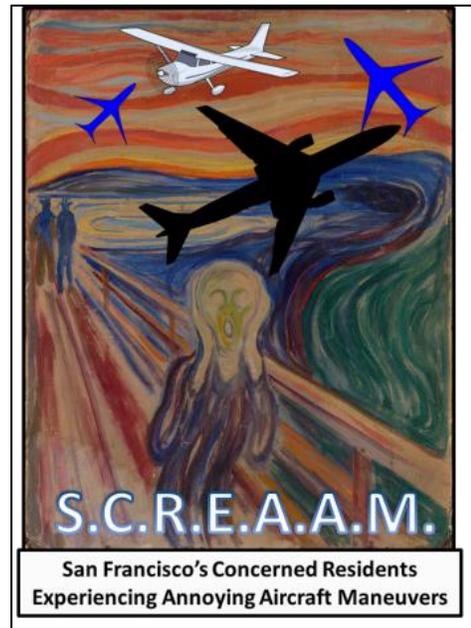


**Date: June 22, 2016**

**To: SFO Roundtable Members**  
c/o David Takashima  
(San Francisco Representative)

**From: S.C.R.E.A.A.M.**  
*San Francisco's Concerned Residents*  
*Experiencing Annoying Aircraft Maneuvers*



To Whom It May Concern:

**A group of San Francisco residents has formed an organization called S.C.R.E.A.A.M., which stands for “San Francisco’s Concerned Residents Experiencing Annoying Aircraft Maneuvers.”** Our objective is to work with the SFO Roundtable, Bay Area airports, the FAA, policy makers, airlines, and citizens to minimize the impact that air traffic has on the health and quality of life of San Francisco residents. We aim to represent the residential neighborhoods of San Francisco most impacted by the NextGen deployment, including Balboa Terrace, Bayview, Bernal Heights, Excelsior, Glen Park, Miraloma Park, Ingleside, Sunnyside, The Mission, Portola, Visitation Valley, West Portal, Westwood Highlands, Westwood Park, and any other San Francisco neighborhoods experiencing excessive jet noise.

**Our group lives in San Francisco- one of the greatest cities in the world - and we believe that our health and quality of life (and in particular, *the ability to sleep*) needs to be protected from unacceptable levels of commercial aircraft noise.** We have found that a mix of new technologies, new procedures, and economic pressures have recently introduced troublesome flight paths over our area that are simply too disruptive to *normal life* on the ground. Beyond the daily annoyance to several hundred thousand residents of San Francisco, we know that various major studies have concluded that aircraft noise negatively affects people’s health both in the short term and over the long term.

**We believe that some of these new, well-intentioned flight paths and unprecedented aircraft maneuvers need to be readjusted.** For example, we are seeing an unfair over-concentration of low-altitude commercial flights in “*conga-line style*” over some residential areas that we feel require re-examination and readjustment. We do realize that aircraft noise abatement is a complex issue and therefore aim to constructively work together with other stakeholders to efficiently and proactively improve local conditions.

**The purpose of this initial letter from S.C.R.E.A.A.M. to the SFO Roundtable is threefold:** (1) To formally **recognize the noise abatement work** previously done by various entities, (2) to share a few **general concerns about the situation** that we would like to see discussed further at SFO Roundtable meetings, and finally, (3) to share **a list of our specific requests** with the SFO Roundtable and ultimately with the FAA, SFO and OAK airports, and the airlines.

**Thank you in advance for allowing us to share our thoughts and requests with you.** Our requests may include such things as adjustments to aircraft altitudes, aircraft paths, aircraft frequency, etc. and these requests can be found at the end of this letter. Since S.C.R.E.A.A.M. aims to concentrate the opinions of many San Francisco residents, we hope that you find this letter to be useful and time-saving in your SFO Roundtable work to improve aircraft noise conditions over San Francisco.

## **Part One – Recognition of Previous Noise Abatement Work**

After researching jet noise issues for several months before forming our group, S.C.R.E.A.A.M. members became aware of the complexity involved in keeping a growing Metroplex full of aircraft *safe* – and have come to appreciate the work of these organizations:

- **The FAA – We acknowledge all of the work they do to keep everyone safe and secure in the air.** We also appreciate the cooperation and leadership that they have shown tackling the difficult quality of life issues for the communities affected by jet noise. We are particularly grateful that they have agreed to take into consideration the noise concerns expressed by our Bay Area community and are willing to re-visit their NextGen procedures. This makes sense since FAA website’s *Vision Statement* includes the following statements: “We strive to reach the next level of safety, efficiency, environmental responsibility and global leadership” but it also notes that “we are accountable to the American public and our stakeholders.”
- **SFO Airport and OAK Airport – Having well-run, world class airports nearby improves our lives.** We appreciate the leadership that SFO has shown in resolving issues for the community and providing tangible solutions, such as the assistance with insulation to 15,000+ residences. We also thank the SFO’s noise abatement team and personnel, who have been very helpful, positive and professional... and certainly have an increasing workload to deal with at the moment due to NextGen deployment issues.
- **SFO Round Table - We appreciate the difficulty of the challenge of listening to every concerned citizen with respect, while tackling the hours and hours of technical discussions and politics required to bring about real change.** They are an exemplary noise abatement organization and we appreciate the spirit of cooperation they have been fostering for years. In its 35<sup>th</sup> year and working as a volunteer group with a limited budget, these noise abatement pioneers have made a big difference over the years. We also thank consultant Cindy Gibbs for her professional explanations of the current challenges and various technical items at the SFO Roundtable Meetings. We also thank David Takashima, the new SFO Roundtable representative for San Francisco, who has been very responsive and helpful in helping us understand and navigate the noise abatement resources available.
- **Congresspersons Jackie Speier, Anna Eshoo, and Sam Farr - They have ensured that noise concerns related to the NextGen deployment at SFO and OAK are being addressed.** We very much appreciate the orchestration and enhanced communications they have enabled with the FAA.
- **All other organizations (like TRACON), the airlines that serve the SF Bay Area, and all of the individuals behind the scenes –** Many have also worked hard to keep everyone safe in the Bay Area’s Metroplex and fly as quietly as possible.

## **Part Two – General Concerns About the Situation**

- **The members of S.C.R.E.A.A.M. are concerned that the FAA is changing aircraft routes and altitudes without proper due process, notification and consideration.** For example, after decades of few jet noise disturbances in many of the neighborhoods we represent, San Francisco residents have had to suddenly deal with virtual “conga lines” of noisy airplanes. The FAA writes that “the intention was to provide a system of procedures which best minimized ground delays while complying with all safety criteria” but never satisfactorily addresses the noise situation on the ground. The proposed *FAA Community Accountability Act* would be one step in resolving this matter, which would require the FAA to work with local communities and limit noise impacts when planning and implementing new flight paths with NextGen. In the meanwhile, however, we frown upon the FAA’s ability to *ruin* a particular set of neighborhoods with commercial aircraft noise without due process, notification, and consideration. S.C.R.E.A.A.M will do its part to make sure that San Francisco residents’ concerns do not fall through the cracks going forward. We are hopeful that significant, positive changes can be made without massive protests or expensive legal action.
- **The members of S.C.R.E.A.A.M. are concerned that the *Airport Noise and Capacity Act of 1990* went too far in curtailing the ability of communities and airports to proactively curb NextGen aircraft noise.** We realize that this item is not under FAA or SFO’s direct control, but questions do arise like from San Francisco residents often, such as “How can municipalities not create curfews over their own airspace above dense residential zones? Why can’t airports just say *no* to airlines, at times? Or even dictate certain rules them?” S.C.R.E.A.A.M. members have become alarmed that those previously allowed concessions of 1990 are still in effect now, such as (1) virtually preventing large metropolitan centers from implementing curfews without difficult legal proceedings and (2) preventing airports from meddling too much in airline business. In short, any noise abatement group look to push back against this 1990 agreement that now haunts any residents looking to minimize aircraft noise over our homes, our property, and our community.
- **The members of S.C.R.E.A.A.M are concerned that the technology, equipment, and procedures currently being used to monitor aircraft noise (and make decisions based on those findings) may not *be good enough* to properly capture the annoyance factor that residents experience on a daily basis.** For example, we feel that what SFO, OAK, and the FAA consider to be a “bothersome” flight needs some redefining. Beyond instrument readings capturing industrial-level noise, people’s real life experiences need to be taken into consideration when addressing noise abatement. An improved system could also take other related factors into account, such as the time of day of the fly-overs, the base altitude of the homes in question, the topographical features of the neighborhoods in question, and the specific airplane maneuvers being attempted throughout the day and night (i.e., such as 180 degree turns or prolonged holding patterns).
- **The members of S.C.R.E.A.A.M. also find that there are shortcomings in the way jet noise complaints are captured in the current system.** The complaint form on the SFO Noise abatement website is difficult and cumbersome to fill out. Instead, residents rely on privately organized jet noise complaint websites that do not necessarily provide the data that the noise abatement teams need to accurately pinpoint offending flights. In short, the burden of identifying and describing offending flights has been left to the citizens on the ground, which hampers jet noise data collection and is unfair because we are not aviation experts.

- **The members of S.C.R.E.A.A.M. are also concerned with the lack of *recent* representation that San Francisco has had at the SFO Roundtable meetings.** We realize that the FAA, SFO, and the SFO Roundtable are not responsible for this situation. However, this is generally concerning to us for several reasons: (1) We feel that the city of San Francisco is not meeting its obligations to advocate for its citizens being inundated by jet noise. The City of San Francisco should keep the available spots for us at the SFO Roundtable filled. We worry that the concerns of San Francisco residents have not been trickling up into the SFO Roundtable members; (2) We are also concerned that San Francisco’s residents may complain less than other municipalities due to the demographics of its resident population. Jet noise complaint websites and applications might not be accessible in languages (Spanish, Chinese, etc.) that our residents use as their first language. In addition, meetings are often scheduled at times and in places that are hard to reach by many lower income and working SF residents. In short, you only hear from a small subset of the local residents being affected by the jet noise; (3) We are also concerned that the Bay Area-wide focus of the SFO Roundtable might be too broad to represent the specific needs of our area of San Francisco. For example, a two or three minute San Francisco comment at a busy SFO Roundtable meeting does not allow enough interaction for more formal, *thoughtful* requests for change. Instead, meetings are more designed to allow residents from many corners of the Bay Area to vent general frustrations; (4) We also want to ensure that the interests of San Francisco residents are equitably considered when making any changes that may bring further increases in jet noise to the Metroplex. In other words, we want to avoid the possibility of more planes moving from municipalities with *consistent* SFO Roundtable representation to municipalities without consistent SFO Roundtable representation. Luckily, we now have a concerned, active representative David Takashima representing San Francisco and we are confident that, through him, our voices will be heard – particularly during this time-sensitive, critical period where the FAA is taking another look at feasible changes within NextGen deployment parameters.

### **Part Three – Specific Requests**

**These requests are submitted on behalf of San Francisco residents and S.C.R.E.A.A.M. to the FAA, SFO, OAK, and airlines... via the SFO Roundtable.** Please note that: (1) Most or all of our concerns and specific requests are within the *feasible items* the FAA outlined. (2) Most or all of our concerns and specific requests are related to *Departures*. (3) Most of our concerns intricately related to the *altitude* of the jets. As a general rule, anything under 9,000 ft.-12,000 ft. begins to disrupt regular life over our residential areas. Specifically, we request that you look into revising the SSTIK and CNDEL flight paths over San Francisco.

**Drilling down into the actual flight data, we find some important insights about the biggest sources of jet noise over our area of San Francisco.** Of all flights in a 3 month period (March 2016 through May 2016) that flew near the central area (zip code 94127) under 8,500 feet, we find that 69% of them were SSTIK maneuver (out of SFO), 27% were CNDEL maneuver (out of OAK), and only 4% were other procedures. However, please note that though 96% of bothersome maneuvers were SSTIK and CNDEL, the remaining 4% of other procedures/flights does include some *exceptionally* loud flights.

**To summarize, we find the flights over our area to be “too low, too loud, and too often.”** We request you please either: (A) go back to the way things were as soon as possible, or (B) fix the parameters of the current NextGen deployment as soon as possible, with a particular focus on the SSTIK and CNDEL ground tracks and altitudes.

**If you decide to go back to the way things were or the previous system (whatever was in place before NextGen deployment of 2015 where we did not experience unacceptable commercial aircraft noise), we will thank you...** and that should alleviate our current concerns to a large degree. However, if that option is just not available anymore and if you decide to fix the current system, here are our group's top requests (many of which have deemed are potentially feasible) for your consideration:

**1 –Go around our area...** Reroute SSTIK and CNDEL flights. Use the SF Bay and the Pacific Ocean more. Fly over water instead of land to avoid residential areas altogether. Tighten the waypoints to ensure this happens. (For example, have the SSTIK flights make a tighter turn to fly over San Bruno / Guadalupe Canyon Parkway. Another example is to have CNDEL flights fly further north, which might even make things safer as it keeps the SSTIK and CNDEL paths further apart.)

**2 – ...or go way up into the sky, when crossing our area.** If you are going to cross residential San Francisco, then go way up to 9,000 to 12,000 feet before flying over the area. (For example, by moving the incoming Pt. Reyes arrivals out to sea or changing their altitude, perhaps the SSTIK flights can achieve much higher altitudes before their noisy U-turns over San Francisco. Or by increasing the altitude on the *arrival* procedures sharing the same airspace as SSTIK and CNDEL, it could allow more airspace for the SSTIK and CNDEL to fly much higher over our area.

**3- Fly over the area less often.** The frequency of flights needs to be examined and minimized over our residential neighborhoods. Consider a lower daily limit to the number of flights in any 24 hour period over the area. (For example, do not prioritize SSTIK and CNDEL departures over other feasible departures; instead prioritize other maneuvers and runways that maximize time spent over water before reaching 9,000 to 12,000 feet. If possible, implement a procedure for southbound SFO departures on runway 1 that turn right instead of left after taking off and hit new waypoint parameters.)

**4 – Do not fly over us at all while we are sleep.** Do not fly over our area from 10pm-8am, unless you are at 9,000 ft. to 12,000 ft. (For example, being to use the NIITE, ODO operations on runway 10 and any new, yet-to-be-determined nighttime procedures way more, which would avoid our area and fly down the SF Bay or up and around the Golden Gate Bridge instead.)

**5 – As a general rule, consider (a) concentrating jets when over water and unpopulated areas** and then only if necessary, (b) **dispersing them to the maximum when over residential areas...** so that the peace of particular neighborhoods is not disproportionately affected or unfairly ruined. In short, there should be no “highways in the sky” over residential areas. (For example, currently both SSTIK and CNDEL fly over the southern parts of San Francisco. Moving SSTIK southward or CNDEL northward would distribute noise more equitably over the San Francisco area.)

**6 – Fly quieter.** Comply with HUSH procedures/technology and other techniques to reduce noise while flying over the area. Again, the most obvious way to do this is to dramatically increase altitudes on these procedures by the time they make landfall. Otherwise, the noise levels In short, the current design of the NextGen system is not working for San Francisco residents, with its hundreds of aircraft per day “ducking” out of the Bay Area and under the arriving flights. This causes “hellish conditions,” as one resident described it. Consider moving particularly noisy maneuvers when over land, such U-turns with lots of departure thrust at low altitudes (2000-9000 feet), which are of particular concern as they magnify the duration of the noise and create multi-directional noise.

**7- Give us the ability to formally request a modification to specific aircraft routes for the worst 10% of offenders** (i.e., the loudest and most annoying flights)... We find that there are a handful of exceptional, super-noise-offenders (like Hawaiian HA11 and others). The ability to modify routes on these low-hanging-fruit-flights will translate into some short-term wins while you are working on bigger, longer term noise abatement decisions. (Consider this: If non-technical San Francisco residents on the ground with no travel plans and no interest in aviation specifics know particular flight numbers by heart, there is probably a serious problem to rectify.)

**8 – As long as it is safe, now that we have NextGen satellite navigation, experiment with relaxing some of the most conservative safety criteria that make the Metroplex difficult to optimize, such as the safety distances between planes.** This might enable the FAA to redo the flight paths in such a way that the SF Bay itself is used more often, and might allow several other new routes to move over the water.

**9 – Improve communications with us.** Increase transparency by informing us of why flight paths were changed and provide rationales for policy decisions going forward. Make it easier to log noise complaint data by creating your own official SFO/FAA *one-click complaint* jet noise website with GPS capabilities (or a similarly easy-to-use application) that reveals the most affected areas or the most annoying individual flights over our area.

**10 – Offer compensation to affected areas.** For remaining unavoidable noise situations, compensate residents for the intrusion ultimately caused of this increase in business by the airports and airlines. Consider restarting programs like noise insulation rebates for any areas of San Francisco that you agree are being unfairly treated.

**We have done the best we can in representing San Francisco’s jet noise concerns and requests.** We are interested in continuing to peacefully live in our world-class city of San Francisco, with our world-class airports handy, with safety in the skies -- but we are also definitely interested in protecting the health and quality of life of our residents on the ground.

**We look forward to any formal responses to this letter from the SFO Roundtable, as well as any additional responses from SFO airport, OAK airport, the FAA, the airlines, and related entities.** Please let us know of any inaccuracies in the facts, figures, and comments we have presented in this letter. Once again, we thank you for your patient understanding and look forward to working with the all stakeholders to improve the currently unacceptable jet noise situation over San Francisco’s residential neighborhoods as soon as possible.

Sincerely,

**The Members of S.C.R.E.A.A.M.**

San Francisco, California, USA

[www.screaam.org](http://www.screaam.org)

*(Note: Specific contact information for responding to this letter will be provided separately to the SFO RoundTable)*

*SCREAAAM Letter for SFO Roundtable Jun 22 2016 v10\_Final*