

March 4, 2021

From: SCANA (Scottsdale Coalition for Airplane Noise Abatement)

Re: Comments to the Federal Aviation Administration regarding Docket No. FAA-2021-0037

Overview of FAA Aircraft Noise Policy and Research Efforts: Request for Input on Research Activities to Inform Aircraft Noise Policy

The following comments are in regard to the above referenced FAA report and request for comments regarding it. After reviewing the report and knowing the on the ground experiences of thousands of residents in communities across the nation where the FAA's NextGen program has callously and illegally ruined previously tranquil lifestyles, additional comment and/or research is not needed to prove that changes to correct NextGen travesties are required.

COMMENT: NO FURTHER RESEARCH IS NEEDED TO DETERMINE NEXTGEN NOISE IS A SIGNIFICANT PUBLIC HEALTH, ENVIRONMENTAL AND QUALITY OF LIFE PROBLEM THAT MUST BE ADDRESSED IMMEDIATELY.

NextGen flight path changes destroyed many community's quality of life with the FAA having no regard for the human cost it foisted on the communities below. It must be remembered that the FAA's actions were judged to be illegal, being, as the U.S. Court of Appeals ruled, "arbitrary and capricious" and initially remanded the entire NextGen program in Phoenix. The FAA obfuscated and hid what the impact of these changes would do these communities and was only concerned with serving the airlines in possibly saving them a few cents on fuel and seconds of travel time. This was done under the guise of safety and efficiency, but the question must be asked, how can aircraft being moved to fly over schools, businesses, hospitals, and residential communities be safer than when they flew over mostly unpopulated or commercial land areas? And efficiency for whom? Certainly not the public who is suffering from this environmental, health, safety, and lifestyle travesty. The beneficiary is the airlines, at the expense of the public.

COMMENT: FAA FLIGHT PATHS MUST PLACE A PRIORITY ON PROTECTING THE PUBLIC BELOW THEM AS OPPOSED TO ACTING ONLY TO INCREASE AIRLINE PROFITS.

The FAA claim that the number of people exposed to significant aircraft noise in the United States has declined from 7 million to 400 thousand is another false narrative the FAA has construed from unrealistic assumptions. That false claim is based on jet engines being a few decibels quieter from previous engine generations. However, the claim that these engine improvements have effectively eliminated significant air traffic noise for 6.6 million people is absurd, especially when the volume of air traffic has more than quadrupled resulting in many more aircraft utilizing the NextGen flight paths that were placed over an increased number of residential communities. Noise complaints around the Country have skyrocketed which refutes the fact fewer people are being impacted.

COMMENT: RESIDENTIAL AND COMMUNITY EXPOSURE TO AIRCRAFT EFFECTS AND NOISE HAS INCREASED, NOT DECREASED, DUE TO NEXTGEN FLIGHT PATHS AND INCREASED FLIGHTS.

The DNL 65 dB significant noise standard is known by everyone to be unrealistic when it comes to perceived annoyance noise levels. Indeed, the NES study said 70.9% of people are annoyed at that level. In order to attain that standard one would have to literally live on the end of a runway. Consequently, the FAA's continued reliance to use that bogus standard as a "no problem" measuring stick is again a false narrative that has been used by the FAA to justify the destruction of people's home life.

COMMENT: THE FLAWED DNL 65 DB NOISE IMPACT STANDARD MUST BE THROWN OUT AND A NEW REAL LIFE MEASUREMENT STANDARD MUST BE CREATED.

NextGen flight paths have been condensed to narrow rails, which expose the communities below to a vast increase of overflights. The number of noise complaints went off the charts after NextGen was implemented. Many communities have flights overhead every 2 minutes for hours on end. The health, environment, safety and well being of these residents has been ruined by the FAA, with no voice or even notice that the tranquility and wellbeing of their life would be so severely impacted. The FAA's actions were unethical, immoral, and as proven in Phoenix, illegal.

COMMENT: FLIGHT PATHS MUST NOT ONLY BE MOVED BACK TO DECADES LONG HISTORICAL ROUTES BUT MUST BE GEOGRAPHICALLY DISBURSED TO LESSEN THE IMPACTS ON RESIDENTS BELOW THEM.

The aviation industry is a valuable and needed service for the Country. Many people avail its benefits and utilize air travel on a frequent basis. However, an important, needed service cannot be allowed to run rampant over the people it serves. Reasonable negotiation and compromise must be in place to provide an acceptable balance of operation and to avoid the current situation where one side, the airlines, enjoy all the benefits, and the other side, the public, is forced to carry the burdens. Changes to NextGen flight paths must be undertaken.

COMMENT: THE AVIATION INDUSTRY IS A NEEDED AND VITAL SERVICE, BUT ITS DESIRE FOR PROFITS CANNOT SUPERCEDE THE QUALITY-OF-LIFE ISSUES FOR THE PUBLIC IT SERVES. NEXTGEN FLIGHT PATHS MUST BE MOVED BACK TO HISTORICAL LOCATIONS.