



City of Palo Alto

Policy and Services Committee Staff Report

(ID # 5517)

Report Type: Agenda Items

Meeting Date: 2/10/2015

Summary Title: Discussion about Air Traffic Over Palo Alto Skies

Title: Discussion and Direction to City Manager Regarding Air Traffic Noise Impacts on Palo Alto Citizens

From: City Manager

Lead Department: City Manager

Recommendation

Staff recommends that the Policy & Services Committee recommend to the City Council to direct the City Manager to continue to work with residents, to utilize the City's federal legislative consultants, and to work with neighboring cities, counties and other governmental organizations on a regional approach in advocacy to the Federal Aviation Administration (FAA).

Background

On October 6, 2014, City Council referred the topic airplane noise to the Policy & Services Committee for discussion. This was due to the October 1, 2014 decision of the San Francisco International Airport Community Roundtable (Roundtable) to only allow the City to participate as a nonvoting member. Prior to this decision, on April 29, 2014, staff presented City Council with a report about the [FAA Draft Environmental Assessment](#) (EA). The report included letters from Congresswoman Eshoo, former Mayor Shepherd and City Manager Keene where they requested a 60 day extension for comment period on the EA.

At April 29, 2014 meeting, City Council decided to contact the FAA and Roundtable. Therefore, on May 2, 2014, the City issued a letter to the FAA presenting a list of comments and concerns. Additionally, Council sought to join the Roundtable and on May 29, 2014 the City submitted this request to the Roundtable Chair. On June 5, 2014 concerned residents met with City Manager Keene to further discuss the noise problem, to discuss the EA, to inform staff about political initiatives to abate noise and to propose immediate actions to reduce noise. Over the next several months, staff began working with residents on their questions and requests. In July 2014, the FAA issued the "Finding No Significant Impact and Record of Decision," which can also be found at the link above. This decision was not favorable to the City, therefore, staff continued to meet with residents.

The City pursued membership on joining the Roundtable. However, on October 1, 2014 the City was notified that it could only participate as a nonvoting member. On October 24, 2014 the Palo Alto Weekly published two articles titled, “Unfriendly skies: Residents, city officials gear up to fight increased airplane noise” and “Making a noise: Government officials attempt to influence aircraft regulations.” These articles provide a perspective into the history and sense of the community’s actions. They reference key documents such as the Anna Eshoo letter from 2000, the Grand Jury Report about the Roundtable, and the September 12, 2014 letter from 26 Congress members to FAA Administrator. On December 10, 2014, the resident group referred to as Sky Posse Palo Alto, sent City Council a letter. In response to the Roundtable decision and in preparation for the Policy and Services Committee, staff from the City Manager’s Office met with Sky Posse representatives on several occasions. Attached is the presentation prepared by Sky Posse for the committee.

Discussion

Staff recommends a steady approach of continuing to work on behalf of our residents in regional and federal advocacy regarding airplane noise. Staff is aware that cities have a limited role in the area of airspace and that this resource is administered by the federal government. Staff believes that utilizing our federal legislative consultants to work with the federal agencies, elected officials and the newly created Congressional Quiet Skies Caucus would be an appropriate use of City resources. Additionally, joining neighboring cities to discuss regional approaches would also assist with advancing Sky Posse’s goals. This action can take many forms such as meeting with San Mateo County cities, continuing to attend the Roundtable as a non-voting member, and/or working with our neighbors in Santa Clara County to create a new Roundtable. Additionally, the City can encourage the Association of Bay Area Government’s Regional Airport Planning Committee (RAPC) to convene and participate in the meetings. Finally, Sky Posse has suggested the hiring of a consultant. Staff is uncertain about the cost and benefits of this proposal.

Staff believes that the proposed recommendation will continue to advance our citizen’s goals. Through the actions mentioned above and proposed actions, staff has acknowledged the airplane noise problem, prioritized it and is willing to continue to assist our citizens with advocacy at the regional and national level.

Resource Impact

Staff time and possible contract dollars are impacts to the General Fund.

Attachments:

- -: 4-29-14 Staff Report (PDF)
- -: 4-29-14 City Council Meeting Minutes (PDF)
- -: 5-2-14 Mayor's Letter to FAA (PDF)
- -: 5-29-14 Mayor's Letter to Roundtable (PDF)
- -: 10-24-14 PA Weekly Article (PDF)
- -: 5-12-2000 Anna Eshoo Letter (PDF)
- -: San Mateo Grand Jury Report(PDF)

- -: 9-12-14 Congressional letter for FAA reform (PDF)
- -: 12-10-14 - Letter from SkyPosse to City Council (PDF)
- -: Sky Posse Palo Alto Presentation (PDF)



City of Palo Alto

City Council Staff Report

(ID # 4725)

Report Type: Inter-Governmental Legislative Affairs Meeting Date: 4/29/2014

Summary Title: FAA Metroplex EA

Title: Discussion and Direction to City Manager Regarding City of Palo Alto Response to the FAA Draft Environmental Assessment (EA) Regarding the Northern California Optimization of Airspace and Procedures in the Metroplex (NorCal OAPM)

From: City Manager

Lead Department: Public Works

On March 25, 2014, the Federal Aviation Administration (FAA) released for public review and comments a draft Environmental Assessment (EA) on potential actions involving the airspace management for flights in the Northern California Metroplex area. This project involves changes in flight routes and altitudes in certain areas and in particular for aircraft arriving and departing from the four major airports in the Bay area: San Francisco, Oakland, San Jose and Sacramento. The proposed action does not require an increase in the number of aircraft operations or involve additional aircraft landings. Over the past few years, the FAA has been implementing airspace management programs nationwide and the Bay area is one of the last regions to be implemented. The FAA has stated these programs are necessary for flight safety as well as fuel economy.

This program is unrelated to the potential flight path change proposed last December by Surf Air that a number of community members were concerned about.

The original deadline for public comments on the EA was April 24. However, the City joined with other agencies to urge the FAA to extend the public comment period, and to provide critical information regarding airplane altitudes (Attachment A, B and C). Staff believes the FAA should provide the altitude information.

At the special request of Congress members Eshoo and Speier, the FAA has extended the comment period to Sunday, May 4, 2014. The requested critical information has still not been released. Therefore, there is no way to evaluate the aircraft position/elevations over the City of Palo Alto (i.e. possibility of lower altitudes and increased noise impact). In an abundance of caution, the EA comment letter (Attachment D) was sent on Thursday April 24, 2014. The recently announced extension of public comments to May 4 allows for Council and public discussion, as well as the opportunity to amend the original comment letter.

The full Environmental Assessment of the project can be found at http://oapmenvironmental.com/norcal_metroplex/norcal_docs.html.

Attachments:

- Letter from Palo Alto Mayor Shepherd to Secretary of State Transportation Foxx (PDF)
- Letter from Congresswomen Eshoo and Speier to State Secretary of Transportation Foxx (PDF)
- Letter from San Francisco Community Airport Roundtable to FAA (PDF)
- EA Comment Letter from Palo Alto City Manager to FAA (PDF)

April 10, 2014

The Honorable Anthony Foxx
Secretary of Transportation
United States Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Subject: Northern California Optimization of Airspace and Procedures in the Metroplex Environmental Assessment

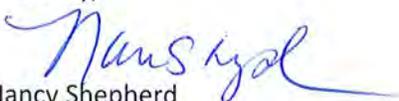
Dear Secretary Foxx,

The Federal Aviation Administration (FAA) has given notice of proposed changes to the published routes of aircraft landing and taking off from San Francisco International Airport and other airports in Northern California. The published document is generally referred to as the Northern California (Nor Cal) Optimization of Airspace and Procedures in the Metroplex (Nor Cal OAPM) Environmental Assessment. Pursuant to federal law, the FAA published the assessment and invited public comment for 30 days.

The City of Palo Alto concurs with our local Congresswomen and other agencies that additional time is needed to receive critically-needed information about the altitude of airplanes along the new routes. The FAA states that it will determine if the information can be made available and, if so, how quickly it can be disseminated. As things stand at the moment, the 30 day time period would be nearly exhausted before this critically-needed information would become publicly available. The altitude of airplanes over Palo Alto heavily influences how much noise is imposed upon residents. Since the FAA has the information, we believe that the City should also have it. Additionally, the City should be given time to incorporate the information into its comments on the Environmental Assessment.

The City of Palo Alto therefore respectfully urges you to instruct the FAA to extend the public comment period on the Nor Cal OAPM environmental assessment by at least 60 days so that the City of Palo Alto and other entities may make judgments based upon information that the FAA has but that is not currently in the public domain. We feel that the purpose of the Environmental Assessment cannot be well served if critically-needed information is absent from the published document or only available at the very last minute. Thank you for your time and consideration of this request. Because the 30 day written comment period ends only a few weeks from now on April 24th, we respectfully ask for your timely attention to this matter.

Sincerely,



Nancy Shepherd
Mayor, City of Palo Alto

cc: Palo Alto City Council
Palo Alto City Manager
Members of the San Francisco Airport Community Roundtable
Congresswoman Anna Eshoo
Congresswoman Jackie Speier

P.O. Box 10250
Palo Alto, CA 94303
650.329.2477
650.328.3631 fax

Congress of the United States
Washington, DC 20515

April 4, 2014

The Honorable Anthony Foxx
Secretary of Transportation
United States Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Secretary Foxx,

The Federal Aviation Administration (FAA) has given notice of proposed changes to the published routes of aircraft landing and taking off from San Francisco International Airport and other airports in Northern California. The published document is generally referred to as the Northern California (NorCal) Optimization of Airspace and Procedures in the Metroplex (NorCal OAPM) Environmental Assessment. Pursuant to federal law, the FAA published the assessment and invited public comment for 30 days.

It is our opinion and the opinion of local government leaders that additional time is needed to receive critically-needed information about the altitude of airplanes along the new routes. The FAA states that it will determine if the information can be made available and, if so, how quickly it can be disseminated. As things stand at the moment, the 30 day time period would be nearly exhausted before this critically-needed information would become publicly available. The altitude of airplanes over communities heavily influences how much noise is imposed upon residents. One can view a line on paper or on a map but without altitude information one cannot begin to estimate the noise impacts. The FAA has the information. We believe that the public should also have it and, just as importantly, that the public should be given time to incorporate the information into its comments on the Environmental Assessment.

We therefore write to respectfully urge you to instruct the FAA to extend the public comment period on the NorCal OAPM environmental assessment by at least 60 days so that the public and its representatives may make judgments based upon information that the government has, but that is not currently in the public domain. We all want to have a safe, well-functioning aviation system. We believe that this objective is in the public interest. We also believe that the purpose of the Environmental Assessment cannot be well served if critically-needed information is absent

from the published document or only available at the very last minute. Thank you for your time and consideration of this request. Because the 30 day written comment period ends only a few weeks from now—on April 24th—we respectfully ask for your timely attention to this matter.

All the best,



Anna Eshoo
Member of Congress



Jackie Speier
Member of Congress

cc: Members of the San Francisco Airport Community Roundtable

Ms. Elizabeth Ray, Vice President, Mission Support Services
Air Traffic Organization
Federal Aviation Administration
800 Independence Avenue, SW
Washington, DC 20591



San Francisco International
Airport/Community Roundtable

455 County Center, 2nd Floor
Redwood City, CA 94063
T (650) 363-1853
F (650) 363-4849
www.sforoundtable.org

April 3, 2014

NorCal OAPM EA
Federal Aviation Administration
Western Service Center - Operations Support Group
1601 Lind Avenue SW
Renton, WA 98057

Re: Extension of OAPM Environmental Assessment Public Comment Period

This comment is in reference to the Draft Environmental Assessment (DEA) released on March 25, 2014. The release included all chapters of the DEA and technical reports except the *Design & Implementation Team Technical Report*, which contains details to the enhancements of IFR procedures. This report was released on March 31, 2014. While the *Design & Implementation Team Technical Report* shows the anticipated procedure way points, it does not show altitudes of the new waypoints or the latitude/longitude of these new locations.

At the April 2, 2014 regular meeting of the SFO Airport/Community Roundtable (Roundtable), the group asked the attending FAA representation for additional design information be made public during the comment period, including altitudes of the way points and the procedure approach and departure plates. Should this information become available during the comment period, we anticipate the existing 30 day comment period will be inadequate to review the changes. We respectfully request a comment period extension of 60 days in anticipation of reviewing the waypoint and associated altitude information.

A key part of the Roundtable's mission is to continually abide by Article II Section 5 of its Memorandum of Understanding, "that the Roundtable members, as a group, will not take an action(s) that would result in the "shifting" of noise from one community to another, related to aircraft operations at San Francisco International Airport." It is our intention to fulfill this article for our stakeholders in San Mateo County and the City and County of San Francisco through a thorough review of the DEA in its entirety, including technical reports.

Regards,

A handwritten signature in blue ink that reads 'Cliff Lentz'.

Cliff Lentz
City of Brisbane
Chair, San Francisco Airport Community Roundtable





OFFICE OF THE CITY MANAGER

CITY OF
**PALO
ALTO** 250 Hamilton Avenue, 7th Floor
Palo Alto, CA 94301
650.329.2392

April 24, 2014

NorCal OAPM EA, Federal Aviation Administration
Western Service Center-Operations Support Group
1601 Lind Avenue SW
Renton, WA 98057

City of Palo Alto Public Comment: FAA Northern California Optimization of Airspace and Procedures in the Metroplex (NorCal OAPM) Draft Environmental Assessment (EA) Document Release.

These comments are in reference to the Draft Environmental Assessment (DEA) released on March 25, 2014. We have reviewed the draft EA, and provide the following written comments as part of the public comment period.

1. While the Design & Implementation Team Technical Report shows the anticipated procedure waypoints, it does not show altitudes of the new waypoints or the latitude/longitude of these new locations, which limits the City's ability to effectively comment. It is the City of Palo Alto's understanding that the FAA has this information and has not made it available to the public. This information is critical as there is no way to evaluate the aircraft position/elevations over the City of Palo Alto (i.e. possibility of lower altitudes and increased noise impact).
2. The City of Palo Alto requested that the FAA extend the public comment period on the Nor Cal OAPM environmental assessment by at least 60 days to allow the City of Palo Alto and other entities to make comments based upon complete information. The outcome of the environmental assessment cannot be accurately represented if critical information is absent from the published document or only available at the very last minute. At this time the altitudes have not be released to the public.
3. The City of Palo Alto is concerned that this project will result in the shifting of noise from one community to another related to aircraft operations over the city of Palo Alto.
4. And lastly, the project directly involves airspace over the City of Palo Alto and yet the City was not notified by the FAA of the proposed project. The City gained knowledge of this project third hand well after the March 25, 2014 released date.

We appreciate the opportunity to participate in this public process.

Sincerely,

James Keene
City Manager

Cc: Congresswoman Anna Eshoo
Congresswoman Jackie Speier
Mayor and Council Members
San Francisco International Airport/Community Roundtable
Molly Stump, City Attorney
Mike Sartor, Public Works Director
Andy Swanson, Airport Manager



CityOfPaloAlto.org

Mr. Keene indicated the Council could give Staff general direction without a particular timeframe. Staff would have to work on the outreach process. At a later time, Staff could provide specific recommendations.

MOTION AS AMENDED PASSED: 7-0 Kniss, Scharff absent

13. Public Hearing - Council Adoption of an Ordinance Modifying: (1) Chapter 18.16 of the Palo Alto Municipal Code (PAMC) to: (a) Address Sidewalk Width and Building Setbacks (Setback and "Build-to" Line Standards, and Context Based Design Criteria) Along El Camino Real, and (b) Reduce the Allowable Floor Area Ratio on CN Zoned Sites Where Dwelling Units are Permitted at 20 Units Per Acre; and (2) PAMC Chapter 18.04 to Adjust the Definition of Lot Area and Add a Definition for "Effective Sidewalk". Environmental Assessment: Exempt from the provisions of CEQA per Section 15305 (Minor Alterations in Land Use Limitations) (THIS ITEM WAS CONTINUED BY COUNCIL MOTION ON APRIL 21, 2014 TO JUNE 2, 2014)

INTER-GOVERNMENTAL LEGISLATIVE AFFAIRS

14. Discussion and Direction to City Manager Regarding City of Palo Alto Response to the FAA Draft Environmental Assessment (EA) Regarding the Northern California Optimization of Airspace and Procedures in the Metroplex (NorCal OAPM).

James Keene, City Manager, reported Staff wanted to share the issue with the Council in case the Council wished to submit a letter to the Federal Aviation Administration (FAA).

Andrew Swanson, Airport Manager, indicated comments were limited to the Metroplex Environmental Assessment (EA). Staff questioned the lack of altitudes in the EA. The FAA felt extra information was not necessary and the document met requirements. The impacts of the report were difficult to understand because altitudes were missing and noise contours resembled flight paths. The FAA modeled noise impacts under conditions of tower staff handling aircraft.

Mr. Keene advised the EA was unrelated to the Surf Air issue. Apparently airports around the country were attempting to move more airplanes in and out of airports more efficiently. Flight paths did not appear to be changing in ways that would be problematic for Palo Alto.

MINUTES

Because there was no altitude data, Staff could not determine if planes would fly lower and presumably be more noisy. Staff requested altitude data, but had been unable to obtain it.

Steve Katzman believed the report was misleading. Planes deviated from paths in order to save time and fuel, to land safely, and to be more easily controlled. Planes merged original flight paths into a single flight path, which was easier for controllers to monitor and handle. The FAA was proposing the single path be the official path. The single flight path resulted in hours during the day without a break in noise. The FAA modeled airplane sound, but did not measure sound on the ground in Palo Alto.

Council Member Burt asked if Mr. Katzman had reference materials regarding the merging of flight paths.

Mr. Katzman answered yes.

Council Member Burt requested Mr. Katzman provide those materials to Staff.

Mr. Keene clarified that Staff did not have altitude information that could help Staff interpret the problem. The speaker seemed to say airplanes had not been following the existing patterns, and the FAA was attempting to formalize the new patterns.

Stewart Carl noticed a dramatic increase in jet noise over Palo Alto in the fall of 2013. He attended two FAA workshops to gain information. The FAA was not changing air routes, but changing maps to match the air routes already changed. The FAA moved air routes south over Palo Alto. The FAA was requesting comment on whether it should adjust formal maps to match the changes.

Council Member Burt suggested Mr. Carl provide written comments.

Mr. Keene requested written public comments be provided quickly as the submission deadline was May 4, 2014. He assumed the Council would support a letter to the FAA including comments from Mr. Katzman and Mr. Carl.

Mr. Carl reported the FAA stated off-the-record that it did not shift noise at the staff level. At a higher level, the FAA shifted routes south under pressure from residents of San Mateo County.

Mayor Shepherd requested an explanation of the lines on the graphic.

Mr. Carl explained that the graphic demonstrated one day of flights over Palo Alto. All flights intersected over Palo Alto. The minimum altitude over a portion of Palo Alto was 2,500 feet. Airlines dropped to lower altitudes in order to save money.

Doria Summa stated the noise level over her home had changed dramatically. She supported Mr. Carl's comments.

Council Member Price believed Congresswoman Eshoo could have been part of a decision-making process that helped push the rerouting. The fact that the City was not given adequate information or timely notice was not stated strongly enough. She inquired whether the City had any recourse.

Mr. Keene advised that the City did not receive a formal notice about the changes. Congresswoman Eshoo's office contacted the City about the EA. Staff proposed sending a strongly worded letter and requested further direction from the Council.

Council Member Price asked if a letter to the Secretary of the Department of Transportation would be beneficial.

Mr. Keene could do that. Congresswoman Eshoo's letter and the Mayor's letter requesting an extension were directed to Secretary Foxx at the Department of Transportation.

Cara Silver, Senior Assistant City Attorney, reported Staff discovered the San Francisco Airport Community Roundtable (Roundtable) when researching the issue. Historically the Roundtable consisted of San Mateo cities. Palo Alto did not have a representative to the Roundtable; however, Mr. Swanson invited himself to that group.

Council Member Berman was shocked that the FAA merged routes into one and then requested comments on changing the maps to match the route. He wondered whether the FAA had to submit to a process before changing the route and if it did so. If the FAA did not follow the process and did not provide proper notice, then the City could have some recourse.

Council Member Burt suspected Congresswoman Eshoo had not seen the map. Staff should send the map to her as soon as possible prior to the deadline so she could act on it. Staff should consider sending information to Palo Alto's Senators and Representative Speier.

MINUTES

Council Member Schmid believed there should be records of planes flying lower than the minimum altitude. The City received a notice of complaints in December 2013, and no complaints were submitted from Palo Alto. He asked if data for Palo Alto was missing or if residents did not complain.

Mr. Carl indicated people had given up on the Roundtable because it did nothing.

Council Member Holman encouraged Staff to continue collecting data. Noise was a nuisance and a health issue. That should be prominent in comments.

Council Member Klein suggested Staff talk to the City's Federal lobbyist and send a copy of letters to Congress Members Honda and Logfren.

Bert Ganoung, San Francisco Aircraft Noise Abatement Office Manager, reported the San Francisco International Airport (SFO) would not comment on the draft EA. One of the routes from the south was a direct overlay according to the FAA. Changes to the route occurred over Monterey Bay to provide fewer emissions, utilize less fuel, and create less noise. The FAA was changing existing profiles and arrivals. Most of those changes were 20 miles and more from airports.

Mayor Shepherd asked if Mr. Ganoung meant Palo Alto residents were not experiencing more airplane noise.

Mr. Ganoung could not say people were not experiencing something different.

Mayor Shepherd asked if Mr. Ganoung could describe what residents experienced.

Mr. Ganoung would have to interview residents individually to do that.

Mayor Shepherd inquired whether technically nothing had changed.

Mr. Ganoung responded yes. On a good day, the noise teardrop was closer to the airport; on a bad day it would extend further south. That was a fact of sequencing airplanes.

Mayor Shepherd inquired whether the City should have received notice of issues.

Mr. Ganoung could not comment as he did not work for the Federal government. The document contained a notice list, which included most libraries in the area.

Mayor Shepherd inquired whether there was a means for Palo Alto to be placed on the list.

Mr. Ganoung noted the Metroplex affected four airports in the area: Oakland, San Jose, San Francisco, and Sacramento.

Council Member Burt asked if Mr. Ganoung meant the graphic was not representative of Palo Alto's typical experience.

Mr. Ganoung explained the pattern was typical for that given day. Patterns varied each day.

Council Member Burt asked if patterns varied daily.

Mr. Ganoung replied yes.

Council Member Burt understood patterns were not static; however, on almost all days Palo Alto was directly affected.

Mr. Ganoung explained that Palo Alto was located directly under Big Sur arrivals from the south and arrivals on the teardrop pattern from the north. San Jose arrivals and general aviation traffic were missing from the graphic. SFO was most likely the cause of noise in that particular graphic.

Council Member Burt inquired whether SFO was aware that Palo Alto experienced this concentration of traffic.

Mr. Ganoung responded yes.

Council Member Burt asked why SFO was not notifying Palo Alto of the traffic situation.

Mr. Ganoung reported SFO was not responsible for providing any notice, because the document did not belong to SFO and SFO procedures were not being changed. SFO received information just as Palo Alto did.

Council Member Burt noted the Roundtable was comprised of communities that traditionally experienced a great deal of noise. This information should have caused a deliberate engagement with Palo Alto.

MINUTES

Mr. Ganoung called Mr. Swanson on the matter three or four days after the document was published and recommended Mr. Swanson review the document.

Council Member Burt recommended Staff discuss the matter with the City Attorney.

Mr. Keene reported the City Attorney had been an integral part of the conversation.

Mayor Shepherd asked when Staff learned of the EA.

Mr. Swanson advised that he contacted SFO after learning about the EA from Congresswoman Eshoo.

Mayor Shepherd felt the teardrop pattern would have looked the same a year ago; however, the Council began hearing complaints in the fall of 2013.

Mr. Ganoung indicated the teardrop pattern was an existing arrival pattern. The noise would have occurred over the past 10 or even 20 years. He invited Council Members and Staff to SFO to discuss the document and patterns.

Council Member Klein inquired about the authority under which the Roundtable operated.

Mr. Ganoung stated the Roundtable was an independent entity comprised of elected officials from San Mateo and San Francisco Counties.

Council Member Klein asked if it operated under some law.

Mr. Ganoung advised that the Roundtable operated under the Brown Act and had its own Charter.

Council Member Klein wanted Palo Alto to be a member of the Roundtable and did not understand why Palo Alto was excluded.

Mr. Ganoung reported the City was welcome to make that request at a Roundtable meeting.

Mr. Keene stated he would begin efforts for the City to join the Roundtable.

May 2, 2014

NorCal OAPM EA
Federal Aviation Administration
Western Service Center-Operations Support Group
1601 Lind Avenue SW
Renton, WA 98057

Re: City of Palo Alto Comments on the FAA Northern California Optimization of Airspace and Procedures in the Metroplex Draft Environmental Assessment Document Release

To Whom It May Concern:

The City of Palo Alto appreciates the FAA 10-day extension to comment on the Northern California Optimization of Airspace and Procedures in the Metroplex (NorCal OAPM) Environmental Assessment (EA). To appropriately evaluate the impacts of this project we reiterate our request for detailed route information and altitudes that have still not been provided. The 10-day extension allowed us to hold a public meeting to discuss the proposal and receive citizen input; however, our review was hampered due to the lack of critical altitude information.

Below is a list of comments the City of Palo Alto has on this proposal. The City of Palo Alto requests that each of these comments be addressed before any further action on this proposal is taken.

1. While the Design & Implementation Team Technical Report shows the anticipated procedure waypoints, it does not show altitudes of the new waypoints or the latitude/longitude of these new locations, which limits the City's ability to effectively comment. It is the City of Palo Alto's understanding that the FAA has this information and has not made it available to the public. This information is critical as there is no way to evaluate the aircraft position/elevations over the City of Palo Alto (i.e. possibility of lower altitudes and increased noise impact).
2. The City of Palo Alto requested that the FAA extend the public comment period on the Nor Cal OAPM environmental assessment by at least 60 days to allow the City of Palo Alto and other entities to make comments based upon complete information. The outcome of the environmental assessment cannot be accurately represented if critical information is absent from the published document or only available at the very last minute. At this time the altitudes have not be released to the public.
3. The City of Palo Alto is concerned that this project will increase or shift noise to the Palo Alto community.
4. The project directly involves airspace over the City of Palo Alto and yet the City was not notified by the FAA of the proposed project. (See attached San Francisco international flight tracks for a 24 hour period on April 18, 2014 the City of Palo Alto is highlight in green.) The City gained knowledge of this project third hand well after the March 25, 2014 release date.
5. The Report's *Design & Implementation Team Technical Report* shows the anticipated procedure waypoints but it does not show the altitudes of the new waypoints or the latitude/longitude of these new locations.
6. A Palo Alto resident testified that he has observed aircraft flying lower than they typically did in the past. Please clarify or confirm:
 - Have flight paths already changed prior to the EA and if so were the proper notification processes followed?

P.O. Box 10250
Palo Alto, CA 94303
650.329.2477
650.328.3631 fax

701-08-01

- Are the aircraft that fly over the City of Palo Alto flying lower now than in the past?
 - Will aircraft be flying lower over the City of Palo Alto once this project is implemented?
7. Our job, as elected officials, is to provide Palo Alto residents with sound precise information from your report. We am not able to do so because of your report is lacking the technical data to do so.

We appreciate the opportunity to participate in this public process on the draft EA; however, it lacks the critical information necessary to properly evaluate the project and give complete comments. We look forward to the release of this critical information and sufficient time to incorporate that information into our response.

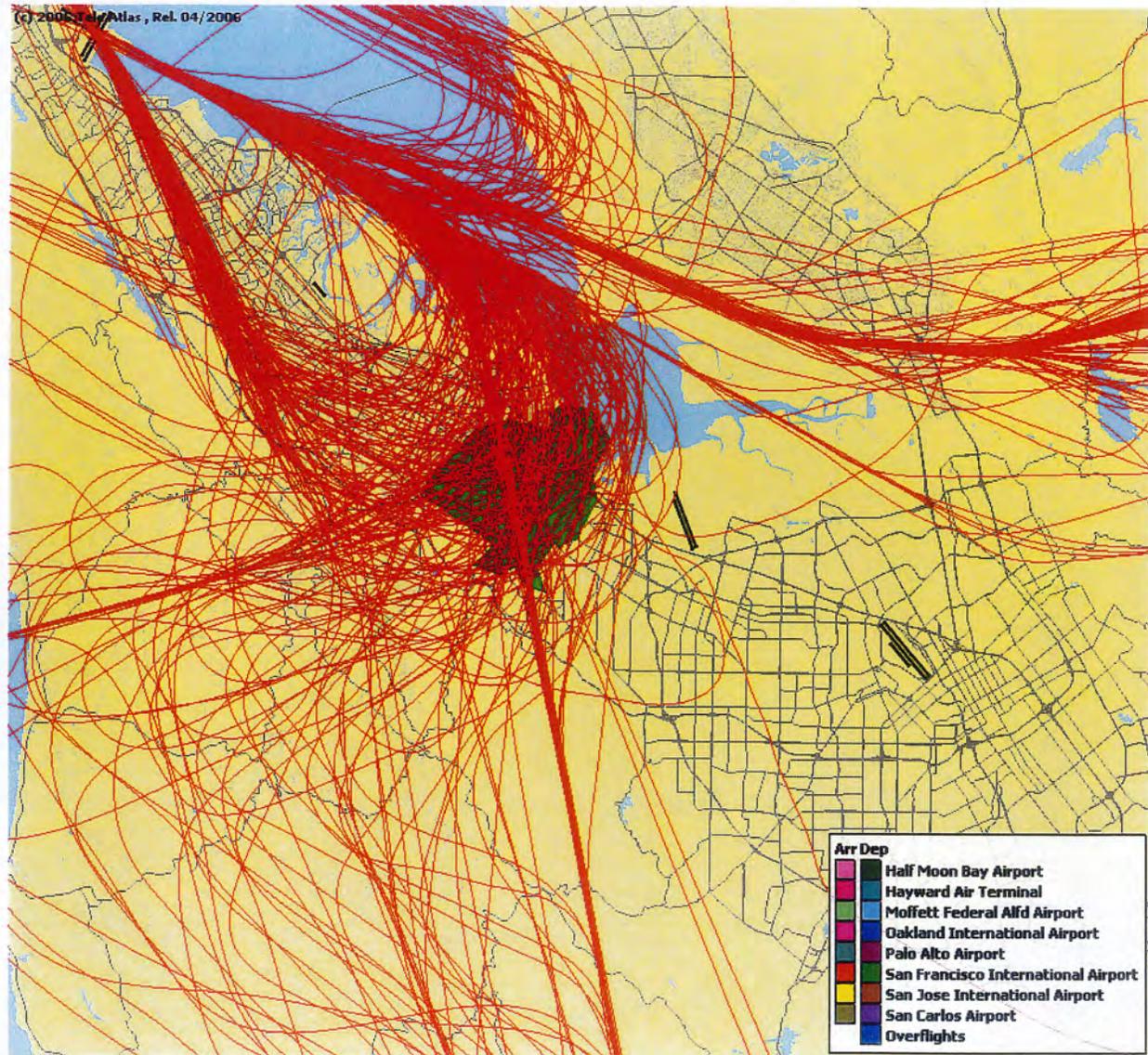
Sincerely,



Nancy Shepherd
Mayor, City of Palo Alto

cc: Congresswoman Anna Eshoo
Congresswoman Jackie Speier
Congresswoman Zoe Lofgren
Congressmen Mike Honda
San Francisco International Airport/Community Roundtable
Palo Alto City Council
James Keene, Palo Alto City Manager
Molly Stump, Palo Alto City Attorney
Mike Sartor, Palo Alto Public Works Director
Andy Swanson, Palo Alto Airport Manager

San Francisco International flight tracks for a 24 hour period on April 18, 2014 the City of Palo Alto is highlight in green:



To: NorCal OAPM EA; Federal Aviation Administration
Western Service Center – Operations Support Group
1601 Lind Ave., SW, Renton, WA 98057

From: Madeleine Tammy Skoog, 3974 Bibbits Drive, Palo Alto, CA
94303

Subject: Northern California Optimization of Airspace and Procedures in
the Metroplex Draft Environmental Assessment

First, I want to thank the FAA and SFO for their presentations the week of 14 through 18 April 2014 in the San Francisco area. The information provided was very interesting. The presenters and representatives did a good job answering questions and clarifying any issues.

As background, in the city of Palo Alto we have been experiencing an increase in the amount of aircraft traffic. We have an on-line system where the topic of airplane noise is very busy with much information being traded as to policy. We are also familiar with the SFO Flight Tracker System, as well as the San Jose Airport Flight Tracker System which provides data on arriving and departing flights, equipment type, altitude, speed, and visual flight path of individual planes.

People are experiencing different levels of air traffic and noise based on location. Speaking for myself only I live in south Palo Alto near the junction of Louis Road and Charleston / Arastradero – which are well traveled thoroughfares in the city near the southern border of the city at Highway 101.

I am experiencing the following:

1. Flights coming overhead from Asia / Hawaii enter the area coming from the west and make the turn northward for arrival at SFO. These are very large planes.
2. Flights overhead from the northern states – Oregon and Washington come down the peninsula then rotate northward for arrival at SFO. These are both large planes and smaller commuter planes.
3. The staging of flights is producing a lower altitude for 747-400's and other planes which are preparing for their instruction to land. There is acceleration as well a breaking to slow down depending on the specific flight instructions.
4. There are commuter planes and large plane coming from the Southern California area.

Bottom line: I am at the juncture for a portion of the air traffic – like a giant freeway interchange with on-ramps, slowing and speeding based on time of day and general traffic in the air. This is not all of the SFO bound traffic - it is the Pacific side traffic for the most part which has to speed up and slow down to join the traffic coming from the east US.

There is also traffic from / to the San Jose Airport which changes based on wind directions.

SFO is planning to close some runways from May to September which will disrupt the "normal" traffic routes. This is a concern since it is during the summer months when people are outside. It is unclear at this point how that will turn out. However, last year during a closure of some runways there was continual traffic and noise. There was also a very low altitude with some of the larger planes.

The noise level is varying based on the size and age of the plane. We do not have noise monitors in the Palo Alto area so there is no documentation of noise except people calling in to complain.

The major concern now is that SFO is contemplating a variance in how planes are directed in the flight path in order to save fuel. It is unclear what the end result of that will be. However, Palo Alto being the prescribed flight path for entry into a portion of the SFO arrival queue is problematical.

It would be appreciated if some type of requirement would be imposed that provides a minimum altitude based on size of planes. I have a copy of the SFO TAC Guide but it is clearly not being followed.

There is also a concern that a plane was visibly viewed as discharging while in flight – unclear what was being discharged -concern is toilets. I can appreciate on extremely long flights on very large planes where this could be a large problem but discharge over a populated area is not acceptable. This is like a cruise ship discharging in the bay.

We are aware that there is a San Francisco Airport Commission to coordinate SFO traffic concerns but Palo Alto is not an active member, despite the fact that it is the pivot point for transactions on queue / arrival and departure for aircraft in the air space. Since Palo Alto is a pivot point for aircraft direction then Palo Alto, as part of Santa Clara County needs a place at the table. It appears that SFO is working to support the demands of the San Mateo cities by moving the flow of traffic south.

Thank you for requesting this feedback – we are here to help and assist in the overall SFO experience.

Regards, Madeleine Tammy Skoog, 04/24/14

Follow Up:

This topic was discussed at the Palo Alto City Council Meeting 04.28.14. There will be follow-up action as more information is available and evaluated.

May 29, 2014

Cliff Lentz
Chair, San Francisco Airport Community Roundtable
San Mateo County Planning & Building Department
455 County Center, 2nd Floor
Redwood City, CA 94063

Re: Request to Include the City of Palo Alto as a Voting Member of the San Francisco Airport Community Roundtable

Dear Chair Lentz,

Thank you for considering adding the City of Palo Alto as a voting member of the San Francisco Airport Community Roundtable. As you can see from the attached map, Palo Alto is directly impacted by aircraft operations from San Francisco International Airport. My City Council colleagues and I believe that a seat on the Roundtable is extremely important for Palo Alto, and would also benefit the Roundtable and San Francisco International Airport (SFO).

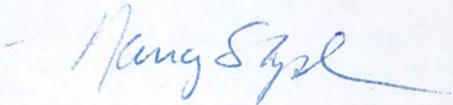
Designating a seat for Palo Alto at the Roundtable would serve two purposes: 1) Our citizens will have an elected official to represent their concerns about noise impacts from aircraft operations at SFO; and 2) the Airport will have a representative of the City of Palo Alto to relay accurate and timely information about Airport operations to our community and advocate for sensible and well-supported changes.

Recently, Congresswoman Anna Eshoo's office contacted Palo Alto about the NorCal OAPM Environmental Assessment and asked us to support the Congresswoman's request for an extension of the comment period. Congresswoman Eshoo's request was the first time that Palo Alto officials were made aware of the NorCal OAPM. We gladly supported Congresswoman Eshoo's request letter by sending our own letters, but the experience taught us that the City of Palo Alto would be better served by participating in the San Francisco Airport Community Roundtable, where we would receive regular updates about important developments at SFO that impact our community.

P.O. Box 10250
Palo Alto, CA 94303
650.329.2477
650.328.3631 fax

We believe that a seat on the Roundtable is key to an open dialogue, understanding and cooperative approach with other cities on the Peninsula that are impacted by aircraft operations from San Francisco International Airport. We greatly look forward to joining the group and playing a constructive role in Airport-community relations.

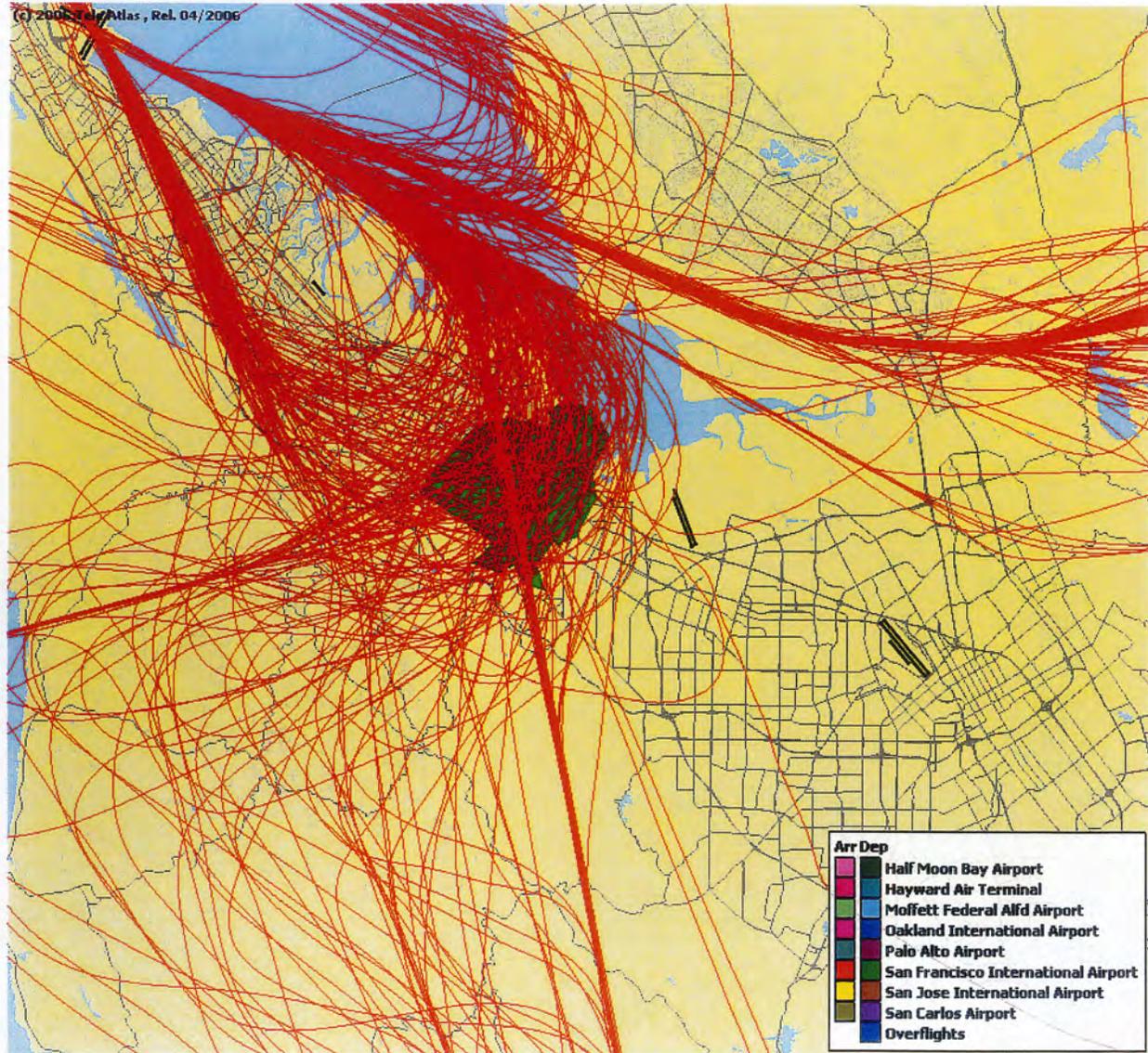
Sincerely,



Nancy Shepherd
Mayor, City of Palo Alto

cc: Congresswoman Anna Eshoo
Congresswoman Jackie Speier
Congresswoman Zoe Lofgren
Congressman Mike Honda
Senator Jerry Hill
Assembly Member Richard Gordon
Palo Alto City Council
James Keene, Palo Alto City Manager
Molly Stump, Palo Alto City Attorney
Mike Sartor, Palo Alto Public Works Director
Andy Swanson, Palo Alto Airport Manager

San Francisco International flight tracks for a 24 hour period on April 18, 2014 the City of Palo Alto is highlight in green:



Unfriendly skies

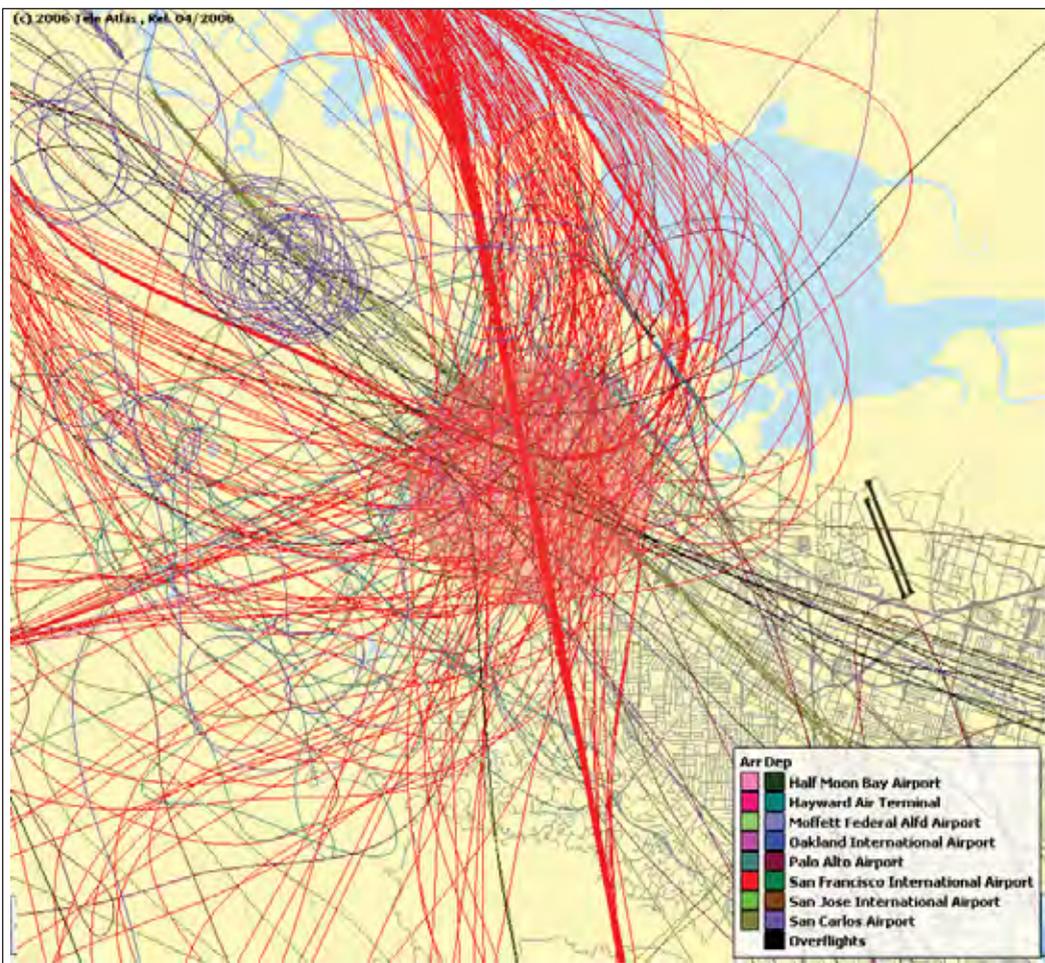


Michelle Lu

Residents, city officials gear up to fight increased airplane noise

by Sue Dremann

Some residents on Amherst Street in Palo Alto are concerned with the level of airplane noise affecting their neighborhood.



On May 31, 244 planes flew within 1.75 miles and 10,000 feet in altitude of the Birch Street intersection with California Avenue in Palo Alto, according to SFO's Noise Abatement Office. The red circle in the middle denotes Palo Alto.

At a gathering in the Holbrook-Palmer Park Pavilion in Atherton last month, as a resident began to speak about the incessant and loud airplane noise blanketing his neighborhood, 150 other attendees from Atherton, Menlo Park, Portola Valley and Palo Alto suddenly looked skyward.

As if on cue, a large aircraft rumbled overhead.

"I can't hear you," the resident quipped.

The crowd applauded approvingly, but residents say that airplane noise over their neighborhoods is no laughing matter. In the 14 years since U.S. Rep. Anna Eshoo and then-Palo Alto Mayor Gary Fazzino secured an agreement with San Francisco International Airport (SFO) to reduce plane noise by 41 percent, the 70 daily flights over Palo Alto have ballooned to as many as 200, according to charts on online flight-track maps.

Residents say the skies are turning into an aeronautic superhighway over Midpeninsula cities and that federal levels for acceptable noise, which date to the 1970s, are obsolete and need to be updated — pronto.

Compounding the issue, the Federal Aviation Administration (FAA) is currently rolling out a plan in the Bay Area to make the airspace more efficient — a plan that residents say is making the noise problem earsplittingly worse. Called Next Generation

Air Transportation System, or NextGen, the plan switches air-traffic control from a ground-based system to a satellite-based one, which the FAA claims will allow it to guide and track planes more precisely and facilitate an expected growth in air traffic.

As part of NextGen, commercial jetliners fly within a narrower band of airspace than before. They also descend using a continuous decrease in altitude rather than following a stepped descent, as previously done — but that increases noise as engines throttle for the decline, residents say.

The NextGen changes have alarmed communities across the nation where the program has rolled out. Starting in June 2012 over Queens, New York, planes began flying at low altitudes every 20 seconds to a minute from 6 a.m. to midnight, said Janet MacEaney, president of Queens Quiet Skies. MacEaney lives about 10 miles away from LaGuardia Airport.

"For the past 2.5 years, we've had an egregious amount of noise," she said.

Now, from Palo Alto to Brisbane, the issue is heating up. More than 900 Woodside, Portola Valley and Ladera residents signed a petition and letter to the FAA regarding the noise. Four Portola Valley and Woodside residents filed a petition with the U.S. Court of Appeals for the Ninth

About the cover: A Surf Air Pilatus PC-12 plane comes in for a landing at the San Carlos Airport on Oct. 17. Photograph by Veronica Weber.

(continued on page 28)



Stewart Carl, a Palo Alto resident, presents information about commercial-airline flight paths over the Bay Area during a meeting of local residents on Oct. 16.

Unfriendly skies

(continued from page 27)

Circuit on Sept. 26 challenging the FAA's finding that its plans for optimizing future use of the Bay Area's airspace won't have any significant impact.

What's more, residents say, the fledgling Surf Air commuter line of propeller planes, which uses San Carlos Airport, is adding a layer of smaller, allegedly noisier commercial aircraft over neighborhood rooftops.

Citizens' groups are springing up along the Midpeninsula with the support of their city governments: Sky Posse Palo Alto; CalmTheSkies in Atherton and Menlo Park; and the Ad Hoc Citizens Committee on Airplane Noise Abatement for the South Bay in Portola Valley and Woodside.

The City of Palo Alto has sought to become a member of the SFO Community Roundtable — which addresses airport noise issues and represents every major

city in San Mateo County — but has been denied membership because it's outside the county. But Palo Alto Mayor Nancy Shepherd and City Manager James Keene have both weighed in on NextGen's environmental-impact study, Shepherd said.

Palo Alto residents who are looking into the issue are seeking to form alliances with the established groups.

Stewart Carl, a member of Sky Posse Palo Alto, began noticing the flight and noise changes around the fall of 2013. From his third-story Palo Alto home office, he has heard the thunderous noise as he's worked late into the night and early morning.

"I've lived there for 18 years and it never bothered me. Now I'm hearing jet noise constantly. I started wondering, 'What is going on?'" he said.

Residents last week gathered in a Palo Alto office conference room to discuss strategies and share information. They considered an email from an SFO official in the Noise Abatement Of-

fice regarding changes in flight paths. He stated that there have been no changes in 2014, but a change did occur in 2013.

Prior to July 2013, arrivals were split between routes over land and over San Francisco Bay. But the FAA permanently directed international planes to fly over the Midpeninsula after the Asiana Airlines crash, when the pilot landed short of the runway, he noted.

The FAA has declined to comment on matters related to the SFO flights because of the pending litigation by the Portola Valley and Woodside residents. But numbers tell part of the story.

This year, 68 percent of flights have come overland from the south compared to 54 percent in 2010, according to SFO data.

For Palo Alto, 48 percent of flights came over land in 2014 compared to 45 percent in 2010.

Palo Alto residents believe the flight paths have shifted to the south. SFO spokesman Doug Yakel said that flight patterns may expand or contract based on



Tina Nguyen, who has filed a lawsuit against the Federal Aviation Administration, talks with Jon Zweig and other area residents about the noise of airplanes flying over residential areas in Palo Alto and surrounding cities on Oct. 16.

increases or decreases in air traffic volume, but he did not specify how far or where the contractions and expansions have occurred.

Tina Nguyen, one of the plaintiffs challenging the FAA's finding of no significant impacts in its environmental review, said tracking the flights through the online airport Web Tracker confirms flights are coming in further south than before.

In addition, Southwest and Virgin America increased their traffic into SFO in 2007. The airport has compensated for it by sending many flights into a holding pattern over Woodside and Portola Valley, while they hold their place in the queue, she said. She verified the traffic patterns by studying the online SFO and San Jose flight trackers. All of these flights also pass over Palo Alto, she said.

Yakel confirmed that traffic around the three Bay Area airports is up about 2 percent compared to last year, mainly due to increases at SFO and San Jose. In August, SFO recorded 18,664 arrivals, he said. Of these, 7,470, or 40 percent, flew over Palo Alto at an altitude of 10,000 feet and lower.

Decibel levels and how they are measured are a major point of contention between the FAA, residents and congressional members.

When Eshoo and Fazzino made their agreement with SFO, the altitude for planes flying over the border of Menlo Park and Palo Alto was to be 5,000 feet rather than 4,000, according to a May 12, 2000, letter she wrote to members of UPROAR, a local airplane-noise group.

Eshoo wrote that the change was anticipated to reduce noise by one to two decibels at ground level.

SFO also agreed to install a permanent noise monitor at the Palo Alto and Menlo Park border to aid enforcement. But Bert Ganoung, SFO's manager of aircraft noise abatement, said the decibel monitor was never installed. When 9/11 and fears of SARS led to a drop in the number of people who were flying, airport revenues decreased, he said. The decreased number of flights also resulted in a lesser need to monitor noise levels, he added.

In 2002, a letter from the head of the noise office withdrew the offer of a decibel monitor. Cities were offered monitors if they paid for them, with SFO agreeing to do annual maintenance, but most no longer saw a need, he said.

An Eshoo spokesperson said the permanent decibel monitor was awaiting final permitting when 9/11 dried up air traffic and the funding for the site.

"At this time, cities can pursue a portable decibel monitor program at no cost," the spokesperson said in an email. "The State of California accepts this quarterly monitoring system as an acceptable substitute to permanent noise monitors under Title 21 — California Noise Standards. Again, it is incumbent upon cities to pursue this option, and they are encouraged to do so."

Nguyen's group hired its own aviation-noise expert, who conducted tests and found that between Aug. 26, 2013, and Sept. 11, 2013, 61 arrival flights had a peak noise level of 80 decibels near Skyline Boulevard in Woodside, she said.

The noise seems to stem from low-flying planes that are violating agreements SFO made in 1998 and 2000 to keep flights above Skyline above 8,000 feet and at the Palo Alto and Menlo Park border at 5,000 feet, Nguyen said. Data from the SFO Noise

How loud is that?

Here's what decibels sound like in terms of everyday noise

Decibels (db)	Noise	Subjective loudness
150	jet takeoff at 27 yards	eardrum rupture
120	thunderclap, chainsaw	painful
110	rock band, auto horn at 3 feet	average human pain threshold
90	Boeing 737 at 1.2 miles before landing, power mower	likely hearing damage from 8 hours of exposure
80	garbage disposal, dishwasher, car wash at 20 feet, propeller plane flyover at 1,000 feet	possible hearing damage from 8 hours of exposure; twice as loud as 70 dB
70	vacuum cleaner, radio, television	upper 70s are annoying to some people
60	air conditioning unit at 33 yards, conversation in a restaurant	moderately noisy
50	conversation at home, loud enough to wake up sleeping person	moderate
30	calm rural area	very quiet
10	breathing	barely audible

Sources: Temple University Department of Civil/Environmental Engineering, Federal Agency Review of Selected Airport Noise Analysis Issues; Outdoor Noise and the Metropolitan Environment, M.C. Branch et al., Department of City Planning, City of Los Angeles, 1970; Centre for Human Performance & Health, Ontario, Canada

Abatement Office shows that more than 80 percent of arrival flights on a typical Sunday violated the 8,000-foot agreement, Nguyen said.

Data obtained from the FAA also showed that between Jan. 1 and May 31, 2013, 60.4 percent of flights arriving from the west were below 8,000 feet over Woodside — with more than half of those flying below 6,000 feet.

But Ganoung countered that planes fly at those altitudes only when weather is good.

The FAA has a 65-decibel Day-Night Average Sound Level standard, which has been in place since 1976 and is considered compatible with residential neighborhoods. But the standard is “outdated and disconnected from the real impact that air traffic noise is having on our constituents and should be lowered to a more reasonable standard of 55 decibel DNL,” wrote 26 members of the U.S. House of Representatives, including Eshoo and Rep. Jackie Speier, in a Sept. 12 letter to the FAA. The letter demanded an update of national sound-level standards and that the agency expedite a five-year noise-level study the FAA has underway.

‘Now I’m hearing jet noise constantly. I started wondering, “What is going on?”’

— Stewart Carl, a member of Sky Posse Palo Alto

Most European countries have dropped the standard to 55 decibels, Carl pointed out.

Nguyen said the FAA’s use of the day-night average is exactly that — an average. It doesn’t note flights that exceed 65 decibels nor remove the night curfews when planes are not flying.

A better weighted analysis would be to study noise levels from single airplanes passing over homes, the residents contend. The U.S. First District Court of Appeal supported that contention in an opinion on an Aug. 30, 2001, lawsuit filed by the group Berkeley Keep Jets Over the Bay Committee against the Port of Oakland. In that case, the Port’s Board of Commissioners had approved a plan to reconfigure and expand the Oakland International Airport to accommodate nearly double the number of flights between 1994 and 2010. The board had concluded there would not be significant noise and emissions problems based on the 65-decibel level, which is an average over a 24-hour period. But the environmental-impact study did not account for the disturbance of increased nighttime flights. The plaintiffs argued that the Port’s reliance on the average provided

a skewed representation of noise issues.

The three-judge panel agreed. “This conclusion is derived without any meaningful analysis of existing ambient noise levels, the number of additional nighttime flights that will occur ... the frequency of those flights, to what degree single overflights will increase noise levels over and above the existing ambient noise level at a given location, and the community reaction to aircraft noise,” the judges wrote.

The members of Congress raised similar concerns in their letter to the FAA.

“It is imperative that the FAA properly balance emission and noise concerns. This includes variations of daily flight routes, continuous descent approaches and rapid ascents,” they wrote regarding the NextGen program.

NextGen has been touted by the FAA as a necessary and long-overdue program that will modernize the nation’s air-traffic operations systems and prepare for a future of increased sky traffic. The FAA’s Aerospace Forecast projects that commercial air-traffic volume will nearly double over the next 20 years. SFO forecasts a 2 percent annual increase in air traffic, Yakel said.

“The airport can accommodate this rate without any adding runway capacity until about 2025-2030. At that point, airlines would have to start using larger aircraft, and/or the airport would have to expand runway capacity,” Yakel said.

“To deal with the projected increases,” Carl said, “the NextGen program will channel air traffic into a handful of narrow flight paths starting up to 200 miles from an airport and will allow air-traffic control to use much tighter aircraft-to-aircraft spacing.”

“The net effect is all of the air-traffic and noise that was spread out over a large area is concentrated over a smaller population living under the handful of precision flight paths into an airport,” he said.

Prior to NextGen, pilots charted their own course until 20 miles from the airport. This approach allowed for flight paths that were more spread out, and with them, the noise. Under NextGen, the flight paths will go directly on over particular neighborhoods, he said.

The plan is to have five paths into SFO. Three of the five come over Palo Alto, and the city is getting roughly half of the arrival traffic, Carl added.

Aircraft spacing, which is now about 6 miles between planes, will reduce to 1 mile or less, he said.

Higher noise levels over Palo Alto are projected under the FAA’s plan, according to consultants ATAC Corporation. The greatest increase by 2019 is expected to be between 1 and 2.7

(continued on page 30)



Passengers board a Surf Air flight to Santa Barbara at San Carlos Airport.

Living under the belly of a ‘beast’

Residents express growing concern over Surf Air’s small commuter planes

Fledgling airline Surf Air’s marketing slogan is “Disruptive Innovation — A Revolutionary Approach to Air Travel.” Some residents in Menlo Park, Redwood City and Atherton say it sums up their experience with the commuter airline’s turbo-propeller planes.

Surf Air started flying out of San Carlos Airport in June 2013. The start-up airline offers members unlimited flights for a monthly fee between regional airports, including Burbank, Hawthorne, Santa Barbara, Las Vegas and Truckee. It currently has as many as 24 flights to and from San Carlos, with the earliest departing at 7:05 a.m. on weekdays and the last arriving at 8:55 p.m. On weekends, the first flight leaves at 8 a.m. on Saturday and the last lands at 10 p.m. on Sunday, according to the company’s website. The airline plans to add Oakland and Carlsbad to its service in November and December.

But its concierge service has upset Midpeninsula residents, who say its Pilatus aircraft is exceedingly noisy. CalmTheSkies, a group based in Atherton, has been trying to get the company to change its flight paths or to have the planes fly higher. A Sept. 30 meeting at Holbrook-Palmer Park brought together people from Palo Alto to Redwood City to voice their concerns to Surf Air executives.

“A critical takeaway is that this isn’t an Atherton problem. It is a problem that affects many communities,” Atherton resident David Fleck, an organizer, said.

Residents said the plane’s sound frequency has been like nothing they have experienced before.

“I call it the blue-bellied beast,” said Sheri Shenk, who said the planes shake her home.

Her visiting grandchildren ran for cover during a recent visit.

“I gauge it by the height of my redwood tree. It’s often lower than 1,500 feet,” she said.

Surf Air CEO Jeff Potter, a former Frontier Airlines CEO who took over in February, said the airline wants to work with the community. Surf is testing a new, quintuple-bladed propeller that might be quieter than the four-bladed type in current use, he said. The airline would like to fly out of Moffett Field, which could eliminate some of the noisy traffic currently burdening south San Mateo County cities, but so far the company hasn’t gotten approval, he said.

Pilots at the Sept. 30 meeting said that Surf Air pilots need training on best practices to descend more quietly in the Pilatus aircraft.

CalmTheSkies is also working to try to get the Federal Aviation Administration to increase the altitudes on flight paths or spread the flight approaches over U.S. Highway 101.

Some residents say they have already done enough talking, and they are considering legal options.

“That’s very indicative about how upset people are becoming in our community,” Fleck said.

San Mateo County has continued to accept federal money from the FAA. Some residents say it is time to stop.

“In doing so, they’re giving away the ability of the county to have leverage to manage ground operations better. We can no longer demand to manage curfews or the number of flights,” Fleck said.

The residents also want better noise monitoring. The studies are dated to before the class of aircraft such as Pilatus existed, he said.

Noise studies are also generally done nearest to airports.

“They don’t extend back to the community,” he said.

Residents said they are closely evaluating candidates running in this November’s election for their responsiveness on the issue.

“It’s the county’s responsibility. They own it — it’s their airport. ... We’re really questioning where our seats of government are on these issues. They are missing in action, and we need them front and center,” Fleck said. ■

— Sue Dremann



A Surf Air employee pushes a bag cart away after passengers boarded a flight to Santa Barbara at San Carlos Airport.

Making a noise

Government officials attempt to influence aircraft regulations

Palo Alto and other government officials have so far been fighting an uphill battle to decrease airplane noise over their cities. For nearly 20 years, Palo Alto officials have been trying to join the San Francisco International Airport Community Roundtable, a group that represents 19 cities within San Mateo County; San Francisco and San Mateo counties; the San Francisco Airport Commission; and The Association of Governments of San Mateo County Airport Land Use Committee.

Palo Alto officials pushed to join the roundtable and become voting members in 1997 but were rejected. Mayor Nancy Shepherd attended the roundtable's June 4, 2014, meeting and again requested the city be allowed to join. The city was again rejected. A July 22 subcommittee meeting that included the Airport Land Use Committee, cities of Pacifica, Redwood City, Portola Valley, SFO Airport Director John Martin and the San Francisco Mayor's Office recommended the roundtable not take a vote on including Palo Alto. Doing so would mean that each city would have to take the issue to their voters and then vote as a group to change their bylaws to allow Palo Alto to join — a cumbersome process.

Instead, they recommended the city continue to attend the roundtable meetings to voice its concerns and participate on a regional level through the Association of Bay Area Government's Regional Airport Planning Committee. But that committee has been largely ineffective, the subcommittee noted, having canceled its last meetings in April and July. It has not met since October 2013, and the last year it met regularly was in 2011.

The subcommittee also recommended helping Palo Alto and Santa Clara County create their own roundtable organization to focus on aircraft noise "from general aviation or commercial activity in the county or from the

region's other airports."

"They are the only county with a major commercial service airport in the Bay Area that does not have an airport-focused noise organization with elected officials and appointed staff," the subcommittee noted, referencing Norman Y. Mineta San Jose International Airport.

Shepherd was philosophical about the snubbing.

"I threw them the whole kitchen sink," she said, noting that Palo Alto has fought battles for other cities because it has a full legal staff and should receive support on the airplane issue.

But she noted the SFO Roundtable might not be the best avenue for redress anyway. A June 2011 San Mateo County grand jury report found the roundtable's effectiveness in representing residents impacted by aircraft noise and vibration was minimal and was diminishing.

"County officials need to make noise about aircraft noise," the grand jury titled its report.

The grand jury found that the roundtable's bylaws do not require the chair or vice chair be an elected representative of a member city, nor does it allow for any membership or committee representation by individual members of the community.

The grand jury also recommended that severely impacted cities form citizen advisory groups to work with their appointed representative on the roundtable to identify and reduce aircraft noise. And "neither County of San Mateo nor the San Francisco Airport Commission exercise their authority to issue fines and sanctions for noise violations despite frequent and repetitive failures to comply with standards," the grand jury noted.

Shepherd said she is now looking for a more strategic approach, "rather than demanding to be part of the noise roundtable and get no advocacy from them."

She will ask for the City Council's Policy and Services Com-

mittee to look into how to best define the problem and which agencies to approach.

"All of this is good timing, since we're going to have to come up with a new mechanism with our own airport," she said, now that the city has taken over ownership of the Palo Alto Municipal Airport.

Airport Manager Andrew Swanson said the city is only in the beginning stages of figuring out what the future Palo Alto Airport will look like — whether to bring in outside management, for example. Flights are up this year, hovering around 180,000, he said.

Palo Alto Airport uses noise-abatement procedures developed by Santa Clara County, with most takeoffs making a turn out over the San Francisco Bay. When there is a fog bank, flights are routed around the municipal golf course and U.S. Highway 101, which does create more noise over Palo Alto and East Palo Alto, he said.

Swanson, who worked with SFO on noise and air-traffic trends, said that with the good economy, residents can expect air-traffic increases.

"It seems to correlate with the economy. There's definitely a direct relationship," he said.

Airplane noise has become an issue throughout the country, particularly as the FAA's NextGen satellite-control upgrades have rolled out, which many residents say has exacerbated the problem.

On Oct. 3, Congresswoman Anna Eshoo announced her membership in the Congressional Quiet Skies Caucus. The caucus will raise awareness of the issue and will work to find meaningful solutions to the problem, a spokesperson said. The caucus consists of members of Congress from across the country whose constituents are adversely affected by incidents of airplane and helicopter noise.

In September, Eshoo and 25 members of Congress indicated their disappointment with the

FAA's handling of aircraft noise and failure to update a decades-old noise limit.

"Airports are epicenters of economic growth, but the noise from aircraft can make them pesky neighbors for many residents who

live near them, including many of my constituents. The creation of the Quiet Skies Caucus provides a forum to advance solutions that abate aircraft noise in our communities," she said in a statement. ■

— Sue Dremann

Unfriendly skies

(continued from page 30)

decibels in the Esther Clark Park neighborhood, west of Foothill Expressway. Residents under the flight path over Esther Clark, Green Acres, Barron Park, then heading north along Jordan Middle School, Walter Hays Elementary School and Eleanor Pardee Park are expected to experience an estimated 1.2-decibel increase, with an average of 45.9 decibels in noise, according to the report.

er increase in areas already at or above 65 decibels and would not result in 3-decibel increases or higher in areas now exposed to noise between 60 and 65 decibels. The air-traffic changes would also not result in increases of 5 decibels or higher in areas exposed to noise between 45 and 60 decibels, according to the report.

But residents pointed out that the study once again is based on the standard of average decibel levels and doesn't consider the noisiest flights. To alter that standard, however, change must happen at the federal level, said John Shordike, the attorney who represented the Berkeley group in the Oakland case.

"Unless there is new legal authority on the federal level under the National Environmental Policy Act (NEPA), (the FAA) can continue to use this ridiculous and meaningless average," he said.

The FAA Modernization Act of 2012, which authorized \$63.4 billion for the FAA modernization, including \$11 billion for NextGen, alters National Environmental Policy Act (NEPA) review for any NextGen procedures, MacEneaney of Queens said.

Her organization is currently working to change that provision when the act comes before Congress for renewal in 2015, she said.

What will the FAA do with the newly opened territory outside the narrow jetliner routes created by NextGen?

The act requires the FAA to provide airspace to military, private and commercial drones by Sept. 30, 2015. The FAA has been hard pressed to find such space for these small, unmanned aircraft amid cargo planes, business jets and commercial airliners. But funneling jetliners into precise, pinpoint-accurate traffic lanes would free up the surrounding space. Currently, drones are restricted to small airspaces away from airports and at low altitudes away from cities. ■

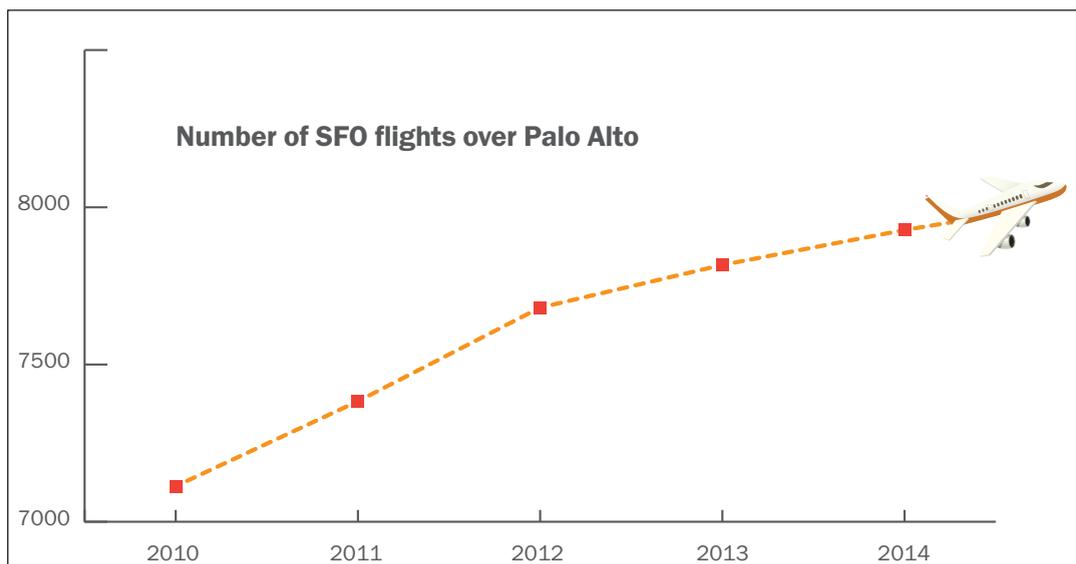
Staff Writer Sue Dremann can be emailed at sdremann@paweekly.com.

'Unless there is new legal authority on the federal level under the National Environmental Policy Act, (the FAA) can continue to use this ridiculous and meaningless average.'

—John Shordike, attorney, Berkeley Keep Jets Over the Bay Committee

Palo Alto locations surveyed ranged between receiving 32 and 45.6 decibels of sound, with most falling in the 43- to 44-decibel range.

But overall, the environmental study concluded that NextGen would have no significant impacts on noise. Using radar data to examine routes to SFO, Oakland Metropolitan International Airport, Norman Y. Mineta San Jose International Airport and Sacramento International Airport, ATAC Corporation's analysis found that the program would not result in a 1.5 decibel or high-



Source: San Francisco International Airport

WATCH VIDEO ONLINE
PaloAltoOnline.com

Two videos showing air traffic over Palo Alto have been posted on PaloAltoOnline.com with these articles. The videos came from San Jose International Airport's online site WebTrack.

The first video, by the Portola Valley and Woodside noise-abatement group, covers a 30-minute period on Aug. 16, 2013, in which 12 flights to San Francisco International Airport were routed from Big Sur and Point Reyes over Portola Valley and Palo Alto.

The second video is from June 24, 2014, from 10 to 11 p.m., and shows 21 low-flying commercial aircraft over both communities. The videos are courtesy of Tina Nguyen and James E. Lyons.

Real-time and archived flight patterns over Palo Alto and surrounding communities, including aircraft altitudes, can be viewed at <http://webtrak5.bksv.com/sjc3>. ■

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Anna G. Eshoo
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ON HIGH TECHNOLOGY

May 12, 2000

Dear UPROAR Member,

Because of your interest and concerns about airplane noise on the mid-Peninsula and the reduction of it, I'm pleased to report to you some important news on the subject.

After hearing from you and many constituents from communities in our area, I launched a collaborative effort with city officials to curb aircraft noise. Elected officials from Palo Alto, East Palo Alto, Menlo Park, Atherton, Los Altos, Woodside, Redwood City and Portola Valley wrote letters to San Francisco Airport Director John Martin requesting the opportunity to meet and to discuss the issue in person. I followed up with San Francisco Airport officials and was able to arrange a meeting between San Francisco Airport Director John Martin and the local officials where a variety of proposals to combat aircraft noise were discussed. Three objectives were established:

1. Need for residents to communicate directly with Airport Noise Abatement Officials
2. Increase in maximum altitude at which planes fly over mid-Peninsula cities
3. Establish a permanent device in the field to monitor aircraft noise

In short, we were successful in achieving all these goals and I think this is a terrific step in the right direction until better technologies are created to make this an obsolete issue. First, Airport officials agreed to set up a complaint line, which identifies the locations of complaint calls.

Second, I contacted the Federal Aviation Administration to request the lifting of altitude requirements over the mid-Peninsula in order to curb the noise of the 70 daily flights that are routed across the 14th Congressional District and into SFO. The FAA responded to our request and agreed with our recommendations. The new flight procedure that has been approved by the FAA will raise the altitudes at which airplanes fly over mid-Peninsula cities. These changes did not require the use of new technology but did need FAA approval due to the alterations of arrival and departure paths.

The new flight patterns have already been implemented and airplanes flying into SFO from Southern California, Mexico, Phoenix, Las Vegas, Hawaii and north from Point Reyes are now crossing a navigation fix located at the Menlo Park-Palo Alto border at 5,000 feet rather than the previous 4,000 feet. It's important to note that since the glide

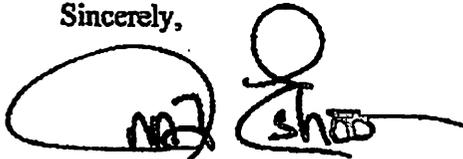
slope angle is increased by the altitude change, a normal descent to the runway requires a maximum reduction of engine thrust in order to reduce speed and configure the aircraft for landing.

It is anticipated that this change will bring about a reduction of between 1-2 decibels at ground level, which equates to a 41% reduction in noise when factoring in both the altitude and glide slope change.

Lastly, San Francisco Airport will install a permanent noise monitor near the navigational marker at the border of Palo Alto and Menlo Park that will aid in the enforcement of the new flight procedures.

I'm very pleased and excited about the positive changes we've been able to make. I appreciate your patience and your advocacy and I hope, of course, that the changes will bring about peaceful nights of sound sleep and more quality of life during the day!

Sincerely,

A handwritten signature in black ink, appearing to read 'A. Eshoo', with a large, stylized flourish on the left side.

Anna G. Eshoo
Member of Congress



County Officials Need to Make Noise about Aircraft Noise

[Issue](#) | [Background](#) | [Findings](#) | [Conclusions](#) | [Recommendations](#) | [Responses](#) | [Attachments](#)

Issue

Is the San Francisco International Airport Roundtable (SFO Roundtable) operating effectively to ensure that San Mateo County residents are not unduly impacted by aircraft noise?

Summary

The San Francisco International Airport (SFO), one of the busiest airports in the world, is experiencing significant expansion and an increase in both domestic and international flight traffic. While SFO is wholly owned and operated by the City and County of San Francisco, it is located entirely within the boundaries of San Mateo County. Many communities in close proximity to SFO and those located under departure flight paths are increasingly impacted by aircraft noise and vibration, especially from night departures.

The San Francisco Airport Roundtable serves as the primary forum to address the impact of aircraft noise on communities in San Mateo County. Comprised of elected officials from 17 San Mateo County cities along with representatives of San Francisco and SFO, the Airport Roundtable is tasked with monitoring noise and complaint data and interfacing with the public, local governments, state agencies, the FAA, the airline industry and SFO administrators on behalf of San Mateo County. The Grand Jury conducted an inquiry to determine if the Airport Roundtable was effectively representing those San Mateo County residents being impacted by aircraft noise and vibration.

The Grand Jury found that the effectiveness of the Airport Roundtable was diminishing, and that participation and enthusiasm for the SFO Roundtable was in decline. The City of Daly City, one of the communities most severely impacted by aircraft noise and night departures, has withdrawn from the Airport Roundtable. Monthly meetings of the Roundtable have been reduced to quarterly meetings. The Grand Jury recommended that the San Mateo County Board of Supervisors become actively involved in revitalizing the Airport Roundtable and recommended that Daly City renew their membership and appoint a fully engaged representative.

The Grand Jury further found that noise monitoring and mitigation efforts are primarily based on compliance with the federal standard of 65dbCNEL, which is an average noise level over a 24 hour period, and therefore does not address single aircraft noise events. They also determined that there is no mechanism in place to measure structural vibration. The Grand Jury recommended that the Roundtable expand their focus to include single aircraft noise events, particularly night departures, and request that the Noise Abatement Office deploy equipment to measure and monitor both single events and structural vibration.

The Grand Jury further found that the bylaws of the SFO Roundtable do not require that the Chair or Vice-chair be an elected representative of a member city, nor does it allow for any membership or committee representation by individual members of the community. It was also noted that there was no representation from the State of California, Division of Aeronautics. The Grand Jury recommends that the bylaws be amended to require the Chair and Vice-chair to be an elected official from a member city and expand membership to include a representative of the State of California, Division of Aeronautics. The Grand Jury also recommends that severely impacted cities form citizen advisory groups to work with their appointed representative on the Airport Roundtable to identify and mitigate aircraft noise in their communities.

Background

The San Francisco International Airport (SFO), is one of the busiest airports in the United States, serving as the gateway to Europe, Asia and Australia. In 2010 SFO served over 39 million passengers on some 387,000 flights. SFO serves as a major hub for United Airlines (now merged with Continental), and as the primary hub for Virgin Airlines. SFO is experiencing significant airport expansion and an increase in both domestic and international flight traffic into and out of SFO.

SFO is wholly owned and operated by the City and County of San Francisco, yet its 2300 acre operation is located entirely within the boundaries of unincorporated San Mateo County and in immediate proximity to numerous residential communities. While San Mateo County undoubtedly benefits economically from the presence of SFO within its borders, it also bears the brunt of the traffic congestion, pollution, and the vibration and noise generated by aircraft and related airport activities.

Although all air traffic control and flight patterns are under the sole jurisdiction of the Federal Aviation Administration, SFO operates under a permit issued by the State of California and is regulated by the State of California Department of Transportation, Division of Aeronautics. The California Public Utilities Code requires that "the department shall adopt noise standards governing the operation of aircraft and aircraft engines for airports operating under a valid permit issued by the department to an extent not prohibited by federal law. The standards shall be based upon the level of noise acceptable to a reasonable person residing in the vicinity of the airport".¹

California law further provides that, "The violation of the noise standards by any aircraft shall be deemed a misdemeanor and the operator thereof shall be punished by a fine of one thousand dollars (\$1000) for each infraction,"² and that "It shall be the function of the county wherein an airport is situated to enforce the noise regulations established by the department."³

In 1971, pursuant to California regulation, San Mateo County designated SFO as a "Noise Problem Airport."⁴ The preamble to the regulations states that "the regulations are designed to cause the airport proprietor, aircraft operator, local governments, pilots, and the department to

¹ Public Utilities Code Section 21669

² Public Utilities Code Section 21669.4 (a)

³ Public Utilities Code Section 21669.4 (b)

⁴ California Code of Regulations, Title 21, Article 2, section 5020

work cooperatively to diminish noise problems. The regulations accomplish these ends by controlling and reducing the noise impact area in communities in the vicinity of airports."⁵

In response, the San Francisco International Airport/Community Roundtable (SFO Roundtable) was created by a Memorandum of Understanding between the County and the cities of San Mateo County in 1981 as a forum to address the impacts of aircraft noise on communities in San Mateo County. Participation by the Cities is voluntary. The San Mateo County Board of Supervisors delegated responsibility for the aircraft noise issue to the SFO Roundtable comprised of local elected representatives from 17 San Mateo County communities along with officials from SFO, San Francisco, San Mateo County and the County Airport Land Use Committee (ALUC). The SFO Roundtable remains the primary agency charged with the responsibility for monitoring aircraft noise data and noise mitigation programs, as well as interfacing with the public, local governments, state agencies, the FAA, the airline industry and SFO administrators on behalf of San Mateo County.

Pursuant to state law, SFO established a Noise Abatement Office. This office operates 31 noise monitors in San Mateo County to measure noise and track ambient noise. These include 29 permanent locations and 2 portable units presently deployed in Brisbane. There is currently no mechanism in place to measure or track structural vibration. The SFO Noise Abatement Office also fields and tracks resident complaints about aircraft noise.

The Grand Jury assessed whether the SFO Roundtable is operating effectively to mitigate aircraft noise impacts on San Mateo County residents.

Discussion

While it is recognized that the Federal Aviation Administration (FAA) regulates the operation of aircraft and controls the use of airspace, there may be significant opportunities for the elected officials in San Mateo County to mitigate the impacts on its residents.

SFO expansion and the increase in air traffic, especially departing night flights, has raised strong objections from some northern San Mateo County communities. Issues also continue to be raised by southern and mid San Mateo County communities regarding aircraft noise from arriving flights coming into SFO.

The Roundtable has maintained a good relationship with SFO, and can claim many successes including the establishment of a state of the art Noise Abatement Office funded by and located at SFO. The role of the Noise Abatement Office is to monitor aircraft noise activity and to compile data and prepare reports. These reports are used by the SFO Airport Roundtable to analyze and mitigate noise impacts in San Mateo County.

In 1983 the FAA and SFO invested \$153,000,000 in a major noise insulation program to soundproof more than 15,000 homes located within the 1983 noise contour map in which it was determined that aircraft noise exceeded the federal standard of 65dbCNEL.⁶ The 65dbCNEL

⁵ California Code of Regulations, Title 21, Article 2, section 5000

⁶ 65 decibels Community Noise Equivalent Level

noise standard represents the average noise level over a 24 hour period rather than the noise level of any individual event. Single event aircraft flyovers need to occur frequently and at very high volumes in order to bring the average noise level to 65dbCNEL. A community or residence could therefore experience numerous severe noise events in a day, but unless the average noise level over a 24 hour period exceeded the standard, it would not be considered a problem.

Eligible homes were noise insulated with the installation of noise resistant doors and windows in return for owners waiving their future vertical air rights and their legal rights to engage in noise litigation against SFO. Funds for the insulation program have been exhausted, and there are no current efforts to seek additional funding for expansion of the program to insulate areas that were not originally included, but may now suffer significant aircraft noise impacts.

The impact of structural vibration created by aircraft departures is not measured or tracked, but represents another impact on northern San Mateo County communities, particularly with night departures of heavy aircraft with international destinations.

While the efforts of the Roundtable and SFO have successfully mitigated the impact of aircraft noise in many areas of San Mateo County, there are individuals and communities that continue to suffer significant adverse impacts from aircraft noise who believe that their concerns are not being adequately addressed. For example, changes in departure patterns over Brisbane have generated strong protests from residents who assert that their quality of life is being adversely impacted. Increased night flights over San Bruno, South San Francisco and Daly City are also of major concern to those communities, especially when the flights depart directly over residential areas that did not participate or were not eligible for the noise insulation program.

The SFO Noise Abatement Office and SFO Roundtable sponsor a cooperative "Fly Quiet" program that monitors departure noise and acknowledges airlines that operate within recommended noise reduction guidelines. Neither the County of San Mateo nor the San Francisco Airport Commission exercise their authority to issue fines and sanctions for noise violations despite frequent and repetitive failures to comply with standards.

Investigation

The 2010-2011 San Mateo Grand Jury conducted an extensive investigation into aircraft noise issues at SFO which included interviews with the following:

- Current and former members of the SFO Roundtable
- Key personnel at SFO and the SFO Noise Abatement Office
- San Mateo County Officials and Staff
- San Mateo County Counsel and Staff
- Elected officials from impacted San Mateo County communities
- Residents in communities impacted by aircraft noise and vibration

In addition, the Grand Jury reviewed numerous current and historic documents that included:

- Bylaws and meeting minutes of the SFO Roundtable

- Federal and state noise standards and regulations applicable to SFO
- Extensive data on SFO flight paths, noise complaints and violations of noise standards
- CNEL Noise Contour Maps (attachment)
- Minutes of the City of San Francisco Airport Commission.

The Grand Jury also toured the San Francisco International Airport and visited the SFO Noise Abatement Office to observe their noise monitoring and tracking systems.

Findings

1. There has been an increase in both total departures and night departures from SFO. Increased volume and changed flight patterns have had an adverse impact on some northern San Mateo County communities including Brisbane and parts of Daly City and South San Francisco. Some of the areas currently experiencing the most severe impacts either declined to participate or were deemed ineligible for the original noise insulation program.
2. Noise data collected by SFO and monitored by the SFO Roundtable address noise averages and do not focus on single events. No data is collected on individual night-time events, which can be the most distressing to residents.
3. The violation of noise standards by any aircraft is deemed a misdemeanor and is punishable by a fine of \$1000. Under California law, San Mateo County has the authority to impose fines and sanctions for violations of noise regulations established by the State of California, Division of Aeronautics. San Mateo County does not impose fines or sanctions on offending airlines as a matter of policy.
4. The State of California, which issues the airport operating permit, is not represented as an advisory member of the SFO Roundtable.
5. Reports received by the SFO Roundtable, prepared by the SFO Noise Abatement Office, are not easily accessible to the public on the website (www.SFORoundtable.org). Information on the website was not current and a message stating that the website is "under construction" was displayed for the approximately one year duration of this investigation.
6. The Roundtable membership does not include any individual residents, nor do they have any citizen representation on any subcommittees.
7. The bylaws of the SFO Roundtable do not require that the Chairperson and Vice-Chairperson be elected representatives from the participating San Mateo County communities who are accountable to their constituencies. The current Chairperson of the SFO Roundtable is not an elected official.
8. The level of attendance by SFO Roundtable members varies widely and is declining overall. Daly City has withdrawn from membership entirely, and the San Francisco Board of Supervisors representative has not appeared since February of 2009. The SFO Roundtable recently decided to reduce their meeting schedule from monthly to quarterly.
9. Public participation at SFO Roundtable meetings is minimal. With one exception, all of the elected members of the SFO Roundtable and all of the residents interviewed stated that noise complaints were not a reliable source of feedback because people had either "given up" or did not believe that complaining was effective.

10. Daly City withdrew as a member of the SFO Roundtable in 2010, citing budget restraints as the reason. Membership fees for 2010 were \$750.

Conclusions

1. While numerous San Mateo County communities are affected to various degrees by aircraft noise from SFO, the most severe impacts are created by departures over Brisbane, Colma, Daly City, San Bruno and South San Francisco. The increasing frequency and intensity of aircraft noise, particularly at night, represents a problem for the quality of life for the residents of those communities.
2. The San Mateo County Board of Supervisors has not recently taken an active role in addressing aircraft noise issues and has largely delegated this responsibility to the SFO Airport Roundtable.
3. It would be more effective to have elected officials serve as Chairperson and Vice-chairperson of the SFO Roundtable, as they are directly accountable to the citizens.
4. Including a representative of the State of California, Division of Aeronautics, on the SFO Roundtable would add an important dimension and enhance effectiveness.
5. The lack of effectiveness of the SFO Roundtable has caused a decline in attendance and enthusiasm for participation in the SFO Roundtable. Community participation is minimal and not encouraged.
6. The focus on average noise levels, rather than single events, can distort the extent and magnitude of the problem and foster the belief that complaining is futile.

Recommendations

The 2010-2011 San Mateo Grand Jury recommends that the San Mateo County Board of Supervisors:

1. Take an active role in revitalizing the SFO Roundtable to make sure that the interests of San Mateo County and its residents are fully represented, and that every effort is being made to mitigate the severe and increasing impacts of SFO airport expansion on San Mateo County residents.

The Grand Jury recommends that the County Board of Supervisors and the member cities of the SFO Roundtable direct their representatives to take action that will:

1. Ensure that the locations of noise measuring and tracking equipment parallel current departure flight paths.
2. Request the SFO Noise Abatement Office to deploy equipment to measure and track the intensity of structural vibration on departure flight paths.
3. Change the focus of required data collection and reports to ACTUAL noise measurements rather than COMPLAINTS from residents about noise.
4. Increase the focus on single event noise violations and frequency, especially with night departures, rather than the 65dbCNEL which represents an average of noise experienced within a 24 hour period.
5. Adapt the "Fly Quiet" Program to include sanctions as well as rewards based on single event violations, particularly with night departures.

Congress of the United States
Washington, DC 20515

September 12, 2014

Michael P. Huerta
Administrator
U.S. Department of Transportation
Federal Aviation Administration
800 Independence Avenue, SW
Washington, DC 20591

Dear Administrator Huerta:

As Members of Congress who represent thousands of constituents negatively affected by airplane noise, we write to express our disappointment in the lack of progress on the part of the Federal Aviation Administration (FAA) to address growing noise pollution in our districts and the negative effects noise pollution has on the health, well-being, and property values of our constituents. Rather than addressing this issue piecemeal in fragmented areas of the nation, we believe it is time for the FAA to tackle this issue on a national level by changing the standard by which it determines acceptable noise pollution. The current 65 decibel Day-Night Average Sound Level (DNL) metric is outdated and disconnected from the real impact that air traffic noise is having on our constituents and should be lowered to a more reasonable standard of 55 decibel DNL.

Although we represent different airports with unique regulations and operating procedures, we are united in our call for lowering the current 65 DNL metric. We believe the 65 DNL, which has been in place since the late 1970s, is no longer a reliable measure of the true impact of aircraft noise. Since the 65 DNL was instituted by the FAA in its Aviation Noise Abatement Policy of 1976, airplane traffic has increased dramatically and will continue to do so over the next two decades. The FAA's own Aerospace Forecast projects that revenue passenger miles—the standard for measuring commercial air traffic volume—will nearly double over the next twenty years. Similarly, the number of operations at FAA and contract towers is expected to increase by more than 45 percent from current levels.

It is not just our communities that question the FAA's use of the 65 DNL. Support for a lower DNL standard, specifically 55 DNL, originates from a 1974 report from the U.S. Environmental Protection Agency (EPA) that was the beginning of a long line of studies – and a recent flurry of complaints – that support the need to lower the FAA's DNL standard. The FAA's use of 65 DNL may be based upon severe and immediate health impacts, but it is essential the FAA consider quality of life, long-term health impacts, home values and overall economic impact. As such, we urge the FAA to expedite its ongoing four-year-long review of the 65 DNL metric and institute overdue and much needed changes. Telling constituents that the FAA's study is not near completion after five years offers them cold comfort when jet noise is blanketing their communities.

We also urge the FAA to utilize Next Generation Air Transportation System (NextGen) technologies to minimize airplane noise. NextGen technologies offer incredible benefits when used correctly, including increased safety and efficiency in air travel for the airline industry and its passengers. However, it appears that the FAA has not fully considered the consequences of NextGen's implementation on airplane noise levels. It is imperative that the FAA properly balance emission and noise concerns. This includes variations of daily flight routes, continuous descent approaches, and rapid ascents. We have seen success using continuous descent in some areas and hope you will institute a national policy to improve the NextGen implementation, with an emphasis on reaching 55 DNL nationally.

We understand that air travel is a key component of the U.S. economy, and we appreciate that commercial aircraft are quieter than ever. However, each day many of our constituents are subjected to unreasonable levels of airplane noise. Economic growth—and efficient, safe air travel—should not be incompatible with vibrant, livable neighborhoods. By lowering its DNL standard, the FAA will greatly improve the lives of our constituents. We stand ready to assist you in achieving this goal, and ask you to inform us how we can help you in this task.

We look forward to your response and thank you in advance for working to achieve this important goal.

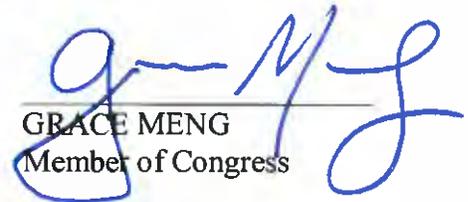
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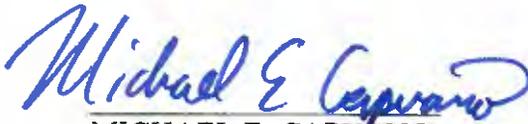
STEVE ISRAEL
Member of Congress



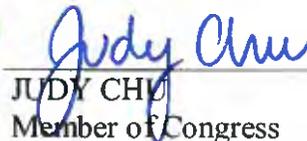
MIKE QUIGLEY
Member of Congress



GRACE MENG
Member of Congress



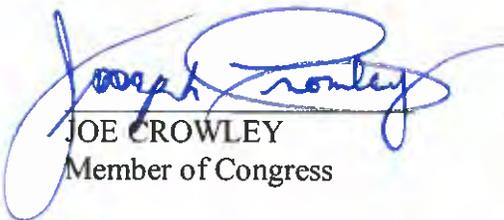
MICHAEL E. CAPUANO
Member of Congress



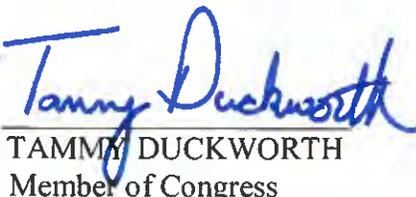
JUDY CHU
Member of Congress



KATHERINE CLARK
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JOE CROWLEY
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TAMMY DUCKWORTH
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KEITH ELLISON
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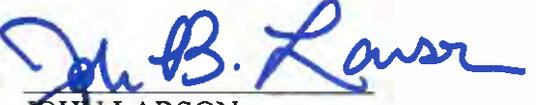

ELIOT L. ENGEL
Member of Congress


ANNA G. ESHOO
Member of Congress


ALAN GRAYSON
Member of Congress


MICHAEL M. HONDA
Member of Congress

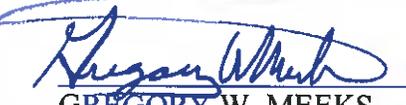

HAKEEM JEFFRIES
Member of Congress

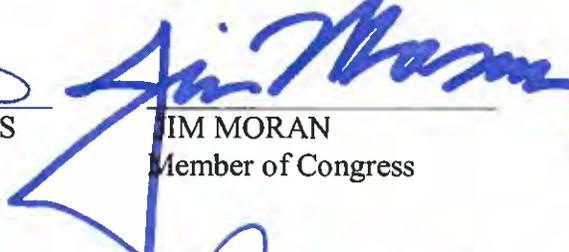

JOHN LARSON
Member of Congress


ZOE LOFGREN
Member of Congress

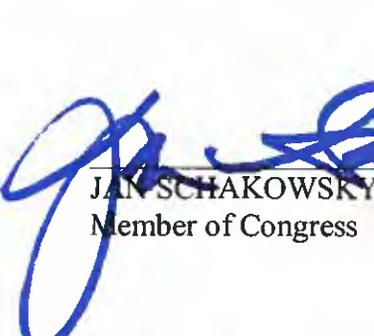

STEPHEN F. LYNCH
Member of Congress

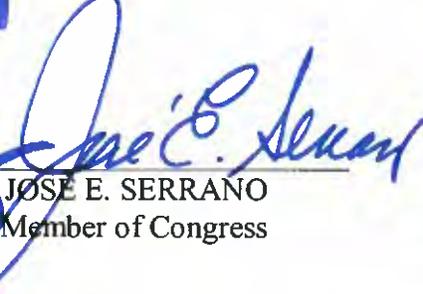

CAROLYN MCCARTHY
Member of Congress


GREGORY W. MEEKS
Member of Congress


JIM MORAN
Member of Congress

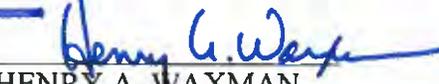

ELEANOR HOLMES NORTON
Member of Congress


JAN SCHAKOWSKY
Member of Congress


JOSE E. SERRANO
Member of Congress


JACKIE SPEIER
Member of Congress


MAXINE WATERS
Member of Congress


HENRY A. WAXMAN
Member of Congress

December 10, 2014

ATTACHMENTS:

- Petition to our Elected Representatives: Reduce Aircraft Noise over Palo Alto and Neighboring Communities [Sky Posse Petition](#)
- Congressional letter to the FAA [Congressional letter](#)
- 2000 FAA Agreement [2000 FAA Agreement](#)
- Citizens Letter to Anna Eshoo [Citizens letter to Ana Eshoo](#)

Dear Council Member,

Aircraft noise is increasing in both volume and frequency at an alarming rate over Palo Alto and our neighboring communities. This sonic pollution has an adverse effect on many Palo Alto residents. We ask you to exercise your full influence and resources to address this problem, and to please do so urgently. We are a group of concerned individuals who have aligned as neighbors to research the issue, learn how it is being addressed in other regions, and to create a common voice for Palo Alto residents. We are also available to assist you in any way that would be helpful.

To demonstrate how serious this issue is becoming, we launched the attached petition last week, generating 300 signatures almost immediately. The attached comments are informative, and fit into the following primary categories:

1. NIGHT – Sleep disruption: Low flying jets waking people up multiple times throughout the night (most common 11pm-12:30am, 4-4:30am, 5:30-6am).
2. DAY – Work disruption and significant impact on quality of life.
3. SAFETY – Low flying planes on narrow paths, scheduled too close together.
4. THINGS HAVE CHANGED – Airplane noise has increased significantly, especially in the past 1-2 years.

We understand that growth is important to the economy of the Bay Area, however the general increase in SFO approach traffic is only partially responsible for the excessive noise over our city. In the past 15 years, SFO arrivals have increased 23% but those flights over Palo Alto have increased 185%, from 70 to 200 arrivals per day. This indicates a shift in traffic from other areas to the space over Palo Alto (despite what the FAA and SFO Noise Abatement Team would like us to believe). As NextGen (a new air-traffic control system) is implemented, this traffic will shift into flight paths even more concentrated over Palo Alto, resulting in an inequitable distribution of the noise burden.

Jets currently descending into SFO aim for 4000 feet over Palo Alto. In the past they flew safely over this interchange at minimum altitudes of 5000 and 5500 feet. While the FAA is contending in their Environmental Assessment that there are no environmental impacts to our region, this is based on a manipulation or absence of the relevant data.

There are three additional air traffic noise contributors. All seem to be a domino effect of these FAA changes.

1. To stay out of the way of SFO traffic, full-sized commercial jets and commuter planes inbound to San Jose Airport (SJC) are flying at very low altitudes (2000 feet and lower). These are regularly routed over Palo Alto.
2. An increasing number of small commuter planes also fly at low altitudes. With new and rapidly growing commuter airlines such as SurfAir, anyone near their flight path is impacted in a drastic way.
3. Pilots can use a descent approach called Continuous Descent Approach, which is much quieter than the currently used stepped approach. But instead, they must make frequent maneuvers and changes, as directed by TRACON (FAA air traffic control), causing more noise and burning more fuel.

On April 29th of this year, City Council discussed this topic along with the FAA Draft Environmental Assessment (EA) Regarding the Northern California Optimization of Airspace and Procedures in the Metroplex (NorCal OAPM). Many of you were as outraged and concerned as we are about several things: a) this is a public health issue, b) how ridiculous it is that Palo Alto is excluded from having an official voice at the SFO Airport Community Roundtable designed to address community noise impacts from aircraft operations at SFO when noise is now affecting Palo Alto more significantly than communities closer to the airport, c) the FAA has been rolling out changes to air traffic routes and shifting them to be concentrated over Palo Alto, and then only giving Palo Alto the ability to comment at the time of finalizing these routes, and d) the FAA did not notify Palo Alto officials of this Environmental Assessment or give ample time to comment.

At that meeting, Council members mentioned wanting data to evaluate and address these changes, and some had good ideas on how to pursue this. We do need data, and we appeal to you to put systems in place so the City of Palo Alto can collect useful and objective data.

There are significant flaws to all the tracking existing systems. The SFO and SJC flight trackers are not consistent with each other, and the loudest flights are often missing from the radar data. SFO reports noise to the FAA using a measurement called CNEL, which is a function of noise intensity, times the log of the number of flights. This minimizes the importance of the frequency of the flights – a significant concern for Palo Alto which is at the conjunction of three approaches.

The FAA and SFO noise complaint systems are not designed to solve the problem, and instead discourage further complaints. The SFO complaint page is difficult to find. Complaints are answered with graphics and long explanations of how the noise was created (often indicating that the situation has always been this way), and there is no indication of potential resolution. The complaints to the FAA Ombudsman are often not answered, or answered with a boiler plate response empathizing with the complainant, but indicating nothing can be done. And these complaints are not collected and reported in a way that helps or supports Palo Alto. Instead, after a short period of time (we have heard 90 days), an increase in SFO traffic or traffic shift is made permanent on the basis of “there have been no complaints”. Despite all of this, the most recent SFO Roundtable report still shows Palo Alto complaints are second to Brisbane.

We are unaware of Council actions taken since that April meeting, other than attempting to join and being rejected again by the SFO Community Roundtable. Here are some suggested actions and approaches to respond to citizen concerns.

Suggested Actions & Approaches

1. Declare that noise pollution is a real concern to the City of Palo Alto.
2. Urgently appeal to the US Department of Transportation, specifically to the FAA, to remedy the noise issues and request full and accurate disclosure of air space changes and all available data for Northern California in a format the public can understand.
3. Reach out to our Congressional Representatives Anna Eshoo and Jackie Speier and other regional, state, and national elected officials to request re-assessment of the environmental impacts of NextGen, re-institute higher flying altitudes over Palo Alto, request a bill to Congress that repeals Section 213(c) of the FAA Modernization and Reform Act of 2012, and request a bill to fund the EPA's Office Of Noise Abatement and Control to get noise pollution recognized federally as a national health issue.
4. Work with the Congressional Quiet Skies Caucus to uplevel aircraft noise to a national issue and endorse the request that the threshold for objectionable noise be reduced from 65dB to 55dB, consistent with European Countries.
5. Install devices throughout Palo Alto to measure and monitor air traffic altitudes and noise levels, both general noise levels and single incident noise events. As mentioned, the existing SFO and SJC flight trackers are not consistent, and the most egregious flights are often missing from the radar data. We also need more than 24-hour average noise measurements because they discount one of the specific issues plaguing Palo Alto, the frequency of flights.
6. Create an effective noise complaint system for Palo Alto residents, monitored by City leadership, which reports complaints, data and analytics to the City and the airports, and communicates the results and progress of noise abatement strategies.
7. Retain independent noise measurement consultants as other communities have done when they need a baseline noise study completed.
8. Retain an independent consultant to propose higher approach altitudes and alternative flight paths that might be acceptable to the FAA (so all Bay Area communities share the noise burden and paths are moved back over the Bay and to other areas away from neighborhoods and schools).
9. Reach out to the airports, air traffic control and their noise abatement teams to understand what is within their power to change.
10. Start a Bay Area Airport Commission responsible for noise abatement that is inclusive of all Bay Area Communities. This should oversee the roundtables or noise abatement groups related to each airport.
11. Last, but of significant importance, ensure that all changes and growth planned for the Palo Alto Airport (PAO) are transparent to the community, give a voice in the decisions to the community, and employ best practices for noise abatement. PAO can benefit Palo Alto without contributing to increased noise in Palo Alto and neighboring cities, but sound planning and transparency are critical.

In summary, we need your help! The aircraft noise situation in Palo Alto is growing out of control. We are not in favor of shifting traffic to any one community (as is happening now). We support responsible aviation and growth, but we should not have to tolerate excessive and unnecessary air traffic noise. The World Health Organization states that repeated exposure to this level of noise is a health hazard. The argument that we “should have known we were moving near airports” doesn’t hold up. Nobody could have anticipated the magnitude of these changes from the shift of more traffic here. The increased level of noise experienced is not necessary and it is relatively new due to these FAA changes. The argument that this is similar to the loud leaf blowers is not the case either. While they are also an unnecessary nuisance, they are not heard constantly throughout the day, and are not heard during the night. There is no reason our health and quality of life should be jeopardized to this degree. The FAA and airports might have positive intentions in making these changes, but they are causing significant negative consequences on the ground that must be addressed.

We encourage an opportunity to meet with you and present this information in a more comprehensive and illustrative way. We look forward to helping in any way we can.

Sincerely,

Sky Posse Palo Alto

City of Palo Alto Policy and Services Committee

Impacts of Air Traffic Over the Mid-Peninsula

Sky Posse Palo Alto
February 10, 2015



100s of
concerned
residents

- Thank you for the opportunity to present this **problem**.
- We look forward to **working with the city** to find a **solution**.



Problem



- Aircraft noise – the Perfect Storm over Palo Alto
- Impacts health, livability, sleep, productivity
- Getting worse
- Can be fixed
- Urgent to address now





Perfect Storm

Palo Alto is under a...

Airplanes:

- 1. Very low**
- 2. Large numbers**
- 3. Intersection**
- 4. Congestion**



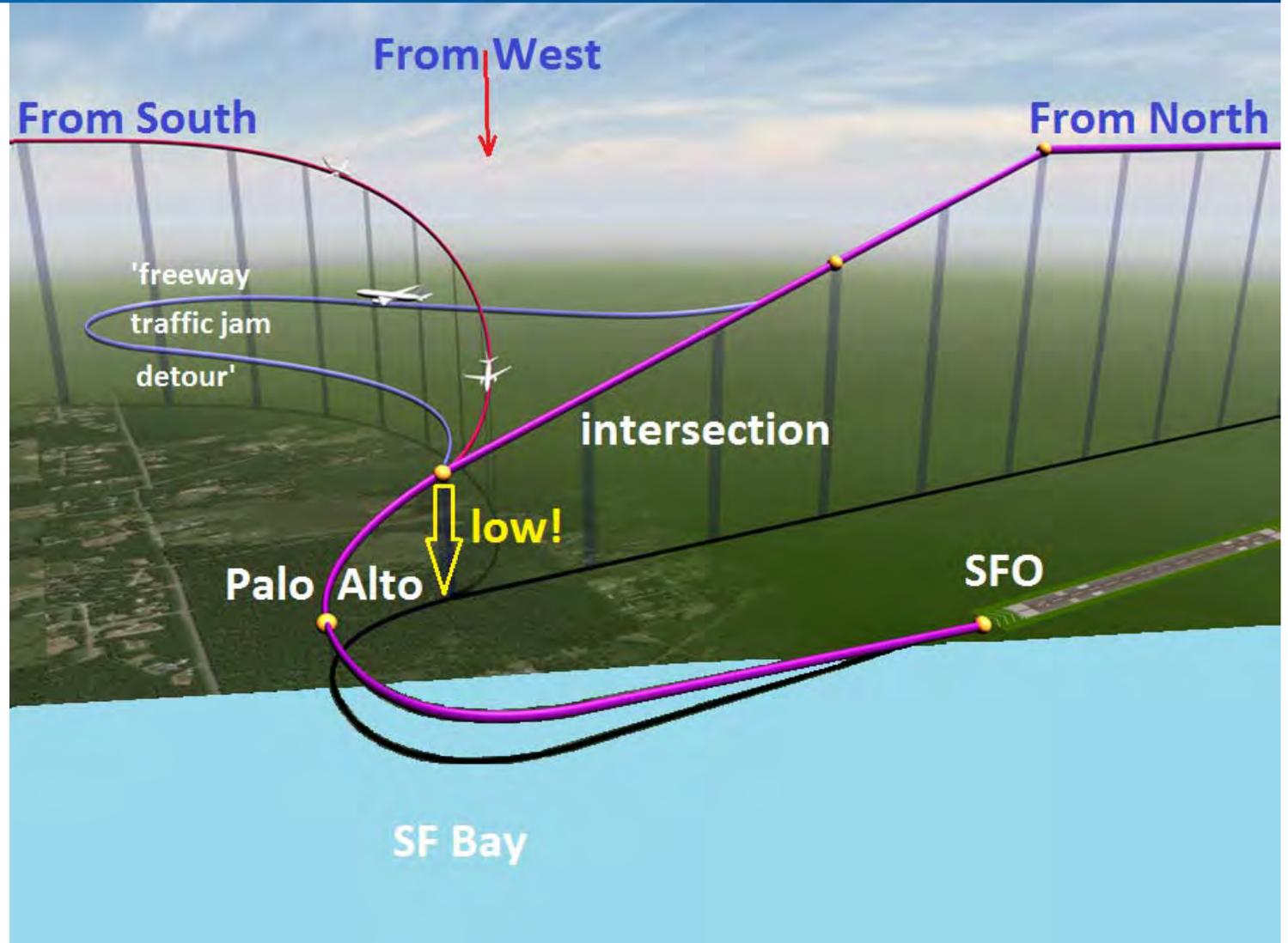
Freeway interchange traffic jam

(And they built it without our permission)

Why So Much Sky Noise?

Airplanes:

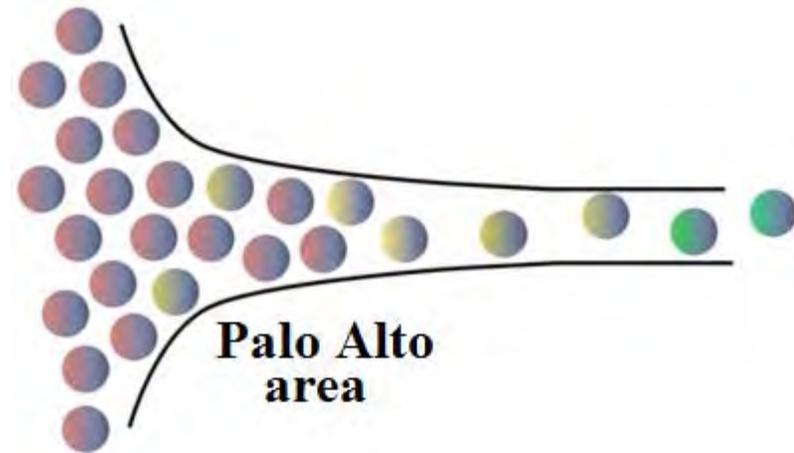
1. Low
2. Many
3. Merging
4. Detours





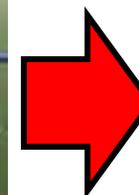
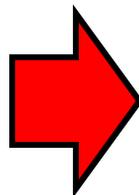
SFO "Work Zone" over Palo Alto

Airplane Merging Operations

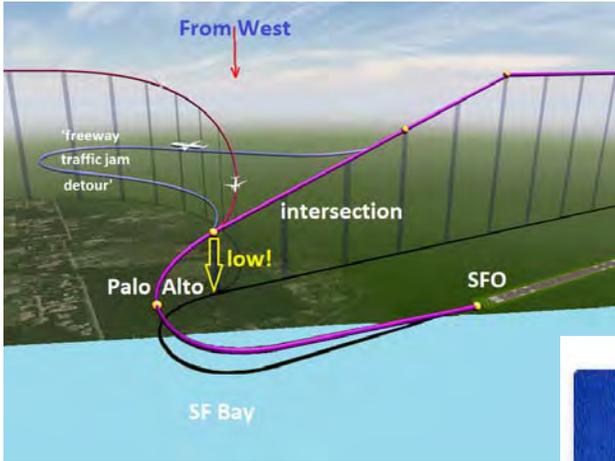


Assembling planes into sequence...

Detours, level, longer 'dirty' flights



Noise!

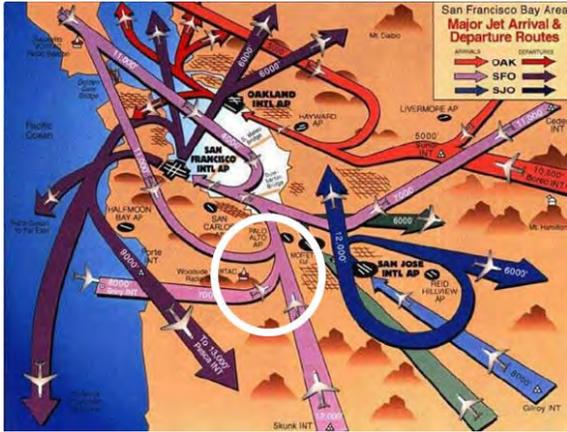


3 'Air Freeways' – 2 SFO 'work zones'

2 work zones:

1. 3-way merge
2. Prep for final





A Day in the Life of Palo Alto



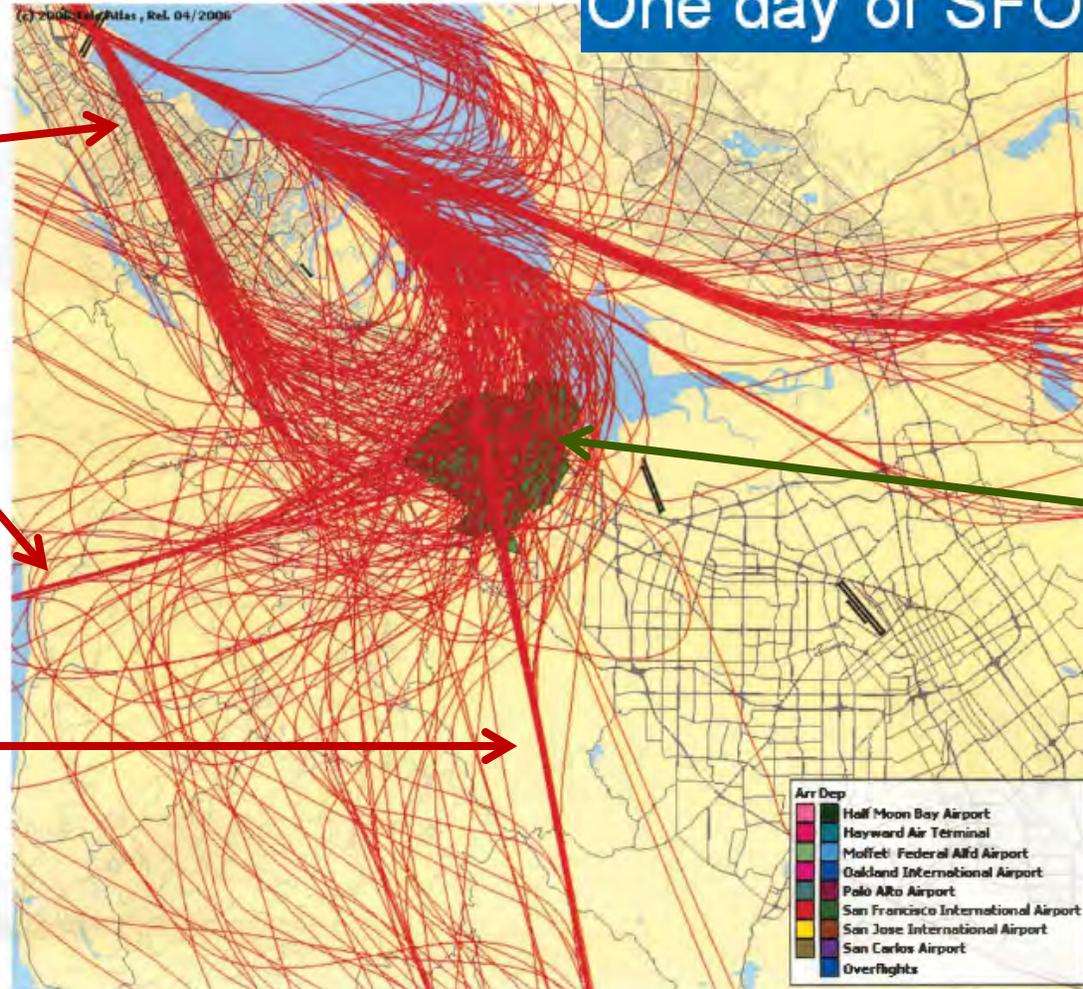
San Francisco International flight tracks for a 24 hour period on April 18, 2014 the City of Palo Alto is highlight in green:

One day of SFO Traffic

Arrivals from North

Arrivals from West

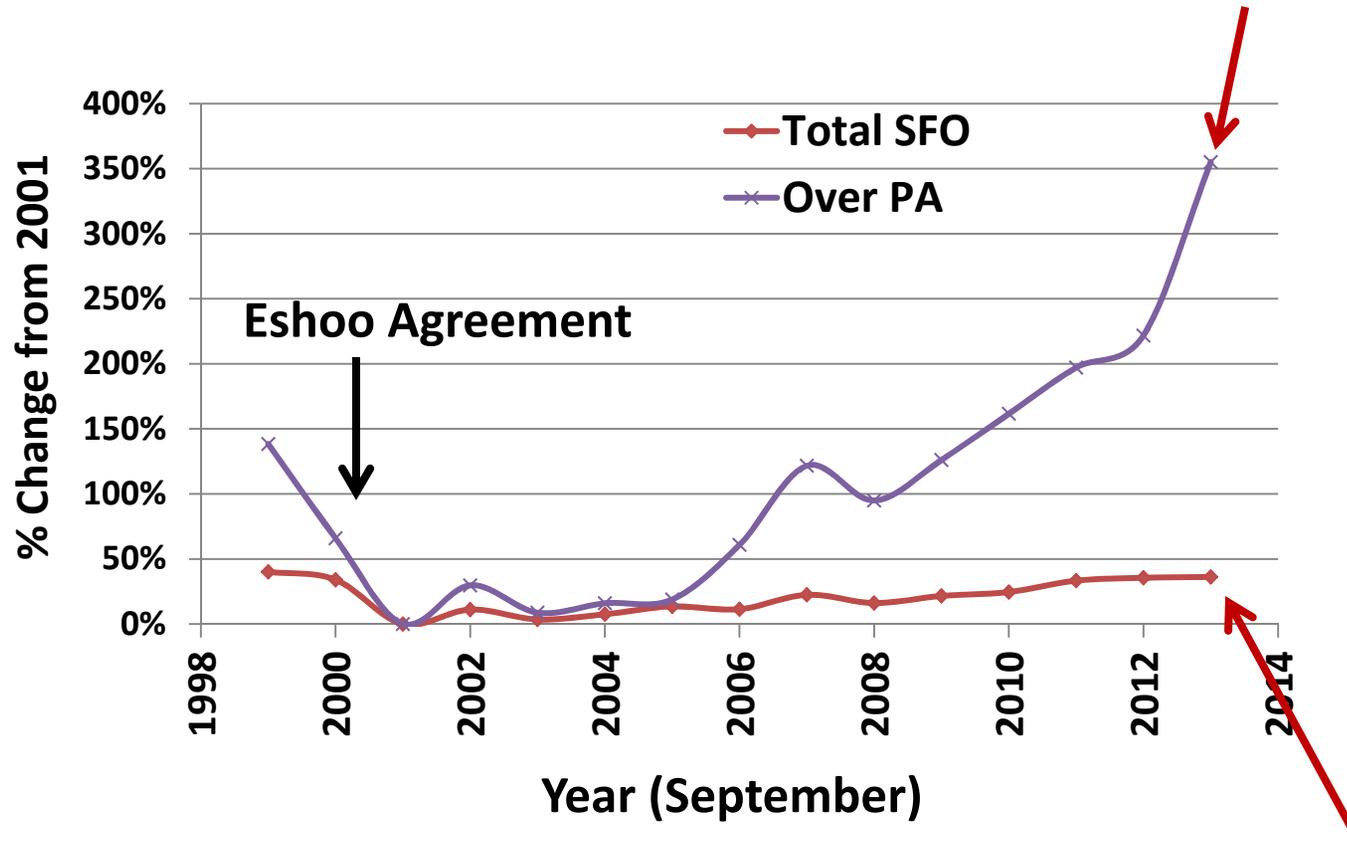
Arrivals from South



Palo Alto

SFO Traffic over Palo Alto has increased more than total traffic

More than 4x increase in SFO traffic over Palo Alto (Hanover Ave)



36% growth in Total SFO Arrivals

Data for all of Palo Alto indicates flights increased from 70 to 200 between 2001 and to 2013

Data from SFO Noise Abatement
Office Information Request

2001 - The “Eshoo/Fazzino Agreement”

WASHINGTON OFFICE
325 CANTON BUILDING
WASHINGTON, DC 20517-0254
PH: 202-804-6004
FAX: 202-226-4389
http://www.house.gov/eshoo

Anna C. Eshoo
14th District, California
Congress of the United States
House of Representatives
Washington, DC 20515-0514

COMMITTEE ON COMMERCE
SUBCOMMITTEE
TELECOMMUNICATIONS, TRADE, AND
CONSUMER PROTECTION
HEALTH AND ENVIRONMENT
WHIP AT LARGE
CO-CHAIR
MEDICAL TECHNOLOGY CAUCUS
VICE-CHAIR
DEMOCRATIC BUDGET GROUP
CO-CHAIR
DEMOCRATIC ADVISORY GROUP
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688 EMERSON STREET
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May 12, 2000

Dear UPROAR Member,

Because of your interest and concerns about airplanes noise on the mid-Peninsula and the reduction of it, I'm pleased to report to you some important news on the subject.

After hearing from you and many constituents from communities in our area, I launched a collaborative effort with city officials to curb aircraft noise. Elected officials from Palo Alto, East Palo Alto, Menlo Park, Atherton, Los Altos, Woodside, Redwood City and Portola Valley wrote letters to San Francisco Airport Director John Martin requesting the opportunity to meet and to discuss the issue in person. I followed up with San Francisco Airport officials and was able to arrange a meeting between San Francisco Airport Director John Martin and the local officials where a variety of proposals to combat aircraft noise were discussed. Three objectives were established:

1. Need for residents to communicate directly with Airport Noise Abatement Officials
2. Increase in maximum altitude at which planes fly over mid-Peninsula cities
3. Establish a permanent device in the field to monitor aircraft noise

In short, we were successful in achieving all these goals and I think this is a terrific step in the right direction until better technologies are created to make this an obsolete issue. First, Airport officials agreed to set up a complaint line, which identifies the locations of complaint calls.

Second, I contacted the Federal Aviation Administration to request the lifting of altitude requirements over the mid-Peninsula in order to curb the noise of the 70 daily flights that are routed across the 14th Congressional District and into SFO. The FAA responded to our request and agreed with our recommendations. The new flight procedure that has been approved by the FAA will raise the altitudes at which airplanes fly over mid-Peninsula cities. These changes did not require the use of new technology but did need FAA approval due to the alterations of arrival and departure paths.

The new flight patterns have already been implemented and airplanes flying into SFO from Southern California, Mexico, Phoenix, Las Vegas, Hawaii and north from Point Reyes are now crossing a navigation fix located at the Menlo Park-Palo Alto border at 5,000 feet rather than the previous 4,000 feet. It's important to note that since the glide

THIS MEMORANDUM WAS PREPARED BY REYNOLDS & REYNOLDS
THIS MAILING WAS PREPARED, PUBLISHED, AND MAILED AT TAMPAYER EXPENSE

- In 2001 Ms. Eshoo and Mayor Gary Fazzino extracted agreement from the FAA that arriving aircraft will stay at least 8,000 feet above sea level when passing over the (Portola Valley) beacon and **5000 feet above the MENLO IAF (716 Laurel Ave, Menlo Park).**
- It was already recognized then that **flights below 5000 feet produce unacceptable noise levels.** With more flights, altitudes need to increase not decrease.

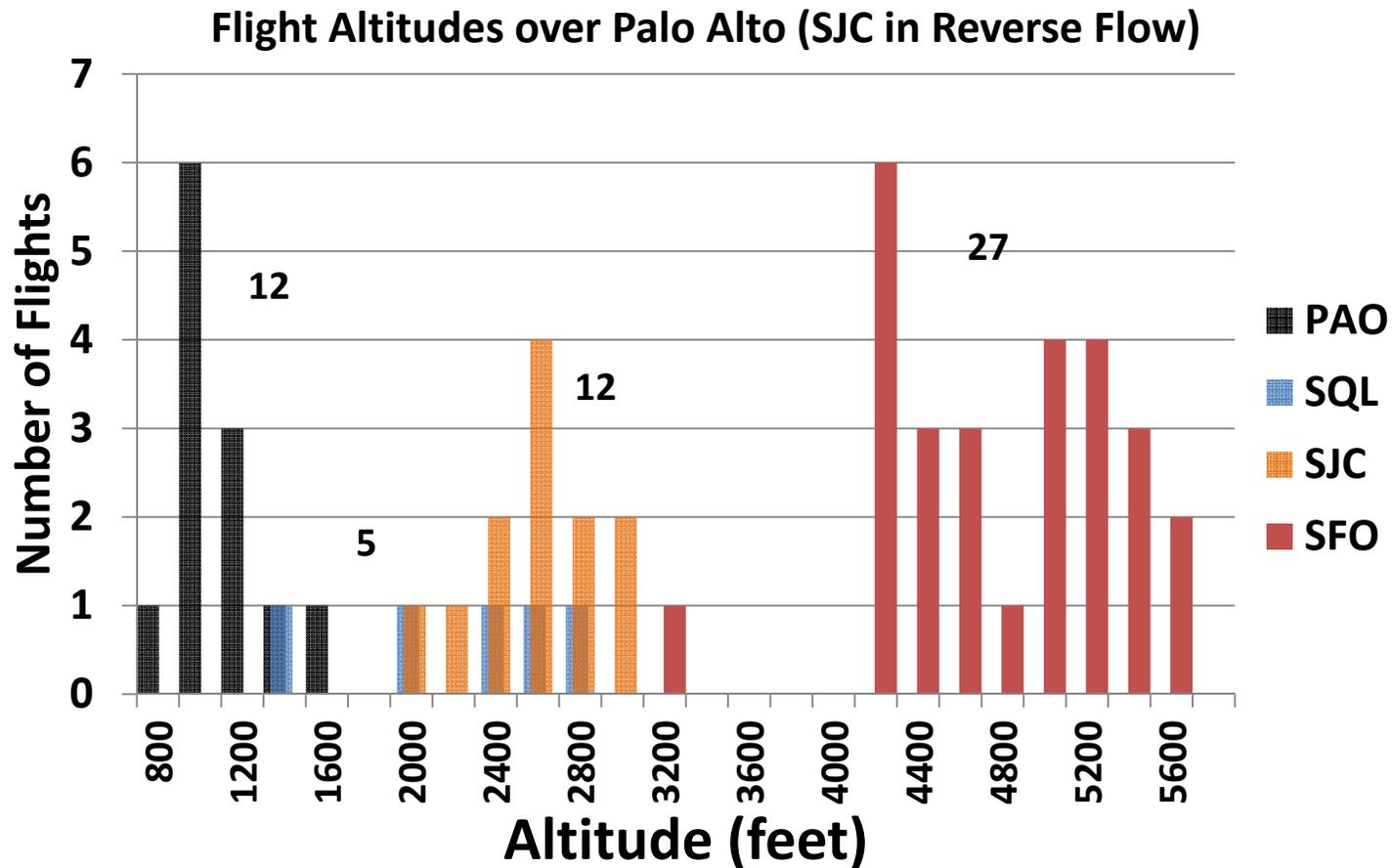
Impacts of Air Traffic over Palo Alto

(February 10, 2015)

Recent Data

Arrivals at Four Airports

Nov 13, 2014, 9AM – 1PM
(SJC in Reverse Flow)

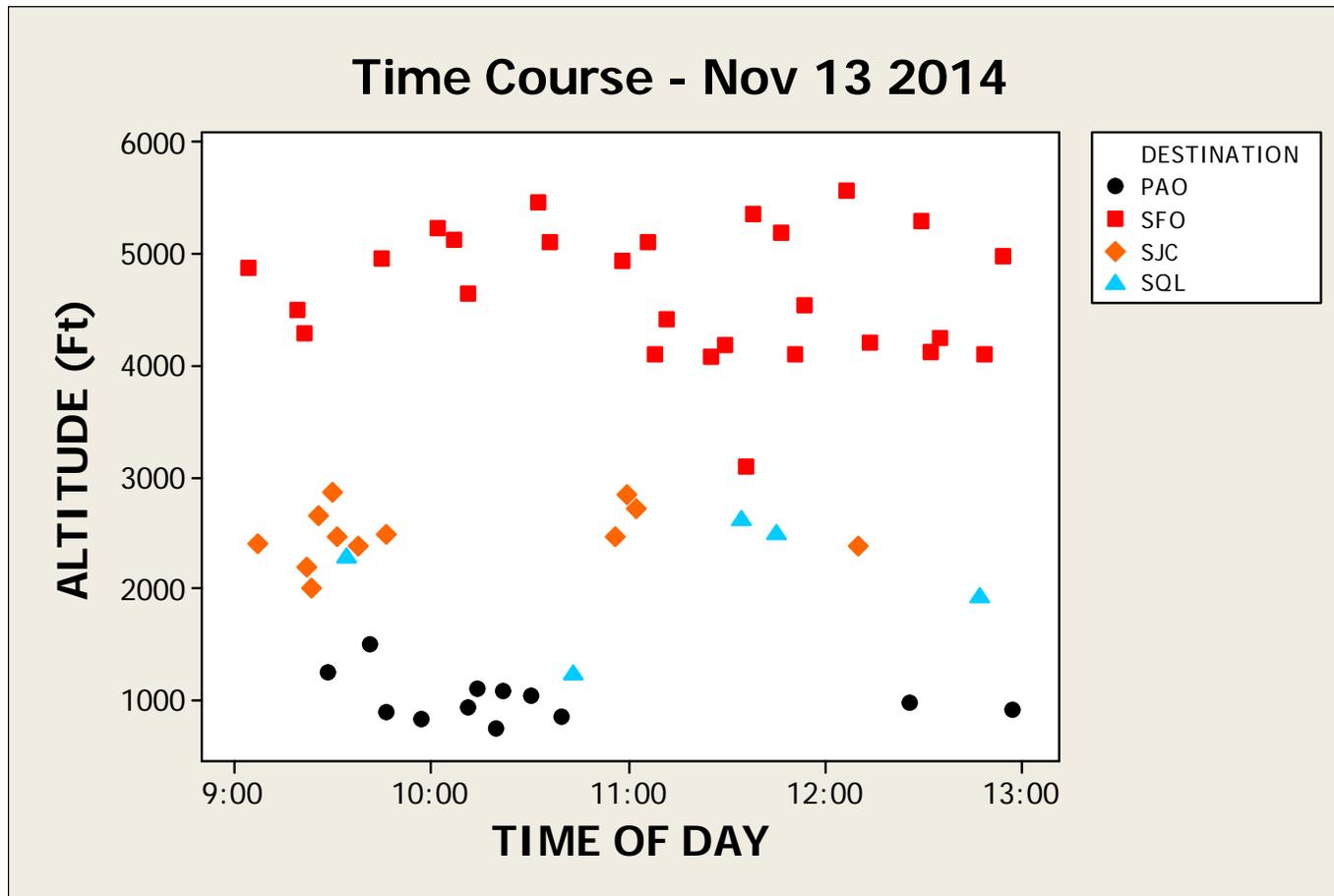


From SJC Web Trak Flight Tracker
Recorded lowest altitude within Palo Alto
Did not record flights at > 6000 feet

Noise impact depends on type of airplane (PA planes are smaller but noise is harsher and impact is significant at these low altitudes).

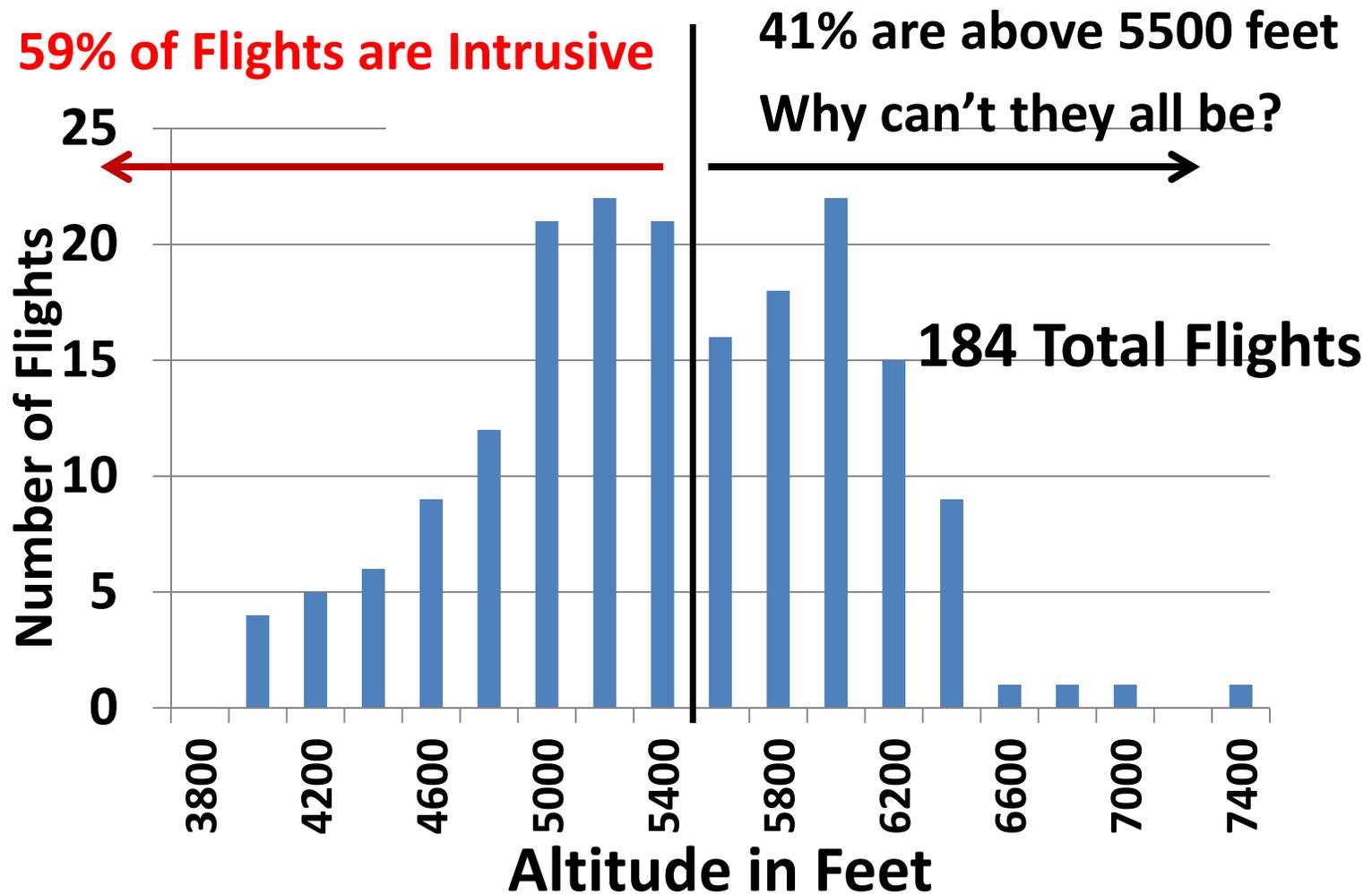
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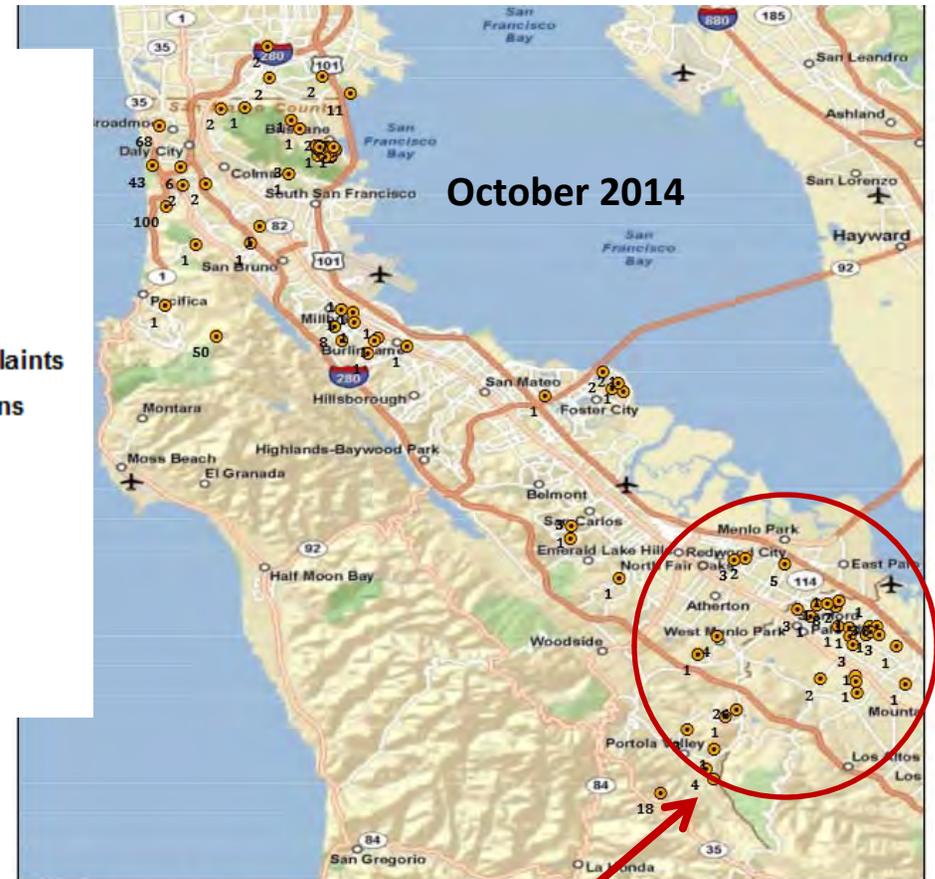
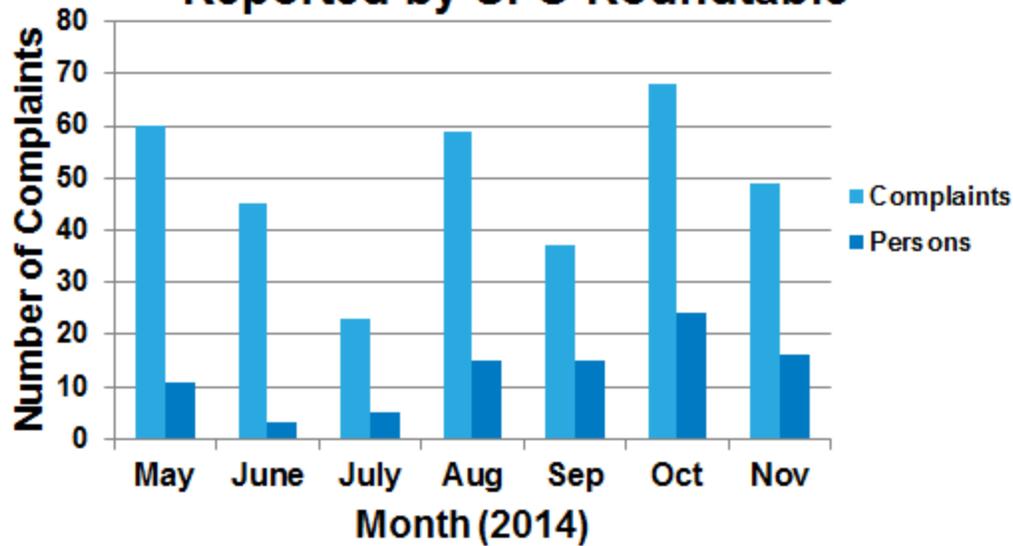
Altitude Distribution of SFO traffic over Midtown October 30, 2014 (24 hours)



From SFO response to Complaint for October 30, 2014

Noise Complaints from Palo Alto (SFO Roundtable)

Complaints From Palo Alto Reported by SFO Roundtable



Petition with > 300 Palo Alto Signatures

Complaints (via flysfo website) from Palo Alto are significant.

If the city does not act, things will get worse: NextGen Rollout

- **NextGen is the FAA's next generation of air traffic management (started in 2013).**
 - Satellite-based, automated
 - Efficiency (capacity for even more flights)
- **Noise impacts only evaluated with 24 hour 'averages', not peak events**
 - Noise metrics minimize the importance of numbers of flights
- **Routes are 'finalized' by March 2015**
- **We need to act before routes are 'set in concrete'**

A Real World Example

Effect of NextGen at Dallas Fort Worth Airport

Green: Departures

Yellow: Arrivals



Routes become highly concentrated into superhighways.
These are new 'Noise Alleys' for populations directly below.

Summary of the Problem

- **Sky freeways over Palo Alto, converging routes, 4 airports**
- **Aircraft Noise has increased disproportionately over Palo Alto.**
- **Affects Quality of Life, Health Sleep, Productivity**
 - **Noise is the New Smog**
- **Concentrated flight paths (NextGen) are being implemented NOW.**
 - Action is urgently needed.
- **Many other cities have similar issues and are resisting NextGen**
 - Queens NY, Chicago , Phoenix, Minneapolis, LAX, Seattle
- **Congress is paying attention**
 - Sep 12, 2014 Congressional Letter to FAA to reduce Day-Night Ave Noise Limit (DNL, used for contour maps near airports) from 65 dBA to 55 dBA
 - Lawmakers (including Anna Eshoo) formed Quite Skies Caucus October 2, 2014
 - (<http://eshoo.house.gov/press-releases/eshoo-joins-quiet-skies-caucus-to-combat-aircraft-noise/>)



Solutions: Working with the City



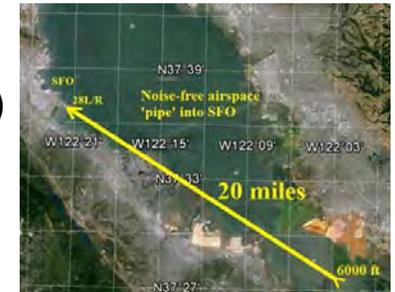
- **Technical NON-Solutions – “wait, trust us”**

- “Quieter” aircraft: 25 yr wait to replace fleets with new still **noisy** aircraft
- CDA Continuous Descent Arrivals: “quieter” but still very **noisy**



- **Technical Solutions – “up up and away”**

- **higher** than 6000 ft, **spread out**, night **curfew** (ea 1000 ft = ½ noise)
- **location, location, location** = descend final 6000 ft **over the Bay**

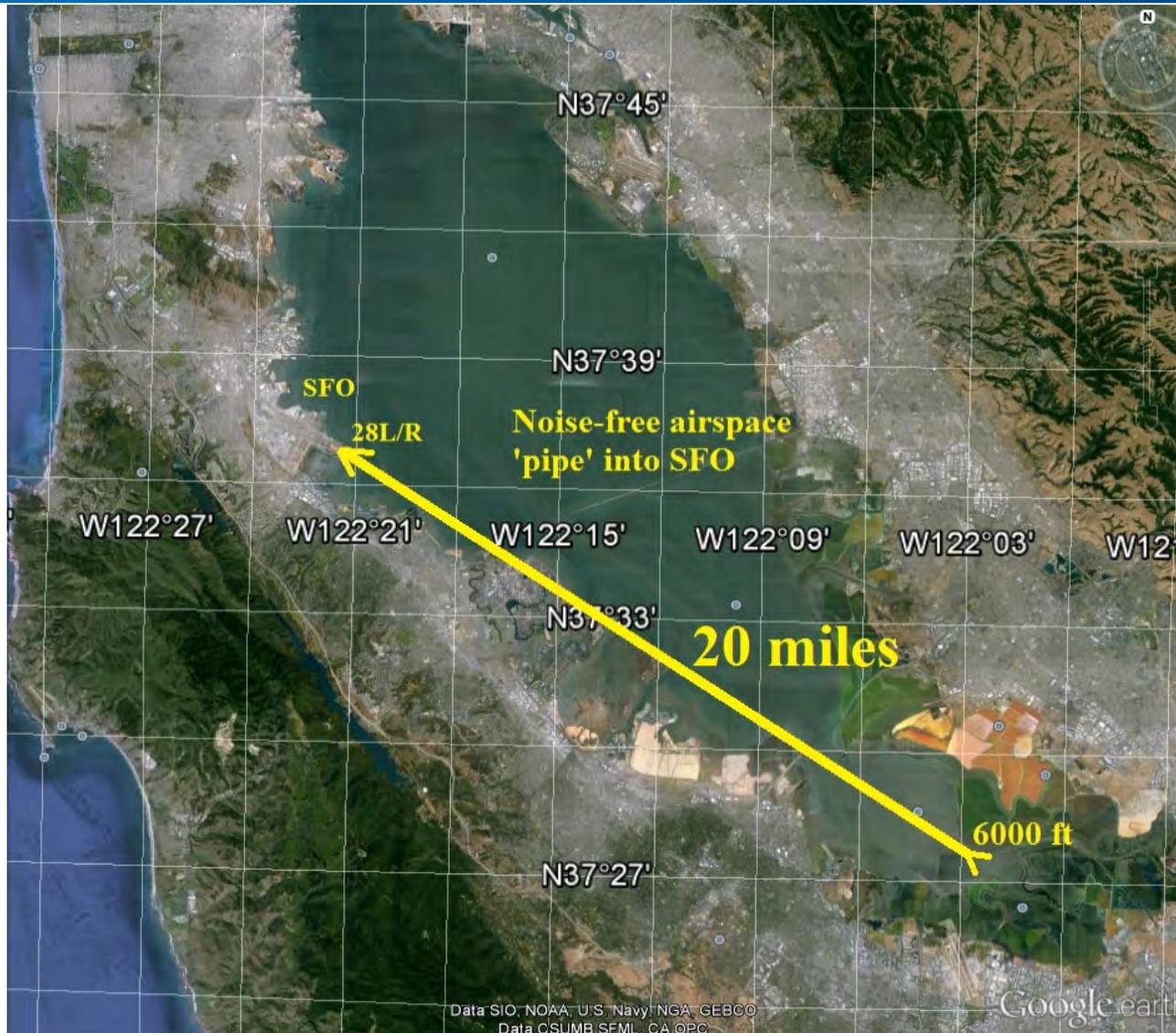


- **Political / Organizational Solutions – ideas**

- **local**: declare problem, monitor noise, complaints, PA airport transparency
- **regional**: proactively design new flight paths, reach out: FAA NCal
- **federal**: reassess routes, transparent process, EPA impact, new noise stds



A Potential Comprehensive Solution (1/2)



20 miles starting at the Southern end of the Bay are plenty for the FAA' and airlines' preferred "Continuous Descent Approach"

A Potential Comprehensive Solution (2/2)

Proposed Quiet Routes Arrival Descent Routes into SFO 28L/R

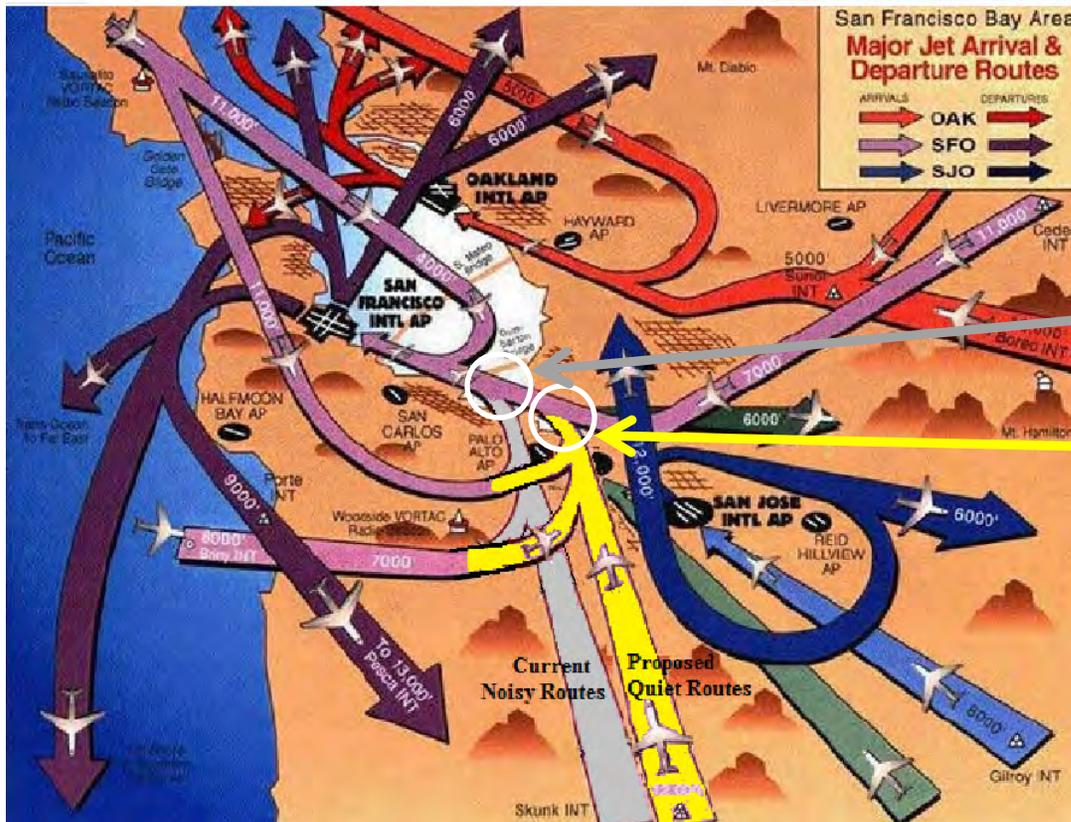
Current
Noisy
Gray



Proposed
Quiet
Yellow



Only slight changes in routing allow for entry into the single pipe from the Southern Bay.



Turn onto final from N, W, S

Current
4000 ft, 14 miles from SFO

Proposed
6000 ft, 20 miles from SFO

What we can do together

FEDERAL ADVOCACY:

Work with other mid-Peninsula cities to urgently lobby the FAA and our federal representatives to:

- 1. Re-assess the environmental impacts of NextGen route changes and re-institute higher flying altitudes over the mid-Peninsula. [3]**
- 2. Supply full and accurate disclosure of air route changes prior to implementation in a format the public can understand. Incorporate 90 day 'trial' periods for public comment. [2]**
- 3. Fund the EPA's Office of Noise Abatement and Control [3]**
- 4. Lower the Day/Night Average Noise Level standard from 65 dBA to 55 dBA [4]**

Numbers in [] correspond to items in cover letter to the City Council on Dec 10, 2014.

What we can do together

REGIONAL ACTIONS:

- 1. Reach out to airports and NorCAL air traffic control to understand what is in their power to change to reduce noise. [9]**
- 2. Start a Bay Area Airport Commission or work with an existing Bay Area organization to address aircraft noise as a regional issue. [10]**
- 3. Retain a consultant to design higher altitude approaches that might be acceptable to the FAA [8]**

Numbers in [] correspond to items in cover letter to the City Council on Dec 10, 2014.

What we can do together

LOCAL ACTIONS:

- 1. Declare that Aircraft Noise is a real concern to Palo Alto. [1]**
- 2. Install noise and altitude monitoring systems to allow objective assessment of individual flight events and frequencies as well as progress toward abatement. [5 ,7]**
- 3. Create an effective noise complaint system for Palo Alto or the mid-Peninsula and insist on feedback to offending aircraft. [6]**
- 4. Ensure that all changes and growth planned for the Palo Alto Airport are transparent to the community and that best practices for noise abatement are enforced. [11]**

Numbers in [] correspond to items in cover letter to the City Council on Dec 10, 2014.

Impacts of Air Traffic over Palo Alto

(February 10, 2015)

Thank You !