

Responses from FAA - Neighbor Meeting with FAA and Airport Management and Neighborhood Follow Up Questions:**Question #1 to FAA:**

In 2020, the STS Airport Manager sent out a letter to pilots asking for compliance with the Noise Abatement by implementing a standardized stable visual approach to Runway 14 and using the Western Approach instrument approach as often as possible. This route was approved previously by the FAA and championed by then Sonoma County Supervisor McGuire. What is the status of the standardized stable visual approach to Runway 14? Some planes do currently use it, including Alaska Airlines, but infrequently.

FAA Initial Response:

STS does not have a Standard Visual Approach nor a “western approach.” There is an RNAV (GPS) RWY 14 approach that is offset 15 degrees west of the centerline that some may refer to as a “western approach.” There is currently a Visual Approach procedure under development by the FAA that is scheduled for release in April 2023. STS Airport has hired a consultant firm to create various approaches based on previous meetings with neighboring communities.

Follow-Up Question: What is the name for the approach that we and Airport website have called the ‘Western Approach’ since Rep. Mike McGuire negotiated it prior to approval of the STS airport expansion? The FAA and the STS airport have used the term RNAV (GPS) RWY 14, but it sounds like a typifying term rather than a unique name. This seems really confusing to us. Can the airport /FAA come up with a clearer and more distinct name for this approach? If there is currently no "visual approach", and most planes are not using the RNAV (GPS) RWY 14, then what are they using to land?

FAA Response:

Note: The publication date for the Charted Visual Approach procedure for RWY 14, mentioned in our first response, has changed to January 25, 2024. The procedure is currently under review by the FAA Air Traffic Organization (ATO).

The airport manager will need to provide clarity as to what is being referred to as the “Western Approach.” There is no approach that STS Airport Traffic Control Tower (ATCT) refers to locally as the “Western Approach.”

FAA flight procedures are named in accordance with agency rules and regulations; therefore, we are not able to change the name. Pilots that are operating under Instrument Flight Rules (IFR) have the option to request to fly a visual approach, this does not have to be charted for them to request or fly it.

Question #2 to FAA:

What percent of Alaska Airline flights use the western approach? They were supposed to be the first and easiest airline to adopt it.

FAA Initial Response:

Alaska, Horizon, and SkyWest comprise roughly 65% of Air Carrier traffic at STS. During Visual Flight

Rules (VFR) operations, the majority of Air Carrier flights that land on Runway 14 are cleared on a visual approach. According to several of the airline pilots who fly into STS and have regular communication with the tower, pilots are instructed by their companies to fly the RNAV (GPS) RWY 14 flight path if they are unfamiliar with the terrain and airport.

After a recent meeting with Oakland Air Route Traffic Control Center (ZOA), STS, and Airlines flying into STS, the pilots will now advise the tower when they are tracking the RNAV (GPS) RWY 14 flight path. Several pilots have advised that the RNAV (GPS) RWY 14 track will afford a stabilized approach versus hand flying the straight-in approach.

Follow-Up Question: As of today, what percent of pilots at STS are using that flight path? If they are, it is on a voluntary basis? It sounds like we are being told that the pilots are instructed by the airlines only to use the RNAV (GPS) RWY 14 if they are unfamiliar with the airport. Is this true? In our neighborhood, we have experienced no lessening of airport traffic/noise since the ZOA meeting in Oakland.

FAA Response:

When Air Carrier pilots are cleared for a visual approach, they will either utilize the RNAV14 approach, which is offset 15 degrees west of centerline or if they are familiar with the airport and terrain, they will line up on the runway centerline. Airline pilots that have not flown into STS will routinely fly the RNAV14 profile even when they are cleared for a visual approach.

If an aircraft is operating under Instrument Flight Rules (IFR) they must fly the approach clearance that Air Traffic Control (ATC) issues to them. All air carriers operate under IFR rules. ATC will issue different approach clearances based on several factors including weather, other air traffic, and pilot requests. When ATC issues a visual approach, it is up to the pilot to line up with the runway and descend at the appropriate time and rate based on the pilot's visual observations of the airport and runway. According to several of the airline pilots who fly into STS, they are instructed by their companies to fly the RNAV (GPS) RWY 14 flight path if they have been cleared for a visual approach and they are unfamiliar with the terrain and airport. The meeting at ZOA with the airlines was to discuss ways STS could get more correct/complete information from airline pilots about the approach they will be flying and was not to create noise abatement procedures. There was also no determination at that meeting that some neighborhoods would see a reduction in airport traffic and/or noise.

Question #3 to FAA

Can the control tower remind jets of the western approach when they are contacted for landing instructions?

FAA Initial Response:

ZOA (Oakland Air Route Traffic Control Center) is responsible for issuing an approach clearance to aircraft landing at STS. They can issue the RNAV (GPS) RWY 14 approach if there is an operational advantage or if the pilot requests it.

Follow-Up Question: It sounds like we are being told that ZOA (Oakland Air Route Traffic Control Center) can "issue the RNAV (GPS) RWY 14 approach" if there is an "operational advantage". Why were we never informed of this before, and if this was known at the time we were told about the western

approach, how is it ethical that we were told that it would be used enough to reduce noise in our neighborhood? So, air traffic at STS is controlled by ZOA in Oakland? Is it all aircraft or just certain types?

FAA Response:

The FAA's primary responsibility is the safety of aircraft. If clearing an aircraft on the RNAV (GPS) RWY 14 approach procedure would cause a safety issue of any kind, such as sequencing, weather, or other traffic deemed to create a safety issue, an "operational advantage" no longer exists, and the aircraft would need to be placed on alternative routing. This is common and prevalent throughout the National Airspace System and is designed to ensure the safety of flight.

Oakland Air Route Traffic Control Center (ZOA) is responsible for all instrument flight rules (IFR) aircraft into and out of Charles M. Schulz - Sonoma County Airport (STS) when they are not with the STS airport traffic control tower.

Question #4 to FAA

Has the FAA gathered noise data under the flight path to assure compliance with the 55 dBA maximum required for residential areas by the Town of Windsor in their General Plan?

FAA Initial Response:

Typical scenarios for the conduct of noise analyses are National Environmental Policy Act studies for specific proposals or the conduct of 14 Code of Federal Regulations (CFR) Part 150 (Part 150) studies. In Part 150 studies, it is the Airport Sponsor, rather than the FAA, who conducts the study for FAA consideration.

The Town of Windsor's 55 dBA is a local - general plan threshold. The responsibility for determining the acceptable and permissible land use is a local decision. The federal land use compatibility guidelines consider any land use outside the CNEL 65 dB contour as compatible in terms of airport noise.

The FAA SFO-Airports District Office (ADO) recommended and offered support to Sonoma County for the conduct of Part 150, Noise Compatibility Planning to establish the Community Noise Equivalent Level (CNEL) 75, 70, and 65 decibel (dB) contours for the Charles M. Schulz – Sonoma County Airport.

The establishment of the Noise Exposure Maps within a Part 150 Study would assist the County with its land use planning communication with neighboring communities, such as the Town of Windsor. Conduct of a Part 150 Study is voluntary and to date, the County has chosen not to proceed with a study.

Follow-Up Question: Why has the County not done studies to determine the actual noise impacts from the airport? The FAA also states. "The federal land use compatibility guidelines consider any land use outside the CNEL 65 dB contour as compatible in terms of airport noise." So that would mean that decibel levels measured at 89+ would not be acceptable, even using Federal standards, over residential neighborhoods two and a half miles from the airport. Why that being is so flagrantly violated?

FAA Response:

With respect to your question concerning why studies have not been done, it is the airport sponsor's role (in this case the County) to pursue noise related studies and determine noise impacts from the airport. It is unclear whether the 89+ decibel reference is a single event level or based on the CNEL noise level – which is yearly day/night average sound levels.

Part 150 established the “day-night average sound level” (DNL) as the noise metric for determining the exposure of individuals to aircraft noise. It identifies residential land uses as being normally compatible with noise levels below DNL 65 decibels (dB).

Question #5 to FAA

What is being done by the FAA to reduce noise pollution in the landing and takeoff paths?

FAA Initial Response:

The FAA, through the Continuous Lower Energy, Emissions, and Noise (CLEEN) Program, is partnering with industry to research and develop new aircraft technologies that reduce noise at the source, where it is generated by the aircraft itself. Historically, advances in aircraft technology have been the main factor in reducing aviation's environmental impact, including noise. Since 1975, the number of people exposed to significant noise in the U.S. has dropped from 7 million to less than half a million, at the same time as passenger enplanements have increased almost 5 times. This noise reduction was largely driven by new aircraft technologies.

The FAA has invested over \$225M in environmental aircraft technologies under CLEEN since 2010, and that funding has been matched by industry partners. In 2021, we awarded a third phase of the program to develop additional noise, emissions, and fuel burn reduction technologies. At the conclusion of research and development under CLEEN, noise reduction technologies have been tested, have demonstrated their benefits, and are ready for incorporation into future engine and aircraft designs, to realize their benefits flying in the National Airspace System. Noise reduction technologies from the first phase of CLEEN, developed from 2010 through 2015, are estimated to reduce the land area exposed to significant noise by 14% by 2050. Subsequent phases of CLEEN are expected to build upon these benefits.

Follow-Up Question:

Please answer our question directly as it relates to our neighborhood. This answer really has nothing do with our airport—our noise levels have increased spectacularly in recent years. What are you going to do in the next 6 months to solve the airport noise problems from the STS airport?

FAA Response:

The FAA does not own airports, therefore local airport sponsors are responsible for identifying and proposing actions designed to reduce the effect of noise on residents of the surrounding area. To assist airport sponsors, the FAA offers the Part 150 program as a way to support airport sponsors should they wish to consider noise impacts around airports and implement noise mitigating measures.

The Part 150 process is a voluntary program and consists of two steps, development of a Noise Exposure Map (NEM), which identifies noise impacted parts of the community near an airport and the Noise Compatibility Program (NCP), which identifies the mitigation measures the airport sponsor wishes to

implement. Through the Part 150 process, the FAA will work with an airport sponsor to review and possibly accommodate noise abatement procedures proposals, provided that the proposed noise abatement procedures can be accomplished safely and do not compromise aircraft performance standards. Completing a Part 150 NCP allows the airport sponsor to seek federal funds to support its approved NCP measures.

In addition to the above, please note that to ensure compatible land uses around airports, FAA encourages airport sponsors to work with local jurisdictions responsible for zoning to avoid building residential units near an airport. The State of California has a statute requiring the establishment of an Airport Land Use Commission (ALUC) that provides oversight necessary to ensure compatible land uses around airports. We recommend that you contact Caltrans if you would like more information on ALUCs.

Question #6 to FAA

What compensation does the FAA provide to compensate for noise pollution that was supposed to be mitigated as a condition of expanding the STS runways?

FAA Initial Response:

The Finding of No Significant Impact/Record of Decision dated, July 19, 2013, and the Final Environmental Assessment (July 2013) for the Proposed Runway Safety Area Improvements and Other Near-Term Airport Improvements identified no noise-sensitive land uses within the CNEL 65 dB noise contour for that proposed project for the years 2014 and 2019. It was determined that the Proposed Action would not cause any significant noise impacts and no mitigation was required.

Follow Up Question:

Does this finding of "no significant impact" include the runway extension and the large jets that would be landing consequently? Given that we are having significant noise impacts (89 decibels day and night) in our neighborhood, nine years after the adoption of this Final Environmental Assessment, what does that mean? The Assessment was obviously and spectacularly incorrect. It calls into question either the competence or the integrity of the people who made the finding. What can be done to fix this inaccurate Final Environmental Assessment from 2013 on paper and on the ground? Everyone agrees that there is a significant noise problem in the Wellington neighborhood currently. What compensation can the airport provide to all those impacted to mitigate this significant impact?

FAA Response:

The Finding of No Significant Impact included the runway extension as part of Phase II of the proposed project.

As stated in our initial response, improvements and Other Near-Term Airport Improvements identified no noise-sensitive land uses within the CNEL 65 dB noise contour for the years 2014 and 2019. The FAA's decision on the proposed project considered aircraft (current and future) anticipated at the time of the study and is valid given what was known. Because airlines may have made different decisions on fleet mixes since our study was completed it is possible that the aircraft fleet mix may have changed. Many newer aircraft have become quieter, so it is unclear whether an aircraft fleet change has resulted in more noise around the airport. One way for an airport sponsor to validate potential noise impacts is to consider FAA's voluntary Part 150 program.

With regards to the 89-decibel referenced above, it is unclear to the FAA whether the 89-decibel reference is a single event level or based on the CNEL noise level – which is yearly day-night average sound levels.

Question #7 to FAA

What is the update on new sensor information to avoid the radar delay caused by the relay from Mt Tam?

FAA Initial Response:

The Mill Valley Radar (QMV) does not always provide thorough radar coverage below 400 feet in the STS area. ZOA will adjust operations as needed to account for the radar coverage. The STS Airport Manager has requested information on what a new radar sensor would provide better coverage and how that would improve air traffic control services. The Airport Manager has also advised that the Airport would consider utilizing a Consultant Firm to request a new sensor at STS. This has been discussed briefly at one or two Airport Commissioner's meetings.

Follow Up Question:

At this point has the Airport Manager finally hired a consultant firm to request a new sensor at STS?

FAA Response:

The airport sponsor is the appropriate party to respond to this question.

Questions #8 & #10 - not included

Question #9 to FAA

Can the Western Approach be used for take-offs that go north?

FAA Initial Response:

If the "Western Approach" refers to the RNAV (GPS) RWY 14 approach, this can only be used for arriving aircraft because it is designed as an approach procedure, not a departure procedure. STS has a radar vector departure that can be assigned to departures when needed. This departure procedure has a range of headings that can be assigned on departure, from the SE to the NW.

Follow Up Question:

On an irregular basis, the airport flips the takeoff and landing directions. When this happens, those departure flights also track directly over our houses. Can those planes be told to use a more westerly approach to avoid our neighborhood?

FAA Response:

Departure and arrival direction from the airport is a safety issue that is generally dictated by the surface winds at the airport surface. The westerly approach is for aircraft that are arriving at an airport, therefore aircraft departing from the airport cannot fly the same path.

Question #11 to FAA

We would like to have a rundown of all the things the county can and can't legally do relative to this issue of noise abatement via the Western Approach and other means.

FAA Initial Response:

The County can conduct a Part 150 Study to engage the local communities, airport users, and fixed-based operators in a land compatibility planning process, including the establishment of voluntary measures with its users to minimize noise contributions where possible. An airport sponsor can consider the implementation of noise and access restrictions under 14 CFR Part 161.

This may be effective only if the restriction is agreed to by the airport sponsor, all current operators that would be affected by the restriction, and all aircraft operators that will be affected by the restriction and will be serving the airport within 180 days of the proposed restriction. Additionally, a proponent may seek approval for a noise or access restriction per Subpart D of 14 CFR Part 161 (Part 161 study) and must demonstrate:

- The restriction is reasonable, non-arbitrary, and non-discriminatory.
- The restriction does not create an undue burden on interstate or foreign commerce;
- The proposed restriction maintains safe and efficient use of navigable airspace;
- The proposed restriction does not conflict with any existing Federal statute or regulation;
- The applicant has provided adequate opportunity for public comment on the proposed restriction;
- and
- The proposed restriction does not create an undue burden on the national aviation system. 21 airport sponsors have undertaken a Part 161 study and none have met the conditions described above.

Sonoma County is embarking on a study that will consider a reduction in minimums to Runway 14/32 and the establishment of a Category II Instrument Landing System (ILS) approach and potential new “mid-point” PC based – Runway Visual Range System.

The proposed contract for study was approved by the County Board on August 9, 2022. The study will evaluate a variety of techniques that can be used for safe arrival to the runway, which may result in noise benefits. The Airport will also include public outreach at the beginning of the study to receive community feedback, and once the study is complete to share the recommendations.

Follow-Up Question:

It sounds like the airport can't really do anything about the noise from landings and take-offs without the cooperation of the airlines, and there doesn't appear to be any way to incentivize the airlines to comply. We have some more specific questions that I would like to ask on this subject, which you can see below. These are yes or no questions.

11 (1). Can the airport restrict the scheduling of flights in and out of the airport? For example, can the airport require all commercial flights to be scheduled between the hours of 9:00am and 5:00pm?

FAA Response #11 (1):

No. Any airport sponsor proposed access and/or noise restriction would be subject to the Airport Noise and Capacity Act of 1990 and would require a 14 C.F.R. Part 161 study as referenced above.

11 (2). Can the airport require that commercial airlines use the more western approach RNAV (GPS) RWY 14 (safety permitting) as a condition of using the airport?

FAA Response #11 (2):

The airport sponsor is the appropriate party for this question.

11 (3). Can the airport impose, investigate, and enforce noise limits regarding the types of planes used, and the way that they are operated?

FAA Response #11 (3):

See response to 11 (1) above.

11 (4). Can the airport impose fines or other penalties on airlines or pilots that don't follow the airport rules?

FAA Response #11 (4):

Many airport sponsors have rules pertaining to leaseholds, fees, etc., for tenants that are enforceable. However, we assume that your question pertains to noise abatement and not normal airport operation rules.

The airport sponsor can propose voluntary noise abatement procedures and can seek user support to comply with said voluntary procedures. Since these noise abatement procedures are voluntary, the airport sponsor cannot impose or enforce fines for violators. Because of this, some airport sponsors choose to use information obtained through a Part 150 study to consider nondiscriminatory incentives to encourage voluntary compliance by users. In this case, the FAA is willing to review the proposed incentives to ensure that they are nondiscriminatory and are in compliance with federal aviation directives.

11 (5). Can the airport limit the scheduling of flights to and from specific destinations?

FAA Response #11 (5):

See response to 11 (1) above.

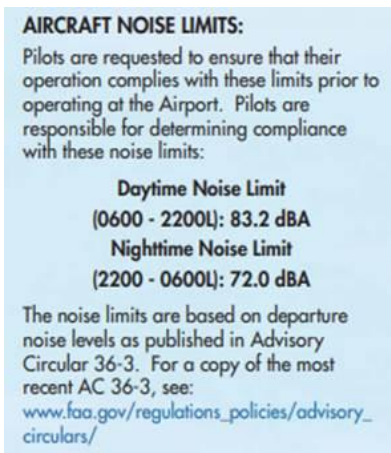
11 (6). What assurance do we have that the new flight paths/patterns coming in 24 months will be adhered to by the airlines, and what assurance do we have that they will reduce noise for us?

FAA Response #11 (6):

This question is vague. Without knowing the procedure(s) in question, we are unable to answer the question.

Post FAA Meeting Question #12 to FAA:

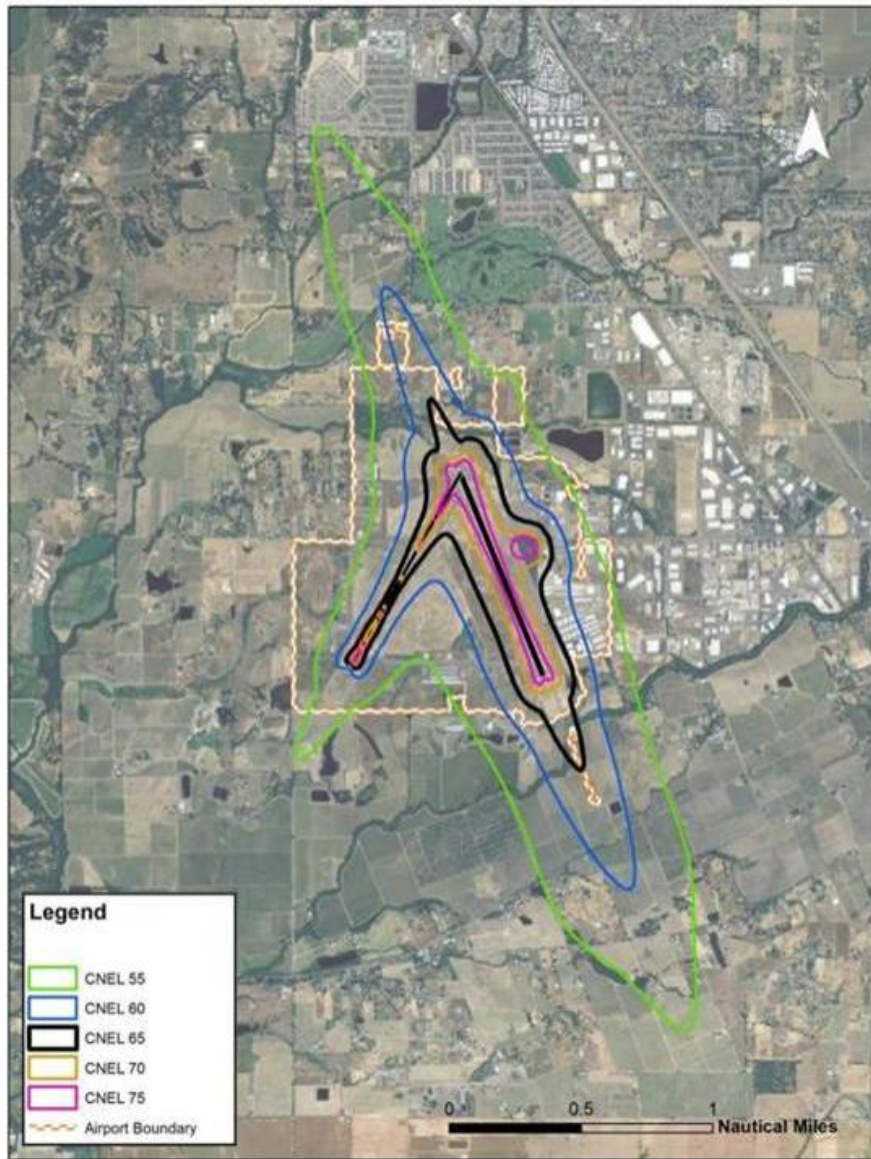
Readings of 89 decibels are an everyday occurrence in our neighborhood while the STS airport itself lists 83.2 decibels as its daytime noise level limit. See image below from the STS airport website. Please explain.



Follow-Up Question:

So, 2.5 miles from the airport (Wellington Circle) is in the landing zone and not in the ambient noise zone? Why is this not shown on the Airport Noise Map below? (Vintana is on the northern edge of the green CNEL 55. Wellington Circle is off this map to the north.) Please give us the updated noise contour map as this one is from 2009, especially showing the 89+ decibel readings in the Wellington Circle area.

Figure 3.10-1
2009 CNEL CONTOURS



SOURCE: MGA/L&B, 2011
PREPARED BY: MGA/L&B, 2011

FAA Response:

The sources of the figure above is unclear. It is the airport sponsor's role to pursue noise related studies and determine noise impacts from the airport.

Post meeting Question #13 to FAA:

There is an arrival flight that now routinely comes over our houses on Wellington Circle after 10 pm at night. It is low and loud, 89+ decibels, just like in the daytime and in summer and fall we all have our windows open to keep the house cool, so this loud and low jet wakes us up out of a sound sleep. Is a flight that low and loud and late even allowed? What can be done to eliminate this gross violation of the

airport Noise Limits?

From the airport website (see previous page), the decibel levels allowed are Nighttime: 10 pm to 6 am = 72 decibels.

FAA Response:

Neither the airport nor the FAA have the authority to dictate airline schedules or operation hours for a particular airport. Given the scenario presented in the question, the airport sponsor would be the appropriate party to address this question. Should the airport sponsor wish to pursue a Part 150 study and develop an NCP to implement mitigation measures, the FAA would provide technical and possibly financial support for the study.

Post meeting Question #14 to FAA:

Has STS considered the noise abatement procedures that other airports have adopted such as SFO?

<https://www.flysfo.com/about/community-noise/noise-office/making-sfo-quieter/noise-abatement-procedures>

FAA Response:

The airport sponsor is the appropriate party for this question.

Post meeting Question #15 to FAA:

Does STS have a contingency plan for debris or crashes into neighborhoods in the runway path?

FAA Response:

FAA does require Part 139 certificated airports, such as STS, to have emergency plans for various situations. The airport sponsor is the appropriate party for this question.

Post meeting Question #16 to FAA:

What is the financial benefit that the STS airport is receiving from contracts with airlines that fly the large commercial jets that are severely, and per the Final Environmental Assessment (July 2013) - unexpectedly- impacting our neighborhood? What has been the increase in STS financial revenue from commercial jet traffic utilizing STS between 2013 (when the prop planes were not creating these noise impacts) to 2022? Please provide us copies of current contracts/fee agreements with your current carriers that identify fees and revenue from 2013 to today or give us a link to that information.

FAA Response:

The FAA does not require or track this information. The airport sponsor is the appropriate party for this question.