



August 23, 2019

The Honorable Mary-Lynne Bernald, Chair
Santa Clara/Santa Cruz Counties Airport/Community Roundtable
% Cities Association of Santa Clara County
P.O. Box 3144
Los Altos, CA 94024

Re: FAA Response Letter Dated July 26, 2019

Dear Chair Bernald and Members of the Roundtable:

Thank you for your efforts to make the Roundtable an effective venue to address and mitigate regional airplane noise issues. As you know, the Town of Los Altos Hills is among the communities heavily impacted by the FAA's NextGen flight procedures and the increased noise and volume of air traffic overflying the Peninsula to/from SFO. Representatives of the Town have attended multiple briefings from the FAA, participated in the Select Committee on South Bay Arrivals, and currently participate in the SCSC Roundtable.

Los Altos Hills has been working with others in our region for years to provide input and guidance to the FAA to help address the increased noise affecting our community. During the Select Committee process, the FAA chose not to offer any specific proposed solutions and instead asked the region to provide recommendations. In November 2016, after hearing many hours of public testimony from affected communities and the FAA's own technical experts, the Select Committee adopted a set of recommendations to the FAA which represent the regional consensus for airplane noise mitigation.

The Town of Los Altos Hills agrees with the sentiments expressed by Santa Cruz County Supervisor and Select Committee member Bruce McPherson in the Santa Cruz Sentinel on August 2, 2019: The FAA failed to sufficiently assess and inform affected communities of the greatly increased noise of the new SERFR procedure prior to its implementation in 2015. Furthermore, the FAA's new NextGen procedures unjustly imposed a significant noise impact on the communities living underneath SERFR. But it would be equally unjust to simply shift that NextGen noise burden to other communities in our region. **No community should have to suffer the near-constant noise impact which NextGen has brought to our region, and the FAA needs to design procedures which fix these noise problems.**

As the Town of Los Altos Hills reiterated to the FAA in our letters dated December 14, 2017 and June 21, 2019, and to Representative Anna Eshoo in our letter dated June 28, 2018, **the language adopted by the Select Committee in recommendation 1.2R1 (and the regional consensus**

which it represents) is unambiguous: the recommendation to move the SERFR route is conditioned upon satisfying the nine noise mitigation criteria in 1.2R2. The Select Committee recognized the potential harm of simply moving the current SERFR noise levels when it recommended the change to the ground track of the SERFR route, which is why the SC explicitly incorporated these criteria into that recommendation: to protect communities living near or under any revised flight path from the increased noise and volume of aircraft since the rollout of NextGen in our region.

In the days leading up to the final vote on this recommendation, the Select Committee received assurances during the proceedings from then-FAA Regional Administrator Glen Martin and his staff (either conveyed directly or on their behalf by Santa Cruz County Supervisor and Select Committee member John Leopold), that these nine noise mitigation criteria were all feasible. In casting the deciding vote to adopt these recommendations, former LAH Mayor and Select Committee member Gary Waldeck relied on these assurances of feasibility from the FAA, as well as those of Congresswoman Anna Eshoo that **“steps will not be taken to implement these changes without regional consensus”**.

Subsequent to the release of the Select Committee recommendations and final report (and only after the Select Committee disbanded), the FAA withdrew its earlier assurances and concluded that several of the nine noise mitigation criteria in 1.2R2 were “not feasible”. In response, former Mayor Waldeck made clear in his letter to the FAA that, had he known that some of these criteria were deemed infeasible by the FAA, he would have voted against 1.2R1—and it would not have passed without his vote.

As the Town of Los Altos Hills is one of the few SCSC RT communities which has residents under the new path as well as the old one, we have a clear responsibility to protect both sets of residents. The Town of Los Altos Hills believes that any replacement of the SERFR route with a “BSR Overlay” will not honor the regional consensus on this issue if it shifts the ground track but fails to adhere to the SC’s nine required noise mitigation criteria. In fact, previous letters sent to the FAA from the City and County of Santa Cruz on this issue have made clear that other communities are similarly concerned about the potential harm of this outcome.

While the Town understands and supports the Roundtable’s decision to not reopen decisions of the Select Committee, we remind the Roundtable that this decision obligates it to support the Select Committee’s recommendations as-written and voted-upon. As the successor body to the Select Committee, the SCSC Roundtable has an obligation to fairly represent the SC’s work and the regional consensus reflected in their final recommendations—especially given the contentious nature of this issue, and the extent to which it has divided communities in our region.

The legitimacy and effectiveness of the Roundtable depends on its ability to fairly represent all residents while working constructively with the FAA to achieve true noise reduction. If the Roundtable as a body fails to protect all the communities it represents, and especially if it protects the rights of some communities at the expense of others, the legitimacy and authority of the Roundtable as a regional venue for airplane noise issues will be permanently undermined.

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For the record, the Town of Los Altos Hills does not support moving the SERFR route unless/until the FAA attests that it has designed a procedure which implements the SC recommendation as-written, including satisfying all nine noise mitigation criteria. If the FAA wants community support for a different solution than that recommended by the Select Committee, it needs to engage in an open process, providing honest and detailed assessment of noise and other impacts of any such proposal, and seeking input from all affected communities.

We stand ready to work with the region and the FAA to achieve true noise reduction to pre-NextGen levels.

Sincerely,



Roger Spreen

Mayor, Los Altos Hills, CA

cc: Los Altos Hills City Council
cc: Representative Anna Eshoo
cc: Representative Jimmy Panetta
cc: Representative Jackie Speier
cc: Santa Clara County Supervisor Joe Simitian
cc: FAA Administrator Stephen Dickson
cc: FAA Deputy Administrator Daniel Elwell
cc: FAA Regional Administrator Raquel Girvin
cc: Los Altos Town Crier
cc: Palo Alto Weekly
cc: San Jose Mercury News
cc: Santa Cruz Sentinel