



**SANTA CLARA/SANTA CRUZ COUNTIES
AIRPORT/COMMUNITY ROUNDTABLE**

PO Box 3144
Los Altos, CA 94024

August 31, 2021

Office of the Honorable Anna Eshoo
698 Emerson Street
Palo Alto, California 94301

Office of the Honorable Ro Khanna
3150 De La Cruz Blvd
Suite 240
Santa Clara, CA 95054

Office of the Honorable Jimmy Panetta
100 W. Alisal Street
Salinas, CA 93901

Subject: SCSC Roundtable Recommendations Regarding the FAA's Neighborhood Environmental Survey Results

Dear Ms. Eshoo, Mr. Khanna, and Mr. Panetta,

The SCSC Roundtable is submitting the following input regarding the FAA's Neighborhood Environmental Survey (NES) for review and response by congressional offices:

The NES found that people are now more highly annoyed by aircraft noise at lower noise levels than those identified in previous studies using dose-response annoyance curves. This is not a surprise to the SCSC Roundtable members and our constituents, who have long held that the DNL 65 dB threshold and reliance on the DNL metric does not adequately capture the full impact of aircraft noise, especially at locations several miles from an airport. For example, based on the FAA's significance criteria, the NorCal Metroplex Environmental Assessment (EA) concluded there would be no new noise impacts from implementing the NorCal Metroplex flight procedures. However, since implementation of the NorCal Metroplex procedures in 2015, thousands of aircraft noise complaints have been filed, investigations have been conducted, committees have been formed, and the SCSC Roundtable has been created to address the increased, adverse noise impacts. The NES validates these impacts, and it is now time for Congress to act.

The SCSC Roundtable makes the following recommendations:

1. Replace Reliance on the DNL Metric

The SCSC Roundtable recommends Congress direct the FAA to task the National Academies of Sciences, Engineering, and Medicine with providing an expert consensus report on developing an updated system of metrics to replace reliance on the Day-Night Average Sound Level (DNL) metric alone for assessing aviation noise impacts.

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 Congressionally mandated 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 assess any noise increases and identify mitigation and abatement measures to remedy impacts when they exceed significance thresholds as defined by an updated system of metrics.

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*.

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.

On behalf of the SCSC Roundtable, thank you for your attention to these requests. We look forward to your response in the near future.

Sincerely,



Mary-Lynne Bernald
Chairperson, SCSC Roundtable