
From: Robert Holbrook <[_____](#)>
Sent: Wednesday, April 25, 2018 12:03 AM

Subject: Consolidated Suggestions for the Ad Hoc Advisory Committee's Report

Chairman Hendricks and Members of the Ad Hoc Advisory Committee,
As you develop the report for the Committee's consideration and vote, members of the community who have actively followed the Committee's progress would like to encourage you to adopt the following recommendations.

Most, but not all, of these suggestions are present in the spreadsheet. The suggestions regarding weather conditions arose from FAA responses at the last meeting. The suggestion for opt-in notification has been added because a new approach procedure being proposed by the FAA for South Flow was discovered late last week. While it is unclear how much traffic would be affected, that approach would route South Flow traffic over an entirely new path through Sunnyvale, Los Altos and Palo Alto. Implementation is scheduled for July 19th; the comment period ends Tuesday. As with the spreadsheet, a few of the new suggestions are outside the scope of what the FAA can implement but are suitable for discussion among City representatives.

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These suggestions are meant to be combined with maximum effect:

- 1) Disperse flights
 - a. Principle: move noise back to where it was for many years before 2012, in the same geographic proportions (*figure 1*).
 - b. Principle: "break the rails" introduced by performance based navigation (PBN) (*figure 2*).

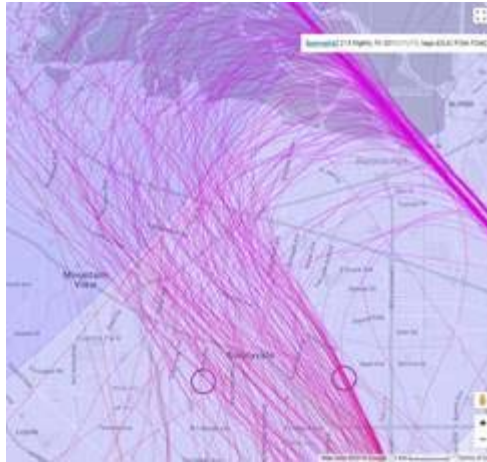


Figure 1

Figure 2

- c. Create a charted visual flight procedure – these are for environmental/noise considerations.
 - d. Convert ZORSA to a 'fly by' waypoint, enabling dispersion East of ZORSA. HITIR should be a fly-by waypoint, too. If this is not possible due to design criteria for STAR procedures, amend the STAR procedures terminating at ZORSA to achieve same effect, that is, to allow airplanes to turn per their turning radiuses and FMS programming as soon as possible after JESEN.
 - e. Return discretion to pilots until Flight Management Systems (FMS) can disperse planes automatically. Back off of FMS until then, including no FMS after JESEN.
 - f. Revert the final waypoint on the STAR procedures to PUCKK, recognizing that most planes will not be able to reach it.
 - g. ATC to fan out airplanes by providing many different headings to pilots, spreading flights laterally over corridors two nautical miles wide or more.
 - h. Ensure that the percentage of flights flying the Eastern Approach stays at historical averages and doesn't drop, especially to zero.
- 2) Reduce per flight noise on the ground
- a. Principle: During South Flow, weather is usually cool and often windy. To reduce the number of noise event indoors with windows closed, South flow traffic should favor lower peak noise over event duration, within reason.
 - b. Principle: Noise is greatly increased by use of lift devices, brakes and jet thrust. The way airplanes are flown should adapt skillfully to changes in weather conditions in order to minimize noise.

- c. Return discretion to pilots until Flight Management Systems (FMS) can fly as quietly as human pilots under 98% of weather conditions. Back off of FMS until then, including no FMS after JESSEN.
 - d. ATC to structure arrivals for vectored flights so that they can descend at a glide. Provide ATC with tools to support this, if required.
 - e. Provide altitude flexibility at HITIR (4000' or above).
 - f. Any published arrival or approach procedure should permit the quietest possible descent under varying weather and wind conditions, but especially the conditions most common when South Flow is used. Review existing procedures to ensure this is the case.
 - g. Retrofit airplanes with equipment to reduce per-flight noise, such as vortex generators.
- 3) Raise the wind speed threshold used to trigger South Flow conditions.
- 4) SJC and airlines to schedule no more airplanes to arrive SJC during any time window than can actually land at SJC during that time window.
- 5) Tracking of noise and modeling of future changes:
 - a. Adopt improved noise metrics: dB-C weighted noise, not dB-A; noise metrics that better reflect human annoyance, factoring in repeated exposures and focusing on noise events over limited durations (hours vs a yearly average). Note: existing noise metrics do not adequately capture the effects of the concentration introduced by Nextgen.
 - b. Principle: FAA should model noise under a range of weather conditions with emphasis on actual conditions versus ideal conditions (see also 2f).
 - c. FAA models to be calibrated against noise monitors on the ground, under a range of weather conditions.
 - d. FAA to enable interested persons and groups to be notified of proposed FAA actions as soon as they are made public. To achieve this, the FAA should enable opt-in email notifications for FAA web pages of community interest. Users should be able to restrict their notifications to a single airport. In particular, email opt-in should be made available for the following pages in the IFP Gateway: 'Charts', 'IFP Production Plan', 'IFP Coordination' and 'IFP Documents (NDBR)'. (Opt-in notifications are available today in the IFP Gateway, but only for procedures already listed on those web pages. It is not possible to be notified when a new procedure is introduced.)
 - e. FAA to post all supporting information showing the noise impact of proposed procedures entered in the IFP Gateway at the time those procedures are posted to the IFP Gateway for comment (or the fact that a 'categorical exclusion' was used and the grounds for using it). When reporting on the results of models, state the assumptions and parameters used.
 - f. Community to develop a regional noise monitoring strategy.
- 6) Acquire resources:
 - a. Add ATC personnel, if required to support the above actions.
 - b. Lobby airlines to adopt the above actions.
 - c. Going forward, coordinate with other interested groups within the metroplex and nationally.
- 7) Appeal to Congress:
 - a. Include the changes to law proposed in this section in the September Appropriations Bill for the FAA.
 - b. Place noise on an equal footing with safety and efficiency, and higher than efficiency over dense residential areas.
 - c. Enable reasonable business incentives to mitigate noise. Amend the Airport Noise and Capacity Act (ANCA) of 1990 to permit incentives to airlines by airport operators to be adopted without FAA approval (per an attorney specializing in airline law, the FAA has approved only one proposal contested by airlines under ANCA in 28 years). Consider

changes to statutory law to permit City, County and State governments to enact reasonable incentives.

- d. Change laws per the Maryland Proposal (link below).
- e. Mandate development of supplemental noise metrics, including those listed in 5a, above.
- f. Note: Formal recommendations to Congress members should be considered by all regional representative bodies: Ad Hoc Advisory Committee, SFO Roundtable, South Bay Roundtable, etc.

Link to the Maryland Proposal:

<http://maacommunityrelations.com/media/client/anznoiseupdate/2018/What%20Went%20Wrong%20with%20NextGen%20and%20How%20Congress%20Can%20Fix%20It.pdf>