City of Palo Alto
City Council Staff Report

(ID # 9109)

Report Type: Action Items **Meeting Date: 4/9/2018**

Summary Title: P&S Committee Recommendations re Airplane Noise

Title: Policy and Services Committee and Staff Recommendations on Next Steps Related to Airplane Noise

From: City Manager

Lead Department: City Manager

Recommendation

The Policy and Services Committee and staff recommend the City Council commits to regularly assign one or more Council Members to actively participate on available community roundtables related to aircraft impacts; and directs staff to:

i. Request temporary noise monitoring from San Francisco International Airport; and
ii. Provide support to Palo Alto Council Members participating on available community roundtables related to aircraft impacts; and
iii. Continue to include the health impacts of aircraft noise and emissions in the City's regional, state and federal legislative priorities and engage with policy makers and associated advocacy groups as appropriate; and
iv. Include in the above efforts Palo Alto's support for:
    a. Improvements to SFO's Fly Quiet Program,
    b. Adherence to the agreement to, whenever able, increase the altitude of aircraft over the Peninsula,
    c. Maximizing the use of the BDEGA East Arrival route to SFO when possible,
    d. Collaboration with other jurisdictions to develop a regional position in support system-wide solutions by the FAA,
    e. Development of a noise-monitoring plan in concert with other jurisdictions,
    f. Maximizing sequencing under current conditions and prioritizing the application of air traffic control technology to improve sequencing and aircraft management to minimize community impacts,
    g. Adoption of improved metrics for airplane noise and related impacts, and
    h. Greater community engagement by the FAA and SFO and SJC airports.

In addition to the action above, Policy and Services recommends that Council endorse a number of additional proposals advanced at the Committee meeting by members of the public. A number of the citizen-initiated proposals have been incorporated into revised and updated

language with respect to i-iv, above. Several of the proposals deserve further evaluation and consideration; these are noted and discussed in greater detail below.

Background

On June 19, 2017, the City Council voted 7-0 (Fine, Scharff absent) to direct staff to:

1. Obtain expert opinion on aircraft noise monitoring strategy; and
2. Meet with neighboring cities to establish a regional position on the issue of aircraft noise; and
3. Align resources to be prepared to respond to the Federal Aviation Administration's (FAA) response to the reports of the Select Committee on South Bay Arrivals and San Francisco International Airport (SFO)/Community Roundtable.

The City of Palo Alto submitted a letter to the FAA on July 7, 2017 (Attachment A) to express its positions in alignment with several recommendations from the Select Committee and the SFO Roundtable.

In late July 2017, the FAA released its initial response to the Select Committee and SFO Roundtable recommendations in the form of the "Phase Two report on the FAA Initiative to Address Noise Concerns of Santa Cruz/Santa Clara/San Mateo/San Francisco Counties, compiled at the requests of Representatives Farr (Panetta), Eshoo and Speier."

On November 15, 2017, the City of Palo Alto submitted a letter to the FAA (Attachment B) expressing its concerns about the Phase Two report and clarifying its positions on the need to reduce the concentration of SFO arrivals using the MENLO waypoint, increase the minimum altitude of flights in this vicinity, and reduce vectoring of flights. The letter also underscored the positions the Select Committee had taken with regard to reverting the SERFR track to the previous BSR track and the importance of improved noise metrics. The cities of East Palo Alto and Menlo Park sent similar letters to the FAA in mid-November.

In late November 2017, the FAA released its "Update on the Phase Two report on the FAA Initiative to Address Noise Concerns of Santa Cruz/Santa Clara/San Mateo/San Francisco Counties, compiled at the requests of Representatives Farr (Panetta), Eshoo and Speier" (Phase Two Update) (Attachment C).

On October 3, 2017, the San José City Council authorized the establishment of the Ad Hoc Committee on South Flow Arrivals to explore possible solutions to address the noise impacts on residents from certain landing configurations at Mineta San Jose International Airport (SJC). All cities in Santa Clara County, and the county, were invited to participate with one vote except San José, which has two votes. Council Member Lydia Kou represents the City of Palo Alto on this body, which was envisioned to complete its work in 120 days. The south flow committee has held five meetings since first convening in November 2017. Council Member Kou may wish to update Council on the committee's work.

At the recommendation of the Select Committee and of Representatives Eshoo, Khanna and Panetta, the Cities Association of Santa Clara County has formed a separate Ad Hoc Committee to explore building the framework for a permanent Roundtable for the South Bay (Santa Clara and Santa Cruz Counties) regarding aircraft noise issues related to SFO and SJC. Palo Alto Council Member Greg Scharff chairs this committee, which has seven members. The Cities Association's Ad Hoc Committee has held four meetings since first convening in August 2017. Council Member Scharff may wish to update Council on the committee's work.

At the Policy and Services Committee meeting of February 13, 2018, the Committee voted unanimously to incorporate into a set of staff recommendations the comments contained in a letter from a Palo Alto resident who spoke at the committee meeting (Attachment I). A discussion of these comments is included at the end of the "Discussion" section below.

On March 13, 2018, Council Members Fine, Kniss, Kou, Scharff and Wolbach joined with City Manager James Keene and staff at FAA headquarters in Washington, D.C. to meet with several FAA executives, including Brian Langdon, Manager of Government and Industry Affairs; George Gonzalez from the PBN Technical Support Services Team; James Arrighi from the Metroplex team, and Lois Yoshida from the FAA Office of the Chief Counsel. City representatives presented the arguments summarized in the City of Palo Alto's information paper on FAA Noise and Community Engagement (Attachment H).

Discussion

With respect to item #1 in Council's June 2017 direction to staff (obtain expert opinion on aircraft noise monitoring strategy), staff has consulted experts, interested community members, and the SFO Noise Office. SFO staff have confirmed that SFO will honor a previous offer to provide temporary noise monitoring in the City of Palo Alto. Policy and Services Committee concurred with staff's recommendation that the City pursue this option with SFO.

With respect to item #2 in Council's June 2017 direction to staff (meet with neighboring cities to establish a regional position on the issue of aircraft noise), city staff began reaching out to city staff of neighboring jurisdictions last summer. In addition, the mayors of Palo Alto, East Palo Alto and Menlo Park met with residents to discuss shared perspectives, resulting in the three cities communicating consistent messages to the FAA in November 2017. The formation of one or more roundtable entities would provide a more effective, comprehensive and transparent means of establishing a regional position on aircraft noise. Policy and Services Committee concurred with staff's recommendation that the City participate collaboratively on the currently established and proposed roundtables described above.

With respect to item #3 in Council's June 2017 direction to staff (align resources to be prepared to respond to the FAA Phase Two report), staff has reviewed the agency's Phase Two Update with aviation experts and interested members of the community. In the Phase Two Update, the FAA categorizes its responses to community positions in four categories: "Addressed Concerns",

"Feasible and Could Be Implemented in the Short Term", "Feasible and Could Be Implemented in the Long Term", or "Not Endorsed". Unfortunately, the majority of Palo Alto's positions were not endorsed by the FAA or, if found feasible, present limited potential relief due to the considerable restrictions faced by a metropolitan region juggling arrivals and departures for three large airports (SFO, SJC, and Oakland [OAK]). A brief summary of those City positions (which were adopted in support of formal positions articulated by the Select Committee and/or the SFO Roundtable), and FAA responses provided in its Phase Two Update is presented here in items A – G, followed by a brief discussion of recurring themes in the report.

A. **Reduce Concentration of Arrivals through MENLO Waypoint: Not Endorsed.**
Palo Alto supported reducing the concentration of SFO arrivals using the MENLO waypoint. The FAA has explained it cannot endorse this proposal because shifting arrivals to variously proposed points to the east or north would conflict with SJC airspace, which cannot be modified due to safety requirements for SJC.[1]

B. **Relocate Arrivals from the South to the East: Not Endorsed.**
Palo Alto supported the notion of redirecting flights arriving from the south farther to the east (towards the hills to the west of Interstate 5). The FAA has explained that the current flow of arriving flights from the east (via FAITH waypoint and DYAMD arrivals) is already saturated with the majority (68%) of SFO's arriving traffic, and could not accommodate the addition of flights currently arriving from the south.[2] The FAA also argues against the inefficiency of routing flights from southern California (and Phoenix, and Mexico) farther to the northeast of their current route into the approach used by the majority of flights arriving from the east coast and Midwest.[3]

C. **Fly Higher Over the Peninsula: Not Endorsed; Addressed Concerns.**
(This is an example of apparent contractions in the Phase Two Update.)
Palo Alto supported proposals to increase the minimum altitude for flights in our vicinity from 4,000 to 5,000 feet. In one portion of the Phase Two Update, the FAA states this recommendation is not endorsed for safety reasons because, to fly a stabilized approach, aircraft are subject to specific descent gradient requirements that essentially prohibit being too high, too close to landing. According to the FAA, to stay above 5,000 feet over our area, SFO arrivals would have to travel farther away from SFO to descend to the appropriate altitude for approach, thereby forcing them into prohibited SJC airspace.[4]

[1] Attachment C, page 108.
[2] Attachment C, page 109.
[3] Attachment C, page 111.
[4] Attachment C, pages 106-107.

However, in another section of the Phase Two Update, the FAA categorizes this matter as an "addressed concern," referencing the existing agreement between the SFO Aircraft Noise Abatement Office and the FAA's Northern California TRACON that calls for aircraft to cross the MENLO waypoint "at 5,000 feet during visual conditions and 4,000 feet during instrument landing conditions" when able. The SFO roundtable requested that this agreement stay in place and be followed, and the FAA states it agrees with the Roundtable's recommendation "to the extent feasible."[5] Policy and Services Committee concurred with staff's recommendation that the City of Palo Alto advocate for adherence to this agreement.

D. Relocate Northern Arrivals from Peninsula to Bay: Concern Addressed; Feasible in Short-Term.

(This is an example of an "addressed concern" and a "short-term feasible" solution that presents little to no improvement from the current state.)

Palo Alto supported calls for BDEGA arrivals to be shifted from the west leg to the east leg. (The BDEGA arrival from the north is characterized by two options. The BDEGA West Downwind leg brings arrivals from north of San Francisco southbound over the Peninsula before they make a easterly U-turn into a north-facing approach over the Bay into SFO. The BDEGA East Downwind leg brings arrivals from north of San Francisco southeasterly over the Bay before they make a westerly U-turn to approach SFO over the Bay. See Figure 1.) The FAA classifies its answer to this proposal as an "Addressed Concern" because it concurs with the recommendation to utilize BDEGA East when possible. In fact, the FAA "currently routes BDEGA arrivals to the East downwind to the extent operationally feasible."[6] However, the FAA report underscores the limitations of utilizing BDEGA East because it shares its final approach with the DYAMD arrival from the east (which carries the majority of SFO's arrivals). Folding BDEGA arrivals in with DYAMD arrivals is a challenge not only due to DYAMD's density of use, but also because DYAMD is constrained by OAK airspace to the north and SJC airspace to the south, thereby limiting the ability of air traffic controllers to vector DYAMD arrivals (to make space for BDEGA arrivals) without creating "a ripple effecting, jeopardizing safety and resulting in delays" potentially across all three airports (See Figure 2). Furthermore, the limited space in between DYAMD arrivals that can be used for routing BDEGA arrivals on the East leg instead of the West leg will likely continually decrease as SFO's overall traffic counts are expected to continually increase.[7] Therefore, while this solution demonstrates a willingness on the part of the FAA to mitigate impacts on the Peninsula, it is not likely to produce any improvement from the current state (since it is already being utilized) and, instead, will likely shrink in value over time as a mitigating solution – at least with respect to daytime noise.

[5] Attachment C, page 88.
[6] Attachment C, page 98.
[7] Attachment C, pages 71-72, 81-82.

With respect to nighttime hours, the FAA identifies a "feasible short-term" solution as it reports it is working to update its procedures to accommodate maximizing use of BDEGA East from the beginning of Nose Abatement Procedure hours until 6:00AM. The FAA commits to "continue to reinforce the use of this procedure to personnel through training and briefings."[8] Policy and Services Committee concurred with staff's recommendation that the City communicate its acknowledgement of the FAA's commitment to this short-term solution and encourage continued exploration of other ways to maximize use of BDEGA East whenever possible.

E. Reduce Vectoring over the Peninsula: *Requirements* Not Endorsed; *Study* Feasible Short-Term.

The City joined with others in calls for reduced vectoring of arriving flights. The FAA insists that speed control and vectoring are tactical decisions used by air traffic controllers to manage the sequencing of aircraft and it will not support any proposed formal restrictions on when air traffic controllers may or may not use this "vital component" of their tools for accomplishing their mission.[9] However, the FAA "is continuously working to improve aircraft setup and sequencing between facilities" and agrees that the BDEGA Arrival route has light enough traffic that it is a candidate for studying whether in-trail spacing may result in a decrease in vectoring.[10] Policy and Services Committee concurred with staff's recommendation that the City seek opportunities to maximize the FAA's use of sequencing on BDEGA in the near term and, when beneficial, on additional routes in the long term.

F. Organize Aircraft Schedules, Use Flow Management to Limit Noise: Feasible Long-Term.

The City of Palo Alto has supported recommendations to encourage the FAA staff to work across its divisions to minimize noise through efficient organization of aircraft schedules and utilizing arrival descents that limit the use of speed brakes. In response to calls for new, more effective, time-based flow management tools that allow for better sequencing of aircraft that are vectored or held prior to final approach, the FAA has stated it is committed to incorporating these improvements as they become available.[11] Policy and Services Committee concurred with staff's recommendation that the City continue to advocate for such solutions to be implemented by the FAA as quickly and thoroughly as possible.

G. **Develop Improved Metrics for Airplane Noise: "Not FAA's Action"**

The City of Palo Alto has supported recommendations by the Select Committee calling for Congressional action to direct the FAA to adopt supplemental metrics that better characterize the true impact of aircraft on people on the ground. Although the adoption

[8] Attachment C, page 98.
[9] Attachment C, page 110.
[10] Attachment C, page 97.
[11] Attachment C, page 101.

of new metrics would fall under the purview of the FAA, the FAA's Phase Two Update declined to speak to this policy recommendation; apparently because the recommendation's phrasing is, technically, directed to the legislative branch of the federal government.

The City of Palo Alto, through its legislative advocacy team in Washington, D.C., has been monitoring the progress of FAA reauthorization legislation. As reported to the Policy & Services Committee during its discussion of legislative priorities on November 14, 2017, while the Senate bill does not address aircraft noise and community engagement, the House bill includes several provisions related to noise and community engagement. These include a requirement for the FAA to conduct a review of the relationship between aircraft noise exposure and its effects on communities around airports, to inform future recommendations for revising the FAA's land use compatibility guidelines (See attachment E).

Policy and Services Committee concurred with staff's recommendation that the City continue to advocate for improved noise metrics and other solutions to negative impacts of aircraft, including greater FAA community engagement.

The FAA's Phase Two Update addresses several community concerns by citing its request that SFO update its Fly Quiet Program. Staff recommends the City partner with other jurisdictions, including through community roundtables, to work with SFO in developing detailed improvements as part of its update to its Fly Quiet Program.

Throughout the Phase Two Update, the FAA makes clear that safety considerations are paramount; City staff concurs.

Several times in the Phase Two Update, the FAA reiterates it will not support solutions that result in shifting the problem of noise from one community to another. It also repeatedly identifies increased flying distance as an unacceptable outcome of many community-proposed solutions that conflict with the economic, environmental, and operational efficiency benefits gained from shorter flying distances. In addition, it repeatedly points to the anticipated inevitability of increases in congestion as airports increase their number of flight operations. The report explicitly states it will not move forward on certain feasible recommendations "until issues of congestion, noise shifting and flying distance have been addressed with the airline stakeholders and the affected communities by the Select Committee and/or SFO Roundtable."[12] While the Select Committee has disbanded, the South Bay Roundtable envisioned by the Cities Association would likely be viewed as an appropriate surrogate for this function in partnership with the SFO Roundtable.

The City of Palo Alto is one of over 100 municipalities in the Bay Area. The ability of any single community of 67,000 to influence the complex operations of a federal agency serving a region

[12] Attachment C, page 103

of 8 million people is, by definition, limited. In addition, the impacts of airplane noise must be considered amid the competing interests of the flying public, airline industry priorities, airport operational requirements, broader economic and environmental impacts and, above all else, safety. The successful navigation of these public interest challenges requires effective collaboration. Policy and Services Committee concurred with staff's recommendation that the City seek cooperative opportunities to team with neighboring jurisdictions through community roundtables and similar partnerships to most effectively address the community impacts of aircraft operations.

Palo Alto's Representative Anna Eshoo, as well as Representatives Khanna, Panetta and Speier, have expressed support for aircraft noise solutions. In addition, Congresswoman Eshoo joined with other Members of Congress to form the Quiet Skies Caucus in Congress to support policy solutions to address airplane noise. Staff recommends the City continue to express appreciation to Congresswoman Eshoo and the rest of the region's Congressional delegation, as well as California's two Senators, for their continued support on these issues. Staff also recommends the City continue partnering with national organizations like the National Association to Insure a Sound Controlled Environment (N.O.I.S.E.) (see Attachment F) to advocate at the federal level for improved noise metrics, community engagement, and other solutions to the negative impacts of aircraft operations. The Policy and Services Committee concurred with these staff recommendations.

Regarding the comments submitted by a resident at the February 13, 2018 Policy and Services Committee meeting:

- Portions a, b and c of Request #1 are respectively incorporated into portions iii, iv.d, and iv.e of the staff recommendation presented in this memorandum.
- Request #2 is addressed in a separate memorandum from the City Attorney's Office.
- Request #3 proposes that the City of Palo Alto advocate on a recommendation by the Select Committee related to the movement of the SERFR ground track to the old BSR ground track. This matter has caused controversy among other jurisdictions in our region and the City of Palo Alto has been contacted by residents who both support and oppose this request. Therefore, staff do not recommend that the City Council include this request in its actions at this time.

Attachments:

- Attachment A; July 2017 Letter to FAA
- Attachment B; Nov 2017 Letter to FAA
- Attachment C; FAA Phase Two Update - Placeholder w-Link
- Attachment D; Maps
- Attachment E; VanScoyoc
- Attachment F; NOISE
- Attachment G; Mercury News Article
- Attachment H; Information Paper on FAA Noise and Community Engagement
- Attachment I; Resident Letter

City of Palo Alto

Office of the Mayor and City Council

July 7, 2017

Michael P. Huerta, Administrator
Federal Aviation Administration
800 Independence Ave SW
Washington D.C. 20024

Subject: FAA response to reports of the Select Committee on South Bay Arrivals and San Francisco International Airport (SFO)/Community Roundtable

Dear Administrator Huerta,

On behalf of the Palo Alto City Council, I would like to recognize the hard work of FAA staff to address aircraft noise over the skies of Palo Alto and Silicon Valley. This was evident by former Western Regional Director Glen Martin's commitment to the local Select Committee meetings.

The city of Palo Alto is located approximately 20 miles from SFO and is the birthplace of Silicon Valley. We are the location for many of our nation's top companies, neighbor to Stanford University, and home to approximately 66,000 residents. The impacts from aircraft noise have a negative impact on the quality of life and health of the people who live and work in our city. Palo Alto places a high value on working with other communities to maintain Silicon Valley's important role in the national and international economy. It is critical that no single community be disproportionately affected by aircraft flights.

It is our understanding that in the coming weeks the FAA will submit for Department of Transportation (DOT) review your agency's response to the reports of the Select Committee on South Bay Arrivals and SFO Community Roundtable.

On several occasions the City has recommended that the FAA should:

1. Create more "points" for aircraft to use while entering SFO. There is currently one point (MENLO waypoint) used for flights coming in from the north, west, and south. This point centralizes all arrival aircraft and noise over Palo Alto. (*Aligns with Select Committee report sections 1.2, 2.5, 2.6, 2.7, 2.8, 2.9 and SFO Roundtable report recommendations 16 and 17.*)
2. Redirect flights arriving from the south to the east; away from the Pacific Ocean coast to the hills west of Interstate 5 and have aircraft enter the Bay from the east. (*Aligns with Select Committee report sections 2.14 and SFO Roundtable report recommendations 8 and 9.*)

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3. Shift the flights arriving from the north away from the Peninsula to the Bay. (*Aligns with Select Committee report sections 2.2 and SFO Roundtable report recommendations 1, 7, and 11.*)
4. Encourage the divisions and staff within FAA to work in partnership with each other to minimize noise through efficient organization of aircraft schedules and routes while also utilizing arrival descents that limit speed brakes. (*Aligns with Select Committee report sections 1.6, 2.6, 2.7, 2.8 and SFO Roundtable report recommendations 6 and 8.*)

We sincerely hope the FAA takes these recommendations into account. Additionally, we ask that the FAA:

1. Create a permanent forum or ad hoc committee to address aircraft noise and the health risk concerns of residents of cities not represented by the SFO Community Roundtable. If not, then amend the SFO Community Roundtable structure to be inclusive of cities beyond San Mateo County. *(Aligns with Select Committee report sections 3.1.)*
2. Adopt supplemental metrics in recognition of the limitations of the Day-Night Average Sound Level (DNL). *(Aligns with Select Committee report sections 3.3.)*

The Palo Alto City Council is committed to working with the FAA, SFO, San Jose International Airport, neighboring cities, counties and all stakeholders to ensure a reasonable solution is identified for Silicon Valley.

Sincerely,

Greg Scharff
Mayor

Cc: Dianne Feinstein, California Senator
Kamala D. Harris, California Senator
Anna G. Eshoo, Congresswoman California's 18th Congressional District
Dennis Roberts, Federal Aviation Administration, Regional Administrator
Palo Alto City Council
James Keene, City Manager
Molly Stump, City Attorney

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City of Palo Alto
Office of the Mayor and City Council

November 15, 2017

Michael P. Huerta, Administrator
Federal Aviation Administration
800 Independence Ave. SW
Washington, D.C. 20024

Subject: City of Palo Alto Response to FAA Initiative Phase Two Report Issued July 2017

Dear Administrator Huerta:

On behalf of the Palo Alto City Council and further to our letter dated July 7, 2017, I want to reiterate our continuing appreciation for the work of FAA staff to address the problems Palo Alto and neighboring cities have experienced since implementation of the NextGen program in the Northern California Metroplex. NextGen added substantial air traffic to our skies, mainly due to the high concentration of jets that now fly over or near MENLO waypoint, at low altitudes, throughout the day and night. It remains critical to achieve meaningful relief since jet noise – as well as emissions – have a negative impact on the quality of life and health of people who live, work and study in our City.

We recognize that the FAA Initiative to Address Noise Concerns of Santa Cruz/Santa Clara/San Mateo/San Francisco Counties is intended to explore changes to published procedures that would help mitigate noise complaints. The purpose of this letter is to highlight Palo Alto's top three priorities as they relate to specific items in the FAA's Phase Two report issued July 2017 (the "Report") as part of the initiative.

While the Report signals some relief is in progress at last, we are concerned the FAA does not provide adequate assurance that solutions will include higher, more distributed flights, as well as fewer overnight flights, sooner rather than later. Nor does it sufficiently commit to a transparent process – including credible impact assessments – before any final implementation decisions. We urge the FAA to consider the below priorities as it prepares for Phase Three of the initiative process.

1. **Reduce the concentration of SFO arrivals using MENLO waypoint**. Per FAA data, 60% of SFO arrivals pass over or near MENLO waypoint, mostly on the SERFR and BDEGA West-leg paths. One action that would greatly alleviate this problem is to designate alternative waypoint(s) to MENLO for a portion of SERFR southern arrivals (which represent 30% of all SFO arrivals). The Report indicates this proposal is "currently under evaluation" (4.d.iv). Some alternative waypoints have been proposed that could enable aircraft to fly at significantly higher altitudes – and over less-populated areas – and then descend the length of the Bay. We also encourage the FAA to develop other options based on its analysis and modeling. To address potential objections to moving some flights (in both this and other contexts), the FAA should specify objective criteria for what constitutes "noise shifting."[1]

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[1] One such standard appears in the FAA's Finding of No Significant Impact and Record of Decision for the NorCal OAPM Project issued July 2014 (at http://www.metroplexenvironmental.com/docs/norcal_metroplex/NorCal_OAPM_FONSI-ROD.pdf). On page 5, it states that noise impacts need only be evaluated for proposed changes in arrival procedures *up to* 7,000 feet above ground level (AGL), which implies that re-routing flights to *above* 7,000 feet AGL would not be considered to cause noise-shifting. To the extent some overflights of populated areas will occur below 7,000-foot altitudes, the FAA should establish an equitable dispersal approach that uses a "pre-NextGen baseline" of flight concentrations.

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Another action that would help reduce MENLO concentration is to rebalance BDEGA West northern arrivals (which come down the Peninsula and make a U-turn over Palo Alto area) and BDEGA East arrivals (which fly more over the Bay). We appreciate that the Report indicates rerouting night flights is feasible and could be implemented in the short term (1.c.vi, 2.a.i). The Report additionally states that rerouting flights during certain times of the day is also feasible but implementation would be in the long term (3.a.i), and that restoring the West/East balance to its pre-2010 level (50/50) is "currently under evaluation" (4.a.iii). Although these changes would still leave a significant number of BDEGA flights over Palo Alto, they would provide some relief, and we therefore hope the FAA proceeds with these steps as expeditiously as possible.

2. **Increase minimum altitude for all flights over/in vicinity of MENLO waypoint to at least 5,000 feet.** The current minimum altitude at MENLO is 4,000 feet (although anecdotal data from users of the stop.jetnoise.net app show a significant portion of jets overfly MENLO *below* 4,000 feet), which is lower than before NextGen. The Select Committee on South Bay Arrivals unanimously recommended increasing the minimum altitude to 5,000 feet for all traffic over and around MENLO. The Report states that a 5,000 minimum altitude for vectored flights in the vicinity of Menlo, as well as aircraft crossing Menlo/vicinity under visual conditions, is "currently under evaluation" (4.d.i, 4.d.ii). The Report rejects a 4,000-foot minimum altitude for instrument approaches over MENLO as "not feasible" due to "procedural development criteria & safety standards" (6.c.viii).

   While we are encouraged that 5,000-foot minimums are under evaluation for vectored and visual approaches and urge prompt action, we believe strongly that similar relief must be extended to instrument arrivals, which constitute much of the MENLO traffic. The FAA provided assurance that NextGen would allow aircraft to "maintain higher altitudes and lower thrust for longer periods" in its draft Environmental Assessment for the NorCal OAPM published in March 2014.[2] No sound reason has been given why a 5,000-foot minimum for instrument flights would not be feasible if, for example, the glide slopes for RWYs 28R and/or 28L were increased even slightly to allow for higher descending altitudes, especially considering that technological advances such as RNAV and GPS enable aircraft to follow more accurate and better-defined routes. We therefore urge the FAA to reconsider its position and to further provide a means for ongoing monitoring and enforcement to assure compliance once new procedures are established.

3. **Reduce vectoring of SFO arrivals without worsening MENLO concentration.** About 50% of arrivals on SERFR, plus those on BDEGA and OCEANIC, are routinely turned off their assigned procedure by Air Traffic Control to sequence them for merging onto final SFO approach. This causes substantial noise due to more aircraft miles, turning, and changes in speed. The Report notes that a proposal for the FAA to work with the SFO Roundtable "to determine where aircraft can be vectored with the least noise impact" is feasible/short-term (2.d.i). Increased in-trail separation on SERFR and possibly BDEGA, which may entail ground delays at departing airports, is noted as feasible/long-term (3.c.ii). We appreciate the intent to direct aircraft to be vectored so as to cause "the least noise impact," but request more specific criteria for how this determination will be made. Also, under no circumstances should a reduction in vectoring lead to even higher concentrations on flight paths over and around MENLO waypoint.

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[2] At http://www.metroplexenvironmental.com/docs/norcal_metroplex/NorCal_OAPM_DEA_Complete.pdf, section 1.2.5.3.

In addition, the FAA is considering reverting the SERFR track to the old BSR track (2.f.i). The Select Committee had conditioned its approval of this proposal on several criteria to prevent moving noise as compared to 2014 levels, and it is important these are followed. Further, we continue to believe that improved, supplemental noise metrics are critical to properly assess the true impact experienced by people on the ground, and we encourage prompt action on the FAA's evaluation of this issue (4.e.xi).

The Palo Alto City Council remains committed to working with the FAA, San Francisco International Airport, San Jose International Airport, Congressional leaders, our neighboring cities and counties, and all stakeholders to ensure a reasonable solution is identified for our region.

Sincerely,

H. Gregory Scharff
Mayor

cc: Senator Dianne Feinstein of California
Senator Kamala D. Harris of California
Representative Anna Eshoo
Representative Jackie Speier
Dennis Roberts, Federal Aviation Administration, Regional Administrator
Palo Alto City Council
James Keene, City Manager
Molly Stump, City Attorney

Attachment C:

FAA Initiative to Address Noise Concerns of Santa Cruz/Santa Clara/San Mateo/San Francisco Counties

UPDATE ON PHASE TWO

Compiled at the Requests of Representatives Farr (Panetta), Eshoo and Speier

November 2017

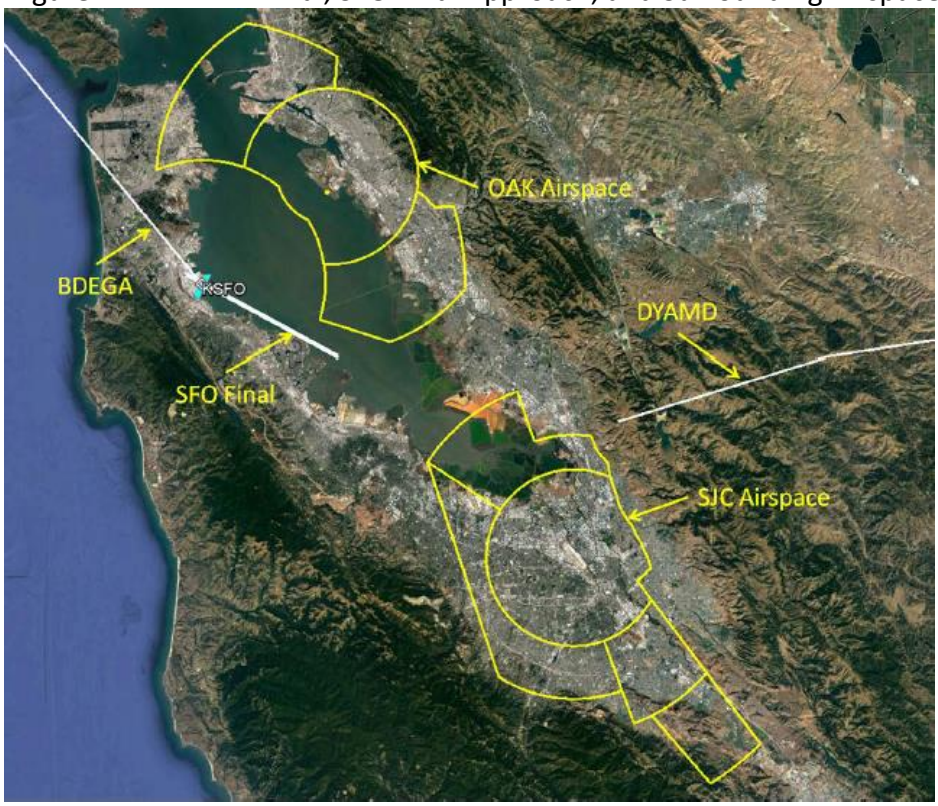
This attachment can be found at the following link:

https://www.cityofpaloalto.org/civicax/filebank/documents/62294

Attachment D

Figure 1: BDEGA Arrivals, West and East Legs

Figure 2: DYAMD Arrival, SFO Final Approach, and Surrounding Airspace



Memorandum

TO: Heather Dauler and Khashayar Alaee
FROM: Steve Palmer, Channon Hanna, and David Haines
RE: Update: Committee Votes on House and Senate FAA Reauthorization Bills / Summary of Noise and Community Engagement Provisions
DATE: June 30, 2017

This memo is an update to the memo dated June 23 which outlined the noise and community engagement provisions in H.R. 2997, the 21st Century Aviation Innovation, Reform, and Reauthorization Act (21st Century AIRR Act) and S. 1405, the Federal Aviation Administration Reauthorization Act of 2017. The additional information reflects in this memo reflects how both bills were treated during Committee consideration.

H.R. 2997, the 21st Century Aviation Innovation, Reform, and Reauthorization Act

House Committee Markup

On June 27, the Transportation and Infrastructure Committee approved by a vote of 32-25, H.R. 2997, the 21st Century AIRR Act. The six-year bill creates a private, nonprofit organization to run the nation's air traffic control system and provides additional language on airport noise and community engagement.

During the markup, only one amendment on noise was offered by Rep. Michael Capuano (D-MA). The amendment would have given FAA the exclusive authority to resolve noise disputes and require any change in air traffic management procedures, including standard instrument departure procedures, standard terminal arrival routes, and instrument approach procedures, or other necessary activities by the new corporation affecting the airspace to reduce noise exposure. During the discussion, Chairman Shuster voiced opposition to the amendment saying that he believes the bill already provides this authority on noise issues to FAA. He continued by saying that he would agree to continue to work on this issue with Rep. Capuano, if he would agree to withdraw his amendment. In response, Rep. Capuano withdrew the amendment saying he looked forward to working with the Chairman on the issue.

H.R. 2997 – Noise and Community Engagement Provisions
The following provisions are in the bill and did not change during this week's committee action:

- Addressing Community Noise Concerns. When proposing or amending area navigation departure procedures that would have flights between the surface and 6,000 feet over noise sensitive areas, the bill requires FAA to consider other procedures to address community noise concerns if: 1) the affected airport, in consultation with the affected community, submits a

request to FAA to consider other procedures; 2) the airport's request would not conflict with the safe and efficient operation of the national airspace system; and 3) the effect of a modified departure procedure would not significantly increase the noise over noise sensitive areas.

- Study on Potential Heath Impacts of Overflight Noise. The bill requires FAA to conduct a study on the heath impacts of noise from aircraft flights on residents exposed to a range of noise levels. The study must include: an examination of the incremental health impacts of noise exposure including sleep disturbance and elevated blood pressure; consider the incremental heath impacts on residents living partly or wholly underneath flight paths most frequently used by aircraft flying below 10,000 feet, including during takeoff and landing; include an assessment of the relationship between a perceived increase in aircraft noise and an actual increase in noise, particularly in areas with high or variable levels or non-aircraft ambient noise. The study is required to focus on the following metropolitan areas: Boston, Chicago, New York, the Northern California Metroplex, Phoenix, and any other area the FAA believes should be considered. A report to Congress is due within 90 days of FAA completing the study.

- Community Involvement in FAA NextGen Projects Located in Metroplexes. The bill requires that within 180 days of enactment, FAA complete a review of the agency's community involvement practices for Next Generation Air Transportation System (NextGen) projects located in FAA-identified metroplexes. There is a requirement that the review include a determination of how and when to engage airports and communities in performance based navigation proposals.

- The FAA is required to submit a report to Congress within 60 days of the review which describes: 1) how FAA will improve community involvement practices for NextGen projects located in metroplexes; 2) how and when FAA will engage airports and communities in performance based navigation proposals; and 3) lessons learned from NextGen projects and pilot programs and how those lessons are being integrated into community involvement practices for future NextGen projects located in metroplexes.

- Noise Exposure Study. The bill requires that FAA conduct a review of the relationship between aircraft noise exposure and its effects on communities around airports. The FAA is required to send a report to Congress within two years containing the results of the review. Based on the results of the review and in coordination with other agencies, the report should include FAA's preliminary recommendations for revising the land use compatibility guidelines.

S. 1405, the Federal Aviation Administration Reauthorization Act of 2017

Senate Committee Markup

On June 29, the Commerce, Science, and Transportation Committee approved S. 1405, the Federal Aviation Administration Reauthorization Act of 2017. The bill does not contain any relevant language on airport noise and community engagement. During the markup, several amendments were offered and accepted, none of which touched on airport noise or community engagement.

Next Steps

While both House Transportation and Infrastructure Chairman Bill Shuster and Senate Commerce, Science, and Transportation Chairman John Thune have said they would like to see floor action on their

respective bills in July, both have admitted that time may not be available given the packed Congressional agenda before August recess. We will continue to track these bills as they move through both the House and the Senate and notify you of any changes made that are relevant to airport noise and community engagement.

N.O.I.S.E.

National Association to Insure a Sound Controlled Environment

2017 Legislative Priorities

1. COMMUNITY ENGAGEMENT // ADVOCACY

N.O.I.S.E. supports expanding community engagement/review and the elimination of Categorical Exclusions (CATEX) when implementing Performance Based Navigation (PBN).

Although N.O.I.S.E. supports NextGen and its goal of modernizing the air traffic control system, Performance Based Navigation (PBN) has the potential to bring significant changes to flight patterns across the country. N.O.I.S.E. contends that the community impacts of aviation noise should be considered as a crucial part of the calculation that determines the overall benefits of the proposed changes. Changes should not be solely based on improved capacity and fuel savings. With the increased concentration of overflights due to the narrowing of flight paths and the decrease in separation between aircraft enabled by PBN, air traffic changes have become even more closely tied to changes on the ground.

Aviation noise is a health issue. Aviation noise is an economic issue. To that end, robust, two-way communication with affected communities is vital to ensuring that the impact and concerns of communities are heard and incorporated into the final design of new airspace as much asfuel savings and efficiency of airspace. This would allow communities under a new or concentrated flight path, guaranteed participation in a due process during the implementation of PBN.

As a part of efforts to ensure adequate community engagement, N.O.I.S.E. believes that both regulatory and legislative Categorical Exclusions or "CATEXes" in current NEPA regulation are not appropriate for the implementation of significant changes to our aviation system. N.O.I.S.E. supports efforts by the FAA and Congress to develop, implement and maintain a more robust community impacts process, in addition to or outside of the traditional NEPA process. This process should insure that ground impacts are considered and community concerns are not only heard, but also incorporated into PBN and traditional track changes that will change noise exposure, even if it does not reach the current FAA threshold of "measurable impacts"

In December of 2016, the following language was included in the National Defense Authorization Act, which promotes this priority: Performance-Based Navigation : This section improves the Federal Aviation Administration's (FAA) advance consultation with communities underneath the flight paths of proposed "NextGen" departure and arrival procedures, and requires the Administrator to reopen his assessment of new NextGen procedures at Phoenix Sky Harbor International Airport and to mitigate any adverse effects on the human environment that resulted from those procedures."

2. NOISE METRICS REVIEW

N.O.I.S.E. supports investigation and review of DNL and its current level of 65 as the only metric used to measure noise impact and expanding noise metrics to take into account the increased concentration of overflights due to the narrowing of flight paths and the decrease in separation between aircraft enabled by PBN procedures to insure that noise impacts are appropriately measured.

N.O.I.S.E.

National Association to Insure a Sound Controlled Environment

In order to adequately understand and address the impacts of aviation noise, we must first establish adequate metrics to measure those impacts. The FAA and Members of Congress are in the process of studying whether 65 is still the appropriate DNL level for measuring noise impacts. As we move forward with NextGen, implement PBN and undertake major airport overhauls, lowering the DNL level may allow for further mitigation for impacted communities and N.O.I.SE supports investigation of lowering the DNL level, however it will not address impacts that are caused by concentrated flight paths characterized by PBN procedures.

As DNL is an average and humans do not perceive noise in averages but rather as individual events, we believe it is time to investigate alternative metrics that could measure impacts such as:

- The psychological impact of concentrated, extended noise
- The physiological impact of infrequent, significant noise spikes during nighttime hours
- Impact of less audible low frequency noise who's vibration induces audible noise
- The length of each period of frequent, regular noise spikes "rush hours" due to over-flights
- The number of rush hours per day
- The average dB of a rush hour's noise—not day-night average
- The intensity of spikes above the average dB of a rush hour's noise
- The intensity and number of spikes above the average, for non-rush hours from 10 PM to 7 AM

Investigating a more appropriate metric to measure aviation noise impacts is crucial and will supplement efforts to greater engage the community to understand their concerns.

3. HEALTH IMPACTS STUDIES

N.O.I.S.E. supports increased funding for studies on the health impacts of aviation noise.

There are currently very few federal studies pertaining to the human impact of the concentration of flights associated with PBN procedures. Some communities do not have the ability to mitigate noise below flight paths and their citizens are exposed to continuous concentrated noise. Although there may not necessarily be an increase in decibels from the planes, there are unknown potential impacts from the increased number and frequency of flights under a given PBN procedure.

Although N.O.I.S.E. has supported the implementation of NextGen technologies as a part of their formal legislative platform in the past, we assert that there must be proper investment into research and development on the health and psychological impacts of that type of the resulting noise due to the more concentrated flight paths. These studies need to begin as soon as possible in order to protect the health of affected communities and mitigate avoidable damage.

4. SOUND INSULATION PROGRAM FUNDING

N.O.I.S.E. supports implementing Sound Insulation Programs Resulting from Part 150 Program studies to the standards used prior to the September, 2012 Public Guidance Letter (PGL-12-09).

A Part 150 program is a noise mitigation master plan developed by the airport and communities to address noise impacts and is funded by the Federal Aviation Administration (FAA) out of the Airport Improvement Program (AIP). One outcome or tool of a Part 150 is a sound insulation program where homes are mitigated for noise by providing improvements to windows or heating and cooling systems.

Insulation programs historically have mitigated homes within the 65 DNL noise contour. A Public Guidance Letter (PGL) was issued by the FAA to change the AIP handbook in August, 2012 and amended in November, 2012.

In order to be eligible for insulation, properties must meet a 2-stage eligibility test: the property must be in the 65 contour and the property must meet an interior noise level requirement (45 dB or greater). Additionally, use of Passenger Facility Charges (PFC's) is no longer considered eligible to be used to mitigate beyond the stated criteria. The FAA maintains that this is not a new policy and that this PGL serves to clarify their noise policy that has been in place since the mid-1980's. Previously, however, common practice dictated that properties need only be within the 65 DNL to qualify for mitigation.

In addition, given the age of some SIP programs in the Unites States, as well as the increase in traffic density at our nation's airports and improved technologies, N.O.I.S.E. supports the development of criteria for eligibility for SIP funding for "second round" implementations.

5. AIR TRAFFIC CONTROL PRIVATIZATION

N.O.I.S.E. opposes privatization of the air traffic control

N.O.I.S.E. has advocated strongly for community engagement opportunities when air traffic patterns are changed. Under a federally-operated Air Traffic Control (ATC) system, those opportunities are the result of persistent advocacy by the community and often times at the request of elected officials at the Congressional level. Although small communities have a role in the proposed advisory board of the new private air traffic control, airport-adjacent communities are concerned that without a mechanism for compelling the private company to meet and discuss their concerns over ground and noise impacts of airport traffic. Authors of this proposal in the House have assured interest groups that community concerns will still be managed by the FAA and not the private ATC. However, because of the great importance that N.O.I.S.E. and its members place on the ability to build relationships and trust with local air traffic employees, our concerns with this proposal remain.

6. N.O.I.S.E. SUPPORTS EFFORTS TO REINSTITUTE THE ENVIRONMENTAL PROTECTION AGENCY'S (EPA) OFFICE OF NOISE ABATEMENT AND CONTROL (ONAC).

The EPA office of Noise Abatement and Control was previously responsible for oversight and regulation of aviation noise, however, in 1981, the Office was defunded due to budget cuts. There are currently legislative efforts, such as Congresswoman Grace Meng's (NY) "Quiet Communities Act of 2015" (H.R.3384) which requires the Environmental Protection Agency (EPA) to combat aviation noise pollution. This legislation would reinstate the ONAC, and also require the EPA Administrator to conduct a study of airport noise and examine the FAA's selection of noise measurement methodologies, health impact thresholds, and abatement program effectiveness. N.O.I.S.E. supports this legislation and the reinstitution of the ONAC in order to provide proper checks and balances to FAA noise policies and procedures that impact residents and the environment on the ground under flight paths and in airport-adjacent communities.

New and cheaper flights fueled by resurgence at Bay Area airports

The surge in flights at SJC and OAK has been a delight to East Bay and South Bay travelers

By JOHN WOOLFOLK | jwoolfolk@bayareanewsgroup.com |
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It's a good time to fly in the Bay Area.

In a turnaround that seemed unimaginable a decade ago, airlines that were rocked by spiking fuel prices, a sour economy and a rash of bankruptcies are now flying high, filling Bay Area airports with new and cheaper domestic and international flights.

Flights once available only in San Francisco have flocked to San Jose, now the nation's fastest growing airport, and Oakland, which has seen a surge in international travel. Gone are the days when the only San Jose to New York flight was a red-eye and the city airport's only international destination was Mexico. Silicon Valley travelers now fly from San Jose to the Big Apple throughout the day, and jet straight to Japan, China, England, Canada and Germany.

At Oakland's airport, international no longer means just late night flights to Mexico and a weekly departure to the Azores during the summer. It now boasts flights to Spain, England, Denmark, Sweden, Norway, and coming this year, Italy and France.

"The Bay Area and Silicon Valley in particular has become the center of the universe, and every airline wants to be part of the action," said Chris McGinnis, founder of San Francisco-based travel blog Travelskills.com. "San Francisco appears to be running out of space to accommodate all this, so everyone's running to San Jose and Oakland to get into the market. With all those new seats and new flights, it means fares are coming down."

A couple could book a weekend getaway in April with nonstop roundtrip flights from San Jose to Beijing for as low as $470 on Hainan Airlines. They could fly from Oakland to Barcelona nonstop on Norwegian for $588 round trip each.

The resurgence of the Bay Area's smaller airports has been a delight to travelers, particularly those who find San Jose or Oakland closer to work or home.

"It's a lot more convenient," said Tim Renouf, 50, a software engineer at Advanced Micro Devices who now flies direct between home in England and work in Silicon Valley.

"It beats sitting on 101 after a long flight to San Francisco," co-worker David Stuttard, 47, said with a smile.

For Veronica Niegsch of Pleasanton, more options to fly direct from Oakland to visit family in Mexico have been a blessing.

“I love it,” said Niegsch, 44, a Federal Aviation Administration budget official who was waiting last week to board a Volaris flight to Guadalajara. Not only is Oakland closer to home, but she finds it much quicker to park and get through security. “It’s small, but you have a lot of options.”

The air travel surge has been a relief to Bay Area airport officials, who bet big on modernizing their 1960s-era facilities during the downturn a decade ago.

Shortly after San Jose approved its biggest-ever bond sale for a $1.3 billion airport makeover, the airport’s top official warned that the U.S. airline industry was “facing its worst crisis in its history.” Fuel prices were soaring, carriers were reporting record losses and a half-dozen airlines had filed for bankruptcy protection.

San Jose and Oakland watched anxiously as struggling airlines consolidated routes at major hubs like San Francisco. Passenger traffic was still falling to 8.2 million in 2010 when San Jose unveiled its gleaming new, spacious high-tech terminal, which had been scaled back from a more ambitious plan. Oakland invested in a $300 million terminal improvement program and a BART transit connection that opened in 2014. Yet passenger traffic that peaked at 14.6 million in 2007 plummeted to 9.3 million with the onset of the Great Recession.

But in the last five years, annual passenger traffic has jumped 25 percent to 55.8 million at San Francisco International, 31 percent to 13.1 million at Oakland International and a stunning 51 percent to 12.5 million at Norman Y. Mineta San Jose International Airport.

“To some extent San Jose has bounced back the most because it had lost the most before,” said Alan R. Bender, professor of aeronautics at Embry-Riddle Aeronautical University Worldwide in Daytona Beach, Florida.

Falling fuel prices and a now-booming economy helped pull the airlines out of their tailspin, along with a wave of mergers and a new generation of highly efficient jetliners. Aircraft like the Boeing 787 and Airbus A350 have allowed airlines more freedom to take chances on routes from smaller airports.

“With fuel prices low and these very economical jets, that favors medium markets like San Jose,” Bender said. “They can take risks they couldn’t take a few years ago.”

But patience, persistence and some smart plays helped San Jose and Oakland take advantage as the industry recovered.

In San Jose, city officials spent years courting a direct flight to Asia, something Silicon Valley executives had been craving. They worked with business leaders to assure airlines there was pent up demand for new routes. It eventually paid off when All Nippon Airways launched a direct flight to Japan in 2013 on the new 787 Dreamliner. A wave of other flights quickly followed.

“If a couple carriers go to a new airport, others do follow,” said Carl Guardino, chief executive of the Silicon Valley Leadership Group, which represents major technology companies. “But it’s really hard to get the first ones to make that bet. We tell that airline that if they come here, we’ll do everything we can to make them successful.”

In five years San Jose went from 29 domestic and two international destinations in 2012 to 43 domestic and 11 international destinations in 2017.

“The rate of growth has been tremendous,” said Marc Casto, president of Casto Travel in San Jose, one of the largest travel management companies in the Bay Area. “It’s one of the fastest growing airports in passenger growth around the nation.”

The growth has been so rapid that San Jose added two gates, bringing the total to 30, and is planning an expansion of up to 10 more.

“We’ve experienced tremendous passenger growth and it’s been a great thing,” said San Jose Airport Director John Aitken. “But with that growth comes some deficiencies in our facilities we’ll have to deal with pretty soon.”

Oakland airport officials bored into travel data and found a huge proportion of international travelers flying out of San Francisco lived in the East Bay or Wine Country, and pursued a strategy to tap that market.

“You can go over to another airport and be the fourth airline going to a European market, or go to Oakland and be the only one,” said John Albrecht, Oakland International’s manager of aviation marketing.

It paid off. Oakland has gone from 29 domestic and three international destinations in 2012 to 48 domestic and 14 international destinations today. International traffic surged 134 percent in the past year, and the airport just completed a $45 million renovation and expansion that doubled its international arrival operations capacity.

San Francisco meanwhile continues to set new records in passenger traffic.

Some airports have seen double-digit growth,” said SFO spokesman Doug Yakel, noting the bounce-back at the Bay Area’s smaller airports. “Our growth has been steady for a number of years.”

McGinnis said the turnabout at the smaller airports has been stunning.

“Multiple flights to Asia from San Jose is something I never thought I’d see,” McGinnis said. “And I never thought I’d see Oakland be the first airport (in the Bay Area) to get a nonstop to Rome. They beat San Francisco to that, that’s a big deal.”

Guardino said businesses don’t see the airports in competition, but that “the goal is to balance out three great airports so that the whole region is successful.”

At the moment, that seems to be working, for both business and leisure travelers. Albrecht said that with so many oversees flights pushing prices down, Bay Area travelers are making weekend getaways to Europe.

“You wouldn’t do it if air fare was $2,000, but now that it’s $500 round trip, it’s suddenly on the list of things to do,” Albrecht said. “That used to be ‘Lifestyles of the Rich and Famous.'”

FAA NOISE AND COMMUNITY ENGAGEMENT

FAA's Next Generation Air Transportation System (NextGen) initiative is designed to modernize the nation's air traffic control system by implementing satellite navigation, allowing for more direct routes, fuel savings, improved safety, and enhanced efficiencies. However, new NextGen arrival and departure procedures have dramatically increased the aircraft noise for many communities, especially in the City of Palo Alto. Specifically, at San Francisco International Airport (SFO), three arrival routes converge through a waypoint that directs the majority of airport arrivals directly over the residential community of Palo Alto at low altitudes and with louder procedures than prior to NextGen. Below, we note specific challenges faced by residents:

- Palo Alto uniquely bears the brunt of 60% of SFO arrivals flying at low altitudes over its residential community. The FAA should redistribute arrivals more equitably.
- Despite an agreement between SFO and the FAA's Northern California TRACON to maintain arrivals in the vicinity of Palo Alto at 5,000 feet during visual conditions and 4,000 feet during instrument landing conditions, the November 2017 Update on the Phase Two Report from the FAA claims that while the Administration now supports this agreement "to the extent feasible," it does not endorse this position. The FAA should, at a minimum, stand by its established agreement and, further, limit all flights in the vicinity of Palo Alto to 5,000 feet.
- NextGen arrival procedures include new speed constraints, resulting in large-scale use of noisy speed brakes and accelerations over densely populated residential areas. These new practices require the development of new mitigation strategies by the FAA.
- The science of NextGen has changed the nature of aircraft environmental impacts on residential communities, including how many communities are affected and at which distances from airports. Therefore, the FAA should recognize the correlating need for new scientific approaches to sound and air quality measurement and mitigation for affected communities. Yet in its November 2017 Update on the Phase Two Report, the FAA identified these issues as not under its responsibility.
- The frequency and volume of air traffic has increased with planes routinely flying over some Palo Alto neighborhoods 60 to 90 seconds apart. The FAA should take into consideration the current and anticipated growth of airports in our metroplex and acknowledge the magnitude of the need for associated corrective air traffic control action to mitigate impacts, and take that action.
- In the November 2017 Update on the Phase Two Report, the FAA declares its refusal to consider a variety of potential solutions "until issues of congestion, noise shifting and flying distance have been addressed with the airline stakeholders and the affected communities by the Select Committee and/or SFO Roundtable." The City of Palo Alto supported our regional partners in the development of an extraordinary number of proposals from the Select Committee and the SFO Roundtable. The responses to these many proposals in the FAA's November 2017 Update on the Phase Two Report amount to no solutions of any significance for the residents of Palo Alto. The City of Palo Alto asks that the FAA develop solutions to mitigate the considerable and disproportionate burden imposed on Palo Alto by SFO arrivals.
- In addition to supporting the work of the Select Committee and the SFO Roundtable, the City of Palo Alto submitted additional solution proposals through letters to the FAA dated July 7, 2017 and November 15, 2017. The FAA has not responded. The City of Palo Alto requests the courtesy of a reply to its communications with the FAA.

Dear Council Members,

My name is Marie-Jo Fremont. I am here tonight to make specific requests on the subject of Airplane Noise on behalf of other Palo Alto residents who have paid close attention to this issue since 2015:

1. **Request #1**: we support the Staff recommendations and would like to propose 3 more items
   a. Advocate for **solutions to reduce the health impact** of both airplane noise **AND** emissions. The negative health effects of both noise and emissions have been documented through various studies.
   b. Collaborate with other elected officials to establish a **regional position** and ask the FAA to solve the problem with **system-wide solutions,** not independent point solutions.
   c. Develop a **noise-monitoring plan in concert with others** (be it airports, roundtables, airplane noise committees, other cities affected by airplane noise)

2. **Request #2**: direct staff to put in place a f**ast track process by the end of June** to allow the City, **if necessary, to file a complaint within 60 days** of the FAA implementing a change.
   a. The City may never have to use it but must be ready to act if necessary under the 60-day FAA deadline to file.

3. **Request #3**: write a letter to the FAA and Congressional Reps as a response to the FAA Update on Phase Two report from November. The response should highlight in particular that the Select Committee recommendation to move the SERFR ground track to the old BSR ground track was for a **new procedure** that would follow **nine criteria**, including flying at **idle power all the way to the Bay** and at **altitudes at or higher than** the previous **BSR** procedure along the entire route.

Thank you.