



March 22, 2021

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

Subject: Docket No. FAA-2021-0037 - Comments on FAA's Neighborhood Environmental Survey

Dear Mr. Scata:

The *LAX/Community Noise Roundtable* appreciates the FAA's recent release of the Neighborhood Environmental Survey (NES) research examining the public perceptions of aircraft noise from residents around 20 airports in the United States. It is our understanding that the purpose of this study is to gather updated data from a national survey to assess the annoyance level relating to aircraft noise. The results can then possibly be used to evaluate and determine whether the FAA's Aviation Noise Abatement Policy, which was based on now outdated data from 30 years ago, should be updated or changed to reflect and address the current noise situation.

While we applaud the undertaking of this noise research, what we long for is the resolution of our on-going, daily concerns, which negatively affect many in our extended community as far as 40 miles away from Los Angeles International Airport (LAX). Our Roundtable operates to identify community noise concerns from aircraft operations at LAX and to recommend courses of action to address the adverse noise effects on the surrounding communities whenever possible.

The NES study concluded that more people are highly annoyed than before, both inside and outside the 65 DNL/CNEL noise contour, when comparing the current results to the 1992 FICON study that employed the Schultz Curve from the 1970's. The present study validates what our community members and residents have been experiencing and saying all along: that they are adversely affected by the increased air traffic, concentrated flight paths, and other adverse factors. Most importantly, the research confirms that the Schultz Curve, which was the basis used for developing noise policy many years ago, does not reflect the current public perception of aviation noise.

We are heartened whenever the FAA and Congress contemplate changes to noise impact criteria for mitigation but hold no illusion that such changes will be immediately forthcoming. We understand that the FAA will not make any changes to its noise policy, including any potential revision to the use of the DNL/CNEL noise metric, until the FAA has carefully considered public and other stakeholder input along with any additional research needed to improve the understanding of the effects of aircraft noise

exposure on communities. Nevertheless, we would like to take this opportunity to encourage the FAA to move swiftly to conduct any additional research that may be necessary to understand the causes of the higher annoyance levels, and at the same time consider updating the noise policy without further delay.

In no way are we suggesting that new federal noise policy (i.e., protection/mitigation criteria) be delayed until more research is completed. Indeed, we feel that sufficient research has already been conducted to render noise policy changes possible. We believe that revision of mitigation impact thresholds should be undertaken NOW with the best understanding currently available and opportunities for future refinement. We even encourage Congress and the FAA do more to assess the successes/failures of existing criteria on a more regular basis.

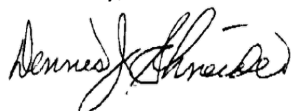
If the FAA were to undertake more research, we recommend the following topics:

- Some of the airport research and surveys were conducted using pre-NextGen data. Consider surveying areas affected by post implementation of NextGen navigation procedures.
- Consider new criteria/multiple metrics be used to evaluate different conditions (i.e., noise impacting those near an airport vs areas affected by concentrated overhead flights at defined altitude thresholds).
- Study ways to reduce on-airport noise and pollution. Find ways to address low frequency noise and reduce atmospheric promulgation of the noise.
- Conduct additional studies of how aircraft speed on arrivals and departures can be used to reduce noise on the ground.
- Study differences in noise impacts resulting from fleet mix changes at commercial airports and/or smaller airports.
- Study the impacts on people based on the frequency of noise events vs single event levels to be used as threshold criteria. Define when restudying is necessary due to air traffic increases.
- Develop improved noise mitigation methods for reducing the causes of annoyance and health degradation.

Our airports are integral to the economic wellbeing of our communities. The membership of this body always supports safe operations. However, we request faster FAA action to address specific concerns affecting our communities such as concentrated flight paths, aircraft not flying at minimum altitudes, noise from ground operations, and other noise issues as mentioned above.

We need solutions, not explanations as to why our communities are so heavily impacted! We continue to be willing and able to work with the FAA to address our communities' concerns. Thank you for the release of the NES research results and for the opportunity for the Roundtable to submit comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Denny Schneider". The signature is fluid and cursive, written over a light blue horizontal line.

Denny Schneider, Chair
LAX/Community Noise Roundtable