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# ***Airport Noise Report***



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## **UPDATED NOISE POLICY SHOULD INCLUDE NEXT-GEN IMPACTS, NEW ANNOYANCE DATA**

FAA's aviation noise policy should be updated to "represent 21st century aviation" including the new impacts of NextGen airspace changes and the findings of FAA's Neighborhood Environmental Study (NES) on annoyance to aircraft noise in communities around U.S. airports, the Aviation Impacted Communities Alliance (AICA) told FAA in comments submitted this week.

AICA represents over 70 grassroots groups across the country working to protect communities from the harmful effects of aviation noise and emissions. Many, if not most, of these groups are under new NextGen flight paths and impacted by noise beyond the 65 dB DNL boundary used by the agency to determine compatible residential use around airports.

As of Sept. 14, some 3,330 comments have been submitted to FAA's docket on its noise policy review and 2,339 comments posted on the docket ([www.regulations.gov](http://www.regulations.gov); search for FAA-2023-0855). The docket closes at the end of September. Still to be submitted are comments from major aviation trade groups representing airline, airports, and other aviation stakeholders.

AICA's comments were developed following a virtual panel discussion held on July 13 and moderated by the Federal Mediation and Conciliation Service (FMCS), which is assisting FAA with its noise policy review. The panel discussion was hosted by FAA and AICA but was not announced publicly and no members of the press were invited to attend.

"The parties agreed to discuss the review framework and facilitate the submission of meaningful comments by members of local communities who are substantially affected by noise and noise impacts," AICA explained in the introduction to its docket comments. AICA's 32-page submission is attached to the email that brought you this week's issue of ANR.

FAA asked those submitting comments on its noise policy review to respond to specific questions. One of those is "What interests or concerns do overflight communities have?" AICA told the agency:

"Overflight communities are concerned that the current noise policy does not reflect the true impacts they

experience – the number of aviation noise events, their loudness relative to the community’s ambient noise, and how often and when the noise occurs. The current policy of metrics and thresholds used for decision-making does not capture the negative health and quality of life impact-factors from NextGen’s high volume and concentration low altitude aircraft. Many GA and commercial vehicle overflight communities are impacted by more than one airport, multiple routes, multiple vehicle types, and different elements of aircraft operations. Commercial vehicle overflight communities are also concerned about multiple procedures and vectors. Therefore, the total noise impacts should be assessed ... FAA’s 1050.1F order and Desk Reference should require total noise impacts for all assessments.

“Today’s one size fits all, DNL 65 has been interpreted as Significant Impact for the two separate noise exposure environments [in the vicinity of airports or overflown]. Overflight communities require different metrics, thresholds, and mitigation including noise abatement procedures and dispersion.”

## **DNL Called ‘Statistically Invalid’**

The AICA comments (beginning on p. 9) include a detailed and convincing argument of why FAA’s core noise metric DNL is “statistically invalid” for assessing aviation noise annoyance and (on p. 17) why Number-Above-Ambient should replace DNL when making decision about noise impact on overflight communities.

“FAA’s current noise policy relies on the DNL 65 metric and threshold for every decision (including environmental reviews, airport noise compatibility planning, soundproofing eligibility, and permanent noise monitoring eligibility) for all communities whether they are in the vicinity of airport or overflown communities, regardless of the communities’ ambient noise level,” the community alliance stressed.

It argued that FAA’s noise policy should address the multiple community environments – those in the vicinity of airports and vertiports and overflight communities – separately.

“Simplicity in a noise policy as emphasized by the FAA cannot be at the expense of communities whose impacts are underrepresented today under the current noise policy. There should be different noise metrics for different circumstances to address the characteristics of noise exposure environments,” AICA asserted.

The alliance argued that FAA should adopt new DNL noise thresholds for determining significant impact based on World Health Organization aircraft noise guidelines adopted in 2018; that the agency does not have the expertise to develop a noise policy that captures the impact of aviation noise (and pollution) on the public’s health and therefore should commission a peer-reviewed consensus report on aviation impacts on public health from the National Academies Division of Medicine; and “that there is currently enough scientific, independent, high-quality epidemiologic data and research for the FAA to conclude that current aviation noise problems are a major public health risk.”

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