

Montgomery County

✈ Quiet Skies Coalition

August 27, 2018

The Honorable John Thune
Chairman
Committee on Commerce, Science, and
Transportation
United States Senate
Washington, DC 20510

The Honorable Bill Nelson
Ranking Member
Committee on Commerce, Science, and
Transportation
United States Senate
Washington, DC 20510

The Honorable Roy Blunt
Chairman
Commerce Subcommittee on Aviation
Operations, Safety and Security
United States Senate
Washington, DC 20510

The Honorable Maria Cantwell
Ranking Member
Commerce Subcommittee on Aviation
Operations, Safety, and Security
United States Senate
Washington, DC 20510

RE: Communities across the U.S. strongly support amendments to S.1405 to address excessive noise impacts from aviation.

Dear Chairman Thune, Ranking Member Nelson, Chairman Blunt, and Ranking Member Cantwell:

We are writing on behalf of the Montgomery County Quiet Skies Coalition of Maryland (MCQSC). MCQSC represents neighborhoods with approximately 7,500 homes, 20,000 residents, and numerous K-12 schools whose daily lives are severely impacted by new flight paths and procedures into and out of Reagan National Airport.

The pending FAA reauthorization, S.1405, presents an important opportunity to restore the health and welfare of hundreds of thousands of Americans who unwillingly find themselves living under highly channelized flight paths that send hundreds of disruptively loud, low-altitude flights over our homes, schools, parks and businesses each day. We sincerely request your help in correcting this injustice.

Senators from Maryland, Massachusetts, New York and California are likely to introduce amendments to the FAA reauthorization to address noise. We urge you to adopt the Maryland (Cardin/Van Hollen) amendment requiring the FAA to safely restore dispersion and altitudes of aircraft.¹ We urge you also to adopt the Maryland (Cardin/Van Hollen) amendment requiring the FAA to measure and assess aircraft

¹ Short title: Restoring Dispersion and Increasing Altitude of Arriving and Departing Aircraft, one version to be offered by MD Senators Cardin and Van Hollen, and a nearly identical version by MA Senator Markey.

noise using state-of-the-art technologies, metrics and methodologies.² Finally, we strongly support an amendment mandating a National Academies of Medicine Consensus Report on the health impacts of air traffic noise and pollution.³

The aviation industry recently wrote to you about the pending FAA reauthorization legislation. They asserted that “the tremendous noise reductions” achieved in past decades negate the need for Congress to incorporate any legislative protections from noise and emissions.⁴ This is not the case. In fact, such protections are desperately needed now more than ever.

As you undoubtedly know, where “Performance Based Navigation” (PBN) procedures are implemented, formerly peaceful residential areas, schools, parks, and places of worship very far from airports (10-20 miles away) are now under 24/7 siege with highly concentrated levels of noise and emissions. Airplanes fly much lower than they used to as they approach airports, bringing the noise closer to people’s homes. Because aircraft are on average much larger than they used to be, the air displacement creates powerful sound booms. Airplanes also fly closer together than before, often only 90 seconds apart, and this reduced spacing requires them to fly “dirty” on approach (flaps down, speed brakes screeching, making thrust adjustments, etc.) to maintain distance between aircraft. Worst of all, they repeatedly traverse the same narrow flight corridors while flying at these lower altitudes and while using these noisy procedures. All of this means an explosion of life-disrupting noise for the victims beneath these new flight paths.

As if all of this were not enough, the FAA and airlines have abandoned historical flight paths that resulted from carefully negotiated noise abatement agreements. They have done so with no consideration for the collateral damage these new flight paths and procedures impose on people on the ground. Wholesale discarding of historical flight paths breaks faith with the American principle that people can plan and make decisions about where to buy a home, which for most of us is the largest financial decision and investment of our lives.

The airline industry and the FAA attempt to justify this explosion of concentrated noise pollution by asserting that it is an unintended consequence of the need to increase airport throughput while maintaining safety, and that they are in any event conducting research to make things better in the future. They also assert that they have made so much progress in reducing noise in past decades that surely this new type of harm can be disregarded. While increased efficiency is certainly a worthwhile goal, and we agree that research on methods to reduce noise is desirable, neither of these arguments creates a tenable excuse for damaging the health and well-being of Americans⁵ with no recourse or option to protect themselves.

² Noise Measuring and Assessment amendment, to be offered by MD Senators Van Hollen and Cardin.

³ Health Impacts of Air Traffic Noise and Pollution, to be offered by MA Senator Warren.

⁴ Letter dated July 26, 2018;

https://www.nbaa.org/advocacy/issues/modernization/FAA_Reauth-Aviation_Coalition_Noise%20Letter-7.26.18.pdf

⁵ Dozens of studies have documented the serious health effects of exposure to such levels of noise. A study by the Columbia University Mailman School of Public Health just released this month, added even more to this established body of evidence. <http://www.mdpi.com/1660-4601/15/8/1753>

We find it particularly disturbing that the FAA and the airlines continue to assert that concentrating noise over *fewer people* is a valid method of “noise reduction.” In their July 26, 2018 letter, airline industry groups claim that “noise *exposure* (emphasis added) decreased 53 percent between 2000 and 2016, while enplanements rose 22 percent.” The noise did not just disappear; rather, it was deliberately funneled into narrow and concentrated sacrificial noise corridors where fewer people are now *exposed* to 100% of the unrelenting noise. Complaints about noise have skyrocketed in metroplexes around the country since these new procedures were introduced, which certainly suggests that noise has not decreased. In fact, neither the airlines nor the FAA knows whether noise has decreased or actually increased, because they do not employ appropriate tools and methods to measure the new kind of noise exposure they have created with these new procedures.⁶

Well over a hundred amendments to protect aviation impacted citizens were proposed for the FAA reauthorization in the House -- another metric that suggests noise has increased rather than decreased if measured appropriately. Unfortunately, only a handful of relatively benign amendments were adopted. We strongly encourage the Senate to do better and adopt truly effective protections for communities besieged by airplane noise. Given your leadership role on this important legislation, we urge you to provide clear direction to ensure that our taxpayer investment of over \$45 billion in NextGen (including the requested \$16 billion new appropriation) achieves the important goals set forth by Congress and benefits all American citizens.

Sincerely yours,

Anne Hollander, Janelle Wright, and Gretchen Gaston

On behalf of The Montgomery County Quiet Skies Coalition of Maryland

www.mocquietskies.org

cc:

Members of the Committee on Commerce, Science and Transportation

Members of the Commerce Subcommittee on Aviation Operations, Safety and Security

Senator Ben Cardin and Senator Chris Van Hollen

Senator Edward Markey and Senator Elizabeth Warren

Members of the Senate

⁶ The FAA continues to rely on antiquated noise metrics and modeling that have no relevance to these new types of concentrated procedures. The FAA’s metrics permit levels of noise that are 10 times higher than what is allowed in most other parts of the world. Based on these outdated metrics, the FAA deems its new policy of noise concentration “insignificant” and therefore immune from the usual environmental review standards, further limiting citizens’ opportunity for recourse.