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June 20, 2023

Mr. Kevin Welsh
Director, Office of Environment and Energy
Federal Aviation Administration

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

Re: Docket No. FAA-2023-0855
“Request for Comments on the Federal Aviation Administration’s Review of the Civil Aviation Noise Policy”

Dear Mr. Welsh:

Thank you for inviting comment on the review of the civil aviation noise policy being undertaken by the Federal Aviation Administration (FAA) to define, assess, and communicate aircraft noise exposure and impacts. The Minneapolis-St. Paul International Airport (MSP) Noise Oversight Committee (NOC) has monitored the FAA’s Noise Policy Review process with keen interest. The NOC previously commented on the request for comment on the Neighborhood Environmental Survey, Docket No. FAA-2021-0037.

The NOC is the primary advisory body on aircraft noise issues associated with MSP. The NOC is comprised of six community representatives and six aviation industry representatives who provide policy recommendations to the Metropolitan Airports Commission (MAC), which owns and operates MSP¹. For 20 years, the NOC has provided a balanced forum and amassed a distinguished record of identifying and analyzing airport noise issues around MSP, which has resulted in the development of many innovative solutions through sophisticated evaluation of noise issues.² These solutions are based both in acoustical methods, such as sound insulation and noise abatement mitigation, as well as non-acoustic methods, such as stakeholder and community collaboration and engagement. The NOC recognizes the importance of this work and, in conjunction with MAC staff, works to maintain strong partnerships with the airlines, airport, community, and FAA through a robust calendar of engagements designed to meet and collaborate with our stakeholders.

It is from this experience that the NOC formulates the following comments and suggestions in response to the FAA’s request for public comment on the Review of the Civil Aviation Noise Policy.

¹ The NOC airport user representation includes air carriers, cargo air carriers, chief pilots, charter air carriers, and the Minnesota Business Aviation Association. NOC community representation includes the cities of Bloomington, Eagan, Mendota Heights, Minneapolis, Richfield and an At-Large community seat representing the cities of Apple Valley, Burnsville, Edina, Inver Grove Heights, St. Louis Park, St. Paul and Sunfish Lake.

² Please see <https://metroairports.org/noc-work-plans-and-accomplishments>.

First, the NOC would like to address the question regarding the information FAA should be using to inform decisions about an updated noise policy. Rather than resting only on the results of the Neighborhood Environmental Survey and subsequent public comments, the NOC would encourage the FAA to complete its current research efforts. Data from ongoing research, such as auditory and non-auditory effects and epidemiological studies currently underway by the FAA, are crucial elements in the portfolio of scientific evidence on the impact of aviation in the community. Scientific evidence resulting from the FAA's studies on children's learning, impacts to cardiovascular health, sleep disturbance and economic impacts is necessary to inform policymakers on the best use of resources and techniques available to minimize aircraft noise impact on our communities.

Second, an overarching comment relates to the FAA's intent on reviewing its noise policy to consider revisions every three to five years. While a regular review of best available data and consideration of supplemental metrics to inform decision-making could be useful, regular and frequent noise policy changes to metrics and thresholds of significance will likely disrupt active or proposed processes – such as land use planning, noise mitigation measures, airport long-term plans and environmental reviews – which require time to establish and/or complete. These processes, particularly corrective and preventative land use management, require a stable noise metric and policy. Substantial time, effort and investment has gone into corrective and preventative land use management around MSP. Over 19,000 homes around the airport have been offered noise relief through MAC's Airport Noise Mitigation Program and the communities have conducted land use planning and zoning efforts based on the DNL metric. A change to the metric and threshold used for determining compatible land use and mitigation eligibility would take time to adopt into practice for both the airport and surrounding communities. Revisions to noise policy to determine compatible land use and noise mitigation eligibility every three to five years would be problematic for the airport and communities to easily and readily adopt. Additionally, frequent changes could add to public confusion and weariness about the definition of acceptable and unacceptable aircraft noise levels. The NOC encourages the FAA to establish a new noise policy that is stable, well-understood and well-researched to limit disruptive and confusing changes for our communities. One way to do this is to complete and incorporate findings from the FAA's aforementioned research initiatives.

The third comment relates to the FAA's statement that the noise policy review is not intended to reduce noise exposure. The NOC has and continues to advocate for the reduction of noise exposure through the advancement of technology. The NOC concurs with the accompanying framing paper which states that the adoption of quieter technology and voluntary noise abatement procedures are necessary to reduce aviation noise exposure. The NOC encourages the FAA to accelerate the implementation of creative noise reduction strategies that take noise sensitive areas into account including noise abatement procedures, procedure development, and runway use. Technology designed to reduce noise at the source is tremendously beneficial to residents and often provides mutual benefits to airports and operators. Federally developed incentive programs should be considered for aircraft operators to install or employ noise reduction equipment, as well as methods to accelerate the adoption of these systems and incorporate noise reduction equipment into the fleet as quickly as possible. The NOC encourages the FAA to build capabilities into the Aviation Environmental Design Tool to quantify the noise reduction benefits provided by advanced noise reduction technology and accurately model low-noise abatement procedures and systems. These capabilities would allow the agency to further reduce the impact on affected communities by actively designing and implementing noise abatement procedures at airports, which would reduce the frequency of flights over residential and other sensitive land uses.

The FAA asked about the concerns voiced by residents outside the 65 decibel (dB) Day-Night Average Sound Level (DNL) contour and sought clarification regarding how the FAA could better communicate noise impacts to benefit the public. Ninety-nine percent of MSP noise complaints in 2022 were submitted by residents outside the 65 dB DNL contour. In addition to overall noise, residents express concerns about the frequency of aircraft operations and the time of day those operations occur. Given that, the calculation of DNL or a revised metric should continue to account for increased

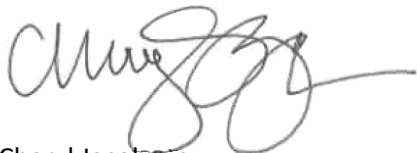
nighttime disturbance. The NOC has found that companion and supplemental noise metrics add clarity when communicating noise exposure and that they aid in decision-making, particularly related to proposed flight procedure changes. Metrics such as number of events and the time above decibel thresholds, as well as maximum sound levels, both augment the benefits of DNL and communicate more effectively to concerned residents who feel an average level is not representative of their experience. Additionally, DNL noise contours often lead to misconceptions that homes outside the contours should have no aircraft noise exposure. Using other metrics sets a more realistic expectation of noise exposure for residents outside published DNL contours.

Given NOC's experience using supplemental and companion metrics to communicate impacts, the NOC believes there is an opportunity for the FAA Air Traffic Organization to improve both the evaluation and communication of noise and environmental changes resulting from new or modified flight procedures. Recently, when the City of Eagan developed several flight procedure modification requests, the NOC utilized companion metrics to evaluate the resultant noise impacts. Understanding how a flight procedure change would increase or decrease the number of events exceeding 65 dB in communities led to a well-researched, balanced, justified and clear decision.

The NOC appreciates the FAA's commitment to engagement and communication with stakeholders during the development of new Performance Based Navigation procedures. However, there remains an opportunity for the FAA to share information with the public early and often using plain language, clear visual representations of proposed flight procedure changes and companion metrics to help communicate impacts to communities.

Thank you for recognizing the vital role the NOC provides in developing recommendations for the MAC. The NOC is poised and eager to participate in discussions regarding the FAA's future decisions on federal noise policy.

Sincerely,



Cheryl Jacobson
MSP NOC Co-chair
City Administrator
City of Mendota Heights



Jeff Hart
MSP NOC Co-chair
General Manager – Airport Customer Service
Delta Air Lines

cc: MAC Planning, Development & Environment Committee
Brian Ryks, MAC Executive Director / CEO
