CHAPTER F
Noise Ordinance Update

INTRODUCTION

Sacramento Executive Airport (SAC) has had a single-event noise limit for 30 years (since 1980). The original 80 EPNdB limit was increased by four decibels in 1994 to accommodate some of the larger, more technologically advanced aircraft that were capable of serving SAC, but could not due to the single-event limit. An analysis of the increase in the single-event limit indicated that it would have a negligible effect on the aircraft noise environment in the neighborhoods around SAC.

The current examination of the SAC noise ordinance was undertaken at the request of the Federal Aviation Administration (FAA). FAA expressed concern to the Sacramento County Airport System (SCAS) that the current Noise Ordinance may be discriminatory as the Ordinance’s base metric, EPNdB, applied to the certification of jet aircraft only. FAA requested SCAS to undertake analysis of the SAC noise ordinance to explore what alternatives might be available to replace the EPNdB-based ordinance. As a result of the FAA’s request, the review of the SAC noise ordinance was included as part of the SAC Master Plan scope of work.

This chapter provides an overview of the SAC single-event noise limit, discusses some of the issues related to its enforcement today, examines options for the ordinance in the future, and makes a recommendation based on the technical analysis.

History of the Sacramento Executive Airport Noise Ordinance

The SAC single-event noise limit was originally one of the eight voluntary noise abatement procedures recommended in the 1979 Executive Airport Master Plan. In September 1980, the Sacramento County Board of Supervisors voted to create a formal noise ordinance that would limit the use of the Airport to aircraft with Federal Aviation Administration (FAA) certificated takeoff noise levels of 80 EPNdB or less. The purpose of the ordinance was to keep the 65 community noise equivalent levels (CNEL) contour within the airport boundary.
or on the adjacent public property (i.e., the Bing Maloney Golf Course). In October 1980, the City of Sacramento, which owns SAC, adopted a similar noise ordinance.

Amendment of the Sacramento Executive Airport Single-Event Noise Limit

An Executive Airport Working Group was formed in 1991 to study the financial viability of SAC and to make recommendations to the County that would improve the financial health of the Airport. One of the Group’s recommendations to the Board of Supervisors in August 1992 was to increase the single event noise limit to allow larger, yet quiet, aircraft use of the Airport. The Group did not recommend a new single event noise limit, but rather suggested that the noise ordinance be rewritten to allow Stage 3\(^1\) aircraft to use the Airport.

In 1993, Harris Miller Miller & Hanson Inc. (HMMH) was retained by Sacramento County to examine the effect of changing the single event limit on SAC’s 65 CNEL contour. Since Stage 3 aircraft can have a wide range of noise levels, the County decided to examine a change in noise level that would allow for larger, technologically advanced aircraft to use the Airport, while not changing the noise levels noticeably. The County requested that HMMH examine the effect of increasing the single event noise limit from 80 to 84 EPNdB.

HMMH’s analysis of the expected change in the 65 CNEL contour revealed that although there was a slight increase in the 65 CNEL contour, it remained entirely on airport property or public lands, meeting the intent of the original noise ordinance.

The County’s Department of Environmental Review and Assessment evaluated the environmental effects of the change of the noise ordinance from 80 to 84 EPNdB and issued a Negative Declaration. Based on the technical analyses, the support from the communities surrounding SAC, and support from airport tenants, the County decided to amend the noise ordinance to allow aircraft with FAA certificated takeoff noise levels of 84 EPNdB or less. The

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\(^1\) Stage 3 refers to one of the FAA’s four noise certification levels. Stage 1 represents the oldest and loudest aircraft types, while Stage 4 represents the most recent and quietest noise certification level. In general, a Stage 3 aircraft will be quieter than a Stage 1 or Stage 2 aircraft of the same size, weight, and number of engines. The difference between the different noise stages is more noticeable on departure than arrival.
City of Sacramento amended its SAC noise ordinance to reflect a maximum takeoff level of 84 EPNdB as well.

A series of public meetings were held to describe the increase in the limit and the expected change in community noise exposure. Based on the overwhelming positive feedback from the communities around SAC, and airport tenants, Sacramento County decided to move forward with the four-decibel increase and the new single-event noise level (84 EPNdB on takeoff) became effective in August 1994 (see Appendix C).

**Weight Limitations on Operations at Sacramento Executive Airport**

In addition to the noise limits, Sacramento County also has weight limits on aircraft operating at SAC. Section 11.12.200 (l.) - Landings and Takeoffs—Executive Airport of the Sacramento County Code states:

> “Prior permission of the director is required for landings and takeoffs of...aircraft with a maximum certificated weight of more than twenty-six thousand (26,000) pounds for aircraft with single tire main mounts; fifty thousand (50,000) pounds for aircraft with dual tired main mounts; and eighty-seven thousand (87,000) pounds for aircraft with dual tandem tire main mounts.”

Although not tied to the noise limits, the SAC weight limits prevents certain aircraft from operating at the Airport on a regular basis. These limits also need to be considered when assessing whether an aircraft can operate at SAC under a revised noise metric.

**ENFORCEMENT OF AIRCRAFT NOISE LIMIT**

The SAC noise ordinance is based on certificated takeoff noise levels published in FAA Advisory Circulars 36-1 and 36-2, as amended. The current versions of these Advisory Circulars (ACs) are AC 36-1H and AC 36-2C, respectively. The noise ordinance allows both aircraft operators and SCAS staff to check the published noise levels to see if an aircraft’s certificated noise levels fall within the allowable noise ordinance limit. Failure to comply with the single event noise limit when operating at SAC is a misdemeanor.
Many of the aircraft operating at SAC do not have EPNdB levels listed in the ACs. If the Director of Airports suspects an aircraft may not be in compliance with the ordinance, he can request the aircraft owner or operator submit other noise level evidence to demonstrate that the aircraft complies with the Ordinance. If these data are not available or are unclear, the Director of Airports may use actual noise measurements to determine if the aircraft comply with the Ordinance. In both the case of owner/operator submitted data or noise measurements, data that is provided in the form of dBA shall be converted to EPNdB by the Director. The ordinance does not provide a means of converting dBA to EPNdB.

Exemptions to Noise Limit
The Ordinance specifically exempts certain types of aircraft operations from the requirements of the ordinance as follows:

- Aircraft operated by or for the United States of America or the state of California.
- Law enforcement, emergency, fire or rescue aircraft operated by or for any county or city of the state of California.
- Aircraft used for emergency purposes during an emergency officially proclaimed by a competent authority pursuant to the laws of the United States, the state of California, or the city or county of Sacramento.
- Aircraft engaged in take-offs or landings while conducting test under direction of the airport director in an attempt to determine the aircraft noise level pursuant to the provisions of the Ordinance.
- Aircraft involved in a bona fide emergency which requires a landing for the preservation of life or property.

Therefore, the first step in the process of assessing compliance with the Ordinance is to determine if the aircraft in question meets any of the exemption criteria. Aircraft that are determined to be exempt based on the exemption criteria need not be assessed in terms of the single event takeoff noise limit.

Using the Advisory Circulars
The SAC single event noise limits are well known in the aviation industry. Prior to flying to SAC, most professional pilots (particularly those who fly corporate jets) are likely to assess if
their aircraft complies with the single event noise limit. Some may check the ACs (or have their flight dispatch staff check the ACs) while others will call SAC staff to ascertain if their aircraft complies with the noise limit.

In an instance where SCAS staff suspects that an aircraft that has landed at SAC does not comply, SCAS staff will use the aircraft registration number to get the precise aircraft model/engine type combination to check against the ACs. Aircraft that comply are permitted to operate at SAC. Owners/operators of aircraft that do not comply should be notified in writing. The ordinance allows for a written warning prior to the issuance of a misdemeanor citation.

Aircraft Not Listed in the Advisory Circulars

As indicated above, the owner/operator of an aircraft not listed in the ACs that the Airport Director suspects does not comply with the single event noise limit must supply noise level data to the Director demonstrating that their aircraft complies with the Ordinance. Alternatively, noise measurements can be made at the owner/operators expense to determine if the aircraft is in compliance with the noise limits. Both methods of demonstrating compliance can be problematic for a variety of reasons including but not limited to:

- Aircraft operated by or for the United States of America or the state of California.
- Lack of cooperation on the part of the aircraft owner/operator.
- Lack of published noise data for certain aircraft types.
- The time and expense involved in conducting noise measurements.
- Lack of sufficient aircraft operations to develop a noise measurement database.
- Inability to inexpensively measure EPNdB.
- Lack of a dBA to EPNdB conversion factor in the noise ordinance.
- Law enforcement, emergency, fire or rescue aircraft operated by or for any county or city of the state of California.

All of these factors could make it difficult to ascertain the status of a suspected non-compliant aircraft operating at SAC. Therefore, this step should only be taken when all other reasonable efforts to ascertain an aircraft’s takeoff noise level have been exhausted.
Determining Compliance without Noise Measurement Data

SCAS staff may be able to reach a reasonable determination of the likelihood that an aircraft will comply with SAC’s single event noise limit based on the aircraft’s weight and power plant as compared to other aircraft that are known to comply with the ordinance. This is particularly true for similar aircraft/engine types that are well below (i.e., three dB or more) the single event limit. For aircraft without a similar noise-certified aircraft comparison, such as experimental aircraft or surplus foreign military aircraft, it may be more difficult if not impossible for SCAS staff to make a comparison and reach a reasonable conclusion regarding compliance.

Single Event Limit Compliance

SCAS staff reviewed the based aircraft fleet at SAC and identified 84 aircraft types representing 274 individual aircraft that do not have EPNdB levels identified in the ACs. SCAS staff may be able to eliminate some of these aircraft from the list by performing the comparison as described in the previous paragraph. Should the Director of Airports have reasonable doubt that one or more of the remaining aircraft do not comply with the Ordinance, technical information should be requested from the aircraft operator/owner to make such a determination or noise measurements can be conducted at the owner’s expense to determine if an aircraft is in compliance.

EVALUATION OF THE AIRCRAFT NOISE LIMIT

As indicated above, the enforcement of the single-event noise limit has been problematic. As a result, considered were alternative approaches to evaluating and enforcing the SAC Noise Ordinance. The most viable approaches are described below.

Considered Approaches

Status Quo. With few exceptions over the years, the SAC Noise Ordinance has been successful in eliminating from operation most of the noisiest aircraft that could otherwise use the Airport. The current system is efficient and takes minimal time on the part of SCAS staff to implement. Maintaining the current Ordinance noise metric might be a viable option. However, doing so means that some aircraft not included in the ACs, but that would almost
certainly exceed the 84 EPNdB when measured, could be operating at SAC in violation of the Ordinance.

**Use of Noise Measurements to Enforce Ordinance.** Concurrence with the Ordinance is accomplished by referencing the ACs and determining compliance or violation of the single event limit (84 EPNdB). This alternative proposes that EPNdB noise levels be determined for aircraft not included in the AC but which are operating and anticipated to operate at SAC. Consideration was given to requiring the noise measurements be conducted at the expense of the operator, should the Airport Director suspect that an aircraft does not comply with the ordinance. The measurements would be performed by the operator with results provided to SCAS for review. Alternatively, SCAS could consider conducting the aircraft noise measurements and using the results to assess compliance. While this approach would offer more statistically accurate assessments of when a violation of the ordinance occurred, the time and cost required for this process is a major drawback.

**Reevaluate the Ordinance During the Master Plan.** Evaluation of the Noise Ordinance during the Master Plan process enables SCAS to assess potential changes to the current EPNdB limit in conjunction with other planned or forecast changes to SAC (i.e., operations and fleet mix). Reevaluating the Ordinance during the update process also gives SCAS the opportunity to present any proposed changes to the communities around SAC for their feedback.

**Selected Method of Evaluation**

Ultimately, the decision was made to reevaluate the Noise Ordinance during the Master Plan process. It was determined that the Master Plan provided the appropriate forum and setting for reevaluating the single event noise limit as a change to the Ordinance. The update process also provides SCAS with the opportunity to publicly discuss Ordinance alternatives. In total, three alternatives were evaluated for the Noise Ordinance during the Master Plan process. These are described in the paragraphs below.

**Noise Ordinance Alternatives**

**No Action.** As described above, the SAC single-event noise limit has been highly successful at preventing noisier aircraft from operating at the Airport. To the extent that the Noise Ordinance could remain effective in preventing non-complying aircraft from operating at
SAC without limiting the overall effectiveness of the Airport the retention of the Noise Ordinance in its current form is considered a viable option under this alternative. As mentioned previously, however, not revising the current Ordinance would also mean that aircraft currently operating at SAC without a recorded single-event measurement in an EPNdB metric may be operating in non-compliance or that efforts to restrict aircraft that do exceed 84 EPNdB could be determined to be discriminatory, and jeopardize the continued existence and effectiveness of the ordinance.

**No Ordinance.** Since the adoption of SAC’s single-event noise limit in 1980, aircraft (particularly corporate jets) have become significantly quieter. Furthermore, the FAA also pointed out that the Noise Ordinance, in its current form, could be perceived as discriminatory towards corporate jet operators, because AC 36-1H (EPNdB) only focuses on aircraft of this type. Elimination of the ordinance would remove any potential for discrimination towards corporate jet operators but it would leave no means for SCAS to effectively control aircraft noise exposure into the community.

**Change Noise Measurement Metrics.** Initial consultations by SCAS staff with FAA resulted in FAA’s willingness to assist in converting the EPNdB limit to a dBA limit. If pursued, the Ordinance would need to be changed to reflect the corresponding dBA limit.

The benefit of this approach as recommended is that using an equivalent dBA level approved by the FAA will make it easier for SCAS to identify noncompliant aircraft without making the Ordinance more restrictive and thus avoid the need to conduct a review under Federal Aviation Regulation (FAR) Part 161. There are other procedural considerations that will need to be addressed including the need to revise the Ordinance and potential environmental processing that may be required by Sacramento County’s Department of Environmental Review and Assessment as a part of the Ordinance revision.

**Selected Alternative**

After consulting with the FAA SCAS determined the most appropriate alternative to pursue is to change the noise metrics used to measure the single event noise levels of aircraft operating at SAC. It was determined that while the Noise Ordinance in its current form is successful at minimizing the community’s exposure to single event noise levels in excess of 84 EPNdB, the Ordinance is at risk to potential challenge on the basis of its discriminatory nature and that
as written is not as inclusive as it could be in covering aircraft that might be operating out of compliance at SAC. Additionally, the number of aircraft listed in the ACs for EPNdB noise levels is limited compared to lists for the A-weighted metric, which includes not only corporate jet aircraft, but single-engine and twin-engine piston and turboprop aircraft as well. Thus the No Action Alternative was rejected.

The option of eliminating the SAC Noise Ordinance was also dismissed from consideration due to the potential for negative community impact and reaction. While advances in aircraft engine and airframe technology has significantly reduced the amount of noise generated, individuals working and residing in the vicinity of an airport can still be exposed to excessive noise levels generated by aircraft on take-off or approach. Preserving an established noise standard is a community expectation, maintains a good relationship between the community and the Airport, and promotes a healthy living environment.

**REEVALUATING THE NOISE MEASUREMENT METRIC**

As described throughout this chapter, one of the greatest weaknesses of the SAC Noise Ordinance is the limiting nature of the metric used to measure noise levels associated with each aircraft. Many of the aircraft operating at SAC are not listed in the ACs using the EPNdB metric, and as such, it is difficult for SCAS staff to determine whether or not certain aircraft operate in compliance at the Airport. In order to address this issue, changing the measurement metric from EPNdB to dBA is the proposed course of action. The scope of the proposed changes to the single-event noise limit, however, is constrained within the parameters established by FAR Part 161, and by FAA directives. Most notably, any change:

- Could not be more restrictive than the current limit;  
- Could be as restrictive as the current limit; or  
- Could be less restrictive than the current limit.

Furthermore, it is the goal of SCAS to make the current single-event limit less discriminatory, focusing less on just corporate jet aircraft and applying equally to all aircraft types operating at SAC. And further, the goal was to try to ease implementation of the Ordinance in order to improve its overall effectiveness.
Weighted Decibels

There is no simple conversion to derive an EPNdB level from a dBA value for a particular aircraft type, though most reference materials suggest that EPNdB is approximately 13 decibels greater than dBA. Therefore, 13 decibels may be added to a dBA value to approximate where an aircraft noise level falls with respect to SAC’s 84 EPNdB single-event noise limit. During discussions between SCAS and the FAA, however, it was determined that the 13 decibel difference would be too restrictive, lowering the max noise limit and effectively preventing aircraft that currently operate at SAC in compliance with the current ordinance from utilizing the Airport. It was therefore determined that subtracting ten decibels from aircraft EPNdB values would create a non-discriminatory list of aircraft that could operate at SAC without being more restrictive than the 84 EPNdB limit.

Utilizing the A-Weighted Metric

The ten-decibel difference between the two metrics facilitated a comparison of the aircraft listed under AC 36-1H (EPNdB) and AC 36-3H (dBA). As shown in Appendix C, the list provided under AC 36-1H is limited to only 193 aircraft (below the 87,000-pound weight limit), and are exclusively corporate jet aircraft. However, the dBA list (Appendix C) is far more comprehensive with a list of 395 aircraft (below the 87,000-pound weight limit) that not only includes corporate jets, but single and twin-engine propeller-driven aircraft as well. The expansive list of A-weighted aircraft more than doubles the number of aircraft that SCAS can reference for possible violations of the single-event noise limit, increasing the overall ability to enforce the Ordinance.

A comparison of the two metrics, however, reveals that switching the metric to dBA and lowering the level to 74 dBA made the Ordinance slightly less restrictive than it is in its current form under the 84 EPNdB level. In total, 26 aircraft types currently above the established 84 EPNdB single-event limit would comply with a revised limit of 74 dBA (see Table F1).
### Table F1  AIRCRAFT (LESS THAN 87,000 LBS) BELOW TAKE-OFF 74 dBA AND ABOVE 84 EPNdB

<table>
<thead>
<tr>
<th>Manufacturer</th>
<th>Airplane</th>
<th>Engine</th>
<th>TOGW 1000 Lbs</th>
<th>TO Flaps</th>
<th>TO dBA</th>
<th>TO EPNdB</th>
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<td>Learjet</td>
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<td>20</td>
<td>73.1</td>
<td>84.3</td>
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<td>73.0</td>
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<td>TFE731-3-1C</td>
<td>40.78</td>
<td>20</td>
<td>72.6</td>
<td>84.8</td>
</tr>
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<td>Falcon 50 (M1230)</td>
<td>TFE731-3-1C</td>
<td>40.78</td>
<td>20</td>
<td>72.6</td>
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<td>Raytheon</td>
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<td>TFE731-3-1H</td>
<td>23.6</td>
<td>-</td>
<td>72.4</td>
<td>85.5</td>
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<td>-</td>
<td>72.4</td>
<td>85.5</td>
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<td>Mitsubishi</td>
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<td>JT15D-4</td>
<td>14.1</td>
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<td>71.9</td>
<td>86.3</td>
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<td>86.3</td>
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</tbody>
</table>

**Source:** ESA, 2010.

Ultimately, the small addition of 26 aircraft types compliant under the new Noise Ordinance with a revised metric (dBA) is considered nominal. With the exception of only three aircraft in Table F1 (i.e., Beechjet 400, MU300-10, and the Falcon 20-G), the increase in decibels generated by the aircraft that would now be allowed to operate at SAC under the proposed
Ordinance change is three dB or less. Furthermore, the increase in operations at SAC from these new aircraft would result in a total of approximately 704 additional operations (an operations is a landing or take-off) per year, or 1.93 operations per day. The small increase in daily operations at the Airport would have a negligible effect on the 65 CNEL contour (see Figure F1).
CONCLUSIONS

The Executive Airport Noise Ordinance has operated at a high level of effectiveness since its inception 30 years ago. However, changing needs of stakeholders, requirements of the FAA, and improvements in performance standards for aircraft have led to the necessity for reevaluating the single-event noise limit. The decision and process of revising the Ordinance was carefully considered and vetted with the FAA and communities around the Airport. The Master Plan public outreach program and process was used for this purpose.

One of the primary goals of the reevaluation process was to avoid triggering a FAR Part 161 review. To do this requires avoiding making the Ordinance more restrictive than it currently is. Additionally, SCAS sought to ensure that the Ordinance applied equally to all aircraft, and not just corporate jets. Finally, any change to the Noise Ordinance needed to make it more easily enforceable for SCAS staff.

The proposed change in the Ordinance noise metric and level satisfies all three criteria identified by the FAA and SCAS. Changing the single-event noise limit to 74 dBA decreases the restrictiveness of the Ordinance while making more aircraft accessible to evaluation. This effectively eliminates the possibility of discrimination towards any one type of aircraft, and allowing SCAS staff to more easily evaluate the operations of a wider pool of aircraft. Though changing the single event limit from 84 EPNdB to 74 dBA under the revised Ordinance may result in very limited additional use by some slightly louder aircraft, discussions with both the FAA and surrounding community indicates that this small change is acceptable to the majority of interested stakeholders in light of the benefits of maintaining and enhancing an already effective Noise Ordinance for the community.