



CITY OF BRISBANE

50 Park Place
Brisbane, California 94005-1310
(415) 508-2100
Fax (415) 467-4989

Bert Ganoung
Aircraft Noise Abatement
San Francisco International Airport
P.O. Box 8097
San Francisco, CA 94128

May 10, 2018

Dear Mr. Ganoung:

Thank you for providing us with the recent City of Brisbane aircraft noise monitoring results for 1Q2018.

We continue to have concerns about the Threshold levels assigned to the noise monitors in Brisbane. The 65dBA is not consistent with previous studies, which had temporary monitors set at 55dBA, and the state standard of 55dBA. In the past, your office had told us that the Threshold should be set above the Community Noise CNEL level. The recent Airport Director's reports and the attached letters suggest the Thresholds should be set above the Ambient Noise level and with no reference to the Community Noise level.

Per the 1Q2018 report, Site 966 (Mission Blue Center) community CNEL is averaging 54dBA, and Site 997 (Solano Street) community CNEL is averaging 59dBA. The report also states, "...monitoring locations in Brisbane are located in a suburb with Ambient Noise in the low 50s dBA...", which leads us to question why the monitors are set at 65dBA.

The Brisbane threshold levels have been set much higher than other recent noise studies conducted by your office. The 1/2018 Brisbane study Threshold was 15dBA above the Ambient Noise level while the 9/2017 Montara study's Threshold was set 3dBA above the Ambient Noise level according to the SFO Director's Report:

Noise Monitor Study	Ambient Noise	Threshold	Threshold Above Ambient Noise	Community Noise Above Ambient Noise	Number of Noise Events/Day
Montara 9/2017	48dBA	51dBA	+3dBA	+3dBA	39
San Francisco 11/2017	51dBA	55dBA	+4dBA	+4dBA	65
Millbrae 12/2017	52dBA	59dBA	+7dBA	+6dBA	216
Portola Valley 2/2017	43dBA	55-50dBA (day/night)	+7-12dBA	+2dBA	148



Noise Monitor Study	Ambient Noise	Threshold	Threshold Above Ambient Noise	Community Noise Above Ambient Noise	Number of Noise Events/Day
Woodside 2/2017	43dBA	52-50dBA (day/night)	+9dBA	+7dBA	58
Brisbane Mission Blue 7/2017	49dBA	65dBA	+16dBA	+4dBA	54
Brisbane Mission Blue 1/2018	50dBA	65dBA	+15dBA	+4dBA	47 (1/13-1/26, 2017 has 164 events per day, set at 55dBA, 3.5 times more)

Using the SFO flight tracking site for flights on 3/16/18, there were 231 noise events counted at the Brisbane permanent noise monitor of 55dBA or greater, and 77 noise events at 65dBA or greater. On this day there were three times more noise events at 55dBA than at 65dBA. Setting the noise monitor threshold to 65dBA rather than 55dBA reduces the number of noise events counted and our analysis and comparing the Mission Blue 1/2017 and 1/2018 results, suggests by a factor of 3 to 3.5 times.

After reviewing the results for 1Q2018, we have a number of concerns:

1. SFO maintains a total of 28 Permanent Monitors for the purpose of monitoring airplane noise where it might impact communities (Attachment A).
2. The California regulatory standard for the noise monitor Threshold Setpoint is 55dBA (Attachment B: Refer to top of page 2).
3. In February 2009, SFO requested a waiver to raise the Threshold Setpoint at 12 Permanent Monitors. (Attachment C). A waiver WAS NOT requested for the Brisbane Permanent Noise Monitor.
4. In December 2011, the California Department of Transportation, Aeronautics Division (CalTransAD) granted a waiver for 11 of the 12 requested Permanent Monitors. The waiver allowed the Threshold Setpoint to be raised to 65dBA at those monitors (Attachment D).
5. The State rejected raising the Threshold Setpoint at one monitor and did not grant a waiver for any of the monitors for which a waiver was not requested by SFO, including the Brisbane Permanent Noise Monitor.
6. Currently, all 28 SFONAO Permanent Noise Monitors are operated with a Threshold Setpoint of 65dB and recently both Temporary Noise Monitors deployed quarterly in Brisbane have had their setpoint raised from 55dBA to 62dBA and 65dBA without adequate explanation.
7. Our reading is that the Noise Monitors (both Permanent and Temporary) which are set at 62dBA and 65dBA without a waiver are operating contrary to State Regulations. This results in a significant under reporting of airplane noise events as well as a false increase in the "Community Noise" level because uncounted airplane noise is considered "Community Noise".

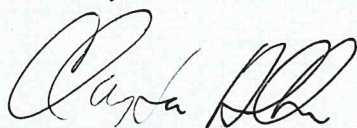
8. The recent increase of the setpoint at the Temporary Noise Monitors at Mission Blue and Lipman has decreased the number of recorded noise events when compared to prior reports and gives the false impression that airplane noise impact has improved. That is not the case.

9. Global standards for airplane noise monitoring use a setpoint of 55dBA. This is supported by health studies.

10. Brisbane is one of the most heavily impacted communities in the Bay Area from airplane noise. It is imperative that data be collected accurately and transparently so that the number of noise events can be properly measured and evaluated over time. One cannot compare the number of noise events when the thresholds are set at different levels, and changing the threshold destroys the data integrity over time.

It is for these reasons that we are requesting that the noise monitors deployed within Brisbane be operated in accordance with State Regulations (at 55dBA), and be consistent with prior Brisbane noise reports. We also request that the 1/17/2018 and 7/2018 reports be amended to reflect the monitors set at 55dBA.

Sincerely,

A handwritten signature in black ink, appearing to read "Clay Holstine". The signature is fluid and cursive, with the first name being more prominent.

Clay Holstine

City Manager, City of Brisbane

c: Kathleen Wentworth, Senior Advisor to Congresswoman Jackie Speier