [sean.greszler.1@us.af.mil](mailto:sean.greszler.1@us.af.mil) or through the 502d ABW Community Initiatives organization email box at [502ABW.ABW.Community\\_initiative@us.af.mil](mailto:502ABW.ABW.Community_initiative@us.af.mil)

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