

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