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**TOWN COUNCIL**

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U.S. Department of Transportation  
Docket Operations, M-30  
1200 New Jersey Avenue SE  
Room W12-140, West Building Ground Floor  
Washington, DC 20590-0001

RE: Docket Number FAA-2018-0954

To whom it may concern,

On behalf of the residents of the Town of Southampton and the Town's Airport Noise Advisory Committee, I would like to acknowledge the determination of the Federal Aviation Authority (FAA) to reexamine the North Shore Route and consider other alternatives to reduce commuter aircraft noise over Eastern Long Island. Excessive levels of noise prompted adoption of the North Shore Route rule. However, the level of noise is at least 4 times as much as when the Rule was first announced and is highly and unnecessarily disturbing to over a million residents from Manhattan and Queens to East Hampton and Montauk. Unfortunately, Southampton Town bears the brunt of this scourge as these aircraft make their way at low altitudes to and from the East Hampton Airport.

Mandatory routes or adjusting where they go is not the answer to this problem, routes merely move the noise from one community to another and do nothing to address the level of noise or safety concerns. What is desperately needed are curfews and steep reductions in the number of operations. If, as a short-term interim step, the FAA determines to modify routes, the following principles must be observed.

1. The routes must be mandatory and must perhaps consist solely of both a North Shore Route and a South Shore Route.
2. To the maximum extent possible, both routes must be over water, more than one mile offshore and at an altitude in excess of at least 5000'.
3. Transition over land to or from a landing facility may occur only within the borders of the Town in which such facility is located.

4. Both routes must apply to amphibian aircraft as well as helicopters, as they are largely interchangeable.
5. If a particular aircraft cannot adhere to the route, either in general or due to prevailing weather conditions or other factors, it may not fly the route at that time.
6. The FAA must commit adequate resources to enforcement or delegate enforcement to the affected Towns.

These recommendations largely update those made by the Town Supervisors of Southampton, East Hampton, Southold and Shelter Island back in 2010 before the North Shore Route was made permanent. The updating reflects the dramatic increase in traffic, our horrible experience with the Rule over the past decade and the growing use of amphibian aircraft.

Further, please see below our responses to the four specific questions posed by the FAA in its request for comments:

1. Did implementation of the Rule result in more or less helicopter noise in your community compared to levels you experienced prior to implementation of the Rule?

— As stated above, the noise by all forms of commuter aircraft has increased dramatically since implementation of the Rule. The ability of pilots to transition from the required route at any point and to fly along the shoreline on a completely unregulated Southern Route has made the North Shore Route completely porous and useless. As it applies to Southampton Town, these flaws in the structure of the Rule have resulted in most of the objectionable air traffic being routed over the neighborhoods and residences of the Town of Southampton to and from an airport not within the Town's jurisdiction.

2. How and when do helicopter operators deviate from the Rule?

— The Rule is so porous that deviation is profound. Deviation is supposed to occur for safety reasons only. However, that requirement is ignored or so loosely interpreted that the Rule is useless. Further, it does not currently apply to operators of amphibian aircraft, who may follow a similar path but do so at very low altitudes at extremely high noise levels. Most operators, in violation of FAA rules applicable to commercial flights, turn their transponders off to make complaining difficult. Any revised Rule must be coupled with a very strong commitment and resources for enforcement.

3. Are there alternative or supplemental routes you believe will reduce the noise impacts without jeopardizing the safe operation of aircraft?

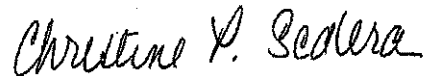
— The North Shore Route must require that aircraft flying that route between the New York City area and the airports in East Hampton and Montauk must stay at least one mile offshore over water around Orient Point and stay over water as long as possible in

transitioning between Orient Point and either airport. A parallel South Shore Route must be added and must also remain over water, at least one mile offshore, until due south of the destination landing facility (Georgica Pond in the case of East Hampton Airport). From experience altitudes of 2400' are neither observed nor effective and that the nature of the sound produced by helicopters requires that they fly at altitudes of at least 5000' to the maximum extent possible. There is no requirement that an aircraft operate if any portion of the flight is known to likely to impose safety concerns before the flight takes off. Major airports routinely ground flights in bad weather. These routes should be designed to minimize harm to people from noise rather than to maximize the ability of aircraft to fly to and from the Hamptons. Aircraft simply should not be permitted to use a route if for any reason they can't do it safely rather than permitting them to modify the route as they wish. The FAA must also establish procedures in coordination with East End Airports to monitor and enforce compliance with these routes.

4. Should the Rule be extended, modified or allowed to expire in 2020?

— Based on the foregoing, it should be both modified and then extended. Further, it would seem that no extension, modification or expiration will be meaningful unless East Hampton has the authority to — and does — steeply reduce the level of commuter air traffic. Only at that point will the requirements suggested above be helpful. Addressing this core issue cannot wait until 2020.

Respectfully submitted,



Christine P. Scalera  
Councilwoman

CC: Congressman Lee Zeldin  
Senator Charles Schumer  
Southampton Town Board  
Southampton Town Airport Noise Advisory Committee  
Noyac Civic Council  
Southampton Press  
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