**DRAFT 8.22.19 Planning Div. Comments on**

**MMC *Sound Management Plan* (rev 8/16/2019)**

1. Background:

The *Sound Management Plan* (referred to in this note as the *Plan*) is the “process draft” submitted on August 16, 2019 following a meeting between MMC COO and the Acting Director of Planning and Urban Development that identified some issues that should be clarified or expanded in the SMP.

The condition of approval (from PB in March 2018) is as follows:

1. *That within 9 months of the date of this site plan approval the applicant shall submit a “Sound Measurement Plan” for review and approval by the Planning Authority, for assessing the actual changes in sound impacts on nearby properties between the helipad operating at the existing site and at the new location, including criteria for mitigation where such impacts are severe based on appropriate national standards. The “Sound Measurement Plan” is required in the event that the predicted sound levels are incorrect, and it shall be approved and implemented at least 2 months before the helipad is relocated;*

The comments below are organized to relate to the headings in the draft *Plan.*

1. *About this Plan* The bolded and underlined comment regarding exceeding the expectations of the FAA is not relevant, as MMC is committed (per the MMC IDP page 96) ’…to conduct a noise study as part of the site plan process…and work to mitigate any potential noise impacts”. Further, the condition requires the assessment of the actual changes in sound impacts. The *Plan* is a site plan requirement and while we have agreed the FAA standards are the most appropriate national standard to guide the basis for mitigation, they are not strictly applicable and all references to FAA should be removed (including the quote above the bolded and underlined section).
2. *The Basics of Noise and Sound*: We reiterate previous recommendation that most of this be included in an Appendix as it is likely to annoy most readers and is not meaningful in the context of the purpose of the *Plan*. Please provide footnotes or references for any quotes.
3. *Background of MMC Helipads:* We suggest adding to the first section *“the existing helipad was approved in 2005 as part of the original Contract Zone based on sound studies and assessment of potential impacts”*. Please add “*subject to the condition requiring this SMP*” at the end of the sentence “*In 2018, the city of Portland approved MMC”S…*.” Clarify frequency of use of the secondary helipad. Page 6- how will MMC ensure other operators of helicopter flights also avoid negative impacts to neighbors? If just a transfer of a patient, why can’t these be scheduled for day time?
4. Standards for Aircraft Sound – p9 b. *Local Standards*: Please remove all references to the B3 zone as MMC is in the MMC IOZ and is bound by the MMC IDP and Regulatory Framework. Please quote the MMC IDP.
5. Measuring Sound Generated by MMC’s Helipad: Please include a table that has three headings: old location helipad, new main helipad, new secondary helipad with the DNL for each of these as measured at each of the measuring locations. Regarding *a. Sound Measurement Locations* we think it would be helpful to add: “*These are the same as used in 2003-2005 and were chosen at that time to assess a helipad anywhere on the MMC campus. They are helpful in understanding the likely change in sound impacts associated with relocation of the pad, but less helpful in predicting the shielding affect of buildings as this effect is relatively localized. These studies indicated that there would be a cone of potential sound increases very near the helipad under the approved flightpaths*”.
6. Complaints and Monitoring: We consider that you should have one heading as *Mitigation* with two components:
	1. *Mitigation for a defined "cone" of known impact* (we understood that you were moving away from listing properties) where the data shows there is an impact and anyone in that area should be eligible for mitigation by right if requested (as outlined in the previous version of the SMP-  with no FAA involvement -  see below)
	2. *Mitigation for anyone outside the cone*-  to be based on the complaint process similar to that described using the FAA criteria re delta of 1.5 DNL  (but again not involving any decision or rulings from FAA - see below) . The criteria for mitigation for any complainant would be to calculate/interpolate the baseline DNL (sound that they experienced from the previous helipad location) and then measure the actual DNL of the operations using the new helipad location.  If over 65 and delta of 1.5 they would get mitigation.  The complaints should not be limited to a particular flight path - the condition of approval was placed on this project because it was thought (and verified by our consultant) that there could be pockets of properties outside the core area that are impacted because of local conditions ie loss of local shielding or frequent deviations from approved flight paths.  The complaints would indicate whether there is a pattern of wider impacts and the trigger number needs to be reconsidered and not limited geographically. The review of the complaints would seek to identify what element is in common and what could be changed to address the issue.

Re the references on page 12 to involving the FAA, this is not appropriate nor acceptable. As noted above we are using an FAA standard as it is the most applicable national standard available - but only to provide a sensible basis for mitigation. The condition requests a clear set of criteria in order to avoid such bureaucracy/determinations etc and the SMP should set out clear criteria that allows for a quick response to a complaint.

1. Conclusion: the first sentence refers to “changes in helicopter operations” but the *Plan* currently does not include any of what was discussed at the meeting relating to operational changes that (say) increase the flight numbers and/or change flight paths. Reference is needed to monitoring arrangements and to clarify the process that would be in place to implement action needed to address the impacts of any changes.. Related to this is to clarify the role of the Neighborhood Advisory Committee. Also please clarify how neighbors are going to be informed of the (final approved) SMP and potential mitigation if they feel that they are experiencing a significant increase in sound impacts.