

Correspondence received for the Legislative Committee of the SCSC Roundtable

Attachments:

Page 2 - 8: Darlene Yaplee - 8/16/2020 - Agenda Item 3

Page 9 - 11: Robert Holbrook - 8/17/2020 - Agenda Item 4

Page 12 - 14: Jennifer Landesmann - 8/17/2020 - Agenda Item 4



SCSC Roundtable <scscroundtable@gmail.com>

Agenda Topic #3 - Legislative Committee Meeting Aug 17th 2020

1 message

Darlene Yaplee

Sun, Aug 16, 2020 at 9:28 PM

To: SCSC Roundtable <scscroundtable@gmail.com>

Cc: Robert Holbrook, "Darlene E. Yaplee"

Legislative Committee Chair Matichak,

Robert Holbrook and I will be making a public comment for "#3 Non-Agendized Items" regarding FAA Reauthorization Bill 2018 (chart attached).

For Metrics - Sections 173, 176, 179, 181, 187 and 188.

For Environment and Health - Sections 176, 187, 189, 534, 742 and 743.

Regards,

Darlene Yaplee and Robert Holbrook

 **FAA Reauth 2018 Status_20200816v1.pdf**
152K

FAA REAUTHORIZATION BILL 2018 - KEY NOISE PROVISIONS AND DUE DATES v. 8/16/2020

SECTION	SECTION TITLE	DUE DATE RELATIVE TO FAA REAUTH (10.5.2018)	STATUS/NEXT STEPS	DUE DATE	TEXT	NOTE
173	Alternative Airplane Noise Metric Evaluation Deadline	1 year	<p>✓ Report issued late on 2020.04.14.</p> <p>Follow up requested by QSC.</p> <p>FAA to respond to QSC.</p>	2019.10.05	The FAA shall <i>complete its ongoing evaluation of alternative metrics to the current Day Night Level (DNL) 65 Standard</i> .	<p>QSC raised issues about the report at the June 2020 FAA/QSC meeting.</p> <p>FAA to respond to QSC.</p> <p>The FAA was not required to complete a report to Congress - only to complete its internal work.</p> <p>However, the FAA combined Sections 173 and 188 into a single report to Congress in April 2020: https://www.faa.gov/about/plans_reports/congress/media/Day-Night_Average_Sound_Levels_COMPLETED_report_w_letters.pdf</p>
175	Addressing Community Noise Concerns	NA	NA	NA	The FAA Administrator shall <i>when proposing a new area navigation departure procedure, or amending an existing procedure that would direct aircraft between the surface and 6,000 feet above ground level over noise sensitive areas, consider the feasibility of dispersal headings or other lateral track variations to address community noise concerns...</i>	Departures only.
176	Community Involvement in FAA Nextgen Projects Located in Metroplexes	6 months to complete review; 2 months after that to report to Congress	Late by over 1 year?	2019.04.05 to complete the review; 2019.06.05 to report to Congress	The FAA shall <i>complete a review of the FAA's community involvement practices of NextGen projects located in metroplexes identified by the FAA...at a minimum, a determination of how and when to engage airports and communities in performance-based navigation proposals. Administrator shall submit to the appropriate committees of Congress a report... community involvement practices, how and when the Administration will engage airports and communities; and lessons learned from NextGen projects...</i>	<p>Is report available now?</p> <p>Obtain a copy of this report and review.</p>
178	Terminal Sequencing and Spacing	Briefing to Congress within 60 days	Was briefing done? When?	2018.12.04	<i>The Administrator of the Federal Aviation Administration shall provide a briefing to the appropriate committees of Congress on the status of Terminal Sequencing and Spacing (TSAS) implementation across all completed NextGen metroplexes ...</i>	<p>Unclear whether briefing happened.</p> <p>If so, can a copy of the briefing materials be made available to QSC or other Congressional members?</p>
179	Airport Noise Mitigation and Safety Study	NLT 2 years	Due in <3 months.	2020.10.05	The FAA shall <i>review and evaluate existing studies of the relationship between jet aircraft approach and takeoff speeds and corresponding noise impacts on communities, including the advisability of using speeds as a noise mitigation technique, and whether any of the metropolitan areas identified in §189 would benefit from such mitigation techniques...submit to the appropriate committees of Congress a report ...</i>	Get a copy of this report and review when issued by 2020.10.05.

SECTION	SECTION TITLE	DUE DATE RELATIVE TO FAA REAUTH (10.5.2018)	STATUS/NEXT STEPS	DUE DATE	TEXT	NOTE
180	Regional Ombudsmen	Within 1 year	Status not clear (see Note)	2019.10.05	Within 1 year, the FAA is directed to <i>designate a regional ombudsman for each FAA region</i> , to serve as a community liaison, make recommendations to address community concerns , and be consulted on proposed airspace changes	As of July 2020, the FAA has posted the names of ombuds on its website, but has not disclosed how these people relate to FAA Community Engagement Officers, how to interact with them, and what recommendations the ombuds have made to FAA Administrator, if any.
181	FAA Leadership on Civil Supersonic Aircraft	2020.03.31	2 Rulemakings completed; a 3rd rulemaking underway. Status of report is unclear.	2020.03.31	The FAA is directed to <i>exercise leadership related to the certification and safe and efficient operation of civil supersonic aircraft</i> , including issuing a Notice of Proposed Rulemaking (NPRM) on noise standards. <i>Not later than 1 year after the date of enactment of this Act, the Administrator shall submit to the appropriate committees of Congress a report detailing...</i>	Get a copy of this report (if available) and review. Comment period on NPRM Landing/Takeoff (LTO) noise closed 2020.07.13. Future NPRM to address sonic boom over land.
186	Stage 3 Aircraft Study	Report in 18 months	Late by 3+ months? Status?	2020.04.05	The FAA is directed to <i>review the benefits, costs, and other impacts</i> to a variety of stakeholders, including communities surrounding airports, from a phaseout of Stage 3 aircraft . "... submit to the appropriate committees of Congress a report..."	Is study available now? Obtain a copy of this study and review.
187	Aircraft Noise Exposure Study	Report in 2 years	Due in <3 months. FAA did not deliver the original study which was expected in 2016.	2020.10.05	The FAA shall <i>conclude its ongoing review of the relationship between aircraft noise exposure and its effects on communities around airports</i> . The report shall include preliminary recommendations for revising land use compatibility guidelines.	Due in <3 months. FAA did not deliver the original study expected in 2016. (Per FAA press release 2015.05.07, will soon begin work on multi-year survey with hopes to finish by 2016). The 1979 Aviation Safety and Noise Abatement Act (ASNA) requires the FAA to "establish a single system of measuring noise for which there is a highly reliable relationship between projected noise exposure and the the surveyed reactions of people to noise to be used to measure noise at airports and surrounding areas." 2015 data is before many NextGen implementations.
188	Study Regarding Day-Night Average Sound Levels	Report in 1 year	✓ Report issued late, 2020.04.14. Follow up requested by QSC. FAA to respond to QSC.	2019.10.05	The FAA shall <i>evaluate alternative metrics to the current average day-night level (DNL) standard</i> , such as the use of actual noise sampling and other methods, to address community airplane noise concerns. <i>The Administrator shall submit to the appropriate committees of Congress a report on the results of the study...</i>	QSC raised issues about the report at the June 2020 FAA/QSC meeting. FAA to respond to QSC. The FAA issued a report combining Sections 188 and 173. https://www.faa.gov/about/plans_reports/congress/media/Day-Night_Average_Sound_Levels_COMPLETED_report_w_letters.pdf

SECTION	SECTION TITLE	DUE DATE RELATIVE TO FAA REAUTH (10.5.2018)	STATUS/NEXT STEPS	DUE DATE	TEXT	NOTE
189	Study on Potential Health and Economic Impacts of Overflight Noise	Study initiated within 6 months Study to be concluded 3 years later	Study should have been initiated by 2019.07 Status?	2019.04.05 to initiate study; 2022.04.05 conclude study; 90 days after submitted to Administrator the study will be submitted to Congress.	The FAA shall enter into an agreement with an eligible institute of higher education to conduct a study on the health impacts of noise from aircraft flights on residents exposed to a range of noise levels from such flights . The study shall examine incremental health impacts, including sleep disturbance and elevated blood pressure, and be focused on residents in designated metropolitan areas (Boston, Chicago, NY, Northern CA, Phoenix, Southern CA, Seattle, Washington, DC metro area are included) and under flight paths frequented by aircraft flying lower than 10,000 feet.	Has the study been initiated? Obtain a copy of this study and review.
329	Performance Based Standards	NA	NA	NA	The Administrator shall, to the maximum extent possible and consistent with Federal law, and based on input by the public , ensure that regulations, guidance, and policies issued by the FAA on and after the date of enactment of this Act are issued in the form of performance-based standards, providing an equal or higher level of safety.	How does public give input to the FAA? This remains unclear.
342-377, 582, 721	Drones					
502	Report on Air Traffic Control Modernization	FAA Report to Congress in 6 months IG report to Congress 9 months later	FAA Administrator report: Status? IG report to Congress: Status?	FAA: 2019.04.05 IG: 2020.01.05	The Administrator shall submit... a report describing the multiyear effort... to modernize the air transportation system..., including ... [schedules, delays, metrics, milestones, projected and actual costs and benefits, risks and mitigations, oversight and stakeholder collaboration efforts, lessons learned and how those have been applied]. Inspector General not later than 270 days after the date on which the report required under subsection (a) is submitted, the inspector general of the Department of Transportation shall review the report and submit to...Congress...[summarizes concerns, permanent recommendations].	Has the FAA report been submitted? Has the IG report been submitted? Request a copy of both reports and review.

SECTION	SECTION TITLE	DUE DATE RELATIVE TO FAA REAUTH (10.5.2018)	STATUS/NEXT STEPS	DUE DATE	TEXT	NOTE
503	Return on Investment Report	1 year, then annually	✓ Report issued 2019.04, then yearly thereafter	2019.10.05, 2020.10.05, ...	<i>The Administrator shall submit... a report on the status of each NextGen program [including] (1) an estimate of the date the program will have a positive return on investment; (2) an explanation of any delay in delivery of expected benefits.... (c) The Administrator shall (1) develop in coordination with the NextGen Advisory Committee and considering the need for a balance between the long-term and near-term user benefits [for the Federal Government and users of the national airspace system], a prioritization of the NextGen programs; (2) annually update the priority list"Department of Transportation shall review the report and submit to the appropriate committees of Congress a statement of the inspector general..."</i>	DOT report on NextGen was issued 08.27.2019 (see links). Request a copy of this report annually. Audit Announcement: https://www.oig.dot.gov/sites/default/files/Audit%20Announcement%20-%20FAA%20NextGen%20Delivery%20Study.pdf . Audit Report: https://www.oig.dot.gov/sites/default/files/FAA%20Metropolitan%20Program%20Final%20Report%5E08-27-19_0.pdf
534	NextGen Delivery Study	Study to be initiated within 6 months Report 1 year later	Late by 3+ months? Status?	2020.04.05	<i>The inspector general of the Department of Transportation shall initiate a study of the potential impacts of a significantly delayed, significantly diminished, or completely failed delivery of the Next Generation Air Transportation System modernization initiative by the Federal Aviation Administration, including impacts to the air traffic control system and the national airspace system as a whole. Including: (4) an analysis of the main differences that would be seen in our air traffic control system; (5) the potential impacts on the flying public, including potential impacts to flight times, fares, and delays in the air and on the ground ; (8) an analysis of the potential impacts on aircraft noise and flight paths ; (9) the potential changes in separation standards, fuel consumption, flight paths, block times, and landing procedures or lack thereof; (10) the potential impacts on aircraft taxi times and aircraft emissions or lack thereof; ...the inspector general shall submit to the appropriate committees of Congress a report on the results of the study.</i>	Is the study completed? If not when will it be completed? Request a copy of this study and review.
547	Enhanced Air Traffic Services	Establish program within 6 months Operate program for 2 years	Should have started pilot. Due in <3 months.	2020.10.05	<i>Establishes a pilot program for preferential access to three airports providing higher priority in sequencing for airplanes equipped with "certain NextGen avionics". "...sequencing aircraft equipped with certain NextGen avionics ahead of other aircraft in the Traffic Flow Management System to the maximum extent consistent with safety."</i>	Has the pilot program started? Which are the 3 participating airports? Ask what FAA program this section furthers: Time Based Flow Management? What are "Certain NextGen avionics"?

SECTION	SECTION TITLE	DUE DATE RELATIVE TO FAA REAUTH (10.5.2018)	STATUS/NEXT STEPS	DUE DATE	TEXT	NOTE
572	Special Review	Report in 2 years	Due in <3 months.	2020.10.05	The FAA Management Advisory Council shall review...1) <i>the practices and procedures of the FAA for developing proposals with respect to changes in regulations, policies, or guidance of the Federal Aviation Administration relating to airspace that affect airport operations, airport capacity, the environment, or communities in the vicinity of airports, including an assessment of the extent to which there is consultation , or a lack of consultation</i> , with respect to such proposals— (A) between and among the affected elements of the Federal Aviation Administration...; and (B) between the Federal Aviation Administration and affected entities, including airports, aircraft operators, <i>communities</i> , and State and local governments. (2) Recommendations for revisions to such practices and procedures to improve communications and coordination between and among affected elements of the Federal Aviation Administration and with other affected entities with respect to proposals described in paragraph (1) and the potential effects of such proposals. This determination is to made after consulting with air carriers, GA, airports , exclusive bargaining representatives of air traffic controllers and state aviation officials. The report shall include a description of the comments, recommendations, and dissenting views received from the Council and a description of how the Administrator plans to implement the recommendations of the Council.	Consider Roundtable input to Airports where appropriate for input to the report. Does the FAA plan to solicit input from communities? If so, how would that be provided?
712	Research Advisory Committee	Written reply to Research Advisory Committee required 60 days after any recommendation	Unclear how to track this supposedly publicly available information	60 days after each recommendation	The national aviation research plan required under section 44501(c) shall include a summary of all research advisory committee recommendations and a description of the status of their implementation." <i>The written reply to the research advisory committee, when transmitted to the research advisory committee, shall be (A) made publicly available on the research advisory committee website.</i>	Clarify function of this committee. Ask the FAA to provide a link to the website where their reply to the advisory research advisory committee will be posted for the public.
741	Research Plan for the Certification of New Technologies into the National Airspace System	Research Plan in 1 year	Late by 9+ months? Status?	2019.10.05	[the Administrator shall transmit] a comprehensive research plan for the certification of new technologies into the national airspace system to the Committee on Science, Space, and Technology of the House of Representatives and the Committee on Commerce, Science, and Transportation of the Senate. <i>This plan shall identify research necessary to support the certification and implementation of NextGen</i>	Is the plan completed? If not when will it be completed? Request a copy of this plan and review.

SECTION	SECTION TITLE	DUE DATE RELATIVE TO FAA REAUTH (10.5.2018)	STATUS/NEXT STEPS	DUE DATE	TEXT	NOTE
742	Technology Review	Report in 1 year	Late by 9+ months? Status?	2019.10.05	The Administrator of the FAA, in coordination with the Administrator of NASA, shall conduct a review of current and planned research on the use of advanced aircraft technologies, innovative materials, alternative fuels, additive manufacturing, and novel aircraft designs, to increase aircraft fuel efficiency. [Among other things the review shall include summaries of projects and missions to examine "such technologies, materials, fuels, and aircraft designs to enhance fuel efficiency and aerodynamic performance, and reduce drag, weight, noise, and fuel consumption;"	Is the review completed? If not when will it be completed? Request a copy of this review and provide comment.
743	CLEEN Aircraft and Engine Technology Partnership		Status? Documentation available?		The Administrator of the Federal Aviation Administration shall enter into a cost-sharing cooperative agreement... with institutions, entities, or consortiums to carry out a program for the development, maturation, and testing of certifiable CLEEN [continuous lower energy, emissions, and noise] aircraft, engine technologies, and jet fuels for civil subsonic airplanes.... (c) The Administrator shall establish the performance objectives for the program in terms of the specific objectives to reduce fuel burn, emissions and noise.	What are the performance objectives for noise? Is there documentation about the objectives to reduce fuel burn, emissions, and noise?
761	NextGen Research	Report in 1 year	Late by 9+ months? Status?	2019.10.05	The Administrator shall submit... a report specifying the top 5 priority research areas for the implementation and advancement of NextGen, including— (1) an assessment of why the research areas are a priority for the implementation and advancement of NextGen; (2) an identification of the other Federal agencies and private organizations assisting the Administration with the research; and (3) an estimate of when the research will be completed.	The FAA presented a slide with the top five priorities. Request a copy of this report and review.
NOTES:						
1) FAA Reauthorization Act of 2018: https://www.congress.gov/115/plaws/publ254/PLAW-115publ254.pdf						
2) This chart tracks sections of the 2018 FAA Reauthorization Act related to aircraft noise and health impacts						
3) QSC = Quiet Skies Caucus in the U.S. Congress, https://nqsc.org/Caucus.html						
4) Quiet Skies Caucus Officers: Co-Chairs Eleanor Norton (D-DC) and Stephen Lynch (D-MA) and Vice-Chairs Mike Quigley (D-IL) and Tom Souzzi (D-NY)						
5) BLUE font = columns "D" and "G" to highlight the current status and the "NOTE" describing the suggested action						
6) NLT - Not Later Than						
7) "Issued" - something submitted by the FAA but may not be meeting Congressional mandate and expectations						
Information compiled by the Aviation-Impacted Communities Alliance, AviationImpactedCommunities@gmail.com						



SCSC Roundtable <scscroundtable@gmail.com>

Comment for today's meeting

1 message

Robert Holbrook

Mon, Aug 17, 2020 at 10:00 AM

To: "scscroundtable@gmail.com" <scscroundtable@gmail.com>

Today, I plan to speak to the idea of shaping the work of Committee members Hendrix and Watanabe into position papers on their respective subjects that would form a source of findings that the RT and the Committees could draw upon in the future to draft letters and take appropriate action.

Time has not allowed me to flesh out a full document, but I am attaching for your consideration a scaffolding that could be considered as a basis upon which such documents could be built. Please view this as more of a template – it is no where close to being a finished work. But that is also the nature of such a document. As the RT continues to meet, additional findings can be added to the scaffolding, fleshing out the bullets and sub-bullets as appropriate. In that process, the RT will develop a rich basis of findings and recommendations to draw upon when the need arises. This is especially important because time might not permit a discussion of all the finer points we might want to suggest before a letter needs to be submitted.

Regards,

Robert Holbrook

**Position Paper Concept.pdf**

79K

CONCEPT
Noise Metrics Position Paper

Findings

DNL

1. The DNL 65 noise metric does not provide the community with reasonable protection from the annoyance of airplane noise
 - a. The rollout of PBN has highlighted the inadequacies of DNL 65 standard for characterizing annoyance
 - i. >10m complaints have been filed at SFO since NextGen was introduced in 2015, with fewer than 5000 complaints per year prior to that.
 - b. In reality, DNL 65 contours are confined to the close proximity of airports. These contours provide no protection to residents further from airports.
2. The DNL standard, as currently applied, has almost no value when used to determine whether an increase in noise will cause significant annoyance to a community.
 - a. Boom Supersonic stated in a comment letter to the FAA that it would take 28,835 daytime Concorde level sonic booms in a year to raise the DNL by 1.5 DNL from 63.5DNL to 65 DNL.
3. DNL metrics used for regulating air flight should not be calculated as annual averages – a much shorter period, more closely approximating human annoyance, should be used.
 - a. Because of the wide variability of reverse-flow traffic, DNL does not fairly characterize annoyance. Reverse flow traffic must be dealt with fairly and systematically.
 - b. See recommendation 1.

...

Tone and Weighting of dB measures (dB-A, db-C)

The Roundtable is unaware of reliable data characterizing the effects of tone on annoyance and seeks more information on this topic. The RT is aware that tone has been flagged as an issue by the FAA and other organizations studying annoyance.

...

Recommendations

DNL

1. Pending further research on this topic, the FAA should report a DNL metric that describes the peak three(?) week period in a year, This would factor out seasonal shifts in reverse-flow traffic.

2. In modeling airplane noise, the FAA should ensure that real-world conditions affecting noise on the ground are fairly represented in the forecasts used for each procedure. For the purpose of calculating noise, averages applied over a long time could understate actual noise. The models predicting DNL levels should fairly describe historically measured variations in real-world conditions affecting noise for the area being modeled. These conditions should include wind speed, wind direction, temperature and barometric pressure.

...



SCSC Roundtable <scscroundtable@gmail.com>

Public Comment today's SCSC Leg meeting - Agenda Item #4

2 messages

Jennifer Landesmann

Mon, Aug 17, 2020 at 9:58 AM

To: scscroundtable@gmail.com

Cc: city.council@cityofpaloalto.org

Dear SCSC Legislative Committee:

For item 4 - I suggest you **please clarify if your goal is to influence "appropriateness of airspace changes" OR "appropriateness of process."**

As you are aware, FAA's NEPA regulations (FAA Order 1050.1F) are about process - a process of consultation with communities. As I have been alerting you throughout the year - **you have power to improve FAA NEPA practices now** and not have to wait for a future bill or legislation to make the process work better.

Remember:

- Last year **the FAA asked YOU to help decide the level of environmental reviews**, and you haven't taken any positions. You could start by getting baseline analysis done for the major procedures affecting citizens. *Noise maps, noise maps, noise maps.*
- **The FAA has also recently gone on record to ENCOURAGE the use metrics beyond DNL in assessment.** There is an abundance of data, technology, and experts who can do this **today**. An extra push of a button outputs more metrics than DNL.Noise maps, noise maps.

Your document rightly points to an appropriateness of process as fundamental to evaluate changes (using right tools and metrics). I assume that just like making changes about roadways, say changing a traffic light to a stop sign - appropriate and realistic analysis is necessary.

Appropriateness of airspace changes should develop from proper consultation - and why the level of review for changes matter. Say Nextgen is meant to build airport capacity yet it barely uses EA's when it should require fuller reviews. **About the complaints you mention** - you need to start clarifying that these complaints are due to *concentration* of noise and pollution. Is it appropriate to concentrate on noise? Everything you are proposing about health issues relates to this.

I have made some *quick/informal notes* in blue for the Item 4 document. Since we just heard about this meeting on Friday, I would be happy to elaborate and send more info on each point after.

Thank you,

Jennifer

[My public omments in blue](#)

Agenda Item #4

Language/Concepts the SCSC Roundtable Requests be Added to Appropriate Federal Aviation Administration (FAA) Legislation

Issue:

Current regulations and guidance that govern the FAA's environmental reviews do not include sufficiently specific language to direct the FAA to adequately consider the impact of aircraft noise on residents and noise sensitive resources when it is making determinations about the appropriateness of flight procedure changes.

[NEPA calls for appropriateness of PROCESS; the proposed changes themselves are then evaluated for appropriateness with proper consultation. Failure of appropriateness of process I suggest is due to the following 3 reasons – not just](#)

FAA's doing:

- 1) FAA Noise Policy thresholds for process: That FAA has set thresholds of significance (for disclosure, public engagement and mitigations) that DENY an appropriate process all for areas outside a 65 dnl. What are the regional committees and roundtables for? To just keep saying we need new legislation? Why not press both FAA and airports to do **full disclosure** starting at 45 DNL and to develop a menu of alternatives beyond insulation such as night time procedures.
- 2) FAA environmental practices: Since nobody asks otherwise, FAA and airports go out of their way to avoid showing before/after noise projections despite public outcry about the problems. **FAA says they encourage the use of alternative metrics**, where's the action? What happens if you never ask?
- 3) Airports and Regional help FAA and airports hide impacts: Committees and roundtables have not been sufficiently proactive to get the noise analysis (fundamental to an "appropriate process"). Noise assessments are not even time consuming; *the technology is available, there is abundant data*.

The SCSC Roundtable could *right now* ask for the FAA to supplement DNL in the EA's ahead (especially because you repp communities which are all FAR away from 65 DNL)– and demand for airports to track impacts with more than DNL. **Has the SCSC asked?**

The intent of the proposed language changes is to protect residents and noise sensitive resources as the FAA considers changing the flight procedures/path/frequency over them.

Recommendation:

The following conceptual language changes need to be included in the appropriate FAA Reauthorization bill or similar bills regarding the FAA – until this language has been approved and adopted for use by the FAA.

- The millions of aircraft noise complaints and public discord that has resulted from the FAA's implementation of the NorCal Metroplex and other Metroplex projects throughout the country has demonstrated that the FAA's existing tools (**FAA TOOLS LIKE AEDT CAN WORK FINE - OTHERWISE ALL FAA ACTIONS WOULD BE INVALID**), noise metrics (**ITS PERMISSIBLE IN FAA NOISE POLICY TO EMPLOY MORE METRICS THAN DNL _ FAA JUST WROTE A REPORT ENCOURAGING THEIR USE**), and thresholds of significance (**SIGNIFICANCE FOR DISCLOSURE, FOR MITIGATION?**) have not effectively or accurately assessed the impact of aircraft noise on residents and noise sensitive resources. Therefore, the FAA must establish new reasonable and realistic noise metrics and noise standards (**FAA SEEMS TO SUGGEST THAT THIS SHOULD BE PROPOSED BY COMMUNITIES – BECAUSE ONE SIZE DOESN'T FIT ALL, THAT MAKES SENSE**) for accurately assessing the noise impacts of flight procedure changes. This includes the application of cumulative and single-event noise metrics to assess impacts on human annoyance, sleep, health, learning, public spaces, and natural quiet. **YOU/WE CAN PROPOSE A GROUP OF METRICS – WHAT ARE WE WAITING FOR?**

FAA's recent 188 report to Congress has a MENU of options. What needs to be discussed is for example for a metric like N above, what should the "above" be? For an airport runway community N70 but that is *inappropriate* for a rural area. The level needs some trial and testing to see together WITH the folks who know the noise (people on the ground, not an outdated FAA manual).

The FAA must modify their existing flight procedure approval processes to include and utilize the new noise metrics when approving any flight procedure modification.

The current approval process appears to be “community consensus” which is devoid of any objective criteria and requires all of the above to be trustworthy.

- When the FAA is reviewing/approving any flight procedure, they must collect noise measurements at homes and noise sensitive uses (using the new metrics defined above). These noise measurements will include actual pre-change conditions, actual post-change conditions, and a post- implementation review process to ensure the “after” condition is the same or an improvement in aircraft noise exposure as measured at homes and noise sensitive uses than was defined in the approved flight procedure. **THERE APPEARS TO BE A NEW PROCESS TO GET AIRPORT MONITORS outside the 65 DNL (using federal funds). THE SCSC could be instrumental in securing permanent monitors for our communities.**
 - If the post-implementation noise measurements are higher than those defined in the approved flight procedure’s environmental documentation, the FAA would be required to modify the flight procedures until the noise levels are at or lower than the approved levels. [SEP]
 - The SCSC Roundtable agrees that safety of air travel is paramount. However, the SCSC Roundtable believes that the rules governing the FAA’s environmental processes should be amended to ensure that “the impact of aircraft noise on people and noise sensitive resources” is given the same decision making weight as “the efficient use of the airspace for aircraft operators”. [SEP]

Jennifer Landesmann

To: scscroundtable@gmail.com

Cc: city.council@cityofpaloalto.org

Mon, Aug 17, 2020 at 10:05 AM

Correction to auto type.

...Is it appropriate to concentrate noise? Everything you are proposing about health issues relates to this...

[Quoted text hidden]