



March 25, 2011

The Honorable Thomas E. Petri, Chairman  
Subcommittee on Aviation  
2251 Rayburn HOB  
Washington, DC 20515

Subject: Opposition to Categorical Exclusion Provision in Section 314 (d) of Senate Bill 223,  
"FAA Air Transportation Modernization and Safety Act"

Dear Chairman Petri:

I am writing to you on behalf of the Los Angeles International Airport (LAX)/Community Noise Roundtable to express the Roundtable's concern regarding the current language in Section 314 (d) of Senate Bill 223, "FAA Air Transportation Modernization and Safety Act." The LAX Roundtable is opposed to the issuance of blanket categorical exclusions for Required Navigation Performance (RNP) and other Performance-Based Navigation (PBN) procedures that "... result in an absolute reduction or no net increase ..." in aircraft noise levels. While the Roundtable wholeheartedly supports the development and implementation of RNP and PBN that reduce aircraft emissions and noise exposure, the Roundtable does not support legislation that would result in the possible shifting of aircraft noise from one community to another.

As it is currently written, the language in Section 314 (d) would permit the increase in aircraft noise exposure over one community as long as there is a corresponding or greater decrease in noise over another community. This approach to issuing a Categorical Exclusion for RNP or PBN procedures is in direct conflict with the requirements of the National Environmental Policy Act (NEPA), Federal Aviation Administration Order 1050.1E, "Environmental Impacts: Policies and Procedures," FAA's established and stated practice of not shifting noise, and the LAX Roundtable's policy against shifting noise. The LAX Roundtable Bylaws state:

It is the intent of the Roundtable to identify noise concerns in the surrounding communities and to recommend courses of action to LAWA [Los Angeles World Airports], the FAA, or other responsible entity that could reduce noise over affected communities without shifting noise from one community to another.  
(Emphasis added)

The Roundtable's policy of not shifting noise is also shared by most other airport-community noise forums in the United States including San Francisco's and Oakland's in the State of California.

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The Roundtable understands and shares Senator Maria Cantwell's frustration over the slow progress related to the implementation of RNP and PBN procedures that could benefit communities near airports by reducing emissions and noise, the air carriers by reducing fuel consumption, and the national air transportation system by increasing operational efficiency. However, we cannot support the idea of expediting the implementation of these procedures without conducting the necessary environmental impact study since these procedures may potentially shift noise from one group of residents to another. Therefore, prior to finalizing and approving the multiyear FAA Reauthorization Bill, the LAX Roundtable respectfully requests that Section 314(d) be removed from the Senate Bill 223 and any versions of the Senate and House bills moving forward for approval.

The LAX Roundtable is a voluntary and independent body that consists of membership from several participating governmental entities, elected officials, community groups, the airlines, the Federal Aviation Administration, and Los Angeles World Airports. The position stated in this letter is the opinion of the majority of the membership of the Roundtable and is not the official position of the Federal Aviation Administration, the City of Los Angeles or Los Angeles World Airports.

Sincerely,



Denny Schneider, Chairman  
LAX/Community Noise Roundtable

cc: . Congressman Bob Filner  
Congresswoman Karen Bass  
Congresswoman Maxine Waters  
Congresswoman Lucille Roybal-Allard  
Congressman Dana Rohrabacher  
Congresswoman Laura Richardson  
Senator Maria Cantwell  
Senator Diane Feinstein  
Senator Barbara Boxer  
Senator Jay Rockefeller  
Gina Marie Lindsey, Executive Director, Los Angeles World Airports  
Steve Alverson, Roundtable Facilitator