



August 31, 2023

The Honorable Polly Trottenberg  
Acting Administrator  
Federal Aviation Administration  
800 Independence Avenue, SW  
Washington, DC 20591

Re: Comments on the Federal Aviation Administration's Review of the Civil Aviation Noise Policy, Docket ID No. FAA-2023-0855

Dear Administrator Trottenberg:

The San Diego County Regional Airport Authority (Airport Authority) respectfully submits the following comments in response to the Federal Aviation Administration's (FAA) Review of the Civil Aviation Noise Policy, Docket ID No. FAA-2023-0855 (Notice).

## **BACKGROUND**

San Diego International Airport (SAN) is classified as a Large Hub in the FAA's National Plan of Integrated Airport Systems (NPIAS). SAN is located in a dense urban core, northwest of the downtown area of the City of San Diego, including residential, commercial, industrial, and open space. SAN covers 661 acres and, based on annual aircraft operations, is the busiest single-runway commercial service airport in the nation.

Established in the 1970s, the mission of the Airport Authority's Aircraft Noise Office is to reduce the aircraft noise impact on the community through noise abatement and mitigation programs while monitoring compliance with local, state, and federal regulations, thus maintaining an environmentally sustainable airport.

The Quieter Home Program (Program) is the Airport Authority's community Sound Insulation Program, providing acoustical treatments such as windows and doors to reduce noise levels in the homes most impacted by aircraft noise. Since 1998, the Program has provided mitigation to more than 5,200 homes. In 2022, 482 residences were sound-insulated, at a total cost of more than \$20 million. In 2022, the Program expanded to include other noise-sensitive facilities, including churches and schools. The program has since finished construction on one church/preschool facility and is working on the design of a second facility.

The Airport Authority has an active and engaged Airport Noise Advisory Committee (ANAC). Formed in 1981, ANAC includes 18 voting members (11 of whom are community members) from various organizations, residential areas, and professional associations. ANAC meets quarterly to review current noise trends and monitor SAN's aircraft noise programs. ANAC is very interested in the FAA's research and has been monitoring progress on this topic since the Neighborhood Environmental Survey was released.

### **COMMENTS ON NOISE POLICY**

The Airport Authority thanks the FAA for the opportunity to provide input to this most important policy review. We conduct extensive stakeholder outreach and appreciate the opportunity to collaborate on this effort.

We find it difficult to provide comment in response to the FAA's Notice without a complete understanding of FAA's intentions for this noise policy "review." FAA's current noise policy is not captured in a single policy document but must be interpreted through its 1976 Aircraft Noise Abatement Policy as supplemented by various orders, regulations, and guidance letters. The Notice is unclear as to whether FAA intends to prepare a revision to the 1976 policy that would be informed by the current stakeholder process, or whether FAA intends simply to proceed with modifications to applicable orders, etc. We would encourage the FAA to define or reaffirm the roles and responsibilities of various parties as discussed in the 1976 policy. For reasons described below, the Airport Authority believes that the FAA needs to provide substantial additional information before we can make any definitive policy recommendations; we also believe that another subsequent stakeholder engagement process like this is warranted once FAA has narrowed its policy options and provided the additional requested data.

The Airport Authority supports science-based policymaking. We appreciate the significant investment in noise effects research that FAA has made over the last decade or more and believe that the results of this research should inform policy. The FAA's NES provides a comprehensive understanding of community response to aircraft noise that should be reflected in a revision to FAA's noise policy. However, FAA is currently conducting important research on the effects of aircraft noise on people – particularly on sleep and health effects – that was initiated with the express purpose of informing noise policy. We believe it is premature to finalize policy revisions before that research is complete.

The Airport Authority supports the continued use of the Community Noise Equivalent Level (CNEL) as an appropriate metric for identifying thresholds of compatibility with noise-sensitive land uses and as a measure of overall community satisfaction.

Cumulative noise metrics are best suited to evaluating long term land use compatibility (e.g., Part 150) and preparing environmental studies (e.g., NEPA). Further, no other metric has been demonstrated to provide better correlation between cumulative noise levels and annoyance. Until such research is available, we believe it is inappropriate to consider other metrics as a replacement for CNEL.

The Airport Authority supports consideration of a noise-sensitive land use compatibility threshold below CNEL 65 dB with some caveats. These are outlined below:

- FAA should provide policy analyses that illustrate the impact of various policy options. FAA has requested input from stakeholders without providing any relevant policy analyses that address the reasonableness or feasibility of alternative significance thresholds. It is irresponsible to make policy recommendations without consideration of these impacts.
- The cost implications for policy changes are significant; the FAA should identify what those costs could be and how they would be paid. As just one example, The Airport Authority estimates that there may be as many as 14,250 homes and approximately 20 other noise-sensitive buildings in SAN's CNEL 60-65 dB contour.
- FAA's current policy requires that interior noise levels exceed 45 dB to qualify for sound insulation. If FAA were to adopt a land use compatibility threshold lower than 65 dB, most homes would be ineligible based on this criterion. FAA will need to develop interior mitigation strategies for exposure below CNEL 65 dB; for example, it could consider funding air handling only (instead of a full sound insulation package that typically includes new windows and doors as well as insulation).
- FAA should identify and share how it would implement a new policy, including changes to orders, costs, and timelines. Stakeholders should be invited to comment on this approach before it is implemented.

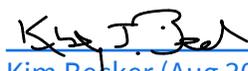
The Airport Authority supports the use of additional noise metrics to help communicate complex aircraft noise information. In our work, we have found that supplemental metrics can be especially useful when discussing proposed changes (e.g., flight path changes in NEPA studies). However, there is not sufficient research to support using these other metrics for decision-making. For example, what level of

change in a metric such as Number of Events Above (NABove) would be considered “significant” for NEPA purposes? And further, what specific NABove is appropriate (Number Above 75 dBA, Number Above 85 dBA)? This research should be conducted and peer-reviewed before FAA considers using such metrics for decision-making.

Community engagement should remain a critical element of FAA noise policy. The Airport Authority congratulates FAA on the significant strides it has made in this area in recent years. We have found participation in the Western Service Area Noise Forum to be useful and encourage FAA to continue with these regular briefings. The Airport Authority also appreciates FAA’s support to ANAC meetings and encourages its continued engagement; FAA’s active participation in these meetings demonstrates not only the Airport Authority’s commitment but also the Federal commitment to minimizing the impacts of aircraft noise on communities. The Airport Authority encourages FAA to continue to support these meetings and to provide additional training for Community Engagement Officers that will enable them to be better representatives of the FAA.

In conclusion, we look forward to collaborating with FAA as you continue to develop your policy. We welcome the opportunity to provide additional input when policy analyses are available and we urge FAA to act in a timely manner to elaborate on its plans for finalizing policy, including a schedule for when new policy will be released, so that stakeholders can plan accordingly.

Sincerely,



[Kim Becker \(Aug 30, 2023 13:12 EDT\)](#)

Kimberly J. Becker  
President/CEO

cc: Angela Shafer-Payne, Chief Development Officer

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# SAN NPR Comment Letter 8-31-23

Final Audit Report

2023-08-30

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