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Subject: Draft State ALUC Planning Handbook

Ron,

This is just an unofficial comment regarding your draft State ALUC Planning Handbook.....just a suggestion, and no need to respond.

I am Chair of the Southern California Association of Gov'ts Aviation Technical Advisory Committee (ATAC). After our last meeting, several members were discussing airport land use, and all agreed that 65 CNEL (and even 60 CNEL) in many cases is not a great metric for estimated potential community opposition/complaints regarding aircraft noise. I read through the draft updated Handbook, and it is an excellent document. It accurately states the legal guidelines regarding airport land use compatibility, and also gives significant "air time" to the reality that "compatible land use" (e.g. neighborhoods outside of 65 CNEL or even 60 CNEL footprints) does not guarantee that residents will not feel impacted by airport-related noise.

For those serving on ALUCs, planning commissions, and city councils or boards of supervisors, it is important for them to understand this "outside 65 CNEL sensitivity", when making land use decisions. We ATAC members involved in the "after-meeting" discussion all agreed that the vast majority of complaints regarding aircraft noise come from residents living well outside the 65 CNEL noise contour. It was suggested, and I am passing it on to you, that some examples of actual airports' noise contours, with complaint overlays (similar to what you have done with accident contours), would be a good visual for education purposes, in addition to the verbiage already provided in the document. I am sure that many airports (Long Beach Airport being one) with automated flight and complaint tracking systems could easily provide you with some examples (plot maps) of how complaint locations vastly exceed the criterion CNEL contour areas (they relate more to flight track and SEL variables).

As I stated, the draft document text deals well with this problem, but a good "visual" or two might help land use planners and decision makers better understand airport land use realities.

Nice work!

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