

**Recommended Comments on  
The FAA's Neighborhood Environmental Survey (NES)**

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The FAA is asking for public comments on its recently released [Neighborhood Environmental Survey](#) (NES) by March 15th.<sup>1</sup> You can submit multiple comments but need to state, “this is an additional comment and is not meant to replace my previous comment(s).”

Below are recommended comments we hope everyone will make. We encourage as many people and groups as possible to submit comments that include these points. Some advocacy groups will use them to create a simple template for members to use. Others will use them to customize their own letters.

**Recommended Comments to the FAA:**

1. The Neighborhood Environmental Survey (NES) is scientifically rigorous and represents reliable **new evidence that must be incorporated into FAA aircraft noise policies**.
2. The NES results show that a *much* greater proportion of people are highly annoyed by aircraft noise across all levels of DNL than was previously thought. It does not show that people are more sensitive to noise than in the past.
3. Previous studies (Schultz curve, FICON study)<sup>2</sup> underestimated aircraft annoyance because they included all transportation noise (e.g. road and rail), and used a mix of older, less robust methodologies. The NES study is specifically about aircraft noise annoyance and uses state-of-the-art methodologies for its design and modeling.
4. **The NES results should trigger a sea change in aviation noise policy** because they refute the long-standing Schultz curve and FICON which have been the foundations of existing aviation noise policy.
5. **The FAA has an ethical obligation to change regulations** that are detrimental to the public, that are under its authority, and that do not require new legislation.
6. **The FAA should provide a timely roadmap** for changing its noise regulations and use the NES results as the new basis for decision-making on community impacts, including in the FAA's Environmental Review Process and Part 150.<sup>3</sup>
7. **The FAA should use additional, existing metrics**, notably “N-Above,” which counts the number of aviation noise events over a certain location and decibel level, to better reflect noise impacts on communities. New noise metrics do not have to be developed or researched before changing noise policy.

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<sup>1</sup><https://www.federalregister.gov/documents/2021/01/13/2021-00564/overview-of-faa-aircraft-noise-policy-and-research-efforts-request-for-input-on-research-activities>

<sup>2</sup> [https://www.faa.gov/airports/environmental/airport\\_noise/](https://www.faa.gov/airports/environmental/airport_noise/)

<sup>3</sup> [https://www.faa.gov/airports/environmental/airport\\_noise/](https://www.faa.gov/airports/environmental/airport_noise/)

8. As a sign of goodwill, **the FAA should immediately start reporting N-Above in addition to DNL.** Communities should not have to wait for new FAA regulations when such data can be reported now.
9. **We urge the FAA to appoint an independent “Blue Ribbon Commission”** of multi-disciplinary experts (such as environmental scientists, public and medical health professionals, engineers), to be tasked with identifying metrics and thresholds that will define “significant impact” based on the NES results as well as the actual experiences of people, local noise environments, nighttime noise, and current scientific knowledge.
10. **The FAA should commission the National Academies** to (1) form an independent committee within the Division of Medicine to produce a consensus report on the health effects of noise and pollution, and (2) form an independent committee within the Division of Sciences to produce a consensus report on ultrafine particles. Both committees would use existing scientific studies and knowledge.

**Potential Pitfalls:**

- Avoid asking for additional airports to be surveyed. If your airport could have been chosen but wasn't, the results apply to your region too and are sufficient for policy change now.
- Avoid suggesting that health impacts need further study before the FAA can change its noise policy. The NES results are sufficient to disprove the Schultz curve and FICON which have been used to set policy up to the present time. The FAA should change its noise policy now, while health impacts studies are pursued in parallel.
- Avoid recommending that the FAA simply lower the DNL threshold. Lowering 65 DNL will not help communities away from the airport who are experiencing concentrated and frequent overflights.
- Be cautious in using the term “new metrics” because it can be misinterpreted to mean metrics that currently do not exist. N-Above is an existing metric that adequately represents precision navigation impacts to people on the ground.