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COMMUNITY GROUPS URGE A4A TO SUPPORT IMMEDIATE ACTION TO REDUCE NOISE HARMS

Some 46 community groups impacted by aviation noise nationwide urged Airlines for America (A4A) in an April 14 letter to take immediate action "to relieve the harm caused by aircraft noise to our communities" in light of the results of FAA's Neighborhood Environmental Survey (NES) and its new national dose-response curve for annoyance based on the survey results.

Released in January, the NES shows that FAA's current noise policy – based on the over-40-year-old Schultz [dose-response] Curve – significantly underestimates community annoyance to aircraft noise (33 ANR 1).

While the Schultz Curve predicts that only 12.3 percent of people will be 'Highly Annoyed' by aircraft noise at a noise exposure level of DNL 65 dB, FAA's new National Curve predicts between 60.1 percent and 70.9 percent of people will be Highly Annoyed at an exposure level of DNL 65 dB, which FAA uses to determine significant noise impact in environmental studies.

"The magnitude of the shift in understanding of human annoyance caused by aircraft noise conveyed by the new National Curve relative to its predecessors presents an imperative call for immediate action," the community groups told A4A's Director of Environmental Affairs Veronica Bradley and A4A's Vice President of Environmental Affairs Nancy Young, who told FAA their member airlines support FAA's aircraft noise research agenda.

"Research is not needed to tell us that much higher volumes of operations, aircraft concentration, and the use of PBN and Flight Management Systems have greatly amplified the aircraft noise problem," the community groups asserted in their response to A4A's comments.

They asked the airline trade group "to support and encourage the FAA to immediately take common-sense actions based on the NES results, in order to relieve the harm caused by aircraft noise to our communities."

These actions, they wrote, include, but are not limited to:

- Acknowledge that the NES results replace the Schultz and FICON numbers;
- Provide a timeline to address the FAA's current interpretation of "significant impact" and its associated implications on FAA noise policies, processes, and regulations;
- Commission the National Academies to recommend a reliable system of metrics and thresholds to represent "significant impact" for all communities (at the airport, near the airport, and away from the airport), with the results to be available by the end of 2022;
- Adopt interim metrics and thresholds for significant impact while developing a revised framework on noise policies, processes, and regulations; and
- Report additional metrics and improve data reporting to better capture the
 true impacts of noise in all noise impact analyses. Reports should include
 metrics such as N-Above, utilize C-weighted dB not just A-weighted,
 display results in 5 dB increments between 45 and 80 dB, and show
 results in 6-hour blocks and during peak traffic periods in addition to 24hour averages.

Don't Stand in the Way of Relief

In its comments to FAA on the updated annoyance survey, A4A said that additional research "is needed to support a more reliable system that demonstrates the relationship between noise exposure and community response, thereby allowing for a data-driven rationale for FAA decisions making."

But the community groups replied:

"We do not need research for new metrics, or other areas of study, in order to immediately change noise policy in ways that finally begin to address the harm that has been substantiated by the new NES data. We ask that the airlines not stand in the way of relief from noise and emissions for people on the ground. It is time to make policy changes instead of delays, deflections, or denials.

"Concurrently with immediate changes to noise policy made in accordance with the NES study, we advocate and respectfully ask A4A to support the convening of a National Academies panel of multi-disciplinary experts to explore existing metrics or recommend a new system of metrics and thresholds to define "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 the results be peer-reviewed, and completed by the end of 2022," the community groups said.