



February 11, 2004

Docket Number FAA-2003-16526  
Docket Management Facility  
U.S. Department of Transportation  
400 Seventh Street, SW  
Nassif Building, Room PL-401  
Washington, DC 20590-001

To Whom It May Concern:

These comments are made in response to the Notice of Proposed Rule Making, Docket No. FAA-2003-116526; Stage 4 Noise Standards. The focus of these comments is directed at the achievement of real noise mitigation by the reduction of aircraft noise at its source. The proposed adoption by the Federal Aviation Administration (FAA) of a "mirror image" of the ICAO Annex 16, Chapter 4 will not, in our opinion, achieve this result.

The Los Angeles International Airport (LAX)/Community Noise Roundtable (Roundtable) was formed in September 2000 as a follow-up to the work of the FAA's Southern California Task Force. Its membership consists of elected officials, local, state and federal who represent the residents of communities impacted by the noise from LAX aircraft operations, the management of Los Angeles World Airports (LAWA), representatives of the airline industry, community groups, and the FAA. 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 Roundtable is a voluntary and independent body and this position is the opinion of the majority of the membership. Our primary objective is to seek ways to reduce noise impacts on people residing near the airport.

Since its inception the Roundtable has identified noise impacts in its member communities and is focusing its efforts on the mitigation of those impacts by working cooperatively with LAWA, the FAA and the airline industry. The experience of the communities adjacent to LAX reveal that the most important contribution to aircraft noise reduction in communities in the past twenty years has been the introduction of Stage 3 aircraft and retirement of the louder Stage 2 aircraft. The Roundtable members expected that the adoption of Stage 4 regulations would result in a similar accelerated reduction of noise. In the Roundtable's judgment, federal noise policy must be supportive of local noise concerns and mitigation efforts. The members of the Roundtable believe the proposed regulation will not provide the support the impacted communities need in our quest for significant noise reduction.

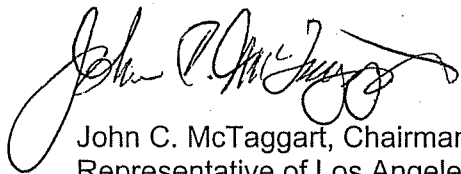
The Airport Noise and Capacity Act of 1990 (ANCA) has not solved the noise problems in the communities impacted by the noise from aircraft. As a result, the communities are absorbing large noise costs, with no relief in sight. Aircraft noise is a key reason that the aviation industry is facing major local resistance to needed capacity improvements

A provision to remove the loudest Stage 3 aircraft from the airline fleets is missing from the Stage 4 rule making. This omission, together with the lack of a stronger Stage 4 requirement leaves local communities with sound insulation and a "balanced approach" as their only mitigation opportunities. The "balanced approach" offered by ICAO equates to the current FAA Part 150 and 161 processes that have failed to recognize and allow local operational mitigation actions.

We have found that sound insulation offers some short term relief in the most heavily impacted residential areas. However, these efforts alone will not achieve the necessary mitigation of noise in the future. The opportunity to apply yet another round of improved technology in the reduction of noise impacts in local communities is seen by the Roundtable members as an essential element in the ability to provide airport capacity for the projected growth in aviation activity. The development of an effective policy for noise reduction through the application of new technology, together with the removal of the loudest of the older aircraft, is an important step to be taken in national policy.

It is important to the Roundtable's members that the mitigation of aircraft noise be a paramount consideration. Aircraft noise currently adversely affects the daily lives of thousands of people residing and working in the vicinity of the Los Angeles International Airport and constitutes a major negative impact on the quality of life in communities nearby. With these concerns in mind, these comments are presented to the Federal Aviation Administration for consideration. Thank you for your consideration of these comments.

Yours very truly,



John C. McTaggart, Chairman  
Representative of Los Angeles County Fourth District Supervisor Don Knabe

cc: House Transportation and Infrastructure Committee  
Senate Commerce, Science and Transportation Committee  
Honorable Senator Dianne Feinstein  
Honorable Senator Barbara Boxer  
Honorable Representative Jane Harman  
Honorable Representative Dana Rhorabacher  
Honorable Representative Maxine Waters  
Roundtable Members  
Mr. Marland Townsend, Chairman, SFO Airport/Community Roundtable  
Mayor Arlene Mulder, Chair, Chicago O'Hare Noise Commission