



February 9, 2005

Federal Aviation Administration
Office of the Chief Counsel, AGC-200
Docket Number FAA-2004-19058
800 Independence Avenue, S.W., Room 915
Washington, D.C., 20590

Dear Sir or Madam:

These comments are made in response to the Notice of Proposed Rule Making, Docket Number FAA-2004-19058 – Draft Order 5050.4B. The focus of these comments is directed at the achievement of real noise mitigation by the reduction of aircraft noise at the source.

The Los Angeles International Airport/Community Noise Roundtable (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 Los Angeles International Airport (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.

Experience in the communities adjacent to the LAX reveal that the most important contributions to 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 a Stage 4 ruling would result in a similar accelerated reduction of noise. In our judgment, federal noise policy must be supportive of local noise concerns and mitigation efforts. The proposed action does not provide the support that we need in our quest for significant noise mitigation.

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

The majority of the changes to the existing order are made to parallel the airport environmental processes with the Order 1050.1E, Environmental Impact: Policies and Procedures on which the Roundtable has previously commented. The following selected elements are those that the Roundtable finds relevant to its Work Program efforts.

Categorical Exclusions

The proposed order expands the general statements in the Policy document and identifies specific airport-related projects that are likely to be excluded and those that are not. We find these to be generally acceptable, specifically because highly controversial projects would not be eligible for exclusion.

Significant Noise Impacts

The proposed language in Chapter 8, Section (15) states "...reminds the responsible FAA official that disclosing impacts having a DNL 3.0 dBA increase over noise-sensitive areas located between the DNL 60 and 65 dBA contours is for information purposed only. Those 3-dBA impacts do not cause significant adverse noise impacts for NEPA purposes."

Our Work Program efforts suggest that the FAA insistence that there are "no significant adverse noise impacts" with changes in noise exposure between the 60 and 65 dBA noise contour is contrary to our local experience, because we already have significant noise impacts in these areas. The following are additional relevant comments that repeat the Roundtable's previous concerns about the ineffectiveness of the 65 dB DNL/CNEL metric:

- Note the "ratcheting effect" that occurs when the 3 dB CNEL incremental increase is applied to determine significant impacts. For example, each environmental review can find an increase of 2 dB DNL/CNEL and find no impact. However, over time the accumulative noise impact can be large;
- At LAX, many significant impacts occur beyond the 65 CNEL noise contour. The FAA must recognize this;
- It is essential that single event noise metrics be applied to augment the DNL/CNEL metric; and
- Without properly identifying noise impacts, the opportunity for the application of effective mitigations are missed.

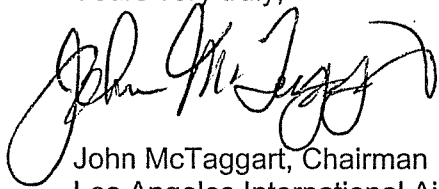
The lack of a rational noise impact identification process leaves local communities with sound insulation and a "balanced approach" as their only mitigation opportunities. The "balanced approach" offered by the FAA in its Part 150 and 161 studies have failed to recognize and allow local operational mitigation actions. If the process used to identify noise impacts fall short of adequately identify those impacts, then the opportunities for effective mitigations are missed.

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 an important step to be taken in national policy.

It is important to the membership of the Roundtable 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 provided to the Federal Aviation Administration.

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
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 Maxine Waters
Honorable Representative Dianne Watson
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Roundtable Members
Mr. Marland Townsend, Chairman, San Francisco International
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