

OAKLAND AIRPORT-COMMUNITY NOISE MANAGEMENT FORUM

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

Co-Chairs

January 17, 2019

Mr. Benny Lee,
Elected-
Representative
City of San Leandro

Ms. Raquel Girvin
Regional Administrator, AWP-1
FAA Western-Pacific Region
777 S. Aviation Blvd.

Mr. Walt Jacobs,
Citizen-
Representative
City of Alameda

Suite 150
El Segundo, CA 90245

RE: RESPONSE TO FAA AUGUST 2018 UPDATES LETTER AND REQUEST FOR FACE-TO-FACE TECHNICAL COLLABORATION MEETING(S)

Members

City of Alameda

Dear Administrator Girvin:

City of Berkeley

In August 2018, the FAA provided a response to the suggestions made by the Oakland Airport-Community Noise Management Forum (Forum) to alleviate and mitigate the severe noise issues that are a result of the implementation of NextGen flight procedures in the Northern California Metroplex.

City of Hayward

City of Oakland

City of San Leandro

The Forum thanks the FAA for its responses to its suggestions. Unfortunately, the responses provided do not do anything to address the situations or provide us with any alternatives. The responses simply tell us that many of our suggestions will not work. The Forum member communities feel that, in all fairness, several of our recommendations warrant further review and consideration instead of being rejected out of hand, without consideration of potential alternatives.

City of Union City

County of Alameda

Port of Oakland

Forum Facilitator

Michael R.
McClintock

The Forum requests that a face-to-face meeting be convened with Ms. Beth White or her technical representatives/Subject Matter Experts (SMEs) which will allow us to further explain our requests and allow for both question and answers. The Forum believes that this will help to resolve these issues in a much faster manner and allow us to come to safe and workable solutions to these very real noise issues.

Technical Advisors

Federal Aviation
Administration

Federal Express

Below are short summaries of the issues that the Forum has identified with respect to the FAA's August 2018 responses:

KaiserAir, Inc.

1. HUSSH SID (FAA item 1.1)

Southwest Airlines

Harris Miller Miller &
Hanson, Inc.

The Forum believes its recommendation regarding the HUSSH procedure can be addressed without impacting SFO procedures. To clarify, the Forum's request is to have aircraft make an initial brief left turn after departing OAK Runway 30 *and* then proceed on course over the center of the Bay to maximize separation from both San Francisco and East Bay communities. In other words, the procedure, beyond HUSSH waypoint, is

Landrum & Brown

not an issue to the Forum. The Forum requests that aircraft turn as soon as practicable after departing towards HUSSH, as this helps those communities immediately off the end of Runway 30.

The location of the HUSSH waypoint and the fact that it is a flyby waypoint ensures that the ground track for this SID comes much closer to East Bay communities than the SILENT. This fact is graphically illustrated by Figure 1 of your response. Our primary concern, however, is for the noise generated by aircraft as they initially depart runway 30. Aircraft on this departure come closer to the Alameda shoreline. A brief, initial turn away from the shore could mitigate this noise. The Forum believes this turn could be made part of the HUSSH SID without losing the required separation. Aircraft could be required to make an initial, brief turn left after takeoff until passing a given altitude (1500-2000 ft.) and then cleared back on course direct HUSSH. An assigned heading until a given DME and then on course to HUSSH might also be an option.

The FAA response was that moving the HUSSH ground track “will create significant noise concerns for the San Francisco area.” The FAA has on many occasions stated that it is the agency’s policy to avoid shifting noise from one community to another. In fact, the HUSSH SID did just that for East Bay communities. The HUSSH SID resolved a noise issue in San Francisco but increased noise for communities in Alameda especially during the initial phase of departing flights. The Forum would like to work with the FAA to find a solution that initially takes aircraft further from the Alameda shoreline and maintains the required procedural separation from SFO departures. We believe such a solution exists.

The FAA also responded that the requested change would impact procedural separation between the HUSSH and SSTIK procedures, which would result in delays at both airports. The Forum requests that the FAA provide quantifiable data regarding how capacity may be negatively impacted by adjusting the initial departure phase of HUSSH procedure to implement a sharper left turn on initial departure from Runway 30.

2. MOVING THE HUSSH WAYPOINT SOUTH (FAA item 1.4)

As previously stated in 1 (above), our primary concern is the increased noise generated by the initial ground track after takeoff from runway 30 by aircraft on the HUSSH departure. If moving the HUSSH waypoint South is not a workable solution, we are proposing adding an additional waypoint to the HUSSH SID if such a waypoint would prompt aircraft to turn more expeditiously after departure. This waypoint could be added at the intersection of the 270 heading off OAK runway 30 and the SFO 360-degree radial (the turn point on the SILENT SID). Aircraft could be cleared direct to this new waypoint immediately after takeoff with no other change to the HUSSH departure. This new waypoint would not reduce procedural separation or shift noise. It would move initial ground tracks away from Alameda shoreline communities. The Forum requests that the FAA provide quantifiable data regarding how capacity may be negatively impacted by adjusting the HUSSH waypoint and to simulate how moving the waypoint southward would not result in moving noise away from East Bay shorelines.

3. WNDSR Arrival (FAA items 2.1, 2.2, 2.3, 2.4, 2.6 [combined response])

We believe that the FAA could do a better job of providing solutions to the existing problem created by the WNDSR arrival. We feel the FAA did not do an adequate job of examining the noise and flight profile of the WNDSR arrival over the East Bay hills (the cities of El Cerrito, Berkeley, Oakland and Hayward) and feel the WNDSR arrival over a very populated area is not in the context of what NextGen promised. The WNDSR arrival is only 3500 feet AGL in a level flight profile. It is not economical, it is noisy, and it is not efficient. If the recommendations of the subcommittee are not amenable to the FAA (recommendations that were asked for by the FAA), then the Noise Forum asks the FAA for solutions that do work. Shifting noise from one community to another is not necessarily the result of moving the flight paths on the WNDSR to other routes. The FAA moved aircraft to a flight path directly over a very populated area over several communities at only 3500 feet AGL, yet this was not considered noise shifting. If the recommendations from the Subcommittee do not work, then the Noise Forum requests the FAA come up with alternative solutions. The Noise Forum is willing to work collaboratively with the FAA to establish different procedures.

4. OAKLAND SID (FAA items 3.1, 3.2, 3.3, 3.4, 3.5 [combined response])

All Forum recommendations regarding the OAKLAND SID were submitted **in an effort** to move departing OAK aircraft further away from the Alameda shoreline. These recommendations included a short-term solution of an initial 280 degree heading after takeoff for a short distance, a permanent change to the ground track, and the creation of an RNAV procedure that replicates the OAKLAND SID. Even though this departure is not a NEXTGEN procedure, the Forum believes the proposed revision provides an opportunity to mitigate noise to East Bay communities. These recommendations were rejected based on procedural separation, coordination requirements and resulting ground delays. The FAA response states that “the safest, most efficient way to accommodate the volume of traffic in this congested area is vectoring”. We believe that a safe and efficient NEXTGEN SID can be created that doesn’t rely so heavily on vectoring. The Forum is requesting that the FAA reconsider this response and requests that the FAA provide quantifiable data regarding how delays may increase if a 280-degree heading on the OAKLAND departure was implemented. The Forum would welcome the opportunity to work with the FAA to find a more precise daytime departure from the Oakland airport.

5. CNDEL SID

Once again, the Forum’s recommendation regarding the CNDEL SID was an effort to achieve greater initial separation between aircraft departing runway 30 at OAK and the Alameda shoreline. As with the HUSSH and the OAK SIDS, the Forum believes that such a solution can be found that meets existing separation requirements and does not shift noise or significantly increase delays. We are requesting that the FAA reconsider its response and work to find such a solution. The Forum is requesting that the FAA reconsider this response and requests that the FAA provide quantifiable data regarding how delays may increase if a 280-degree heading on the OAKLAND departure was implemented for a short distance after
takeoff.

6. NIITE SID

Response will be sent at a later date.

7. TRUKN SID

The issue with the TRUKN departure has been the distinct, constant and same flight paths that SFO departures fly versus the previously dispersed flight path profile of the SFO SID. This has led to a noise shifting from one area to another. Especially impacted is the concentrated flight paths to the East. The Forum requests that routes be dispersed over the entire area as before. What other alternatives are available and what does the FAA recommend to alleviate the noise issues? As above, the Forum requests to meet with the FAA to discuss and review alternatives to these issues.


CONCLUSION

The East Bay has suffered under the extreme noise issues brought on by NextGen procedures. The Forum thanks the FAA for its responses so far but finds the FAA's responses to most of the Forum's concerns to be inadequate to alleviate the very real noise issues created by NextGen procedures. The FAA states several times in response to our suggestions that noise cannot be shifted to other communities, and for various reasons that safety would be an issue. Since the Forum feels that some of the FAA responses may have been due to a misunderstanding on the part of the FAA of the Forums intentions and requests, the Forum requests to meet with FAA SME's to develop alternative solutions that will work to alleviate the noise impacts brought on by NextGen procedures. These could also be developed in conjunction with the Northern California Metroplex and improve noise levels in the Metroplex area.

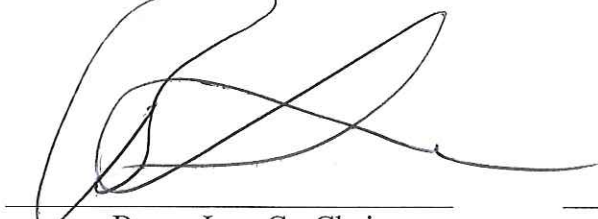
When meeting with FAA technical representatives, questions could be sent to the FAA beforehand to help speed the process of addressing the noise issue on the topic (e.g. HUSSH, WNDSR, etc.) for the meeting. We firmly believe that collaboration in face-to-face meetings will result in a quicker and better process to resolve these issues. We look forward to the FAA meeting with our NextGen Subcommittee as soon as possible to get moving on these issues.

Respectfully submitted:

Oakland Airport-Community Noise Management Forum


Peter Marcuzzo, Chair
Forum Metroplex Subcommittee

Approved:


Benny Lee, Co-Chair


Walt Jacobs, Co-Chair

Ms. Racquel Girvin

January 17, 2019

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Cc:

Rep. Barbara Lee (CA-13)

Rep. Eric Swalwell (CA-15)

Rep. Mark DeSaulnier (CA-11)

Rep. Mike Thompson (CA-5)

City of Oakland Councilmember Sheng Thao, Dist. 4

Alameda County Supervisor Nate Miley, Dist. 4

Ms. Elizabeth Lewis, President, SFO Community Roundtable

Forum Members and Advisors

Save Our Skies East Bay

Alameda Citizens League for Airport Safety and Serenity

Berkeley Keep Jets Over the Bay

Forum Facilitator