

OAKLAND AIRPORT-COMMUNITY NOISE MANAGEMENT FORUM

An Advisory Body to the Executive Director of the Port of Oakland

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April 18, 2018

Mr. Dennis Roberts, Regional Administrator
Federal Aviation Administration
Western-Pacific Region
P.O. Box 92007
Los Angeles, CA 90009

RE: Oakland Airport-Community Noise Management Forum's Response to the FAA's Interim Response Report for the Supplemental Proposals to Revising the Northern California Metroplex for Alameda and Contra Costa Counties

Dear Administrator Roberts:

The Oakland Airport-Community Noise Management Forum (Noise Forum) appreciates the FAA's efforts to provide an interim response to its March 2017 proposals to mitigate NextGen noise impacts to Alameda and Contra Costa Counties within the NorCal Metroplex. As you may remember, the Noise Forum serves as an advisory body to the Executive Director of the Port of Oakland on community noise concerns. In response to consultations with and at the behest of the former FAA Regional Administrator, Mr. Glen Martin, the Noise Forum accepted the role as the link to the FAA on behalf of affected communities. Noise mitigation proposals were prepared at the request of Mr. Martin to provide the FAA with recommendations to adjust published OAK and SFO NextGen procedures to alleviate identified adverse community noise impacts.

The Noise Forum received a copy of the FAA's report titled *Interim Response to Oakland Airport-Community Noise Management Forum's Recommendations* on February 8, 2018 through the efforts of Representative Barbara Lee. The attached report details the Noise Forum's review of and response to each of the 36 items the FAA addressed in its February interim report. The Noise Forum respectfully requests the FAA consider and act upon our responses.

Progress will require ongoing and timely dialogue. The Noise Forum respectfully requests that the FAA initiate and commit to a better dialogue between the Noise Forum and the FAA to more effectively and expeditiously develop workable operational noise mitigation and settle issues if aspects of a proposed adjustment are of concern. In this vein, OAK and the Noise Forum had greatly appreciated previous efforts by the FAA to engage with the Airport and the Community through the attendance of FAA personnel at its quarterly noise meetings. This attendance was extremely beneficial towards maintaining a dialogue. We were disappointed that this was discontinued and respectfully request that these efforts be reinstated.

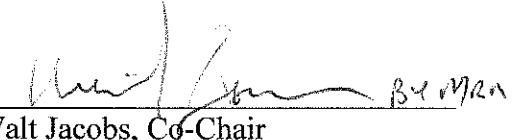
Mr. Dennis Roberts
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The Noise Forum remains hopeful that concentrated good faith collaboration between stakeholders, the FAA and affected communities will result in acceptable NextGen aircraft noise mitigation for Alameda and Contra Costa Counties. We are confident that mitigation solutions exist that simultaneously maintain safety in our skies. We look forward to a full commitment on the part of the FAA to bring this about.

Thank you for your consideration.

Sincerely,

Benny Lee, Co-Chair


Walt Jacobs, Co-Chair

cc. Senator Dianne Feinstein
Senator Kamala Harris
Rep. Barbara Lee (CA-13)
Rep. Eric Swalwell (CA-15)
Rep. Mark DeSaulnier (CA-11)
Rep. Mike Thompson (CA-5)
Mr. Glen Martin, FAA
Oakland Vice Mayor Annie Campbell-Washington
Alameda County Supervisor Nate Miley, Dist. 4
Ms. Elizabeth Lewis, President, SFO Roundtable
Noise Forum Members and Advisors
Save Our Skies East Bay
Alameda Citizens League for Airport Safety and Serenity
Berkeley Keep Jets Over the Bay
Noise Forum Facilitator

Response to the FAA's Interim Response Report
For the *Supplemental Proposals to Revising the*
Northern California Metroplex for Alameda and
Contra Costa Counties

Oakland Airport- Community Noise Management Noise Forum
April 2018

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INTRODUCTION

The FAA is currently conducting analyses of proposals to mitigate community-identified adverse NextGen noise impacts in Alameda and Contra Costa Counties. These analyses are in response to the Oakland Airport-Community Noise Management Forum's *Supplemental Proposals to Revising the Northern California Metroplex For Alameda County/Contra Costa County* (the Proposal) sent to the FAA on March 27, 2017. Proposals include recommendations to address new Performance Based Navigation (PBN) procedures identified by the community as adversely affecting health and quality-of-life.

The Oakland Airport-Community Noise Management Forum (Noise Forum) received a copy of the FAA's report titled *Interim Response to Oakland Airport-Community Noise Management Forum's Recommendations* on February 8, 2018 through the efforts of Representative Barbara Lee.

The Noise Forum's proposals consist of requests to mitigate 6 NextGen OAK and SFO arrival and departure issues that adversely impact Alameda and Contra Costa Counties. These recommendations provided evidence to support adjusting the identified procedures alongside proposed mitigation solutions. Recommendations include potential procedural modifications to adjust altitude, airspace route changes and moving existing waypoints. The Forum's proposals also seek the FAA's help to use new area navigation (RNAV) procedures to move flights away from populated areas. For each of the 6 issues, multiple recommendations and alternative mitigation recommendations were made. In addition, there were several procedural requests in the Proposal's conclusion asking how the FAA's process will be undertaken, specific timelines etc.

The FAA separated the Proposal's 6 NextGen issue requests into 34 individual recommendations in order to respond to each individually. These, together with the 3 process questions the Forum included in its Conclusion section, make for a total of 37 items the FAA responded to.

While the Forum is thankful for and appreciates the FAA's response to Representative Lee's request for an interim report, we are disappointed that this report provided little in the way of concrete answers to recommendations in the Proposal and little information on where the East Bay's Proposals are within the FAA's process. The FAA's interim report notes several times that Northern California airspace is complex, interconnected and interdependent. It's our understanding that the FAA has already committed to mitigation changes in other locations of the Bay Area. For an interdependent Metroplex, it follows that mitigation should be more concurrent across the Metroplex, especially given the fact that the FAA is only evaluating a total of 34 recommendations for the East Bay's 6 NextGen issues.

The Forum appreciates that some recommendations are more complex than others, but strongly urges the FAA to implement feasible mitigation steps as they become practicable to bring much needed noise relief as well as the advantages of quiet descents and fuel savings that NextGen promised.

The Forum remains hopeful that concentrated good faith collaboration between stakeholders, the FAA and affected communities will result in acceptable NextGen aircraft noise mitigation for Alameda and Contra Costa Counties. We are confident that mitigation solutions exist that simultaneously maintain safety in our skies. While the Forum agrees that safety is of upmost importance, it is our opinion that efficiency can't be held more important than the quality-of-life impacts and potential adverse health that aircraft noise makes to our communities. The importance of actively moving forward gains importance when credible solutions exist to mitigate these impacts. Therefore, the Forum strongly urges and respectfully requests that the FAA commit the necessary resources to actively move forward with the proposed recommendations in a more expeditious manner.

Organization of the Noise Forum's Response

This document details the Forum's review of and response to each of the 37 items the FAA addressed in its interim report. In the interest of continuity, the Noise Forum's response will maintain the same "break-out" and order used by the FAA in its interim response.

Each response from the Noise Forum will provide the FAA's response regarding the current status and associated timeline for implementation for that recommendation, as well as a reference to where that recommendation may be found within the Noise Forum's original 2017 proposals.

NOISE FORUM RESPONSE

1. HUSSH

A. Noise Forum Recommendation

"The short-term solution would be for Air Traffic Control to assign headings to aircraft departing OAK runway 30 that restore the initial SILENT ground track." (OAK Proposal Page 13)

FAA Response

Under Evaluation

Noise Forum Reply

No information is provided as to where along the FAA's evaluation process this recommendation is. The terminology "Under Evaluation" is vague and cannot be correlated with any sections of the provided "Timeline" explanation (pgs. 6-8 in the FAA's interim report). As this is left open-ended, the Noise Forum respectfully requests the FAA to:

- i. provide additional detail on Process/Status and feasibility of this recommendation,
- ii. provide more specific timeline details.

B. Noise Forum Recommendation

"Additionally, the FAA should ensure aircraft remain on their filed route and not turn prior to REBAS intersection and secure a decreased level of night-time noise by issuing an FAA memorandum of understanding with ATC to keep aircraft on the route as published to the REBAS intersection unless safety dictates otherwise."

FAA Response

Under Evaluation

Noise Forum Reply

The Noise Forum appreciates that Air Traffic Control has already implemented aircraft flying the full nighttime noise abatement HUSSH procedure as published to REBAS intersection in February 2017 unless safety dictates otherwise. The Noise Forum wants to clarify that this asks the FAA to secure this action by issuing a memorandum of understanding with ATC. No information is provided as to where along the FAA's evaluation process this recommendation is. The terminology "Under Evaluation" is vague and cannot be correlated with any sections of the provided "Timeline" explanation (pgs. 6-8 in the FAA's interim report). As this is left open-ended, the Noise Forum

respectfully requests the FAA to:

- i. provide additional detail on Process/Status and feasibility of this recommendation,
- ii. provide more specific timeline details.

C. Noise Forum Recommendation

“...evaluate the HUSSH procedure and adjust it to replicate the SILENT SID ground track and require aircraft to fly to REBAS unless safety dictates otherwise and adjust the REBAS intersection offshore to keep aircraft over the water instead of turns over land.” (OAK Proposal Page 13)

FAA Response

Under Evaluation

Noise Forum Reply

No information is provided as to where along the FAA’s evaluation process this recommendation is. The terminology “Under Evaluation” is vague and cannot be correlated with any sections of the provided “Timeline” explanation (pgs. 6-8 in the FAA’s interim report). As this is left open-ended, the Noise Forum respectfully requests the FAA to:

- i. provide additional detail on Process/Status and feasibility of this recommendation,
- ii. provide more specific timeline details.

D. Noise Forum Recommendation

“...moving HUSSH waypoint southward as much as feasible to facilitate a sharper left turn by aircraft after departing OAK runway 30” (OAK Proposal Page 13)

FAA Response

Under Evaluation

Noise Forum Reply

No information is provided as to where along the FAA’s evaluation process this recommendation is. The terminology “Under Evaluation” is vague and cannot be correlated with any sections of the provided “Timeline” explanation (pgs. 6-8 in the FAA’s interim report). As this is left open-ended, the Noise Forum respectfully requests the FAA to:

- i. provide additional detail on Process/Status and feasibility of this recommendation,
- ii. provide more specific timeline details.

E. Noise Forum Recommendation

“...regulate and eliminate turns off of HUSSH prior to REBAS intersection and secure a decreased level of night time noise by creating a memorandum of understanding with ATC to keep aircraft on the route as published to the REBAS intersection for published noise abatement procedures unless safety dictates otherwise.” (OAK Proposal Page 13, 14)

FAA Response

Under Evaluation

Noise Forum Reply

The Noise Forum appreciates that Air Traffic Control implemented aircraft flying the full nighttime

noise abatement HUSSH procedure as published to REBAS intersection in February 2017 unless safety dictates otherwise. The Noise Forum wants to clarify that this asks the FAA to secure this action by issuing a memorandum of understanding with ATC. No information is provided as to where along the FAA's evaluation process this recommendation is. The terminology "Under Evaluation" is vague and cannot be correlated with any sections of the provided "Timeline" explanation (pgs. 6-8 in the FAA's interim report). As this is left open-ended, the Noise Forum respectfully requests the FAA to:

- i. provide additional detail on Process/Status and feasibility of this recommendation,
- ii. provide more specific timeline details.

F. Noise Forum Recommendation

"...moving the location of REBAS over the Bay to mitigate noise from concentrated traffic turning eastward over communities in the Point Richmond area." (OAK Proposal Page 14)

FAA Response

Under Evaluation

Noise Forum Reply

No information is provided as to where along the FAA's evaluation process this recommendation is. The terminology "Under Evaluation" is vague and cannot be correlated with any sections of the provided "Timeline" explanation (pgs. 6-8 in the FAA's interim report). As this is left open-ended, the Noise Forum respectfully requests the FAA to:

- i. provide additional detail on Process/Status and feasibility of this recommendation,
- ii. provide more specific timeline details.

G. Noise Forum Recommendation

"...adjusting night time hours for noise abatement operations from the current 2200-0700 local time Monday through Saturday, 2200-0800 local time on Sunday to new night time hours of noise abatement procedures of 2100-0800 local time daily, seven days a week for relief as flight curfews are not an option" (OAK Proposal Page 14)

FAA Response

Under Evaluation

Noise Forum Reply

No information is provided as to where along the FAA's evaluation process this recommendation is. The terminology "Under Evaluation" is vague and cannot be correlated with any sections of the provided "Timeline" explanation (pgs. 6-8 in the FAA's interim report). As this is left open-ended, the Noise Forum respectfully requests the FAA to:

- i. provide additional detail on Process/Status and feasibility of this recommendation,
- ii. provide more specific timeline details.

H. Noise Forum Recommendation

"...as OAK departures over Berkeley and Oakland are lower in altitude and markedly louder than SFO departure, implement the adjusted HUSSH procedure all the way to REBAS and then onto the next fix for all northerly OAK departures from Runway 30 so that the HUSSH DP is in effect 24 hours a day for these flights instead of only at night to decrease the noise burden on Oakland, Emeryville, Berkeley, Albany, and Kensington." (OAK Proposal Page 14)

FAA Response

Due to safety and efficiency of the National Airspace System (NAS), this cannot be endorsed by the FAA

Noise Forum Reply

The Noise Forum agrees that this recommendation does affect efficiency, but the Noise Forum is not convinced that having those OAK departures leaving to the north use the HUSSH 24-hours a day affects safety. The HUSSH is procedurally separated from the OAK WNDSR arrivals. There is a potential interaction with SFO SNTNA departures, but the SNTNA is not as heavily used as other SFO departures. Minimal delays are possible, but it is challenging to understand they would be substantial. Safety could be maintained with appropriate sequencing and in-trail spacing for all departures. This recommendation would require aircraft to travel approximately an additional 10 miles northward prior to turning to destination, but this inefficiency should not be held more important than the adverse health and quality of life impacts of aircraft noise. The health of citizens should override the efficiency of operations. The Noise Forum respectfully requests:

- i. clarification from the FAA on the perceived safety issues,
- ii. this recommendation remains under consideration.

I. Noise Forum Recommendation

“...the FAA provide modeling or other tools to determine the effects of different REBAS waypoint location options to best mitigate aircraft noise for the Pt. Richmond area and Marin County on the other side of the Bay.” (OAK Proposal Page 14)

FAA Response

Under Evaluation

Noise Forum Reply

No information is provided as to where along the FAA’s evaluation process this recommendation is. The terminology “Under Evaluation” is vague and cannot be correlated with any sections of the provided “Timeline” explanation (pgs. 6-8 in the FAA’s interim report). As this is left open-ended, the Noise Forum respectfully requests the FAA to:

- i. provide additional detail on Process/Status and feasibility of this recommendation,
- ii. provide more specific timeline details.

2. WNDSR

A. Noise Forum Recommendation

“...the current WNDSR TWO flight track be eliminated and the FAA consider options to replace this RNAV to another location that allows for geographically shorter flight paths and quiet, fuel efficient optimized descents into OAK.” (OAK Proposal Page 17)

FAA Response

Under Evaluation

Noise Forum Reply

No information is provided as to where along the FAA’s evaluation process this recommendation is.

The terminology “Under Evaluation” is vague and cannot be correlated with any sections of the provided “Timeline” explanation (pgs. 6-8 in the FAA’s interim report). As this is left open-ended, the Noise Forum respectfully requests the FAA to:

- i. provide additional detail on Process/Status and feasibility of this recommendation,
- ii. provide more specific timeline details,
- iii. that proposed WNDSR procedure designs and amendments be presented to the Forum in a timely manner to grant the opportunity to comment prior to proceeding,
- iv. initiate a dialogue between the Noise Forum and the FAA to address modifications to settle issues if aspects of the proposed design are of concern,
- v. take extraordinary steps to address WNDSR, as it is a 24-hour arrival route into OAK, which is also a hub for FedEx. Well documented studies show aircraft noise at night most severely impacts the health and well-being of communities.

B. Noise Forum Recommendation

(Preferred Alternative for flights arriving from the) North: “...the FAA consider establishing the preferred alternative of OAK arrivals to the east. This alternative proposes the FAA consider an RNAV somewhere within a corridor... generally encompassing the Mendocino VOR to the Santa Rosa VOR to RAGGS fix then airway V494 towards EMBER and the towards SHARR fix and joining the MADWIN SIX arrival for flights arriving from the north.” (OAK Proposal Page 17)

FAA Response

Under Evaluation

Noise Forum Reply

No information is provided as to where along the FAA’s evaluation process this recommendation is. The terminology “Under Evaluation” is vague and cannot be correlated with any sections of the provided “Timeline” explanation (pgs. 6-8 in the FAA’s interim report). As this is left open-ended, the Noise Forum respectfully requests the FAA to:

- i. provide additional detail on Process/Status and feasibility of this recommendation,
- ii. provide more specific timeline details,
- iii. that proposed WNDSR procedure designs and amendments be presented to the Forum in a timely manner to grant the opportunity to comment prior to proceeding,
- vi. initiate a dialogue between the Noise Forum and the FAA to address modifications to settle issues if aspects of the proposed design are of concern.

C. Noise Forum Recommendation

(Preferred Alternative for flights arriving from the) East: “Flights originating from the east could use a corridor towards the SAHRR or BANND/TOOOL waypoints for joining the OAKES TWO arrival... Crossover from the PYE NAVAID routing to the east towards SHARR or BANND/TOOOL waypoints can be accomplished further north in Oakland Center’s airspace at their discretion.” (OAK Proposal Page 17)

FAA Response

Under Evaluation

Noise Forum Reply

No information is provided as to where along the FAA’s evaluation process this recommendation is. The terminology “Under Evaluation” is vague and cannot be correlated with any sections of the

provided “Timeline” explanation (pgs. 6-8 in the FAA’s interim report). As this is left open-ended, the Noise Forum respectfully requests the FAA to:

- i. provide additional detail on Process/Status and feasibility of this recommendation,
- ii. provide more specific timeline details,
- iii. present proposed WNDSR procedure designs and amendments to the Forum in a timely manner to grant the opportunity to comment prior to proceeding,
- vii. initiate a dialogue between the Noise Forum and the FAA to address modifications to settle issues if aspects of the proposed design are of concern.

D. Noise Forum Recommendation

“... the FAA undertake airspace and noise analyses to identify appropriate adjustments to avoid population and better achieve flight track efficiency and quiet descent procedures into OAK.” (OAK Proposal Page 20)

FAA Response

Under Evaluation

Noise Forum Reply

No information is provided as to where along the FAA’s evaluation process this recommendation is. The terminology “Under Evaluation” is vague and cannot be correlated with any sections of the provided “Timeline” explanation (pgs. 6-8 in the FAA’s interim report). As this is left open-ended, the Noise Forum respectfully requests the FAA to:

- i. provide additional detail on Process/Status and feasibility of this recommendation,
- ii. provide more specific timeline details.

E. Noise Forum Recommendation

“This second alternative proposes the FAA consider an OAK arrival RNAV somewhere within a corridor generally encompassing routing towards the Mendocino VOR the towards Santa Rosa VOR then towards the Concord COR crossing the area new the Concord VOR at 10,000 feet and then routing down the California Interstate 680 highway corridor to the Oakland Runway 30 final approach.” (OAK Proposal Page 20)

FAA Response

Under Evaluation

Noise Forum Reply

No information is provided as to where along the FAA’s evaluation process this recommendation is. The terminology “Under Evaluation” is vague and cannot be correlated with any sections of the provided “Timeline” explanation (pgs. 6-8 in the FAA’s interim report). As this is left open-ended, the Noise Forum respectfully requests the FAA to:

- i. provide additional detail on Process/Status and feasibility of this recommendation,
- ii. provide more specific timeline details.

F. Noise Forum Recommendation

“... the FAA undertake airspace and noise analyses to identify appropriate adjustments to avoid population and better achieve flight track efficiency and quiet descent procedures into OAK.” (OAK Proposal Page 22)

FAA Response

Under Evaluation

Noise Forum Reply

The Noise Forum would like to clarify this recommendation appears repetitive as the same analyses request was made for each of the two alternative WNDSR mitigation recommendations in the Noise Forum's proposals. No information is provided as to where along the FAA's evaluation process this recommendation is for either alternative. The terminology "Under Evaluation" is vague and cannot be correlated with any sections of the provided "Timeline" explanation (pgs. 6-8 in the FAA's interim report). As this is left open-ended, the Noise Forum respectfully requests the FAA to:

- i. provide additional detail on Process/Status and feasibility of this recommendation,
- ii. provide more specific timeline details.

3. OAKLAND 9

A. Noise Forum Recommendation

"...in the short term, the FAA assign headings to aircraft after takeoff that direct aircraft turn left to a heading of 280° until reaching the OAK 4 DME arc, then proceed on the published departure." (OAK Proposal Page 24)

FAA Response

Under Evaluation

Noise Forum Reply

No information is provided as to where along the FAA's evaluation process this recommendation is. The terminology "Under Evaluation" is vague and cannot be correlated with any sections of the provided "Timeline" explanation (pgs. 6-8 in the FAA's interim report). As this is left open-ended, the Noise Forum respectfully requests the FAA to:

- i. provide additional detail on Process/Status and feasibility of this recommendation,
- ii. provide more specific timeline details.

B. Noise Forum Recommendation

"...aircraft departing on the OAKLAND NINE not be turned eastbound until leaving 5000 feet (as opposed to 3000 feet in the current ATC directed noise mitigation procedures)." (OAK Proposal Page 24)

FAA Response

Under Evaluation

Noise Forum Reply

No information is provided as to where along the FAA's evaluation process this recommendation is. The terminology "Under Evaluation" is vague and cannot be correlated with any sections of the provided "Timeline" explanation (pgs. 6-8 in the FAA's interim report). As this is left open-ended, the Noise Forum respectfully requests the FAA to:

- i. provide additional detail on Process/Status and feasibility of this recommendation,
- ii. provide more specific timeline details.

C. Noise Forum Recommendation

“...the FAA evaluate the OAKLAND NINE (daytime departures) and adjust it so that the ground track is further away from BFI/Alameda.” (OAK Proposal Page 24)

FAA Response

Under Evaluation

Noise Forum Reply

No information is provided as to where along the FAA’s evaluation process this recommendation is. The terminology “Under Evaluation” is vague and cannot be correlated with any sections of the provided “Timeline” explanation (pgs. 6-8 in the FAA’s interim report). As this is left open-ended, the Noise Forum respectfully requests the FAA to:

- i. provide additional detail on Process/Status and feasibility of this recommendation,
- ii. provide more specific timeline details.

D. Noise Forum Recommendation

“...the FAA consider creating an RNAV departure that replicates the newly proposed OAKLAND NINE above.” (OAK Proposal Page 24)

FAA Response

Under Evaluation

Noise Forum Reply

No information is provided as to where along the FAA’s evaluation process this recommendation is. The terminology “Under Evaluation” is vague and cannot be correlated with any sections of the provided “Timeline” explanation (pgs. 6-8 in the FAA’s interim report). As this is left open-ended, the Noise Forum respectfully requests the FAA to:

- i. provide additional detail on Process/Status and feasibility of this recommendation,
- ii. provide more specific timeline details.

E. Noise Forum Recommendation

“...the FAA undertake airspace and noise analyses to identify appropriate adjustments and demonstrate that any proposed changes will result in noise reduction and not adversely impact other areas.” (OAK Proposal Page 24)

FAA Response

Under Evaluation

Noise Forum Reply

No information is provided as to where along the FAA’s evaluation process this recommendation is. The terminology “Under Evaluation” is vague and cannot be correlated with any sections of the provided “Timeline” explanation (pgs. 6-8 in the FAA’s interim report). As this is left open-ended, the Noise Forum respectfully requests the FAA to:

- i. provide additional detail on Process/Status and feasibility of this recommendation,
- ii. provide more specific timeline details.

4. CNDEL

A. Noise Forum Recommendation

“Consider adjusting CNDEL THREE departure so that the ground track for this departure is further away from BFI/Alameda. This could be accomplished by directing aircraft departing OAK runway 30 to turn left to a heading of 280° until reaching the OAK 4 DME arc.” (OAK Proposal Page 26)

FAA Response

Under Evaluation

Noise Forum Reply

No information is provided as to where along the FAA’s evaluation process this recommendation is. The terminology “Under Evaluation” is vague and cannot be correlated with any sections of the provided “Timeline” explanation (pgs. 6-8 in the FAA’s interim report). As this is left open-ended, the Noise Forum respectfully requests the FAA to:

- i. provide additional detail on Process/Status and feasibility of this recommendation,
- ii. provide more specific timeline details.

B. Noise Forum Recommendation

“...the FAA undertake airspace and noise analyses to identify appropriate adjustments and demonstrate that any proposed changes will result in noise reduction and not adversely impact other areas.” (OAK Proposal Page 26)

FAA Response

Under Evaluation

Noise Forum Reply

No information is provided as to where along the FAA’s evaluation process this recommendation is. The terminology “Under Evaluation” is vague and cannot be correlated with any sections of the provided “Timeline” explanation (pgs. 6-8 in the FAA’s interim report). As this is left open-ended, the Noise Forum respectfully requests the FAA to:

- i. provide additional detail on Process/Status and feasibility of this recommendation,
- ii. provide more specific timeline details.

5. NIITE

A. Noise Forum Recommendation

“... the FAA restore the requirements of the night time noise abatement flight procedure as charted under SFO QUIET to SFO NIITE. Restore the heavy charted lines from NIITE to REBAS to indicate this is the charted route to fly unless safety dictates otherwise and adjust the REBAS intersection offshore to keep aircraft over water instead of turning over land.” (OAK Proposal Page 30)

FAA Response

Under Evaluation

Noise Forum Reply

No information is provided as to where along the FAA's evaluation process this recommendation is. The terminology "Under Evaluation" is vague and cannot be correlated with any sections of the provided "Timeline" explanation (pgs. 6-8 in the FAA's interim report). As this is left open-ended, the Noise Forum respectfully requests the FAA to:

- i. provide additional detail on Process/Status and feasibility of this recommendation,
- ii. provide more specific timeline details.

B. Noise Forum Recommendation

"...the FAA consider regulating and eliminating early turns off of the NIITE prior to REBAS intersection and secure a decreased level of night time noise by creating a memorandum of understanding with ATC to keep aircraft on the route as published to the REBAS intersection for published noise abatement procedures unless safety dictates otherwise." (OAK Proposal Page 30)

FAA Response

Under Evaluation

Noise Forum Reply

The Noise Forum appreciates that Air Traffic Control has already implemented aircraft flying the full nighttime noise abatement NIITE procedure as published to REBAS intersection in February 2017 unless safety dictates otherwise. The Noise Forum wants to clarify that this asks the FAA to secure this action by issuing memorandum of understanding with ATC. No information is provided as to where along the FAA's evaluation process this recommendation is. The terminology "Under Evaluation" is vague and cannot be correlated with any sections of the provided "Timeline" explanation (pgs. 6-8 in the FAA's interim report). As this is left open-ended, the Noise Forum respectfully requests the FAA to:

- i. provide additional detail on Process/Status and feasibility of this recommendation,
- ii. provide more specific timeline details.

C. Noise Forum Recommendation

"...the FAA consider moving the location of REBAS to over the bay to mitigate noise from concentrated aircraft turning eastward over communities in the Point Richmond area." (OAK Proposal Page 30)

FAA Response

Under Evaluation

Noise Forum Reply

No information is provided as to where along the FAA's evaluation process this recommendation is. The terminology "Under Evaluation" is vague and cannot be correlated with any sections of the provided "Timeline" explanation (pgs. 6-8 in the FAA's interim report). As this is left open-ended, the Noise Forum respectfully requests the FAA to:

- i. provide additional detail on Process/Status and feasibility of this recommendation,
- ii. provide more specific timeline details.

D. Noise Forum Recommendation

"...the FAA consider adjusting night time hours for noise abatement operations from the current 2200 – 0700 local time Monday through Saturday, 2200 – 0800 local time on Sunday morning to new night time hours of noise abatement procedures of 2100 – 0800 local time daily, seven days a

week for relief as flight curfews are not an option.” (OAK Proposal Page 30)

FAA Response

Under Evaluation

Noise Forum Reply

No information is provided as to where along the FAA’s evaluation process this recommendation is. The terminology “Under Evaluation” is vague and cannot be correlated with any sections of the provided “Timeline” explanation (pgs. 6-8 in the FAA’s interim report). As this is left open-ended, the Noise Forum respectfully requests the FAA to:

- i. provide additional detail on Process/Status and feasibility of this recommendation,
- ii. provide more specific timeline details.

E. Noise Forum Recommendation

“... the FAA provide modeling or other tools to determine the effects of different REBAS waypoint location options to best mitigate aircraft noise for the Pt. Richmond area and Marin County on the other side of the Bay.” (OAK Proposal Page 30)

FAA Response

Under Evaluation

Noise Forum Reply

No information is provided as to where along the FAA’s evaluation process this recommendation is. The terminology “Under Evaluation” is vague and cannot be correlated with any sections of the provided “Timeline” explanation (pgs. 6-8 in the FAA’s interim report). As this is left open-ended, the Noise Forum respectfully requests the FAA to:

- i. provide additional detail on Process/Status and feasibility of this recommendation,
- ii. provide more specific timeline details.

6. TRUKN

A. Noise Forum Recommendation

“... the FAA consider TRUKN proposals in two sections as detailed above – TRUKN North and TRUKN East. The Noise Forum also requests the FAA consider the WNDSR proposals above as part of overall noise mitigation for TRUKN. As detailed above, moving WNDSR has additional significant advantage in that it frees airspace so that SFO departures can eventually use quieter and more fuel efficient continuous climb procedures.” (OAK Proposal Page 35)

FAA Response

Under Evaluation

Noise Forum Reply

No information is provided as to where along the FAA’s evaluation process this recommendation is. The terminology “Under Evaluation” is vague and cannot be correlated with any sections of the provided “Timeline” explanation (pgs. 6-8 in the FAA’s interim report). As this is left open-ended, the Noise Forum respectfully requests the FAA to:

- i. provide additional detail on Process/Status and feasibility of this recommendation,
- ii. provide more specific timeline details.

B. Noise Forum Recommendation

(For TRUKN section) North – “...the FAA restore the historical traffic concentrations to the topographically lower areas where it existed prior to NextGen and that the communities grew and developed under. To accomplish this, the Noise Forum requests that the FAA move the current GRTFL and DEDHD tracks westward of Highway 13 and eastern Oakland to reestablish and better restore historical patterns of SFO departing traffic in this area.” (OAK Proposal Page 35)

FAA Response

Under Evaluation

Noise Forum Reply

No information is provided as to where along the FAA’s evaluation process this recommendation is. The terminology “Under Evaluation” is vague and cannot be correlated with any sections of the provided “Timeline” explanation (pgs. 6-8 in the FAA’s interim report). As this is left open-ended, the Noise Forum respectfully requests the FAA to:

- i. provide additional detail on Process/Status and feasibility of this recommendation,
- ii. provide more specific timeline details.

C. Noise Forum Recommendation

(For TRUKN section) East – “...the FAA restore historical traffic concentration to where it existed prior to NextGen and under which communities grew and developed. To accomplish this, the Noise Forum requests the FAA consider adding a track to the area of existing COSMC and HYPEE tracks and adjust to better echo legacy concentrations.” (OAK Proposal Page 37)

FAA Response

Under Evaluation

Noise Forum Reply

No information is provided as to where along the FAA’s evaluation process this recommendation is. The terminology “Under Evaluation” is vague and cannot be correlated with any sections of the provided “Timeline” explanation (pgs. 6-8 in the FAA’s interim report). As this is left open-ended, the Noise Forum respectfully requests the FAA to:

- i. provide additional detail on Process/Status and feasibility of this recommendation,
- ii. provide more specific timeline details.

D. Noise Forum Recommendation

“... the FAA investigate for both TRUKN North and TRUKN East: Airspace and noise analyses to identify appropriate adjustments to restore historical traffic patterns and conditions.” (OAK Proposal Page 38)

FAA Response

Feasible and Could Be Undertaken in the Short Term (Less than 2 years)

Noise Forum Reply

This response is vague and needs clarification. The language of this particular recommendation is to *undertake analyses* to identify appropriate adjustments to restore historical traffic patterns and conditions. The FAA's response indicates it is feasible to only *initiate* studies of this issue in less than 2 years. This is a vague and unsatisfactory commitment to initiate analyses of an adverse issue that was published and commenced in 2014. The Forum respectfully requests the FAA commit the necessary resources to actively move forward with this recommendation to modify TRUKN to better reflect historical flight paths in the most expeditious manner available. The Forum also respectfully requests:

- i. that proposed TRUKN procedure designs and amendments be presented to the Forum in a timely manner to grant the opportunity to comment prior to proceeding,
- ii. a dialogue be initiated between the Noise Forum and the FAA to address modifications to settle issues if aspects of the proposed design are of concern,
- iii. the FAA provide more specific timeline details.

E. Noise Forum Recommendation

“... the FAA investigate for both TRUKN North and TRUKN East: Analyze if a procedural decrease in altitude over TRUKN exists and whether higher altitudes can be restored.” (OAK Proposal Page 38)

FAA Response

Feasible and Could Be Undertaken in the Short Term (Less than 2 years)

Noise Forum Reply

Little information provided as to where along the FAA's evaluation process this recommendation is. The Noise Forum respectfully requests the FAA to:

- i. provide additional detail on Process/Status of this recommendation,
- ii. provide more specific timeline details.

F. Noise Forum Recommendation

“... the FAA investigate for both TRUKN North and TRUKN East: Model how proposed changes will result in noise reduction.” (OAK Proposal Page 38)

FAA Response

Feasible and Could Be Undertaken in the Short Term (Less than 2 years)

Noise Forum Reply

This response is vague and needs clarification. The language of this particular recommendation is to *undertake analyses* to model noise reduction. The FAA's response indicates it is feasible to only *initiate* studies of this issue in less than 2 years. The Forum appreciates that noise modeling may only be practicable once a proposed procedure design or change is in a more mature state, but this is a vague and unsatisfactory commitment to initiate analyses of an adverse issue that was published and commenced in 2014. The Forum respectfully requests the FAA commit the necessary resources to actively move forward with the recommendation to modify TRUKN to better reflect historical flight paths and legacy noise conditions in the most expeditious manner available. The Forum also respectfully requests:

- i. that proposed TRUKN procedure designs, amendments and noise modeling be presented to the Forum in a timely manner to grant the opportunity to comment prior to proceeding,
- ii. a dialogue be initiated between the Noise Forum and the FAA to address modifications to settle

- issues if aspects of the proposed design are of concern,
- iii. the FAA provide more specific timeline details.

G. Noise Forum Recommendation

“… the FAA investigate for both TRUKN North and TRUKN East: If FAA automatic navigation procedures become able to assign RNAV tracks automatically to simulate historic dispersed traffic concentrations and legacy noise conditions experienced on the ground along multiple RNAV’s, use the TRUKN procure to test this capability.” (OAK Proposal Page 38)

FAA Response

Feasible and Could Be Undertaken in the Short Term (Less than 2 years)

Noise Forum Reply

The Forum appreciates that this recommendation may apply to future NextGen capabilities. The Forum respectfully requests the FAA commit the necessary resources to actively move forward with the recommendation to modify TRUKN to better reflect historical flight paths and historical noise impacts in the most expeditious manner available. The Forum also respectfully requests:

- i. that proposed TRUKN procedure designs, amendments and noise modeling be presented to the Forum in a timely manner to grant the opportunity to comment prior to proceeding,
- iv. a dialogue be initiated between the Noise Forum and the FAA to address modifications to settle issues if aspects of the proposed design are of concern,
- ii. the FAA provide more specific timeline details when they become available.

RESPONSES TO “CONCLUSION”

The Noise Forum’s March 2017 Proposals included the following process requests in the “Conclusion” section of its report. These requests were identified as “recommendations” by the FAA. This terminology will be maintained for continuity.

A. Noise Forum Recommendation

“Specific direction from the FAA for how the process is anticipated to move forward” (OAK Proposal Page 39)

FAA Response

This is an FAA Process Question and is answered in the Introduction (Pages 4-7 of the FAA’s Interim Report)

Noise Forum Reply

The Forum would like to clarify that this request seeks information regarding the specific process moving forward as it pertains to Alameda and Contra Costa Counties. The FAA’s response only provided the FAA’s generalized and open-ended guidelines that may or may not affect the process for the Noise Forum’s proposals. As this is vague, the Noise Forum respectfully requests the FAA to:

- i. provide additional detail on Process/Status as it pertains to the specific Alameda and Contra Costa Counties’ recommendations in the Forum’s proposals,
- ii. provide more specific timeline details.

B. Noise Forum Recommendation

“An estimated timeline for the process.” (OAK Proposal Page 39)

FAA Response

This is an FAA Process Question and is answered in the Introduction (Pages 4-7 of the FAA’s Interim Report)

Noise Forum Reply

The Forum would like to clarify that this request seeks information regarding the specific timeline process moving forward as it pertains to the individual Alameda and Contra Costa Counties NextGen noise mitigation proposals. The FAA’s response only provided the FAA’s generalized and open-ended guidelines that may or may not affect the process for the Noise Forum’s proposals. As this is vague, the Noise Forum respectfully requests the FAA to:

- i. provide additional detail on Process/Status as it pertains to the specific Alameda and Contra Costa Counties’ recommendations in the Forum’s proposals,
- ii. provide more specific timeline details as they pertain to the individual recommendations for Alameda and Contra Costa Counties.

C. Noise Forum Recommendation

“Information on the means the FAA will employ to evaluate approved flight tracks and procedures for noise impacts on the communities over which they will fly.” (OAK Proposal Page 39)

FAA Response

This is an FAA Process Question and is answered in the Introduction (Pages 4-7 of the FAA’s Interim Report)

Noise Forum Reply

The Forum would like to clarify that this request seeks information regarding the specific process moving forward as it pertains to the Alameda and Contra Costa Counties proposals as it becomes available. The FAA’s response only provided the FAA’s generalized and open-ended guidelines that may or may not affect the process for the Noise Forum’s proposals. As this is vague, the Noise Forum respectfully requests the FAA to:

- i. provide additional detail on Process/Status as it pertains to the specific Alameda and Contra Costa Counties’ recommendations in the Forum’s proposals as it becomes available,
- ii. any information regarding evaluation be presented to the Forum in a timely manner to grant the opportunity to comment and address concerns prior to proceeding.

CLOSING

The Oakland Airport-Community Noise Management Forum appreciates the FAA's participation in the process to mitigate adverse NextGen noise impacts on Alameda and Contra Costa Counties. As the Noise Forum is the FAA's requested body to address mitigation on behalf of communities, we strongly urge the FAA to more closely and collaboratively include the Forum in the FAA's procedure design process going forward. We appreciate it is an iterative process with multiple stakeholders, and request greater participation in the efforts.

Aircraft noise is not just "annoying" to East Bay communities living under the newly concentrated aircraft routes implemented under NextGen. Multiple well documented and peer-reviewed studies demonstrate that aircraft noise adversely and seriously affects blood pressure and cardiovascular health, as well as negatively impacts children's learning abilities. FAA procedure design criteria must consider not just air safety and efficiency for the airspace users, but also consider the serious community impacts aircraft noise can create. Considerations of efficiency should not be held more important than the adverse noise and health impacts to residents.

While it is our understanding that the FAA has already committed to mitigation changes in other locations of the Bay Area, we expect that mitigation should be more concurrent across the Metroplex, especially given the fact that the FAA is only evaluating a total of 34 recommendations for the East Bay's 6 NextGen issues.

The Forum appreciates that some recommendations are more complex than others, but would again like to strongly urge the FAA to implement feasible mitigation steps as they become practicable to bring much needed noise relief as well as the advantages of quiet descents and fuel savings that NextGen promised. Therefore, the Forum strongly urges and respectfully requests that the FAA commit the necessary resources to actively move forward with the proposed recommendations in a more expeditious manner.

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