

November 10, 2020

Raquel Girvin Regional Administrator Federal Aviation Administration Western-Pacific Regional Office 777 S Aviation Blvd, Suite 150 El Segundo, CA 90245

# Re: Endorsing Aircraft Noise Recommendations Prescribed by U.S. Conference of Mayors and National League of Cities Resolutions

# Dear Ms. Girvin:

On behalf of the LAX/Community Noise Roundtable (Roundtable), I am writing to express our support of the aircraft noise recommendations contained in the resolutions from the U.S. Conference of Mayors and the National League of Cities. The Roundtable highly values the importance and potential benefits of these suggested measures that offer improvements in assessing and reducing noise exposure for our surrounding residential communities. Therefore, the Roundtable is taking this opportunity to express our support of the following specific recommendations and to request that the FAA consider supporting and adopting these measures.

# Requiring Supersonic Aircraft to Comply with Stage 5 Noise Standards

Earlier this year, the FAA issued the Notice of Proposed Rulemaking with the intent of not requiring supersonic aircraft to meet Stage 5 noise requirements, which are already imposed on all other classes of aircraft. The communities represented on the Roundtable have benefitted over the years from the reduction of noise resulting from legislation continuing to require aircraft manufacturers to produce quieter aircraft. This proposed rule represents a regression in noise certification stringency and has the potential to create more noise for our communities. The Roundtable has concerns about this proposed rule and is asking the FAA again to consider requiring supersonic aircraft to meet Stage 5 and future noise standards as part of the aircraft noise certification process.

### Lowering 65 DNL/CNEL Threshold

The Roundtable supports decreasing the DNL/CNEL significant noise threshold from 65 to 60 as the current threshold of significance (65 CNEL) is too limiting and does not extend into areas of highest concern from our represented communities. The Roundtable also awaits the findings of the FAA's "annoyance survey", which will provide a basis for determining whether changing the 65 CNEL is warranted. Should the results warrant changes to current policy pertaining to aircraft noise exposure, the Roundtable urges the FAA to consider lowering the

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threshold as it may offer noise reduction benefits to nearby residents located outside the 65 CNEL contour.

### Using Alternative Noise Metrics to DNL/CNEL

The Roundtable understands that the FAA stands by its use of DNL/CNEL as the primary metric for assessing noise impacts based on the Report to Congress regarding evaluating alternative metrics to DNL/CNEL. However, most communities believe that this metric does not adequately assess aircraft noise impact, particularly from flight path changes. Hence, the Roundtable urges the FAA to reconsider using alternative metrics in certain situations in addition to DNL/CNEL, such as using N75 for speech interference, Leq(8) for learning disruption, and Lmax(C) for rattle caused by low frequency noise.

Thank you for your consideration of our requests. The Roundtable believes that these recommended measures are well intended as they provide improved means of assessing and addressing aircraft noise issues. The Roundtable values the long history of working together with the FAA and appreciates your continued support of our efforts to explore ways to reduce aircraft noise. We look forward to your response.

Sincerely

Denny Schneider, Chair LAX/Community Noise Roundtable

cc: Roundtable Members