

Appendices

Appendix 1: Letters

Gary M. Kunz, Chairman  
East Columbia Neighborhood Association  
8105 N Brandon Avenue  
Portland, OR 97217

Mr. Phil Stenstrom  
Manager, Aviation Noise Program  
Portland International Airport  
7000 NE Airport Way  
Portland, OR 97218

4/15/2017

Dear Phil,

I'm writing to inform you that the East Columbia Neighborhood Association is going on record opposing the increased frequency, allowable hours, and expansion to runways 10 R and 10 L of the ANG overhead approach practice maneuvers.

Areas to the west of PDX are heavily residential and we believe the proposed maneuvers will negatively impact the livability of our neighborhood. To this end we have created a petition and intend to gather signatures to demonstrate community support for our position.

I look forward to discussing this matter with you and representatives of the CNAC, FAA, and ANG.

Sincerely,

  
Gary M. Kunz, Chairman  
East Columbia Neighborhood Association

Appendices

**CENTRAL NORTHEAST NEIGHBORS, INC.**

4415 NE 87<sup>th</sup> Ave \* Portland, OR 97220-4901  
503-823-3156

January 3, 2018

Douglas Fasching, Board President  
Central Northeast Neighbors  
4415 NE 87<sup>th</sup> Ave  
Portland, OR 97220

Mr. Vince Granato  
PDX Chief Operating Officer  
Port of Portland  
7200 N.E. Airport Way  
Portland, OR 97218

Dear Mr. Granato,

Currently, the Oregon Air National Guard (ORANG) conducts its Continuous Descent Approach (CDA) exercises Monday through Friday from 9am to 5pm. It is now requesting approval to expand this allowed time to include all daylight hours seven days a week. On behalf of the Central Northeast Neighbors (CNN) coalition, I am writing to ask your support in opposing this proposed expansion.

The residents surrounding the airbase have already experienced the impact of this proposed change first hand. With the support of the Citizen Noise Advisory Committee (CNAC), ORANG conducted a six-month trial period of this proposed expansion. This temporary deviation from the original agreement allowed all of the residents of the impacted neighborhoods to see the ramifications of the proposed changes and it gave them pause. Additionally, the original agreement was that the aircraft were to fly north of Columbia Boulevard, however during the trial many planes flew directly over the CNN office which is on NE Sandy Boulevard.

At the September 12<sup>th</sup>, 2017 meeting, the Cully Association of Neighbors moved to “oppose the expansion of the National Guard continuous descent approach as outlined in the expansion proposal,” (Please see attached minutes).



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At our October 2017 Board Meeting, Cully residents Erwin Bergman and Kathy Fuerstenau gave a presentation voicing their concerns with Air National Guard flight patterns. Included in their presentation was the impact to the surrounding neighborhoods of this proposed expansion including potentially harmful noise levels. It was at this meeting that the CNN Board voted unanimously to oppose the proposed expansion (Please see attached minutes).

In conclusion, I ask you to join the CNN coalition and the Cully Association of Neighbors to oppose the proposed expansion by the Air National Guard.

Thank you for your attention to this very important matter.

Sincerely,

A handwritten signature in blue ink, appearing to read 'D. Fasching', written in a cursive style.

Doug Fasching, Central Northeast Neighbors, Board President

cc. Laura Young, President Cully Association of Neighbors  
Port of Portland CNAC  
Oregon Air National Guard

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May 4, 2017

To Whom It May Concern:

We have recently learned that the Oregon Air National Guard intends to fly twice the number of F-15 jets over the East Columbia Neighborhood, at low elevations, for extended hours. Our company would like to go on record opposing the increased frequency, allowable hours, and expansion to runways 10 R and 10 L of the ANGI overhead approach practice maneuvers. We oppose these measures as the jets would be flying very low directly over the Columbia River RV Park, a business that we own and operate.

We believe that the additional noise would severely hurt our profits and current patrons. As it stands, the jets are one of the most common complaints we get from people staying in our park. People stay in our park to enjoy a peaceful atmosphere while they vacation in the city. The jets are a harsh disruption to that enjoyment. The noise itself is disturbing enough but, the jets also cause the RV's to shake and rattle. Once word gets out that the jets are flying low overhead, from sunrise to sunset, 7 days a week, no one will want to stay in our park.

We ask that the Oregon Air National Guard not implement this plan now, or ever. The current plan would hurt our business and bother our patrons.

Thank you,

  
Delta Management Co. LLC

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To: Mr. Vince Granato  
PDX Chief Operating Officer

Dear Mr. Granato,

The Cully Association of Neighbors (CAN) encourages you to reject the Air National Guard (ANG) request to expand the scope of its Continuous Descent Approach (CDA) at PDX. At the September 12, 2017 CAN meeting we unanimously voted to oppose the proposed CDA expansion for a 6 month trial period and not to make it permanent.

**CAN ASKS YOU THEREFORE: NOT TO ALLOW CDAS ON WEEKENDS. NOT TO ALLOW CDAS BEFORE 9:00 AM AND NOT AFTER 5:00 PM. NOT TO ALLOW VISITING ANG UNITS TO FLY CDAS.**

By approving this CDA expansion you, PDX. would be trading away the quality of life of CAN residents as an offset for a tighter jet fuel budget. Redmond and K. Falls, both considerably less populated than the Portland Metropolitan areas, should be the least disruptive and most appropriate locations for PDX ANG. Certainly visiting units should be directed there.

To CAN it appears further as a total absence of sensitivity by the ANG to invite other ANG units to come to PDX and fly CDAs after over 8 years of complaints and opposition to the CDA by residents. At a previous September 9, 2009 CAN meeting we had likewise unanimously and vigorously opposed the first CDA here at PDX on the promise that the program would be abandoned if sufficient complaints would be received. The complaints came in and are still coming in, but the CDAs continued and were never cancelled. PDX ignored its neighbors!

In 2008 CAN was told of some fine tuning of the CDAs had been done, if so, however, their present day to day execution is very annoying and unacceptable. CAN has so far endured 8 years of direct overhead CDAs. From a fairly low daily and total number of CDAs we have witnessed an increase of up to 21 and possible more daily CDA noise events. Up to May 2017 CDAs were only flown between the hours of 9:00 am to 5:00 pm. Now we are facing CDAs from sunrise to sunset and instead of weekdays only it would be expanded to the entire week. Thus technically 365 days or continually. Quiet weekends will be a thing of the past, at least in CAN! As an additional present to CAN is a standing invite to other ANG in the US to join in flying CDAs here. Visitors we were told would be advised in advance of the guidelines they were to be "faithfully" observed, such as boundaries, speed, power settings etc. One of the requirements to stay north of the Columbia Blvd. has been ignored by visitors and local ANG all the 8 years in spite of 8 years of complaints.

Noise bursts from intermittent spooling up have been especially annoying. Finally instead of limiting a flight to 2 aircraft now up to 4 jets fly their CDA together, extending each annoying event.

It should be noted, at this time, that CAN's concerns and request is not about regular daily activities at PDX, but directed at CDAs only. CAN residents were or should have been aware when they moved to CAN. They however were not aware or expected to low level military overflight corridors to be established over their historic neighborhood boundaries.

On this basis CAN believes that Aviation Laws and FAA Regulatory Framework is not being followed and CDAs are inconsistent by:

1. A change from a long existing and accepted flight route to a new location, where noise sensitive residential properties have not previously been exposed to a high noise level from direct overflights.
2. Furthermore shifting flight patterns and noise from a primarily more compatible industrial and commercial to a primary noise sensitive residential area is a real NO NO in the Aviation Regulatory framework.
3. As a reminder the PDX Part 150 Noise Compatibility Planning Meetings attendees (CAN) were time and time again ADMONISHED on these points by FAA staff.

Throughout aviation, addressing noise is a significant issue, reflecting findings over time best described by the World Health Organization (WHO) showing that Air traffic exposed population exhibit significant annoyance levels based on the severity of exposure. WHO defines health as "state of complete physical, mental and social wellbeing and not merely the absence of disease and infirmity". This implies that noise induced annoyance, especially when sudden, additional stressors at CAN have been the documented including poor air quality from diesel exhaust and arsenic, lead and

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other hazards air pollutants from local glass fabrication.

You may ask yourself why CAN is directing its request of the Director of Operation/Chief Operating Officer instead of CNAC, it being the voice of the public providing input, feedback and advise to you the proprietor. As the proprietor of the PDX airport you have been given by law the right and responsibility to DETERMINE and CONTROL all activities at the airport other than the "control the flight of the aircraft" being federally preempted. Rights and responsibilities of the airport proprietor are convincingly in case and statutory law including: 42 USCS Pubic Health and Welfare — Noise Control US Supreme Court. Burbank v. Lockheed Air Terminal US Supreme Court. Griggs v. Allegheny County Federal Aviation Ac 49 USCS 1431 Federal Aviation Regulation, Part 36. The Airport Proprietor. These laws make it convincingly clear, "That: Low level overflight may be considered a nuisance, an interference with the full and complete use of a property and in the constitutional sense represents a "taking" Airport proprietors must therefore consider locally determined desire for quiet.

"The Airport Proprietor in a brief law summary had been provided to CNAC members in the past listing proprietor's rights to include being able to deny the use of its airport on the basis of noise consideration like CDA activities, a restriction that Steve Schreiber had previously exercised by working with and through the FAA. Other obligations would require the proprietor to obtain noise easements known as Avigation Easements...If CDAs become permanent as a very specific landing procedure.

You may ask yourself why CAN is directing its request at the Director of Aviation or, it's Chief Operating officer instead of CNAC being the voice of the public. By its very nature CNAC is only advisory and not an action group or organization like PDX. As a proprietor however you have all the rights and responsibilities to act on our requests.

Your decision to support or to deny the ANG requested expansion of the CDA should this obviously be based solely on a finding that CDAs will or will not impose an extraordinary, unreasonable or excessive impact on an affected neighborhood. This to be based on the level of complaints both in the number and intensity and that being the sole yardstick. AS CNAC members represent a rather large metropolitan area it is reasonable to assume that only one or two CNAC members with firsthand knowledge could adequately represent the affected area which only borders the airport. If in addition they would reside in the affected area they then would be able to provide the most accurate picture of the effects of CDA over an extended period. CNAC members that may or may not have witnessed a well-rehearsed ANG fly day are in no position to provide credible evidence as to the day to day reality of living with CDAs. Their voices should not be heard!! CAN should not be made subject to the NIMBY SYNDROM! CAN was told many times that noise from CDAs is not that loud and annoying based on data that PDX collected from Carefully orchestrated flight operations and perfect weather conditions rather unlike day to day operations.

Noise readings from staged CDAs arranged by PDX are continuously exceeded by power ups during the CDA thus representing meaningless numbers! These loud bursts of noise are especially bothersome.

A minuscule reprieve promised to CAN was to move 35% of the current CDAs to the west end of 28L (6). With a 4 aircraft formation at that location we observed ship 3 and 4 sailing through most of CAN —thus no relief.

50 year historical PDX weather data make a promised 35% CDA shift to Jo R, certainly quite welcome by CAN totally unrealistic: thus no relief to CAN.

Refreshing was the request by the PDX Noise Office to the ANG to minimize afterburner takeoffs as much as possible. By contrast the ANG inviting other ANG with aircraft which require afterburner takeoffs make their presence at PDX much more annoying for airport neighbors.

Of real help to CAN however would be to move most or preferably ALL CDAs to 28R the east end of the north runway which would place essentially all the CDAs over the Columbia River, there to annoy the sea lions instead of CAN residents.

We are certain however that the ANG will argue Most vehemently that a 28R is unacceptable because:

1. It would require more taxiing time.
2. It would require crossing a possibly active runway which FAA is generally not fond of.

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3. It would waste a lot of jet fuel and certainly a lot less than flying to Klamath Falls or Redmond for CDAs there. It is so much easier to impose it on neighboring residents

4. 28R supposedly has no runway overrun barriers making for a less safe operation. CAN questions this.

Can Believes that we have presented a reasonable detailed and accurate case that CDAs together with other stressors have made life in our neighborhood so much less enjoyable. CAN looks forward to a positive outcome for us. CAN does not believe that our residents should be the scapegoat to offset military budget shortfalls. We would certainly be willing to sit down with you to answer any questions you may have. CAN is looking to a positive neighborly resolution with PDX.

Sincerely

Erwin Bergman, Airport and Quality of Life Committee Chair for Cully Association of Neighbors (CAN), Community Advisory Committee representative for Central Northeast Neighbors

cc. Curtis Robinhold, Executive Director Port of Portland  
Laura Young, Chair Cully Association of Neighbors (CAN)  
Doug Fasching, President Central Northeast Neighbors  
Mayor Ted Wheeler and Portland City Council  
Speaker Tina Kotek District 44  
Representative Michael Dem brow District 23  
US Representative Earl Blumenaur 3rd District  
Senator Jeff Merkley  
Senator Ron Wydon

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**From:** Tish Moll  
**Sent:** Thursday, August 24, 2017 7:16 AM  
**To:** PDXNoise <PDXNoise@portofportland.com>  
**Subject:** Attn: Citizens Noise Advisory Committee - regarding f14 jets

Attn: Citizens Noise Committee

I wrote you a lengthy email last night regarding the jet landing maneuvers. One more observation I neglected to express and would like to add:  
I of course have spoken to other friends and co-workers about this issue who do not live in my neighborhood. From 4 of them I have heard this response (I'm paraphrasing, but all expressed the same thought) "I know! I was shopping in a Cascade Station store and I heard them and it was unbelievably loud"! One of them actually said her heart started pounding, like a panic attack, thinking a plane was crashing into the store. Think about that. Unsuspecting shoppers actually experiencing panic because of the jets. Not good!

**From:** Tish Moll  
**Sent:** Wednesday, August 23, 2017 9:02 PM  
**To:** PDXNoise <PDXNoise@portofportland.com>  
**Subject:** Attn: Citizens noise advisory committee - Jet landing maneuvers over Cully and Sumner neighborhoods

I am writing this letter to summarize my complaints to you for this summer's assault on my livability because of the air force jet's landing maneuvers directly over my home and neighborhood. I have written emails to you before in the last couple of months. I hope they have been read and are still on record. I know you are having a meeting sometime in early September. I will be unable to attend but would like to have my input considered. The jet noise this year will be winding down as summer wanes, but I know that if you as a committee don't have any clout or intention to stop this assault on our livability it will start again next spring and we will have the same intolerable conditions to deal with all next spring thru the summer next year. I do not want that to happen and I don't feel it should.

Points to consider:

I know you have been tabulating complaints this year, you need to consider those numbers will not be accurate as your phone line to register complaints was overwhelmed in late June and early July. I know this because I was not getting my calls returned and when I persisted I finally got through and received an apology with the explanation from the person manning this line that he was simply overwhelmed and could not return calls. At this point it seems reasonable to surmise many people would give up calling again with any new complaints, as all they received was a recording and no calls were returned in a reasonable amount of time. I also came to find out the web site to register complaints had technical i.t. problems, probably lasting well over a month. Therefore that site was unavailable to who knows how many would-be people wanting to complain. I myself persisted to get this problem fixed and resolved, but in the meantime



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untold people were unable to get a complaint thru via that resource either. It is again reasonable to assume that many people gave up. The point I am trying to make here is you need to consider that your complaint numbers are undoubtedly lower than they would be had the complaint system been working correctly all summer. In reality, your complaint numbers are probably worthless. I have the feeling the complaint lines are just there to appease people anyway and are used just as public relations tools. If that weren't the case, the complaints would be listened to and action would be taken. We have been under noise assault all summer and I certainly haven't heard or seen any let up. This may be a test period for you and the Air National Guard, but consider that during this test period, we the people in these neighborhoods have had to be the guinea pigs. It has not been fun!

The flights this year were over the top in number and the new tighter flight landing made the jets fly directly over my house at a very low altitude many times a day almost every day. This is during the peak period of our outdoor livability and enjoyment in Portland, and it certainly was detrimental to my livability. I have a right to enjoy my own back yard, read a book, putter in the garden, relax in a lawn chair, - whatever - without fighter jets directly over my house constantly. What this does to a person's psychological well-being is not good. When the "visiting" jets were here for a couple of weeks the noise and frequency was off the charts! It felt like I was living under a dog fight of jets. That period especially was totally INTOLERABLE! The whole season has been bad, but if I have to go through that again next summer I will be very very angry and upset about it. I do not feel friendly or hospitable to those "visitors" . PLEASE DO NOT INVITE THEM BACK.

I informed you via this email site earlier this summer that I saw visible discomfort from my dog more than once as jets were directly over my home. She would actually moan as the jets were overhead. I heard from a neighbor of mine that her dog also showed physical discomfort, moaning as they flew over. As I am sure you are aware dogs hearing is very sensitive. I asked in a previous email to you that acceptable noise levels for animals be investigated and considered by you. I hope you did look into that. IT SHOULD BE CONSIDERED. This is a residential neighborhood these jets are impacting and we certainly have a right to have our beloved pets not be subjected to this noise assault either. It is worse for them than us humans, and NEITHER our pets nor ourselves should be subjected to this at all, let alone at the frequency we have been this summer. I know the time, hours, and days of maneuver restrictions have been lifted. Those restrictions are the LEAST that can be done. The restrictions should be reinstated.

There is a new park going in the Cully neighborhood next year, which is wonderful for that neighborhood of Portland. Unfortunately that park will not be as pleasant as it could be because of the air force jet noise it will be subjected to. There is a high school (Helensview) which is very near to where I live that the

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jets fly directly over at a very low altitude. Those students should not be subjected to those frequent high noise levels. Our neighborhoods should not be subjected to this. We do not live on an air force base, we do not live in subsidized housing that military personnel living on air force bases do, we pay property taxes to live in a livable environment . Your committee along with the Air National Guard need to consider all this as you make decisions regarding acceptable noise levels and the frequency of these jets that we are subjected to. What sounds good on paper from the powers that be and helps one side needs to be countered with the livability issues and voices from the other side .

One last point I would like to make. About 10 - 15 years ago when the military landing maneuver were first happening over our neighborhood I went to a meeting where the agenda stated a certain time period for public input. That sounded good to me, your committee was going to listen to public input. The meeting was about what the committee's recommendation would be, whether or not to give their approval for these jet maneuvers. I remember this vividly - IMMEDIATELY after the public input period (where many concerns and complaints were voiced) , a pre-written motion was read, then approved, that the committee give their approval. It was infuriating, almost a slap in the face! It was as if to say, " we set aside a time for public input, but we certainly weren't listening. Our motion to approve had already been written" --- I hope your committee still doesn't have that kind of attitude, that you are not just giving lip service that you care about the public's concerns. Because our concerns are real, our complaints are valid. **OUR LIVABILITY ISSUES NEED TO BE HEARD.**  
Sincerely,  
Patricia Moll

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**From:** Erik Molander  
**Sent:** Thursday, December 21, 2017 11:03 AM  
**To:** Stenstrom, Phil <Philip.Stenstrom@portofportland.com>  
**Cc:** Tom Hickey; Bill Coffman  
**Subject:** Re: Overhead landing pattern trial period feedback

### EXTERNAL EMAIL:

Hi Phil,

The Bridgeton Neighborhood Association has voted to take no stand on the issue. The Board couldn't reach consensus on the issue. We realize that there is a petition to oppose the new landing pattern and have suggested that neighbors that are opposed to sign it.

It will be interesting to see the radar tracks from the FAA. As a member at Columbia Edgewater I can attest that they are sometimes over a mile off course and much lower than 300' on final descent.

Thank you for the update on the shift to the March 9, 2018 meeting date. I'll keep all the interested parties informed.

Cheers,

Erik Molander  
Chair, Land Use Committee Bridgeton Neighborhood Association

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### **CULLY ASSOCIATION OF NEIGHBORS**

Central Northeast Neighbors  
4415 NE 87th Avenue  
Portland, Oregon 97220

Mr. Vince Granato  
PDX Chief Operating Officer  
Port of Portland  
7200 N.E. Airport Way  
Portland, OR 97218

2/7/2018

On behalf of the Cully Association of Neighbors (CAN), I wish express appreciation for the good work of the Citizen Noise Advisory Committee (CNAC) and the ongoing commitment of our community partners at the Port of Portland and Oregon Air National Guard (ORANG) to continuing productive dialogue and collaborative engagement with impacted neighborhoods. Such communication supports CAN's efforts to promote a healthy, thriving, vibrant, equitable and diverse community which all feel welcome and safe to call home.

This letter serves to reaffirm and clarify the intention and desired outcomes of the CAN General Meeting assembly vote that took place on September 12<sup>th</sup>, regarding the CDOA test period, recently referenced in a document from Central NE Neighbors (CNN). The community desires specific outcomes including: changes in flight patterns to reduce military flights over neighborhoods, reduction of noise impacts of 4 ship formation by limiting flights to 2-ship formations, revert to prior agreed upon hours and days of flights (9am - 5pm weekdays), prohibit visiting aircraft from engaging in CDOA patterns, encourage runway utilization (10 vs. 28) to mitigate noise impacts over most impacted neighborhoods and more public engagement around the sources of aircraft noise impacts on community (departures vs. arrivals, visiting vs. local pilots, etc.).

As presented to CNAC and to CAN at its May 9, 2017 meeting, ORANG performed a six-month test of an expanded "rapid descent" flight routine. As described, the effects were expected to be: a change in flight paths, takeoff and landing routines, an increase in number of flights and number of aircraft formation size, more visiting aircraft participating in the CDOA, and expanded hours and days of operation. It was also indicated that the change in flight patterns and formation size would reduce noise impacts over Cully. Near the end of the six month trial period (September 12<sup>th</sup>, 2017) of the ORANG CDOA four-ship pattern, CAN considered the overall effects of the test on the community.

The assembly generally held that the intensity, location and timing of the new patterns had increased rather than decreased noise levels, and that the duration of noise events in the community to an unreasonable degree, and therefore the new routines were objectionable as a permanent change. Long term members of CAN also reminded newer members of CAN's prior objections to flights over the neighborhood during 2008, when the CAN membership voted unanimously to oppose the overhead approach pattern implementation. Therefore, on September 12th, the membership and the Board of CAN voted, without opposition and with one Board member abstaining, to oppose the continuation of the new routines embedded in the test period.

It is our hope that ORANG and the Port of Portland will honor the needs of Cully and other impacted neighborhoods in the following ways: return flight hours and days to pre-test schedules, refrain from allowing visiting pilots to fly the CDOA and other patterns that will errantly take them over neighborhoods, limit the size of flight formations to 2 ship patterns for training purposes, encourage utilization of the 10 L/R runway for training purposes to dramatically reduce military aircraft noise impacts on the Cully neighborhood.

Thank you for your time and consideration of our request.

Sincerely,

Laura Young  
Chair, Cully Association of Neighbors

**WOODLAWN NEIGHBORHOOD ASSOCIATION**  
WWW.GOWOODLAWN.COM



Woodlawn Neighborhood Association  
c/o NE Coalition of Neighborhoods  
4815 NE 7<sup>th</sup> Avenue  
Portland, OR 97211  
info@gowoodlawn.com

March 06, 2018

Re: Overhead Approach by Air National Guard

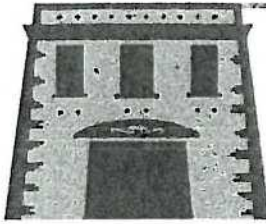
Dear Citizen Noise Advisory Committee:

We are attaching signatures from our Woodlawn Neighbors who are in opposition to the use of the "Overhead Break". Many of our neighbors complain of being startled and left shaken by the sudden and unusual noise of these Overhead Breaks. These are folks that have lived in the neighborhood for many years and likely have become accustomed to general airport & national guard noise, but find these now additionalis incompatible with our residential settings.

We urge you to consider halting these low altitude operations over our residential neighborhoods.

Sincerely,  
Shelly Caldwell  
Chair, Woodlawn Neighborhood Association

A handwritten signature in black ink, appearing to read "Shelly Caldwell".



# **NORTH PORTLAND NEIGHBORHOOD SERVICES**

North Portland Neighborhood Chairs Network 2209 N. Schofield Street Portland Oregon

97217 [info@npnscommunity.org](mailto:info@npnscommunity.org)

## ***Support of the East Columbia Neighborhood Association opposition to the Continuous Overhead Descent Approach at PDX***

### ***Position of the North Portland Neighborhood Chairs Network***

On November 6, 2017, the North Portland Neighborhood Chairs Network voted to support the end of low altitude operations of military fighter craft over residential neighborhoods and to oppose the practice of Continuous Overhead Descent Approach to PDX. Additional background information on this position supporting the East Columbia Neighborhood Association has been prepared for presentation by the Chair of East Columbia Neighborhood Association.

#### **Supporting**

Amber Dennis, Chair, Arbor Lodge Neighborhood Association  
Susan Johnston-Wright, Bridgeton Neighborhood Association  
Gary Kunz, Chair, East Columbia Neighborhood Association  
Jeff Geisler, Chair, Hayden Island Neighborhood Network  
Dannielle Herman, Overlook Neighborhood Association  
Jan DeLeeuw, Chair, Piedmont Neighborhood Association  
Tom Karwaki, Vice-Chair, University Park Neighborhood Association  
Mike Salvo, Chair, University Park Neighborhood Association

#### **Abstaining**

Tyler Roppe, Chair, Kenton Neighborhood Association  
Scott Mizze, University Park Neighborhood Association

*The North Portland Neighborhood Chairs Network is a monthly caucus of the leaders of the eleven neighborhood associations in North Portland*

*Frost*

East Columbia Neighborhood Association  
2209 N. Schofield  
Portland, Oregon 97217

Mr. Curtis Robinhold  
Executive Director  
Port of Portland  
PO Box 3529  
Portland, OR 97208

1 March 2018

The East Columbia Neighborhood Association voted overwhelmingly that the overhead landing maneuver, proposed by the ORANG, is completely inappropriate when staged over our neighborhood.

We appreciate that the ORANG needs to maintain proficiency through regular training. Many of us are ex-military or have relatives currently serving our country in uniform. During the months of May through October 2017 the Port of Portland in conjunction with the ORANG conducted a test of the Overhead Continuous Descent Approach (OCDA) at PDX.


Members of the East Columbia Neighborhood participated in this test by observing aircraft operations, making notes, and finally holding a robust discussion during an open neighborhood meeting in November. What we were struck with was the difference between the straight-in landing approach and the OCDA. Neighbors participating noted that the OCDA had a much greater negative impact on the neighborhood than the straight-in approach.

Please see appendix A: Summary of neighborhood observations and comments

It is not lost on any of us that the ORANG pilots are friends, neighbors, and family members and need training to stay proficient and safe as they stand ready to defend our nation. It is also not lost on us that our community members work, sleep, and live in our homes within the recognized residential areas of Portland. It is vital that residential areas be protected from industrial types of noise and pollutants. The very nature of low altitude jet aircraft operations delivers industrial noise and pollutants directly to the inner portions of our residential community.

We urge the Port of Portland and CNAC to recommend, as they did before in 2002, that this maneuver not be allowed over our residences! If that can not be done, we'd like to know why and then be afforded the opportunity to be active participants in a fair discussion that balances the training needs of the ORANG with the livability of our residential community.

Very Sincerely,



Gary M. Kunz, Chairman  
East Columbia Neighborhood Association

Attached: Copies of petition signatures  
cc  
Ted Wheeler, Mayor

East Columbia Neighborhood Association  
2209 N. Schofield  
Portland, Oregon 97217

Mr. Curtis Robinhold  
Executive Director  
Port of Portland  
PO Box 3529  
Portland, OR 97208

28 February 2018

Dear Mr. Robinhold,

The East Columbia Neighborhood Association voted overwhelmingly that the overhead landing maneuver, proposed by the Oregon Air National Guard (ORANG), is completely inappropriate when staged over our neighborhood.

During the months of May through October 2017 the Port of Portland in conjunction with the ORANG conducted a test of the Overhead Continuous Descent Approach (OCDA) at PDX and above our neighborhood. Members of the East Columbia Neighborhood participated in this test by observing aircraft operations, making notes, and finally holding a robust discussion during an open neighborhood meeting in November. What we were struck with was the difference between the straight-in landing approach and the OCDA. Neighbors participating noted that the OCDA had a much greater negative impact on the neighborhood than the straight-in approach.

Please see appendix A: Summary of neighborhood observations and comments

Many of us are ex-military or have relatives currently serving our country in uniform. It is not lost on any of us that the ORANG pilots are friends, neighbors, and family members and need training to stay proficient and safe as they stand ready to defend our nation. It is also not lost on us that our community members work, sleep, and live in our homes within the recognized residential areas of Portland. It is vital that residential areas be protected from industrial types of noise and pollutants. The very nature of low altitude jet aircraft operations delivers industrial noise and pollutants directly to the inner portions of our residential community.

We urge the Port of Portland and Citizen Noise Advisory Committee (CNAC) to recommend, as they did before in 2002, that this maneuver not be allowed over our residences. During the years since 2002 our neighborhood has grown in density which only amplifies the negative impacts of this landing maneuver. If that can not be done, we'd like to know why and then be afforded the opportunity to be active participants in a fair discussion that balances the training needs of the ORANG with the livability of our residential community.

Very Sincerely,



Gary M. Kunz, Chairman  
East Columbia Neighborhood Association

Attached:

Copies of petition signatures  
Port of Portland letter August 12, 2002



cc

Ted Wheeler, Mayor

Amanda Fritz, Commissioner

Dan Saltzman, Commissioner

Nick Fish, Commissioner

Chloe Eudaly, Commissioner

Honorable Tina Kotek, Oregon Speaker of the House

Honorable Lew Frederick, Oregon State Senator

Alice Cuprill-Comas Commission President, Port of Portland

Phil Stenstrom, Manager PDX Noise Management Program

## Appendix A: Summary of neighborhood observations and comments

Compared to the conventional straight-in approach:

- The overhead approach is louder when a flight of aircraft approach at their higher speed and higher altitude
- The circling descent maneuver delivers noise to residents that previously had none or little.
- The latter portions of the circling maneuver bring aircraft extremely low above our residences, about 400 feet.
- The close proximity of aircraft to homes is very startling and disruptive to normal activity.
- The operation of jet aircraft directly above and very close to residences causes noticeable vibration to the occupants as well as their homes.
- The operation of jet engines directly above and very close to residences delivers additional air pollution to our community.
- The time saved approaching the airfield at higher speed is mostly lost by the additional time in the circling descent portion of the maneuver. Net benefit to the community is near zero.
- Reduced noise impact on those directly beneath the straight-in approach is zero. No one lives in the Columbia River.
- Increased noise to those living farther from the straight-in approach is significant because louder higher aircraft direct their noise further into the community.



August 12, 2002

Vice Commander Brad Applegate  
Oregon Air National Guard  
142 FW/CC  
6801 NE Cornfoot Road  
Portland, Oregon 97218-2797

Dear Vice Commander Applegate:

After reviewing the discussion on the Oregon Air National Guard's proposed overhead approach procedure during the last Citizen Noise Advisory Committee (CNAC) meeting, reviewing the noise office's field data during the test period, and having a number of internal discussions, the Port of Portland has recommended to the FAA that the Air National Guard F-15's not be allowed to fly the overhead approach procedure. The data that was collected made it clear that the overhead approach increases noise in neighborhoods close to the airport.

The idea of additional testing was also proposed at the CNAC meeting. Based upon the data currently available, it is our opinion that any new tests or modifications of the procedure (changes in altitudes or speeds) would not significantly reduce the noise levels in neighborhoods adjacent to the airport.

The ORANG is an important partner with PDX as we work on aircraft noise issues. The dialog between the Port, the CNAC, and the Air National Guard was beneficial and illustrates the willingness of the Guard to address noise while at the same time maintaining readiness and providing for Homeland Defense. We appreciate your understanding of the balance we must find between airport operations and community impacts, and look forward to continued cooperation.

Sincerely,

A handwritten signature in cursive script that reads 'Steve Schreiber'.

Steve Schreiber  
Aviation Director

cc: Gary Thornton, Chair, Citizen Noise Advisory Committee  
Ray Ballantyne, Manager, Federal Aviation Administration, Portland Tower  
PDX Airport Issues Roundtable  
Chris Corich, General Manager, Operations and Maintenance, PDX  
Joe Walicki, Manager, Noise Office, PDX

## Overhead Approach Monitoring

### Introduction:

- From May 6 to May 16, 2002, the Noise Management Office conducted a series of attended noise monitoring sessions for the Oregon Air National Guard (ORANG) as they tested an overhead arrival procedure.
- The ORANG set forth several objectives in a letter to the Citizen Noise Advisory Committee (see attached). One objective was to reduce aircraft noise levels at PDX. They are "...concerned about noise problems... and want to help in any way possible..." ORANG suggested that the overhead patterns will actually decrease noise levels.
- The purpose of the monitoring sessions was to determine if the procedures decreased or increased noise in the surrounding communities.

### How the test flights were recorded:

- Data collection sites were located in residential neighborhoods that are in close proximity to the airport and under proposed overhead arrival routes.  
(See attached maps)
- Data collected includes both runways 10R and 28L overhead and straight-in arrivals.
- This study focused on ORANG F-15 arrival noise data only.

### Facts to consider:

- The attended monitoring sites are located on the side streets of neighborhoods where automobile traffic noise and the ambient noise levels are higher than the ambient levels in homes and back yards.
- Aircraft measurements were occasionally contaminated by community noise such as auto traffic.
- Overhead aircraft arrived in pairs; however, only one radar track is recorded (see attached flight track maps). It is typical for the military to have only one aircraft with an ATC beacon code "On" while flying in close formation.
- The overhead procedure calls for weather conditions of a 3500' ceiling and visibility of 5 miles. Based on historical weather data, these conditions exist 28% of the year
- ORANG typically has arrivals at PDX during weekdays at 10:00 and 14:00 hours.

### Findings:

- The results of the monitoring in general show that the overhead procedure increased noise levels on the arrival portion of the overhead maneuver when compared to a straight-in arrival. Ambient levels ranged between 43-57 dBA. Overhead Log Max levels ranged between 74.5-82.3 dBA.

- There was added noise in communities that received little or no aircraft noise activity at all when the straight-in approach is used. The noise was noticeable on the ground in the vicinity of the overhead approach.
- Some of the actual overhead arrival routes were outside the proposed ORANG routes. Some of the aircraft flew further into residential communities

### **Conclusion:**

We were only asked to look at the noise concern. We did not consider any other factors such as national security concerns, tactical training, etc. In general this procedure added to the overall noise in neighborhoods adjacent to the airport.

*Field work and report complied by:*

*Bob Noble and Eric Petersen, noise technicians, and Matt Tjostolvson, noise intern.*

*Noise Management Office*

*June 21, 2002*

Mr. Vince Granato  
PDX Chief Operating Office  
Port Of Portland  
7200 NE Airport Way  
Portland, OR 97218

Dear Mr. Granato

March 1, 2018

This letter supplements my September letter to you honing in on information already shared with you. I am again asking you not to approve the expansion of the CDAS as requested by the ANG.

First thought I would like to share with you how much more my neighbors and I thoroughly enjoyed the last nearly six months not have to hear, see and feel military jets flying CDA's over our heads. One felt that it was not necessary to repeatedly scout the sky and listen for the increasing pitch and rumble of an approaching aircraft bearing into our ambient before peace and life can return again- but for how long? A real nuisance we can do without that.

Secondly I would like to make you aware that your proprietor's approval of the expansion of the CDA program, in fact the entire CDA program is inconsistent with FAA requirements unless you can offset it with other efforts detailed later.

Who am I?

For the benefit of some, especially people in the decision loop, though it would not be inappropriate to tell them that I have worked for just about 30 years with PDX on a variety of technical, operational and planning activities representing Cully and the Central Northeast Neighborhood Coalition and myself. Having been extensively involved with aviation/aircraft noise issues it bothers me immensely when I hear that if you don't like it you are free to move away; or why did you pick your home site knowing that the airport would be your neighbor?

Due diligence?

I moved to my house at 5330 NE Holman (adjacent to Lombard Blvd) in 1970, approx. one mile south from the PDX with departure and arrival corridors at the same distance. My daytime noise ambient measured between 45-49 DBA with intermittent small bumps by traffic and trains. Nighttime ambient typically is around 40 DBA.

My wife and I are both retired and thus & not away from home like a typical 8-5 person. Our living area at home faces the airport, and windows are typically open weather permitting. We have a large vegetable garden and fruit trees making for lots of "fresh air". Our home is 800 ft. south of Columbia Blvd, identified as the southern boundary of CDAs. GA and cargo feeder

aircraft fly occasionally over our home. We feel that the sky overhead is ours; that is before CDAs!

Where are the planes?

CNAC and PDX noise management staff have consistently questioned the location and route of CDA aircraft provided mainly by complainants. While I cannot vouch for accuracy of information by others I will totally stand behind my observations. An aircraft observed directly overhead, that is at 90 degrees directly over my home is 800 ft. south of its operational boundary goal. No radar track will improve accuracy!! When aircraft progressively move laterally and more and more change into "very close" or "way off". My observation suggests that about 40% of CDAs occur Significantly south of the Columbia Blvd- boundary.

We hear you! Really?

PDX in approving the CDA in 2008 and 2017 promised that if neighborhood impacts would be too severe by the number of complaints received, they would stop CDAs. In spite of significant complaints PDX did not stop pursuing CDAs. One wonders what the level of complaints has to be to stop the program. Evidence collected throughout the western aviation world clearly shows that complaints received at various airports are "ONLY THE TIP OF THE ICEBERG". Unhappy people after many efforts, and not seeing any results from their efforts, just give up as a waste of their time. Where will the goalpost be for PDX?

Inconsistency with FAA requirements

As CDA affected PDX neighbors are continuing the complaint process with PDX we are becoming more concerned that our efforts will fall again on deaf ears, and the full range of CDA increases will be implemented Our efforts now have identified an area where PDXs past and current approach is not consistent with applicable FAA policies reflected in the FAA Environmental Desk Reference for Airport Actions. In section 17 on noise on page 18 we find under noise mitigating the following;

PASTED IN

1) Operational measures. Some common operation mitigation measures include: (A) change in flight tracks or runway usages;

A) Note: New or revised flight procedure changes at less than 3,000 feet AGL may route air traffic over noise-sensitive areas not previously overflown. These procedures must be examined, even if they affect fewer people than the no action. This analysis is needed to determine if the proposed procedures would cause a significant impact to the newly affected community. Mitigation to the area newly affected should be included where appropriate. Be sure to assess impacts due to the mitigation. This analysis is needed to ensure mitigation does not cause more severe impacts than unmitigated impacts.

- B) Voluntary noise abatement procedures: or
- C) Changes in airport operation acceptable to airport users that do not interfere with interstate commerce.

2) Land-use related measures. Some common land use mitigation measures include:

A) Buying land or land interests such as air rights, easements, and development rights. These measures establish airport-compatible uses of the affected properties;

First the term mitigation describes an action, namely doing something. It may be an action on the ground or on paper. Thus CDA is an action, namely a change in flight tracks.

Secondly an action must occur at less than 3000ft AGC; again this applies.

Thirdly it identifies an action over a noise sensitive property area-, again CDA's fit into this category.

Fourth it identifies an area/ property that has not previously been overflown. One can argue that point but this area has never been identified as a flight corridor. No attempts have ever been made in the past to acquire any rights or easement over it, as it did not have any utility or is necessary for efficient operation of the PDX airport. Furthermore CDAs over this residential area have always been contentious and objected to by the residents from its first proposal in 2002 with support of neighborhoods and even in the past objected to by a PDX Aviation Director. To basically conclude that the past CDA over continuous unabated protection efforts by the residence over this residential area made it into a designated and legal flight route and there by not meeting this requirement is rather absurd. However we expect it!

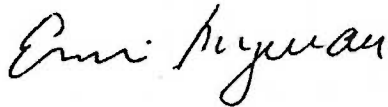
Under these circumstances it appears to me/us that for PDX as the proprietor and sponsor of the CDAs to continue or even expand their scope is not acceptable FAA consistent resolution. An option is a provision in the FAA language that this action/ the CDAs would be allowed if it could be shown that even by not meeting the three spelled out requirements the action/ CDA would have less community impact then their prior flight route in this case the straight 3 degree arrival path. Aircraft on this route do overfly an extensive industrial and commercial established flight corridor over which any necessary easements, and development freights would have been acquired a long time ago. Also significant residential development in this area is "relatively" new suggesting that all or many residents have been aware of an established PDX and related aviation noise before moving there. In comparison to this established corridor CDAs would by far have the most significant impact. Another comparison, principally sponsored by the ANG suggests that CDAs would reduce the noise impact over the city. How this could be shown is a puzzle since obviously many, many aircraft overfly the city, and a few more or less would not make too much a difference unless of course the ANG intends to "fly circles at tree top" level. As a conclusionary note one should be aware that according to FAA policy any aircraft over 3000ft AGL does not have noise impacts of any significance and thus may be ignored.



To be consistent with the FAA language CDAs should thus at the very least not be expanded, in fact they should be stopped altogether! FAA policy has ALWAYS been to avoid as much as possible avoid disturbing residential over-flights and most certainly not reroute over-flights from commercial/ industrial areas to residential areas!!

Under the Proprietary Exception in Aviation Law PDX as the proprietor has the right and in fact the duty to address and work with their neighbors to not adversely affect their health and quality of life. FAA and ATC responsibility is to ensure safe Aviation consistent with established FAA rules only.

Sincerely,

A handwritten signature in cursive script, appearing to read "Erwin Bergman".

Erwin Bergman

CNAC Representative for Central Northeast Neighbors, Quality of Life for Cully (CAN)

CC: Vince Graunto, Chief Operating Officer  
Curtis Robinhold, Executive Director  
Doug Fashing, President Central Northeast Neighbors  
Phil Stenstrom, Manager Aviation Program

Mr. Curtis Robinhold  
Executive Director  
Port of Portland  
P.O. Box 3529  
Portland, OR 97208

March 8th, 2018

Re: ORANG proposed Overhead Continuous Decent Approach (OCDA)

This letter is being presented to the members of the CNAC and to Mr. Phil Stenstrom, manager PDX Noise Management Program

I am a member of the East Columbia Neighborhood and my property is directly affected by this proposal over my home.

I do not give the ORANG or the Port of Portland permission to violate the airspace above my home. This OCDA is very invasive to myself and has caused me injury. I am demanding that this invasion of my US constitutional rights to life, liberty and the pursuit of happiness not be infringed upon. I am demanding that this OCDA cease and not be approved unless an emergency condition presents itself.

Continuous ringing in my ears attributed to the screaming sound of the engines at approx. 1000 ft over my property or in the vicinity thereof.

Severe Anxiety due to the presents of a massive war machine (jet) overhead at such a low altitude. This anxiety has led to my chronic loss of sleep.


Possible Health problems to my body due to the constance barrage of the pollution spewed by the exhaust (burned and unburned) on my Person and any living person or animal on my property, my Garden and my animal pasture. This may have a deleterious effect during this test period and far into the future if approved.

Economic Loss of property values caused by the establishment of this OCDA.

Environmental damages to surrounding parklands and wetlands.

I am demanding that you not approve this OCDA.

Thank you,

  
Martha Johnston  
9509 NE 13th Ave  
Portland, OR 97211

PH: 503-720-5035 cell  
ediplumb@ [gmail.com](mailto:ediplumb@gmail.com)