

SCSC Roundtable All Correspondence

July 23, 2021 – July 27, 2021

July 23, 2021

From

Phoebe Weiman

To

SCSC Roundtable

Message

SCSC Roundtable Meeting July 28th - Agenda Packet Posted

Dear SCSC Roundtable and Interested Parties,

The meeting agenda packet for the SCSC Roundtable meeting on July 28th, 2021 is now posted to the SCSC Roundtable Website for your convenience. Information is provided on the first page of the agenda packet for accessing the virtual meeting.

Have a great weekend!

Phoebe Weiman

Airport Planner

July 24, 2021

From

Greg Hyver

To

SCSC Roundtable

Message

This ain't going away anytime soon.

Greg Hyver
• N Rodeo Gulch

Gina Engelund Gina. I feel your helplessness in regards to the betrayal of our city leaders and our Congressional representatives who dropped the ball. The pure BS of the Roundtable (the government-speak so no average citizen could really understand what was being said and what progress was being made, the lack of any timeline ever provided to us, the lies that the wheels were in motion to move SERFR back to BSR) followed by the "FAA Workshop" farse. We all need to be patient first and demand a formal statement from our local "representatives" what really went down at the FAA Workshop, and whether the final decision on SERFR's permanency is true or not. If it is, then we must reform as a citizen group and decide in which direction we need to go. I know that we're all totally exhausted, not only by the constant jets passing over, but by this entire, phony process (Select Committee, Roundtable) that lasted seemingly forever and was always meant as a facade to mask the real decision-making bodies (corporations; greedy politicians). Notice how they always throw out the word "safety" in their justifications for everything. Who can argue against public "safety?" That's been a tried and true method they apply to gullible people. Bullsh*t! All lies. The decision to go the route of negotiation with the FAA (vs. lawsuit) was made by the Board of Supervisors a couple of years ago. That decision, as we are now learning, was a gigantic mistake!!! The FAA, and those who were supposed to be out there representing us (SCBOS, Roundtable, Panetta, Feinsten) literally \$%#\$@ us. They wrote their nice little letters on government stationary, then dropped the ball. Other CA counties went the opposite direction and chose to sue the FAA, and they've had much better success than the fruitless negotiation path. This should now be a viable path for the County to consider, that is, if they give a crap about any of us and understand the injustices that have been smugly shoved into our faces by the FAA. Yet, there are certain supervisors who like SERFR just where it is, and will vote against a lawsuit. That means organizing and protesting at their meetings and calling these particular supervisors out. A second legal alternative is a class action lawsuit, not simply against the FAA, but against individuals who participated in allowing this outcome to happen by lying to us that SERFR was on its way out, causing us to wait it out for over a year, doing nothing, while Google, SFO and Panetta were working backroom deals. These individuals never did really represent our interests. That's why we were always in the dark and never given a timeline. They thought we were simply too stupid to figure them out. There was never any transparency because they never intended to move SERFR--ever. The link for one of the LA lawsuits follows: [FAA Violated Environmental Laws at LAX, Federal Appeals Court Rules](#)

[FAA Violated Environmental Laws at LAX, Federal Appeals Court Rules](#)

In a victory for the city, a federal appeals court found that the Federal Aviation Administration violated key e...

July 24, 2021

From

John Miller

To

SCSC Roundtable

Message

Reaction to the FAA Refusal to Fulfill Mandate of Select Committee

Hello Ms. Bernald,

I attended the FAA online meeting and was really disappointed in how the FAA handled it. Seldom have I seen a public agency so blatantly misread the temper of the public and I have attended many public agency meetings in my time. I'm referring to the obvious emphasis being placed on the FAA itself, with unnecessary on screen representation from every client stakeholder of the FAA EXCEPT representatives of the public. Why were there no people from the SCSC, who know this material, on screen asking the kind of questions only you can ask?

Had the FAA properly thought it through even the FAA should have concluded that if they were going to deliver bad news to a public patiently waiting for a promised solution to airplane noise for over 6 years, that bad news should not be delivered in a self-indulgent, self-focused manner and in an ill placed attempt at an unfortunate combination of levity and dismissal of public concern. Why weren't questioners able to speak and ask their questions with a chance to engage the FAA people live and in real-time? That's what the San Jose City Council does, that's what the Santa Cruz and Santa Clara County Supervisors do in their meetings. That's how a public agency deals with its constituents. But, oh of course, the FAA's constituents are not the public, but the airlines. Reducing costs, increasing efficiencies and externalizing the cost to people like me is standard operating procedure. Last night's meeting made that very clear.

The U.S. helped win the Second World War in 4 years. The FAA initiates an unannounced change to the flight approach to SFO in 2015 and 6 years later, it explains (not very clearly, I might add) that they were unable to do much of what they were asked (and promised to do) because safety considerations prevented them from doing so. Or something like that. I have no idea which parts of the Select Committee's request for the return of the Big Sur route were not met, which were, and what that ultimately means. Of the many faces assembled by the FAA and put on screen last night, no one clearly explained the significance of that decision in terms of exactly what it might mean for those of us living in the Santa Cruz Mountains in particular. One cynical interpretation is that instead of just saying, hell no, Big Sur will never be returned-to, the FAA instead says something totally ambiguous so that just plain folks don't understand what they were told. My impression is that the FAA is going to do whatever the hell it wants to do and people unfortunate to have the cost of FAA programs externalized to them (in the form of intolerable noise to name only one impact) will just have to suck it up. I guess that's me and the unlucky thousands of others who moved to the Santa Cruz Mountains for the peace and quiet that is now only a memory. The guy from Alaska Airlines had it right when he said it is all about priorities. Yeah, the FAA's and the airlines' priorities not the public's.

And then the FAA left us with word that in the future they would be happy to work with area Round Tables to consider new recommendations the public might have. Really? After 6 years of secrecy, manipulation, stonewalling if not outright lying, and promises unfulfilled, we should repeat the process? Really? I will conclude by pointing out that Boston and Phoenix sued the FAA and received from the courts judgements in their favor resulting in curbing the excesses of the FAA in those cities. However, we in the Bay Area decided to COOPERATE with the FAA and embark on the long, frustrating and incredibly time-consuming process that gave birth to the Select Committee and all of the history around that through which we have lived these last 6 years. Obviously, that was a big mistake. The question before us is what can be done now?

That's all I have to say. Thanks for reading.

John Miller

July 24, 2021

From

Eric Witter

To

SCSC Roundtable

Message

FAAs refusal to follow the Select Committee's Recommendation

Chairperson Mary Lynne Bernald,

It is difficult to express the thoughts and feelings we are having about the FAAs decision to not follow the Select Committees recommendation to move the SERFER flight path. We did the democratic process to find a productive solution, we waited six years for FAA, and now they have said that they are doing nothing because they can't meet all of the criteria. If there is criteria that can't be met, then the next step should be to see what can be done. They had six years to work on a way to make this better.

We live in the mountains in Santa Cruz, and our quality of life has changed drastically since having a roaring flightpath over our heads. The majority of planes clearly use speed brakes (very loud), even though the FAA claimed they should be doing a guided decent.

Please help us find a solution to this problem. It is unacceptable that the FAA is refusing to make a solution to the problem they created.

Thanks,

Eric Witter

July 24, 2021

From

Richard L. Blanding

To

SCSC Roundtable

Message

Heavy Aircraft Noise

Sirs;

For far too long now we've been enduring unacceptable levels of noise from heavy airliners, late at night. Every night at 11:30, again at midnight, again at

12:30 A.M., our bedroom and indeed our whole house reverberates with the extremely loud roar of very large aircraft flying at low altitude over our house near downtown Los Altos. We did not buy a home in close proximity to an airport, and should not have to put up with this abuse. It is far more than a nuisance or an annoyance, it is a serious detriment to enjoying living in this community.

Sincerely,

Richard Blanding

July 24, 2021

From

Gary Luhrman

To

SCSC Roundtable

Message

FAA Decision not to adopt new Next Gen BIG SUR arrivals to SFO

Dear Reps. Eshoo and Panetta,

I first want to thank you for your support and for issuing a joint statement regarding the FAA's decision not to adopt the recommended Next Gen BIG SUR arrivals to SFO. After waiting so long for something to finally happen and the announced commitment from the FAA to make the changes beginning this summer - it is a terrible let-down. I am not convinced they tried very hard.

In listening to their reasons for not accepting the recommendations based on safety criteria, I find it unbelievable that the FAA could not apply the same safety criteria by moving the approach path a few miles north to the proposed Next Gen BIG SUR flight path. Knowing that this was pretty much the same flight path that SFO had been using for the past 50 years. It is unbelievable and unacceptable.

Please keep the pressure on the FAA to make the proposed changes. They need to make this happen!

Joint Statement: <https://eshoo.house.gov/media/press-releases/rep-eshoo-speier-panetta-respond-faa-decision-not-adopt-select-committee>

Best regards,

Gary Luhrman

July 24, 2021

From

Diane Matlock

To

SCSC Roundtable

Message

FAA - SERFR - BSUR HELP!

Dear Chairperson Bernald,

I sent the following letter to Congresswoman Eshoo. I would greatly appreciate it if you can help make progress with the FAA on the points I raised in the letter. I have great respect for the work the Roundtable is trying to do, but unless Congress directs the FAA to come up with a SERFR/BSUR solution, I'm concerned the Roundtable will be powerless.

Respectfully,

Diane Matlock

Dear Congresswoman Eshoo,

I attended both FAA Workshops this week. I was devastated to hear that SERFR will not be returned to the BSUR flight path. After six years of trusting the FAA, we were simply told that the Select Committee criteria could not be met due to safety issues. SIX YEARS! I feel the FAA gave us false hope and misled us into believing if we were patient, it would get fixed.

The FAA meetings were an insult to our intelligence. The Q&A sessions were weak and many questions went unanswered. Focusing on safety was a smoke screen. No one ever expected the FAA to put safety aside. Also, claiming that all the criteria could not be met without explaining what criteria could be used to move the flight path back was unacceptable and lazy. How can the FAA spend six years on an issue and not come up with a solution or at least options? It was shocking, to say the least.

Moving forward, the FAA claims they are always willing to work with the Roundtables and communities to gather feedback and look at new solutions. Clearly, the process is broken. We spent six years working with the FAA and they did nothing. Nothing! The FAA also claimed they just need to understand 'intent' to work with communities. I believe the intent was clear: move SERFR back to the original BSUR flight path in a safe manner.

I am hoping you are as outraged as I am at the lack of progress. Is it reasonable to ask you to communicate the following to the FAA?

1. Please explain to the FAA that the intent is clear. Move SERFR back to BSUR so you can right the wrong that was done in 2015. It is unacceptable that SERFR is destroying people's quality of life while BSUR received virtually no complaints.
2. Direct the FAA to stop playing games by asking the Roundtables and communities to develop the criteria to make the change. The FAA has the expertise and therefore should come up with the criteria to move the flight path back under safe conditions. The criteria set by the Select Committee were recommendations; the intent was to move the flight path back. The FAA should develop the solution to meet the intent.
3. The FAA claims they did develop a safe operational procedure to move the flight path back, even though not under the exact criteria as the Select Committee recommendations. Why isn't that procedure being implemented?

4. If the FAA is unwilling to work on the plan to move the flight path back without given specific criteria by non experts, we will end up exactly where we are today--no where. If the FAA is not willing to move the flight path back under any circumstances, we need them to admit that now so people stop investing time (and hope) in a solution. We need honest answers as to whether there is still hope.

There was so much momentum and community involvement at the start of this nightmare. Trying to get that back when all trust is broken will be near impossible. Still, I'd appreciate your feedback on how the community and your office can move forward together to get the flight path moved as soon as possible. We desperately need your help and guidance.

Sincerely,

Diane Matlock

July 24, 2021

From

David Knight

To

SCSC Roundtable

Message

Move Back to BSR...

Hello,

I'd like to express my extreme displeasure with the FAA for not moving forward with shifting back to BSR. This has been going on for years and directly impacts the quality of life of those under the current flight path. Many of us bought our homes to avoid this kind of noise and to move the flight path over us and then refuse to remedy the situation for no good reason is unacceptable.

Thanks in advance for working to push the FAA to implement the select committee's recommendations.

David Knight

July 24, 2021

From

Mark Bucko

To

SCSC Roundtable

Message

SERFR

In the recent workshop, we repeatedly heard that SERFR could not be moved back because it is satellite based navigation and the old route is land based navigation.

WHAT?

Why can an old ground based track not be converted to satellite? Satellites do not depend on ground topography do they?

Maybe there is a good reason, but it seemed telling to me that they just kept spouting that answer and not why the old rack couldn't be converted and then restored.

Would like to know...

Thanks and best,

Mark Bucko

July 24, 2021

From

Scott Beam

To

SCSC Roundtable

Message

We need State Representatives who Represent US

We thank our constituents who engaged in this long and arduous process, and we are grateful to the local governments who invested in the regional Airport Roundtables that made these workshops possible. We also appreciate the commitment made by the FAA at the workshops to remain engaged with the Santa Clara, Santa Cruz, and SFO Roundtables. Our constituents' participation brought the FAA to the table for a dialogue on airplane noise reduction, **and we are committed to supporting their continuing efforts.**"

Seriously?

This is all they have to say? How about showing some leadership and start driving this issue from their position of power. We gave these people a position of authority and leadership by voting them into office - perhaps too many times now!

Now they are committed to supporting our efforts?

Gee, thanks for the support. LOL

I am appalled at the response by the FAA but I have to admit I saw this coming from the beginning. We were warned not to file a lawsuit because that would only make the FAA withdraw and not "work with us". What a joke.

Two things need to happen here:

- 1) File a lawsuit
- 2) Elect State Representatives that give a shit about what WE want.

From this point on I will vote for the person most likely to engage this issue and solve it. I no longer will vote for a person running for office based on their party affiliation.
Anna Eshoo it is time for you to find a new job! She is out of touch.

July 25, 2021

From

Steve Smith

To

SCSC Roundtable

Message

SERFR3

Dear Mary Lynne Bernald,

It is an absolute disgrace the way the FAA has handled the transition to SERFR3 and refusal to go back to BR1XX.

The FAA made the transition to SERFR3 with no public consultation in Santa Cruz county, the first we knew planes were flying over our homes every minute or two.

The FAA then went through the whole public consultation and assessments found it was viable to change but then decided to do nothing.

This is nothing but arbitrary and capricious, you are public servants yet you do nothing but serve the interests of the airlines. Disgraceful.

I know neither you nor the FAA really care which is exactly why I and others under SERFR3 need to contact our congressional representative.

This is not going to go away until you make the change.

Sincerely,

Steve Smith -President

OAIInnovations inc.

July 25, 2021

From

Debbie Hakim

To

SCSC Roundtable

Message

Agenda Item #9 for July 28, 2021 meeting

Dear SCSCRoundTable members,

After the disappointing news from the FAA this week and my questions about solving the noise issues not answered, I would like you to request a curfew for our community. From the FAA workshop, I found out that San Jose Mineta Airport has a curfew with no fly overs between 11:30 pm and 6:30 am. Other communities have the HUSH program implemented. My community is impacted from the arrivals to SF via the SURFR path. For the last few years, my family has suffered from being woken up from several cargo fly overs between 11:30pm and 6:30 am. In fact, last night between 1:15 am to 1:44 am, 3 cargo planes flew over our home. We also suffer from these planes during the day. Anyway, I feel a curfew will give us some relief. The lack of sleep has caused a lot of health issues and I feel we need a curfew too.

Thank you,

Debbie Hakim

July 26, 2021

From

Kelly Caborn

To

SCSC Roundtable

Message

New Submission from Contact us

Name

Kelly Caborn

Email

Subject

SCSC Roundtable

Message

I am ABSOLUTELY OUTRAGED at the deception, lies and gas-lighting from this committee, the FAA and everyone involved in not following the touted "correct process" and failing to implement the majority approved Roundtable directive to the FAA to move the SERFR flight path back to a BSR flight path. What an absolute miscarriage of justice and shining example of the dysfunction and dishonesty of government and its elected/appointed officials. Thousands of us patiently worked through the lengthy, time-consuming, and difficult process as we suffered the daily onslaught of hundreds of incredibly loud jets 24/7, in the Jet-Super-Highway that was built over our heads without notice, environmental report, concern or representation from any of our local officials. We played your game as you strung us out for years with bureaucratic process & procedure and worked within that process to achieve a majority vote with directive to the FAA to fix the injustice thrust upon us and move the SERFR flight path. We've waited 6 years for the FAA to deliver and were told by our representatives to be patient just a little while longer and that the flight path change was definitely coming only to be completely blindsided by the FAA joke of a public meeting last week that the flight path couldn't be moved! Absolutely BS and unacceptable. We are organized. We are outraged and we Vote! Shame on you and it's past time to hold our 'elected' representatives and government agencies accountable.

July 26, 2021

From

Kelly Caborn

To

SCSC Roundtable

Message

Outraged over lack of action and no accountability

I am ABSOLUTELY OUTRAGED at the deception, lies and gas-lighting from this committee, the FAA and everyone involved in not following the touted "correct process" and failing to implement the majority approved Roundtable directive to the FAA to move the SERFR flight path back to a BSR flight path.

What an absolute miscarriage of justice and shining example of the dysfunction and dishonesty of government and its elected/appointed officials. Thousands of us patiently worked through the lengthy, time-consuming, and difficult process as we suffered the daily onslaught of hundreds of incredibly loud jets 24/7, in the Jet-Super-Highway that was built over our heads without notice, environmental report, concern or representation from any of our local officials.

We played your game as you strung us out for years with bureaucratic process & procedure and worked within your process to achieve a majority vote with directive to the FAA to fix the injustice thrust upon us and move the SERFR flight path.

We've waited 6 years for the FAA to deliver and were told by our representatives to be patient, trust The Roundtable and wait just a little while longer; that the flight path change was definitely coming only to be completely blindsided by the FAA joke of a public meeting last week announcing that the flight path couldn't be moved! Absolutely BS and unacceptable.

We are organized. We are outraged and we Vote! Shame on you and it's past time to hold our 'elected' representatives and government agencies accountable.

Sent from my iPhone

July 26, 2021

From

Darlene Yaplee

To

SCSC Roundtable

Message

Input to SCSC RT Draft NES Letter - Agenda Item #3

SCSC RT Members,

Thank you for your continued efforts to communicate recommendations to remedy the adverse aviation impacts on our communities so that our Congressional representatives can enact needed changes.

Here are requested changes to Agenda Item #3, the DRAFT NES letter (text in italics represents the current SCSC RT draft; we highlighted some words in the draft to make it easier to spot text we recommend changing).

For convenience, we have included the full text to this email as well as provided an attachment. Thank you for your time and consideration.

Darlene Yaplee and Marie-Jo Fremont

ATTACHMENT: Input to SCSC RT Draft NES letter to Congressional Representatives

Input to SCSC RT Draft NES letter to Congressional Representatives

1. Reduce the Impact Threshold Noise Levels

We recommend reducing the threshold noise levels as measured by DNL as a short-term solution and mitigating the impacts above the new threshold. Scientific evidence has clearly indicated that the current DNL 65 dB impact threshold must be lowered. The results of the NES suggest that a level of DNL 47 dB would result in the same level of annoyance now as was associated with the DNL 65 dB when it was first established in the early 1980s. The SCSC Roundtable recommends that Congress immediately establish DNL 50 dB as the aircraft noise impact threshold for National Environmental Protection Act (NEPA) and 14 CFR Part 150 noise analyses. As long as the

DNL metric is used in the preparation of noise analyses under NEPA, 14 CFR Part 150, and other federal statutes, it should be lowered to DNL 50 dB.

The SCSC Roundtable also recommends that Congress establish that noise sensitive land uses exposed to aircraft noise levels of DNL 50 dB and higher are considered impacted and that the FAA be required to develop mitigation measures to reduce aircraft noise exposure to levels below DNL 50 dB

----->Requested changes for recommendation 1

This should be recommendation #2, not #1. NextGen noise impacts will not be fully addressed if the FAA implemented this recommendation and did not adopt and use alternative metrics for assessment and decision making. DNL vastly underrepresents the numerous, frequent, and highly concentrated overflights of NextGen. Alternative metrics beyond DNL must be used to assess impacts and determine significant impact.

The DNL threshold must be linked to the ambient noise level. Adopting the same fixed DNL level for urban, suburban, or rural areas is too simplistic an approach. The difference between ambient noise and aircraft noise is really what matters. A 47 dB aircraft noise over a 46 dB ambient noise is not a significant increase. However, a 45 dB aircraft noise over a 30 dB ambient is a very large noise increase but would not qualify with a 47 dB DNL threshold.

As tempting as it may be, please do not specify a DNL threshold. As mentioned in other presentations, an independent body of experts such as the National Academies would be better suited to do that.

Replace paragraphs 1 and 2 with the following: SCSC RT recommends Congress direct the FAA to task the National Academies of Sciences, Engineering, and Medicine to provide an expert consensus report on a system of metrics (existing) and thresholds to replace reliance on the Day-Night Level (DNL) metric alone for assessing aviation noise impacts.

Furthermore, specifying a fixed DNL threshold to determine significant impact for all environments is dangerous because:

The FAA uses the DNL threshold for 2 purposes: 1) determine the level and outcome of environmental reviews, and 2) represent the basis for sound insulation programs.

Communities away from an airport and the ones at or near an airport have different ambient noise levels and environments. This must be reflected in having different thresholds (and metrics).

For communities away from an airport, again, we do not recommend for the SCSC RT to specify a new threshold. Furthermore, we don't understand the rationale behind the DNL 50 given the NES results. Selecting a new DNL threshold must be done rationally versus picking a round number.

As stated in the SCSC RT draft, the NES results would suggest lowering the threshold to 47 dB, which represents the same level of annoyance as the one when DNL 65 was selected 40 years ago. Resident Robert Holbrook also mentioned this on page 195 of the 07/28/2021 meeting packet.

Thresholds for sound insulation (14 CFR Part 150) must also be dealt with separately given the potentially very large financial implications.

For example, if DNL 47 became the new basis for sound insulation programs, many residents located between SFO and Palo Alto would qualify (SFO monitoring established a CNEL 52 for Palo Alto). Furthermore, current funding is insufficient to cover all residents in the 65 DNL contour.

2. Adopt and Use Alternative Metrics and Thresholds

The use of a single metric (DNL) and threshold (65 dB) to assess "Significant Impacts" is inadequate and does not meet the Congressional requirement for a metric that provides "a highly reliable relationship between projected noise exposure and the surveyed reactions of people to noise" (1979 Aviation Safety and Noise Abatement Act (ASNA)."

To more correctly assess and then mitigate the impact of aircraft noise for people on the ground while developing a new national framework that is consistent with the results of the NES and the requirements of ASNA, the FAA should adopt and use alternative metrics and thresholds.

Intermittent noise is profoundly different from ambient noise. The Roundtable further recommends that the FAA be required to identify noise sensitive areas where low noise levels (daytime and nighttime) below DNL 50 are an aspect of the setting, and then conduct additional analyses using alternate noise metrics (e.g., Time Above [TA], Number Above [NA]) to identify any reportable noise increases and potential mitigation.

----->Requested changes for recommendation 2

This should be recommendation #1. We need metrics beyond DNL alone to address NextGen impacts.

In the first sentence, please correctly state the Congressional requirement. The ASNA 1979 language refers to "a single system". The FAA has interpreted the Congressional directive to be a single metric instead of a system of metrics. The Congressional requirement is for a single system, not a single metric. A system of metrics would include alternative metrics beyond DNL alone and help solve the current "one size fits all" problem for near and far from airport environments.

Per our previous comment, please do not specify a DNL threshold. If the SCSC RT insists on doing so, the reference to "DNL 50" in the 3rd paragraph should be changed to "DNL 47".

The words "identify any reportable noise increases and potential mitigation" at the end of the recommendation do not fully capture the community requirements, which are for the FAA to use alternative noise metrics for decision-making, not just for analysis, and be required to remedy noise impacts when they are significant as defined by a system of metrics and thresholds.

We request replacing “identify any reportable noise increases and potential mitigation” with “assess any significant noise increases and identify mitigation and abatement measures to remedy impacts when they exceed significant levels as defined by a system of metrics and thresholds.”

3. Fully Fund the Recommendations

The SCSC Roundtable recommends that Congress provide adequate funding on an ongoing basis to accomplish Recommendations 1, Reduce the Threshold Noise Levels, and 2, Adopt and Use Alternative Metrics and Thresholds.

----->Requested changes for recommendation 3

We agree that Congress should fully fund the highest priority to Adopt and Use Alternative Metrics and Thresholds as these are the keystones of environmental reviews and critical to address new noise impacts created by NextGen procedure and vectoring changes.

In addition, if you decide not to adopt our proposed changes for current recommendation 1 and still specify a DNL threshold that would apply to both NEPA and 14 CFR Part 150, then we urge you to limit the funding request to NEPA only. As stated before, there are serious financial implications on noise insulation programs if the DNL threshold was lowered substantially. The financial consequences, including direct cash outlays, must be understood before funding requests are made.

4. Develop a Timeline

The SCSC Roundtable recommends that the FAA should quickly develop a timeline for implementing the above recommendations regarding changing the DNL impact threshold, determining how to mitigate noise effects in areas exposed to DNL 50-65, implementing a policy to use alternative metrics to better evaluate noise, and developing a new framework to comply with ASNA.

Finally, we hope the FAA is cognizant of its critical role in communicating with the public and other stakeholders. As the FAA implements changes in response to the NES study and other developing information – whether on its own initiative or in conformance with Congressional direction – we urge that the FAA provide basic study data and accessible and understandable interpretations of its research findings and subsequent policies. The SCSC Roundtable members look forward to continuing to help our local governments in communicating with the public about aircraft noise issues. We want to thank you for considering the SCSC Roundtable's recommendations and for continuing to support our efforts to reduce aircraft noise for our constituents.

----->Requested change for recommendation 4

Per our previous comments on recommendation 1, please remove the reference to DNL 50-65.

1st paragraph: wording must change to accurately articulate the dual purpose of using alternative metrics. Alternative metrics should not be used solely “to better evaluate noise”. Alternative metrics should also be used for decision making purposes and requirements for the FAA to reduce noise levels when impacts are significant. Requested language: “...implementing a policy to use alternative metrics to assess any significant noise increases and require the FAA to reduce noise levels when impacts are significant.”

2nd paragraph: add a sentence to request that the FAA make the NES data sets available to the public, which they promised to do but have not done yet.

Requested language: add “In particular, we urge the FAA to make the NES data sets available as it has stated it will when the NES results were released more than 6 months ago.” after the existing sentence “we urge that the FAA provide basic study data and accessible and understandable interpretations of its research findings and subsequent policies.”

Finally, the words “mitigation” or “mitigate” are used a few times in the draft and could be misinterpreted by the FAA as representing noise insulation only. As shown in the FAA's Airport Land Use Compatibility Planning document, section 5.4 on page 105 of meeting packet (lines 2528-2538), the FAA distinguishes between “mitigation” and “abatement”. Please edit the draft to clarify that mitigation is not limited to noise insulation but also includes noise abatement measures.

Attachment Name

2021072_Darlene_Yaplee_Input to SCSC RT Draft NES Letter

**Input to SCSC RT Draft NES letter to Congressional Representatives
SCSC RT Meeting – July 28, 2021**

Here are requested changes to the DRAFT NES letter (text in italics represents the current SCSC RT draft; we highlighted some words in the draft to make it easier to spot text we recommend changing).

1. Reduce the Impact Threshold Noise Levels

We recommend reducing the threshold noise levels as measured by DNL as a short-term solution and mitigating the impacts above the new threshold. Scientific evidence has clearly indicated that the current DNL 65 dB impact threshold must be lowered. The results of the NES suggest that a level of DNL 47 dB would result in the same level of annoyance now as was associated with the DNL 65 dB when it was first established in the early 1980s.

*The SCSC Roundtable recommends that Congress immediately establish **DNL 50 dB** as the aircraft noise impact threshold for National Environmental Protection Act (NEPA) and 14 CFR Part 150 noise analyses. As long as the DNL metric is used in the preparation of noise analyses under NEPA, 14 CFR Part 150, and other federal statutes, it should be lowered to **DNL 50 dB**.*

*The SCSC Roundtable also recommends that Congress establish that noise sensitive land uses exposed to aircraft noise levels of **DNL 50 dB** and higher are considered impacted and that the FAA be required to develop **mitigation** measures to reduce aircraft noise exposure to levels below DNL 50 dB*

----->Requested changes for recommendation 1

- **This should be recommendation #2, not #1.** NextGen noise impacts will not be fully addressed if the FAA implemented this recommendation **and** did not adopt and use alternative metrics for **assessment and decision making**. DNL vastly underrepresents the numerous, frequent, and highly concentrated overflights of NextGen. Alternative metrics beyond DNL must be used to assess impacts and determine significant impact.
- **The DNL threshold must be linked to the ambient noise level.** Adopting the same fixed DNL level for urban, suburban, or rural areas is too simplistic an approach. The **difference between ambient noise and aircraft noise is really what matters**. A 47 dB aircraft noise over a 46 dB ambient noise is not a significant increase. However, a 45 dB aircraft noise over a 30 dB ambient is a very large noise increase but would not qualify with a 47 dB DNL threshold.
- As tempting as it may be, **please do not specify a DNL threshold**. As mentioned in other presentations, an independent body of experts such as the National Academies would be better suited to do that.
 - **Replace paragraphs 1 and 2 with the following: SCSC RT recommends Congress direct the FAA to task the National Academies of Sciences, Engineering, and Medicine to provide an expert consensus report on a system of metrics (existing) and thresholds to replace reliance on the Day-Night Level (DNL) metric alone for assessing aviation noise impacts.**
 - Furthermore, specifying a fixed DNL threshold to determine significant impact for all environments is dangerous because:
 - The FAA uses the DNL threshold for 2 purposes: 1) determine the level and outcome of environmental reviews, and 2) represent the basis for sound insulation programs.

- Communities away from an airport and the ones at or near an airport have different ambient noise levels and environments. This must be reflected in having different thresholds (and metrics).
- For communities away from an airport, again, we do not recommend for the SCSC RT to specify a new threshold. Furthermore, we don't understand the rationale behind the DNL 50 given the NES results. Selecting a new DNL threshold must be done rationally versus picking a round number.
 - As stated in the SCSC RT draft, the NES results would suggest lowering the threshold to 47 dB, which represents the same level of annoyance as the one when DNL 65 was selected 40 years ago. Resident Robert Holbrook also mentioned this on page 195 of the 07/28/2021 meeting packet.
- Thresholds for sound insulation (14 CFR Part 150) must also be dealt with separately given the potentially very large financial implications.
 - For example, if DNL 47 became the new basis for sound insulation programs, many residents located between SFO and Palo Alto would qualify (SFO monitoring established a CNEL 52 for Palo Alto). Furthermore, current funding is insufficient to cover all residents in the 65 DNL contour.

2. Adopt and Use Alternative Metrics and Thresholds

The use of a single metric (DNL) and threshold (65 dB) to assess "Significant Impacts" is inadequate and does not meet the Congressional requirement for a metric that provides "a highly reliable relationship between projected noise exposure and the surveyed reactions of people to noise" (1979 Aviation Safety and Noise Abatement Act (ASNA))."

To more correctly assess and then mitigate the impact of aircraft noise for people on the ground while developing a new national framework that is consistent with the results of the NES and the requirements of ASNA, the FAA should adopt and use alternative metrics and thresholds.

Intermittent noise is profoundly different from ambient noise. The Roundtable further recommends that the FAA be required to identify noise sensitive areas where low noise levels (daytime and nighttime) below DNL 50 are an aspect of the setting, and then conduct additional analyses using alternate noise metrics (e.g., Time Above [TA], Number Above [NA]) to identify any reportable noise increases and potential mitigation.

----->Requested changes for recommendation 2

- **This should be recommendation #1.** We need metrics beyond DNL alone to address NextGen impacts.
- In the first sentence, **please correctly state the Congressional requirement.** The ASNA 1979 language refers to "a single system". The FAA has interpreted the Congressional directive to be a single metric instead of a system of metrics. The **Congressional requirement is for a single system, not a single metric.** A system of metrics would include alternative metrics beyond DNL alone and help solve the current "one size fits all" problem for near and far from airport environments.
- Per our previous comment, please do not specify a DNL threshold. If the SCSC RT insists on doing so, the reference to "DNL 50" in the 3rd paragraph should be changed to "DNL 47".

- The words “identify any reportable noise increases and potential mitigation” at the end of the recommendation do not fully capture the community requirements, which are for the **FAA to use alternative noise metrics for decision-making, not just for analysis, and be required to remedy noise impacts when they are significant as defined by a system of metrics and thresholds.**
 - We request replacing “identify any reportable noise increases and potential mitigation” with “assess any significant noise increases and identify mitigation and abatement measures to remedy impacts when they exceed significant levels as defined by a system of metrics and thresholds.”

3. Fully Fund the Recommendations

The SCSC Roundtable recommends that Congress provide adequate funding on an ongoing basis to accomplish Recommendations 1, Reduce the Threshold Noise Levels, and 2, Adopt and Use Alternative Metrics and Thresholds.

----->Requested changes for recommendation 3

- We agree that **Congress should fully fund the highest priority to Adopt and Use Alternative Metrics and Thresholds** as these are the keystones of environmental reviews and critical to address new noise impacts created by NextGen procedure and vectoring changes.
- In addition, if you decide not to adopt our proposed changes for current recommendation 1 and still specify a DNL threshold that would apply to both NEPA and 14 CFR Part 150, then we urge you to limit the funding request to NEPA only. As stated before, there are serious financial implications on noise insulation programs if the DNL threshold was lowered substantially. The financial consequences, including direct cash outlays, must be understood before funding requests are made.

4. Develop a Timeline

The SCSC Roundtable recommends that the FAA should quickly develop a timeline for implementing the above recommendations regarding changing the DNL impact threshold, determining how to mitigate noise effects in areas exposed to DNL 50-65, implementing a policy to use alternative metrics to better evaluate noise, and developing a new framework to comply with ASNA.

Finally, we hope the FAA is cognizant of its critical role in communicating with the public and other stakeholders. As the FAA implements changes in response to the NES study and other developing information – whether on its own initiative or in conformance with Congressional direction – we urge that the FAA provide basic study data and accessible and understandable interpretations of its research findings and subsequent policies. The SCSC Roundtable members look forward to continuing to help our local governments in communicating with the public about aircraft noise issues. We want to thank you for considering the SCSC Roundtable’s recommendations and for continuing to support our efforts to reduce aircraft noise for our constituents.

----->Requested change for recommendation 4

- Per our previous comments on recommendation 1, **please remove the reference to DNL 50-65.**
- 1st paragraph: wording must change to **accurately articulate the dual purpose of using alternative metrics.** Alternative metrics should not be used solely “to better evaluate noise”. Alternative metrics should also be used for decision making purposes and requirements for the FAA to reduce noise levels when impacts are significant.

- **Requested language: “...implementing a policy to use alternative metrics to assess any significant noise increases and require the FAA to reduce noise levels when impacts are significant.”**
- 2nd paragraph: add a sentence to request that the FAA make the NES data sets available to the public, which they promised to do but have not done yet.
 - **Requested language: add “In particular, we urge the FAA to make the NES data sets available as it has stated it will when the NES results were released more than 6 months ago.”** after the existing sentence *“we urge that the FAA provide basic study data and accessible and understandable interpretations of its research findings and subsequent policies.”*

Finally, the words “mitigation” or “mitigate” are used a few times in the draft and could be misinterpreted by the FAA as representing noise insulation only. As shown in the FAA’s Airport Land Use Compatibility Planning document, section 5.4 on page 105 of meeting packet (lines 2528-2538), the FAA distinguishes between “mitigation” and “abatement”. **Please edit the draft to clarify that mitigation is not limited to noise insulation but also includes noise abatement measures.**

July 26, 2021

From

Jane Manning

To

SCSC Roundtable

Message

requests for Santa Cruz Mtns

July 26, 2021

Dear SCSC Round Table members,

We participated in the recent FAA Northern CA Airspace public workshop about airplane noise impacts. It was discouraging for so many reasons. The FAA's selectivity with respect to facts aside, it was disappointing because it glazed over the lack of progress on noise mitigation. It felt like the workshop's main goal was to close out the Select Committee process.

We hope, however, that it presents a fresh opportunity for the Roundtable to generate new ideas that the FAA can work on. This letter is to respectfully request:

1. new solutions on flight paths coming out of the SCSCRT Technical working group, potentially in coordination with the SFO RT TWG.

2. specifically, do not overlook our geographic area, which is hopelessly overlooked by the FAA. The Skyline area of the Santa Cruz Mtns between upper Boulder Creek and Saratoga/Los Gatos experiences HUNDREDS of overflights per day on SERFR, BRIXX, the SJC in- and outbound Hawaii routes, and the STIKK departure procedure. The June 17 BRIXX change, by the way, is much noisier for us because it now tracks along the upper west flank of Skyline ridge after JILNA (now the final waypoint), rather than on top of the ridge... a truly missed opportunity because of public exclusion: slightly further west would have been higher AGL over an unpopulated canyon. Additionally, planes on STIKK were ignored by the FAA after the GOBBS waypoint: they are under full power over Skyline, where their roar lasts 3 - 5 minutes. We are located at the intersection of all of these routes, so it is no exaggeration that the impact is very similar to living close to the major airports!

The toll from hundreds of overflights is truly emotional. We've written the FAA and the airports, both of which responded with various forms of denial. Our county supervisor is among the people undermining the Select Committee recommendations and the SCSCRT. Therefore, we support and depend on the SCSCRT to help continue pushing for improvements, however slight and hard-won. We ARE lobbying the County of Santa Cruz to re-join the Roundtable.

Thank you

Jane Manning and Denis De Ceuster

July 26, 2021

From

Darlene Yaplee

To

SCSC Roundtable

Message

62 Organizations Signed Letter to NAC re. Community Engagement Meetings
SCSC RT,

The attached letter concerns the urgent need to improve community opportunities for input to the FAA on aviation noise and pollution impacts. The letter asks FAA Administrator Dickson and the NextGen Advisory Committee (NAC) to follow through on a recent proposal to hold meetings on community engagement and to include a depth and breadth of stakeholders from impacted communities in those meetings. The letter was signed by 62 advocacy organizations nationwide (including several from the bay area) representing millions of U.S. residents who are negatively affected by aircraft noise and pollution.

Attachment Name

2021072_Darlene_Yaplee_62 Organizations

July 12, 2021

TO: Steve Dickson, FAA Administrator
Bradley Mims, FAA Deputy Administrator and NAC Designated Federal Officer
Russell Childs, NAC Chair, and President & CEO, SkyWest, Inc.
Brad Pierce, President, NOISE - Aurora City Council

CC: Members of the House Committee on Transportation and Infrastructure, Members of the Congressional Quiet Skies Caucus

Dear Mr. Dickson, Mr. Mims, Mr. Childs, and Mr. Pierce,

Our groups represent air travelers, families, organizations, communities and businesses negatively impacted by aviation noise and pollution nationwide (see list below of supporting organizations). We are following up regarding Mr. Pierce's suggestion at the June 21, 2021 meeting of the NextGen Advisory Committee (NAC) that two or three meetings be held with aviation industry stakeholders between now and the next NAC meeting in October to improve community engagement on aviation noise.

In the spirit of community engagement and to encourage a meaningful dialogue and useful outcomes, we urge the NAC and Mr. Pierce to include in their meetings enough representatives from communities to ensure the NAC hears from a broad range of perspectives. The meetings should incorporate representatives who are a mix of resident/community advocates and elected officials from communities that are directly impacted by aviation operations across the country, including but not limited to Metroplexes and single sites.

We welcome your reply to info@AviationImpactedCommunities.org.

Thank you for considering our request on behalf of aviation-impacted communities.

Signatories:

National Organizations

aiREFORM
Aviation-Impacted Communities Alliance (AICA)
Citizens for Quiet Skies
National Quiet Skies Coalition
NextGenRelief.Org
NextGenNoise.Org
Quiet American Skies-Quiet Community LLC
Sky Justice National Network

State/Local Organizations

Advocates for Viable Airport Solutions, CA
Airport Community Roundtable of Charlotte, NC

Airport Impact Relief, Incorporated (AIR, Inc.), MA
Bay Area Jet Noise, CA
BOS Fair Skies, MA
Bucks Residents for Responsible Airport Management (BRRAM), PA
Citizens Against Gillespie Expansion and Low Flying Aircraft (C.A.G.E.L.F.A), CA
Citizens Against Runway Expansion (C.A.R.E.), IL
Citizens for a Friendly Airport (C4FA), CA
Citizens for Quiet Skies-Arapahoe County, CO
Citizens for Quiet Skies-Gold Canyon, AZ
Concerned Residents Against Airport Pollution (C.R.A.A.P.), CA
Concerned Residents of Brisbane, CA
Concerned Residents of Palo Alto, CA
FAiR Chicago, IL
GrotonAyerBuzz of Ayer, MA
GRRift (Gilpin Residents Refuse Increased Flight Traffic), CO
HICoP (Hawaii Island Coalition Malama Pono), HI
Hull Neighbors for Quiet Skies, MA
Logan Aircraft Noise Working Group, MA
Lower Makefield Township Trenton-Mercer Airport Review Panel, PA
Montgomery County Quiet Skies Coalition, MD
Montgomery-Gibbs Environmental Coalition, CA
Mountain-News, Lake Arrowhead, CA
Oregon Aviation Watch, OR
Plane Sense 4LI, NY
Quiet Skies, AL
Quiet Skies Boulder County, CO
Quiet Skies Coalition, WA
Quiet Skies Lake Arrowhead, CA
Quiet Skies Maui, HI
Quiet Skies Northeast Miami-Dade County, FL
Quiet Skies Puget Sound, WA
Quiet Skies San Diego, CA
Quiet Skies Santa Monica Mountains, CA
San Francisco's Concerned Residents Experiencing Annoying Aircraft Maneuvers (S.C.R.E.A.A.M.), CA
Santa Clarita for Quiet Skies, CA
Save Our Skies East Bay (S.O.S.E.B.), CA
Save Our Skies LA, CA
SCANA (Scottsdale Coalition for Airplane Noise Abatement), AZ
Sherman Oaks & Encino for Quiet Skies, CA
Sierra Club, Hawai'i Island Group, HI
Sky Justice Miami, FL
Sky Posse Los Altos, CA

South Metro Airport Action Council, MN
Southern Maryland Fair Skies Coalition, MD
Springfield Civic Association, MD
STOP Jet Noise NOW! SFOAK North S.F. Bay Area, CA
Studio City for Quiet Skies, CA
The 02152 Initiative, MA
Trenton Threatened Skies, NJ
UproarLA, CA
Vashon Island Fair Skies, WA
West Adams for Quiet Skies, CA

July 26, 2021

From

Robert Holbrook

To

SCSC Roundtable

Message**Noise Footprints of the New Fleet**

I plan to address this topic at Wednesday's meeting as a non-agendized item. It could also be an appropriate topic for future consideration of the Roundtable (agenda item 10).

Members of the Roundtable,

There is reason to suspect that the noise footprint on the ground of a widely-used commercial aircraft may be set to double over large areas represented by the Roundtable as the fleet is upgraded. My hypothesis is based on very limited data: a single set of data points published in the November 2019 Environmental Impact Report assessing the expansion of Norman Y. Mineta San Jose International Airport (SJC).

My hypothesis assumes the aircraft models cited below are comparable. I encourage the Roundtable to ask ESA or the FAA to evaluate whether this is the case and more generally if, for comparable models, the noise footprints at loud, but not the loudest, sound levels are expected to expand as the fleet is upgraded. Affected communities would be interested in the results and a doubling of any noise footprint, if that were the case, would be alarming.

Evidence

Table 13 of Appendix J of the EIR shows the *Sound Exposure Level in Acres* for a variety of aircraft. The following rows seem to represent current and new models of the same basic aircraft:

AEDT Type	Sound Exposure Level in Acres - Arrivals							
	55	60	65	70	75	80	85	90
737-800	93976	64126	39599	21138	9252	4695	1473	406
737-8 MAX	174321	118790	78087	45420	22402	4475	1282	354

While there is a modest drop in acres affected by arrivals at the higher noise levels from 80 – 90 dBA SEL, the highlighted numbers show that, relative to the 737-800, the acreage affected by arrivals of the 737-8 MAX at the lower levels of 55 – 75 dBA SEL has roughly doubled. (Higher SEL values would be expected closer to the airport as the aircraft descends, lower values further away.)

Requested Actions

- Request that ESA or the FAA clarify whether the models cited are comparable for this purpose or if the 737-8 MAX and 737-800 used for this analysis are different enough to explain the increase in acres affected.
- Ask them to assess the above question more generally, if data is readily available.
- Request that ESA identify roughly how far from an airport residents would be exposed to aircraft noise at the 55-75 SEL dBA levels. Please note that Sound Exposure Level (SEL) is not DNL: it refers to the sound created by a single event only.

Thank you for your attention to this matter. For those interested, I offer some further thoughts below.

Robert Holbrook
Mountain View

Further Thoughts

The idea that a modern redesign of an older aircraft could broadcast equivalent noise to twice as many acres as its predecessor over large regions might seem surprising given FAA claims that newer aircraft are quieter and more efficient than older aircraft. After all, the noise improvements are driven in part by requirements mandated by the FAA as part of their Stage criteria, which escalate over time.

Unfortunately, if this is indeed a problem, the metric used by the Stage criteria to regulate noise would not flag it. The EPNdB metric averages the noise measured on the ground directly under (or, in one case, lateral to) an aircraft at three measurement points, the furthest of which is less than four miles from the airport. Since EPNdB does not consider noise further from the airport than that, it wouldn't affect claims that the new aircraft are 'quieter'. True, aircraft would be less noisy very close to the airport, but they might be louder elsewhere.

Roughly speaking, the measurement points fall within with the 65 DNL contour, which to date has been the focus of FAA interest and actions regarding noise. It is now important that the FAA broaden its focus to include areas further from the airport, because data from the Neighborhood Environmental Survey released in January indicates that the percentage of people previously thought to be highly annoyed within the 65 DNL contour (12.3%) is now expected at the 47 DNL contour. To calibrate, Palo Alto reports that it contains areas experiencing 52 DNL. In light of this, I would suggest that the EPNdB metric should be updated to include measurement points much further from the airport – at least to the 47 DNL contour. This would help discourage manufacturers from shifting noise away from areas very close to the airport, where it is measured for certification, to areas further from the airport, where it is not.

The Roundtable, in its May 29, 2020 letter to the FAA on supersonic standards, wrote that the FAA should better address noise outside the EPNdB measurement points by modifying the landing and takeoff criteria that it had proposed. If it turns out that expanding noise footprints are an issue with new aircraft models more generally, the Roundtable might want to make a similar suggestion with respect to the EPNdB metric used to approve those aircraft.