

April 14, 2021

Filed electronically through www.regulations.gov

To: Donald Scata, Noise Division Manager, Office of Environment and Energy, Federal Aviation Administration, 800 Independence Ave. SW Washington, DC 20591

Re: Overview of FAA Aircraft Noise Policy and Research Efforts: Request for Input on Research Activities to Inform Aircraft Noise Policy (Docket No. FAA-2021-0037)

Dear Mr. Scata:

The attached comments regarding the Neighborhood Environmental Survey are submitted on behalf of the Aviation-Impacted Communities Alliance (AICA). The AICA is a small, focused group of community advocates working to create briefings on national priorities and legislation for aviation-impacted communities.

This comment is not meant to replace other comments submitted by the AICA.

1. **The FAA Neighborhood Environmental Survey (NES)** uses rigorous, state-of-the-art survey methodologies and its results provide **reliable new evidence about aircraft noise annoyance that should be promptly incorporated into FAA aircraft noise policies**.
2. **The NES results show that a *much* greater proportion of people are highly annoyed by aircraft noise across all levels of DNL than was previously thought.**
3. **The NES does not show that people are more sensitive to noise than in the past.** Rather, previous studies on which FAA policy is based (Schultz curve, FICON study) underestimated aircraft annoyance because they included all transportation noise (e.g. road and rail), and used a mix of older, less robust study methodologies.
4. **Annoyance with aviation noise has only increased since the timeframe when the NES was completed** because it was conducted prior to the implementation of NextGen Performance Based Navigation (PBN). Claims that aviation noise impacts have decreased over time due to the introduction of quieter aircraft have been rendered obsolete by the extreme concentration of flight paths caused by PBN procedures.
5. **The NES results should trigger a major change in aviation noise policy** because they refute the long-standing Schultz curve and FICON which have been the foundation of existing aviation noise policy.
6. **The FAA has an ethical obligation** to change regulations that are detrimental to the public, that are under its authority, and that do not require new legislation.
7. **The FAA should provide a timely roadmap** 6 months from now (Oct. 2021) for changing its noise regulations and use the NES results as the new foundation for decision-making on community impacts, including in the FAA's Environmental Review Process and Part 150.

8. **The FAA should start using additional, existing metrics to improve understanding of noise impacts and to report noise impacts on communities.** As a starting point: (1) the FAA should use and report N-Above (which counts the number of aviation noise events over a certain location and decibel level) because frequency of noise disruptions is highly correlated with annoyance, and DNL (an averaging metric) fails to account for this; (2) the FAA also should use and report a C-weighted metric (dBC), which measures the lower frequencies of noise that are at the source of most annoyance and sleep disturbances farther from the airport, but which are discounted by the A-weighted metric (dBA) currently in use; and (3) the FAA should also measure and incorporate the differences in aircraft-induced noise and ambient noise levels for determining significant impact thresholds for different noise environments.
9. **As a sign of goodwill and to improve understanding of noise impacts, the FAA should immediately start reporting these additional metrics, not just DNL.** Communities should not have to wait for new FAA regulations when such data can be reported now.
10. **The Agency should convene a National Academies panel of multi-disciplinary experts to recommend a new SYSTEM of metrics and thresholds to redefine “significant impact” from aircraft noise.** The panel should include noise experts, public and medical health professionals, sleep experts, and acoustical engineers, among others. The panel should take into consideration, among other things: the NES results, the difference between local noise environments (ambient noise) and aircraft-induced noise, and nighttime noise. At a minimum, the panel should investigate the following metrics: N-Above, C-weighted db, and DNL from 40-75+. It is imperative that the panel be independent and that the results be peer-reviewed.
11. **The FAA should commission an independent committee within the National Academy of Medicine** (within the National Academies of Sciences, Engineering and Medicine) to produce **a consensus report on the health effects of air traffic noise and pollution, including the effects of ultrafine particles (UFPs).** The consensus report should summarize the large body of existing scientific literature and studies on the health effects of air traffic noise and pollution, and it should make policy recommendations based on the results. The FAA should then promptly take any actions necessary to protect the public from the identified health impacts of aircraft noise and pollution.

Thank you for the opportunity to comment. We look forward to the FAA taking immediate action to incorporate the NES results into FAA aircraft noise policies.