November 10, 2004

Ms. Victoria L. Catlett
Docket Number FAA-2004-19158
Docket Management Facility
U.S. Department of Transportation
400 Seventh Street, SW
Nassif Building, Room PL-401
Washington, DC 20590

Dear Ms. Catlett:

The Los Angeles International Airport (LAX)/Community Noise Roundtable (Roundtable) offers these comments on the Department of Transportation, Federal Aviation Administration’s Final Rule on 14 CFR Part 150, Airport Noise Compatibility Planning, dated Friday, September 24, 2004.

The Roundtable was created by Los Angeles World Airports (LAWA) in September 2000 as a follow-up to the Federal Aviation Administration’s (FAA) Southern California Task Force. The Roundtable is intended to reduce and mitigate adverse aircraft noise impacts that the users of LAX produce on surrounding communities. Membership of the Roundtable consists of state and local elected officials and staff, representatives of congressional offices, members of recognized community groups, the FAA, the airlines, and LAWA Management. This forum provides a mechanism that attempts to ensure cooperation between LAX and local impacted communities in achieving noise impact reduction to those communities wherever possible.

Members of the Roundtable are aware that the changes proposed in this rule making reflect changes to federal legislation enacted by Congress. The Roundtable members are also aware of the new Order 1050.1E, Environmental Impact: Policies and Procedures, issued on June 8, 2004, and of the limitations that those policies impose on the ability to adequately identify the noise impacts that aircraft operations have adjacent communities.

The Roundtable’s members wish to offer support in this instance to three of the proposed revisions to 14 CFR Part 150 that it believes improve and support its efforts to mitigate noise impacts. The specific items are:

Section 150.7 Definitions – Clarifies the definition of a Part 150 Study Noise Exposure Map (NEM) by allowing an airport sponsor to select a forecast period longer than five years in preparing its NEMs.

Comment – The Roundtable has commented in the past that a longer forecast period is desirable because it is more likely to indicate significant future noise impacts when applying the FAA DNL metric and incremental change criteria.
Section 150.21 Noise Exposure Maps and Related Descriptions – An airport sponsor is required to update its NEM if there is a change in operations that either creates any substantial, new non-compatible land use; or a significant reduction in noise over existing non-compatible land uses.
Comment – While the introduction of the Stage 3 aircraft caused a sizable reduction in the noise contours at LAX, future Stage 4 efforts are not likely to produce noticeable changes.

Appendix A, Noise Exposure Maps - Requires the FAA to post noise exposure and land use information from NEMs on the FAA’s web site
Comment – The posting of NEM information is an important step in keeping the communities informed about current and projected future noise exposure.

Please keep in mind that the position adopted by the Roundtable, as stated in this correspondence, is not the official position of the City of Los Angeles or Los Angeles World Airports. The LAX/Community Noise Roundtable is a voluntary and independent body and this position is the opinion of the majority of the membership.

Yours very truly,

John McTaggart, Chairman
Los Angeles International Airport/Community Noise Roundtable

cc: Honorable Senator Dianne Feinstein
Honorable Senator Barbara Boxer
Honorable Representative Jane Harman
Honorable Representative Maxine Waters
Honorable Representative Dianne Watson
Roundtable Members
Mr. Marland Townsend, Chairman, San Francisco International Airport/Community Roundtable
Arlene Mulder, Chair, Chicago O’Hare Noise Compatibility Commission
Kim Day, LAWA
Secretary Norman Y. Mineta, U.S. D.O.T.