Draft letter to the FAA from the City of Brisbane

Following the implementation of the NextGen navigation system at San Francisco Airport, the community of Brisbane has experienced a significant increase in the frequency and loudness of aircraft noise events. We have received numerous complaints from concerned citizens who have experienced the following disturbances:

- Residents are woken up before 6 am and in the middle of the night from flight disturbances
- Children are awakened from their naps in the middle of the day, or prevented from going to sleep at night
- Outdoor conversations are interrupted, or even worse, children in parks are unable to hear their parents or caretakers who are trying to communicate with them or nearby motorists to ensure their children's safety
- Noise events often occur with a frequency of 2 to 3 minutes over an extended period of time. This makes it hard for children to concentrate at school and on homework and for professionals to work from home offices

These are just some examples of the harmful effects of airplane noise experienced by our residents as a result of the NextGen procedures. This affects the entire City and is well documented in the May 2015 Mission Blue Noise Study conducted by the SFO Noise Abatement Office.

On behalf of our concerned citizens, we hereby request that the FAA redefine the NextGen procedures in a way that does not cause the undue noise impacts currently being experienced in our community.

The newly adopted SSTIK procedure has caused negative impacts for Brisbane for two reasons. First, the first waypoint was moved 0.5 nautical miles south so planes fly less over water than the prior procedure before turning west over the peninsula, resulting in lower altitude flights directly over Brisbane.

Secondly, the Ridge Noise Study of April-May 2015 demonstrates that the new SSTIK procedure has led to a dramatic increase in noise events in Brisbane. The data confirms that:

- The number of noise events at the Ridge increased from 36/day[1] in 2010 to 115/day[2] in 2015
- 65% of the flights that flew within ¼ mile of the SSTIK waypoint created noise events at the temporary noise monitor at the Ridge. This suggests that the flight path is right over the Ridge.
- The FAA CNEL metric for noise at the temporary noise monitor at the Ridge changed from 46.1[3] in 2010 to 52.0[4] in 2015. This means that flights are causing double the amount of noise.

In addition, we are concerned that a large percentage of flights continue to be vectored, despite the new GPS-guided technology. While the purpose of NextGen is

to make the skies safer and with less manual involvement, we are still seeing 50% of flights (*Cindy Gibb to please calculate for Cliff*) being vectored, causing noise events over Brisbane. The FAA's metric for flight compliance is 1 mile either side of the proposed flight path. Given that GPS guidance now allows more precision in flight paths, a 2 mile-wide swath is too broad and should be narrowed to measure whether planes are being vectored.

Since 2011, total movements off runways 1L and 1R that turn west and down the peninsula at SFO have increased by X% from 2011 to 2015 (*Cliff please insert the total flight movements off runways 1L and 1R that turn west and down the peninsula from 2011 to 2015).*

We appreciate and support the FAA's efforts to address our concerns and the concerns of our neighboring communities by undertaking the FAA Initiative to Address Noise Concerns of Santa Cruz/Santa Clara/San Mateo/San Francisco Counties. At the same time however, we are concerned about the substantial increase in airplane noise in our community, and request that revisions to flight procedures be designed and implemented in a way that results in a reduction of the noise burden currently placed on our City. In addition, we are seeking a wider geographic distribution of the noise so that no one community is unfairly burdened with a disproportionate amount of noise. Given the growing increase in the number of flights that come through SFO and Oakland, it is of the utmost importance that the FAA works diligently with surrounding communities to minimize the noise impacts of these flights.

Therefore, on behalf of the City of Brisbane, we request that the FAA consider the following in its re-evaluation of its NextGen navigation system:

1. Minimize the noise impacts to Central Brisbane and the Ridge by considering moving the SSTIK waypoint so that planes fly much further over water and at a higher altitude when starting to fly over the Peninsula
2. Require planes to adhere to GPS-guided flight path
3. The CNDEL procedure for flights south from Oakland and STIIK are designed to minimize safety and separation issues
4. Avoid vectoring unless required for safety or separation reasons
5. Develop a metric to measure compliance over flyover waypoints. The current metric of a 1 mile either side of the path is too broad
6. Ensure that no one community is unfairly burdened by a disproportionate amount of noise.
7. The flight procedures are real-time tested to determine the actual noise impact such as utilizing the data from the existing network of SFO Noise Monitors and community input.
8. The FAA is responsive to test and community input results to further modify and adjust proposed flight procedures.

We sincerely appreciate your response to our concerns.

Signed by all City Council members

References Cited

1. SFO Noise Abatement Office, 2010, Aircraft Overflight and Noise Analysis Brisbane California, Page 5, Section 6.
2. SFO Noise Abatement Office 2016, Short Term Aircraft Noise Monitoring, Brisbane California Technical Report #022016-P51-966, Page 1, Table 1 "SFO Events."
3. SFO Noise Abatement Office, 2010, Aircraft Overflight and Noise Analysis Brisbane California, Page 2, Section 3.