March 15, 2021

Mr. Stephen Dickinson
Federal Aviation Administration, Administrator

RE: Comments submitted on-line for FAA Federal Register - Request for Input on Research Activities to Inform Aircraft Noise Policy

---

Dear Mr. Dickinson,

The City of Cambridge appreciates the opportunity to comment on the Federal Register Notice FAA-2021-0037 regarding the results of the environmental noise survey at US airports, and how these results should be translated into new policies and practices for how FAA evaluates the impact of air traffic in the US. These findings reflect the public's strong reaction to long-term shifts in how airplane traffic is managed, and the resulting disruptive and repetitive nature of airplane noise in communities surrounding airports around the country.

The consolidation of flight paths along geo-located controlled navigation waypoints is becoming a widespread practice in modern navigation technology. Flights that previously would have been distributed over a larger area are increasingly following a pre-determined narrower path, and thus concentrating a high number of flights over a particular area, while reducing flyovers in other areas.

Given the amplitude and number of community noise complaints in the New England region for example, it is clear that the current metric is insufficient to describe the level of discomfort people are experiencing. As new navigation research and technologies are being developed and implemented across the country, it is important that additional, complementary investigations be conducted to more fully examine the noise and health impacts of repetitive airplane noise events, and to use these results to develop new and equitable environmental and community noise policies.

Unlike highways, which can be mitigated with noise barriers and rezoning, fly-over noise is much harder to mitigate, and the inevitability of the disturbances only adds to the overall discomfort, mental health and quality of life of the impacted population. Recognizing the increasing disturbance of plane noise, the FAA has begun to conduct surveys across the nation over multiple airports, hopefully as the groundwork to lay out new environmental policies. However, analyses are limited to overall noise exposure over periods of times, and do not factor in the repetition of plane events or population densities. The studies also seem to average airports with different navigation procedures, hence lacking focus on the specific impact of RNAV systems.

After years of enduring the changes and increase of flights from the Logan Airport, Cambridge believes that the followings avenues should be investigated to establish improved environmental noise policies for aviation:

- Establishing a new noise annoyance metric, to replace the current Day-Night Sound Level (DNL) measurement, that sets out new thresholds based on the level and number of planes experienced per day.

- A new metric should be able to identify any critically impacted communities, which is not the case today.
- There should be not-to-exceed quotas of maximum number of planes per day for a given threshold, which is not the case today.
- A noise equity metric should be established to compute an equity calculation over a number of given communities, to distribute the level of impact (the metric could consider intensity, annoyance, population density and time).
- A new noise equity metric could also be extended to include income and other socio-economic factors to avoid the worsening of impacts on already dis-advantaged, under-represented or marginalized communities.

As the US economy recovers from the pandemic, and flights increase back to pre-pandemic levels and beyond, the effect of noise from flights is going to be felt once again. The results of the surveys conducted by FAA have made it clear that noise from over-flights are strongly impacting many residents near airports. The health effects of this noise, and a new noise metric that more accurately shows the burden of noise, need to become primary areas of focus for the FAA for studying and developing new policies for how to mitigate this noise.

Thank you again for the opportunity to comment on this important matter. Please contact Bill Deignan at the Cambridge Community Development Department at wdeignan@cambridgema.gov with any questions.

Sincerely,

Louis A. DePasquale
City Manager, City of Cambridge Massachusetts