



Sky Posse Palo Alto

2225 East Bayshore Avenue, Suite 200, Palo Alto, CA 94301

February 26, 2019

Andi Jordan, Executive Director
Cities Association of Santa Clara County
PO Box 3144
Los Altos, CA 94024

Re: Santa Clara | Santa Cruz Community Roundtable
Five Principles to help guide next steps

Dear Members of the Roundtable,

The Santa Clara Santa Cruz Community Roundtable represents welcome progress after some four years of regional discussions over aircraft noise. We want to thank the 13 member cities; Santa Clara and Santa Cruz County, and CASCC for your leadership on this issue.

Formation of the Roundtable follows the foundational efforts of the Select Committee on South Bay Arrivals which successfully set an agenda based on considered "Underlying Principles" which guided the subsequent public discussions. We think there is much information to serve as guidance for next steps in the process to find solutions to aircraft noise problems for our communities; how those steps are taken to make measurable reductions in aircraft noise is critically important. Foremost is the need to recognize the noise impacts to all communities affected, and to address how and where those impacts are affecting particular communities. No person or family living in the 13 communities represented by this Roundtable expected or were prepared for the effects of a rapid, multi-fold increase in air traffic over their homes.

To ensure the best chance of success for the Roundtable to address the problem of aircraft noise for impacted communities, we suggest focusing on five principles -- based on the "Underlying Principles" of the Select Committee. These are basic goals that can and should be incorporated as a baseline for determining a successful outcome for this Roundtable.

- **Reduce noise impacts** on communities caused by NextGen Performance Based Navigation procedures. This should be the first priority for Roundtable discussions and outcomes, for all communities affected.
- **Use of metrics that accurately and meaningfully measure aircraft noise** is essential for outcomes that reduce real noise as experienced by those on the ground in affected communities.
- **A common baseline of aircraft noise** must be established to determine what and where are the outlying or unacceptable levels of noise that need to be addressed.

February 26, 2019

Page 2

- A small number of **communities should not be disproportionately affected** when there are ways to avoid or disperse aircraft noise.
- **Night flights** are a particular health concern that needs urgent attention.

Our view is that aircraft routes should be redesigned so that the overall ground-level noise is reduced to the minimum possible and no single corridor or set of communities bears a disproportionate amount of the noise. To succeed, it is imperative to have **accurate data and analysis**. In addition, solutions and **alternatives must be explored in a holistic manner** - as FAA reminds - all arrival and departure procedures in the Northern California airspace are interconnected and interdependent.

Finally, we ask that NEPA statutes, and FAA's own rules and orders be observed and documented in your meetings - particularly to immediately receive from FAA noise and emissions screenings for all CATEX actions (which, by law, require a procedure to demonstrate reduction in fuel burn, emissions, and noise to qualify as a CATEX), and that affected communities have early and meaningful involvement in amendments or new actions before final records of decision. Again, thank you and we look forward to supporting efforts which can help all our communities.

Kind regards,

Sky Posse Palo Alto

CC: Representative Anna Eshoo
Supervisor Joe Simitian
FAA Administrator Dan Elwell
Members of the Select Committee
Palo Alto City Council
Raquel Girvin, FAA
Steve Alverson, ESA

Sky Posse Palo Alto is a grassroots group of residents from across the Mid-Peninsula deeply concerned about increased air traffic over our communities. Many have invested substantial effort in studying the issues, attending hearings and meetings, and engaging in outreach.

See our website at www.skypossepaloalto.org

UNDERLYING PRINCIPLES

1. Minimizing aircraft noise must be a priority of the FAA when designing procedures, and of Air Traffic Control (ATC) when vectoring flights. Airline efficiency may have to be compromised to some degree to minimize noise exposure on the ground.
2. Aircraft noise should not be an afterthought in FAA planning and operations; nor should aircraft noise be moved randomly without regard to the relative noise burden experienced by communities below. A small number of communities should not be disproportionately affected when there are ways to avoid or disperse aircraft noise.
3. Reducing aircraft noise at night is an urgent priority. Given the availability of airspace in the nighttime hours, it should be an extremely rare occurrence that a flight path is disruptive to the community. Further, “nighttime” should be defined as 12 midnight to 6:00am, but should be expanded to include the hours of 11:00pm-12:00am and 6:00am-7:00am whenever possible.
4. When designing new procedures, the FAA must include affected communities as stakeholders. Aircraft noise not only disrupts quality of life but also has significant and well documented adverse impacts on the health and well-being of individuals residing under flight paths, particularly children.
5. No matter how effectively the airspace, or any specific procedure, is re-designed, the value of the change will only be as helpful as the extent to which it is followed. ATC should adhere to published procedures except when safety considerations require vectoring. The rate of adherence to published procedures should be monitored.
6. Meaningful metrics for measuring aircraft noise should be used when working with the Committee’s Recommendations. Limiting the metrics to use of DNL is inadequate and unacceptable. A baseline of aircraft noise should also be established. The recent agreement between the FAA and the Massachusetts Port Authority (which owns and operates three airports: Boston Logan International Airport; Hanscom Field; and Worcester Regional Airport), to use real-world single-event noise data from communities in order to develop a supplemental noise metric to measure and track noise and flight concentration is a development the Committee supports and points to as an example of a meaningful metric.
7. Reducing the noise impacts caused by NextGen should be a priority.
8. The FAA should demonstrate its ongoing commitment to working with communities throughout the San Francisco Bay Area, including, but not limited to, the three counties represented on the Select Committee on South Bay Arrivals, by: (a) monitoring resultant noise levels following implementation of Recommendations from the Select Committee; (b) participating with successor committees to the Select Committee; and (c) leading all future procedural, waypoint, and flight path development activities undertaken in response to continuing health and noise issues associated with local air traffic in consultation with the affected communities.

Adopted by the Select Committee.

(Vote: 11 Aye, 1 Nay, 0 Absent or Abstain)