



October 15, 2014

Docket Operations, M-30  
US Department of Transportation  
1200 New Jersey Avenue SE, Room W12-140  
West Building Ground Floor  
Washington, DC 20590-0001

Subject: Docket Number FAA-2014-0510, "Implementation of Legislative Categorical Exclusion for Environmental Review of Performance Based Navigation Procedures"

Dear Sir or Madam:

The Los Angeles International Airport/Community Noise Roundtable (Roundtable) is a voluntary independent body whose membership consists of local elected officials, representatives of congressional offices, members of recognized community groups, the Federal Aviation Administration (FAA), the airlines, and Los Angeles World Airports (LAWA). These parties have worked collaboratively for more than 13 years to identify noise issues that affect the communities surrounding Los Angeles International Airport (LAX) and to seek feasible solutions to reduce aircraft noise in those affected communities.

In Docket Number FAA-2014-0510, the FAA is seeking public comment on "...the entirety of the prospective implementation of the CATEX in Section 213(c)(2) of the FAA Modernization and Reform Act of 2012, and particularly invites comment on ... specific aspects of the Net Noise Reduction Method which are under consideration by the FAA as described in this notice. ..."

The Roundtable would like to take this opportunity to provide input on this important issue. The Roundtable strongly supports the implementation of PBN measures that will result in measurable reductions in cumulative aircraft noise exposure across the entire community, but strongly opposes the implementation of PBN measures that would shift aircraft noise exposure from one community to another even if the total number of people exposed to aircraft noise is shown to be reduced using the Net Noise Reduction (NNR) Method.

**Shifting noise from one population to another is unacceptable.** The Roundtable's By Laws state that the Roundtable will "... recommend courses of action to LAWA, the FAA, or other responsible entity that could reduce noise over affected communities without shifting noise from one community to another." (Emphasis added) This type of "no shifting of noise" policy is shared by most other airport community noise forums in the United States and has historically been supported and publically

referenced by the FAA in response to communities seeking relief from incessant aircraft noise exposure resulting from concentrated aircraft overflight activity. However, the NNR Method would clearly allow new residents/communities to be exposed to increased aircraft noise if the NNR calculation shows a neutral or net benefit in the total number of people exposed to aircraft noise, and contradicts the "no shifting of noise" principle. In addition, the NNR method, if adopted, would potentially allow new people to be exposed to incompatible noise levels of 65 dB DNL and higher with no opportunity for mitigation. If newly impacted people are exposed to incompatible conditions, a Categorical Exclusion should not be allowed.

**A totally transparent public process is recommended.** The Roundtable understands that the FAA's process of reviewing and issuing Categorical Exclusions on PBN procedures does not require public notification and input. The Roundtable believes the public has a right to know whenever their homes will be newly exposed to noise levels exceeding 65 dB DNL and encourages the FAA to conduct an appropriate level of public outreach on the CATEX process. The public outreach effort will provide an opportunity for the FAA to inform the public about the potential impacts associated with implementing PBN procedures and afford the public the chance to provide the FAA with input on the potential impacts.

The Roundtable would strongly support an alternative approach that would require reductions in all three noise exposure bands in order to justify the use of a CATEX for new PBN Procedures. The Roundtable believes that this approach is consistent with Congress' intent and direction to the FAA to issue and file a CATEX for any new PBN procedure that "... would result in measureable reductions in fuel consumption, carbon dioxide emissions, and noise on a per flight basis as compared to aircraft operations that follow existing instrument flight rule procedures in the same airspace." A new PBN procedure that results in no increase in noise in all three noise exposure bands clearly qualifies for a CATEX.

In summary, the Roundtable supports the FAA's use of a per-flight noise calculation method to justify Categorical Exclusions only when implementation of a PBN procedure would result in noise reductions in all three noise contour bands without shifting noise from one community to another.

The Roundtable appreciates the opportunity to express its views on this matter and looks forward to seeing the approach the FAA takes to meet Congress' intent. The position stated in this letter is the opinion of the majority of the Roundtable's membership and does not represent the official position of the FAA, the City of Los Angeles, or LAWA.

US Department of Transportation  
Docket Number FAA-2014-0510  
October 15, 2014  
Page 3

Please address your reply, if any, to the LAX/Community Noise Roundtable, c/o Los Angeles World Airports, 1 World Way, P.O. Box 92216, Los Angeles, CA 90009-2216, Attention: Kathryn Pantoja.

Sincerely,

A handwritten signature in black ink, appearing to read "Denny Schneider". The signature is fluid and cursive, with a large loop at the end.

Denny Schneider, Chairman  
LAX/Community Noise Roundtable

cc: Roundtable Members  
Senator Dianne Feinstein  
Senator Barbara Boxer  
Congressman Adam Schiff  
Congressman Brad Sherman  
Congressman Henry A. Waxman  
Congresswoman Janice Hahn  
Congressman Tony Cardenas  
Congresswoman Maxine Waters  
Congresswoman Karen Bass