

**ONCC National Register Response to FAA Neighborhood Environmental Survey
FAA-2021-0037**

The O'Hare Noise Compatibility Commission hereby submits its comments on the FAA Neighborhood Environmental Survey as published in the Federal Register on January 11, 2021.

On January 13, 2021, the Federal Aviation Administration (FAA) released its long-awaited 20-airport survey on aircraft noise annoyance. The result was no surprise to the O'Hare Noise Compatibility Commission (ONCC), an inter-governmental aircraft noise advisory organization whose sole mission for the last 25 years has been to mitigate aircraft noise through residential and school sound insulation and to advocate for quieter aircraft technology.

After six years, the FAA Neighborhood Environmental Survey (NES) reached the conclusion that *"a substantially higher percentage of people are highly annoyed over the entire range of aircraft noise levels"*.

The NES concluded that at a noise level of 65DNL, 60.1 to 70.9 percent of the people surveyed were highly annoyed within the context of the questionnaire compared to the 1992 Schultz Curve (the basis of the FAA's noise policy) of only 12.3 percent of the population.

The NES methodology of 10,000 mail-in questionnaires garnered a healthy 40 percent response rate from that population while the follow-up telephone survey of 2,000 respondents resulted in a 9.1 percent response; therefore, we can put some credibility to its expected conclusion on noise annoyance.

The FAA has indicated it will adhere to its 40-year-old policy regarding aircraft noise based on the NES findings and will maintain the standard 65DNL metric until it can review public and stakeholder input along with additional research on the impacts of aircraft noise exposure on communities.

The FAA has asked the public to respond to the *Federal Register* to help the agency reach its final conclusions regarding aircraft noise annoyance. Here is the ONCC's response.

In January 2009, the ONCC wrote to the FAA urging the agency to initiate a change in the 65 DNL noise measurement standard for communities that neighbor major airport hubs. The Commission cited the Transportation Research Board's 2008 findings that *"the expanding use of...airport monitoring systems, flight-track systems and geographic information systems may make the evaluation of annoyance and single-event noise rich for examination."*

ONCC stated in that letter that the current 65 DNL calculation did not account for the increased frequency of flights or the heightened annoyance to citizenry. At that time, runways at busy airport hubs, such as O'Hare, averaged 325 to 400 flights a day at three-minute intervals between 8 to 16 hours each day. Furthermore, averaging noise decibels throughout the day does not resolve significant event-based annoyance for people living, working, and attending school beneath aircraft traffic.

ONCC argued then that the 65 DNL metric does not serve the residents whose quality of life is being sacrificed. Escalating changes in airport operations and runway use without an immediate recognition of the need to reevaluate their impacts often leads to immediate, reactionary thinking instead of rational problem solving.

The ONCC has spent the last six years initiating and facilitating rational problem-solving strategies and policies to mitigate nighttime aircraft noise in particular.

In 2015, the Commission reviewed its voluntary nighttime noise abatement program, Fly Quiet, and sponsored a roundtable discussion panel whose members included chief pilots, airport managers, air traffic controllers and regional FAA personnel. The purpose of the discussion was to review noise abatement flight procedures and to inform ONCC members of the Commission's parameters regarding changes to nighttime abatement.

Working closely with the Chicago Department of Aviation (CDA) and the FAA, the ONCC formed an *ad hoc* Fly Quiet Committee comprised of suburban leaders whose communities completed a 360-degree arc encompassing the airport, other community noise organizations, and industry consultants.

The primary goal of the committee was to spread out community noise exposure during the nighttime hours and establish predictability by establishing a runway rotation plan.

The ONCC, in consultation with the CDA and with guidance from the FAA, was able to request a series of runway rotation tests, which would only last for six months to be exempt from any necessary environmental review.

The *ad hoc* Fly Quiet Committee worked under FAA Order 1050.1F which allowed for the ability of the FAA to Categorically Exclude this type of test in Paragraph 5-6.n, which states:

“Tests of air traffic departure or arrival procedures conducted under 3,000 feet above ground level, provided that: (1) the duration of the test does not exceed six months; (2) the test is requested by an airport or launch operator in response to mitigating noise concerns, or initiated by the FAA for safety or efficiency of proposed procedures; and(3) the test data collected will be used to assess the operational and noise impacts of the test.”

In all, there were three runway rotation tests which led to an Interim Fly Quiet (IFQ) Plan executed in 2019. The IFQ, which secured approvals by the FAA, successfully worked to reduce aircraft noise exposure for communities and provided nighttime noise relief for communities near O'Hare.

IFQ procedures were implemented when airport demand required only one arrival and one departure runway and utilized an eight-week schedule to rotate the primary arrival and departure runways to balance aircraft noise. The program ran from November 2019 to May 2020 and from September 2020 to January 2021, with the completion of Runway 9C.

The CDA applauded the ONCC for dedicating itself to creating a quieter airport for O'Hare's surrounding communities and continues to work collaboratively on this effort to establish a permanent runway rotation program.

“This innovative approach in addressing noise, an issue all airports face, is yet another thing that makes O'Hare International Airport unique,” said CDA Commissioner Jamie L. Rhee. “When developing this program, we wanted to ensure that we worked alongside the people most impacted by airport noise, our

neighboring communities. This kind of collaboration is a rarity in the aviation industry, and I am proud to be working toward a solution that everyone can feel good about.”

The IFQ rotation program is the first of its kind in the U.S. and was intended to improve upon the original nighttime noise abatement program first implemented in the 1970s, which has since evolved to reflect today’s modern aircraft and flight paths.

The Interim Fly Quiet rotation program was a critical part of ONCC’s mission to balance operations at O’Hare, between East/West and North/South, enabled by the airfield modernization program.

The IFQ data have guided the development of a permanent Fly Quiet Program to be in place when the O’Hare Modernization Program is completed at the end of 2021. The ONCC’s Fly Quiet Committee is currently meeting with the CDA to develop the final nighttime noise program – Fly Quiet 21 – to be implemented once the final runway is commissioned.

The ONCC urges the FAA to continue its collaborative working relationship with all community aircraft noise organizations and increase its efforts. It is in their best interest to bring together, and listen to those noise-impacted populations to develop problem-solving policies that are a win-win for residents and the industry.

The ONCC recommends that the FAA establish a consortium of airport operators who have the noise data and trends available from noise monitors within the scope of their airport communities. These data are a valuable tool to support DNL policy.

The ONCC appreciates that the FAA conducted a nationwide survey of the 20-airport population, but questions the usefulness of a survey that takes over six years to complete. Some respondents were likely reporting from the standpoint of experiencing flight procedures that have since been revised.

Aircraft are quieter today, but frequency and RNAV procedures really exploit the same population over and over again. While residential sound insulation is a great help, residents living under flight paths cannot enjoy the outdoors or even let the fresh air into their homes through an open window. ONCC has supported nighttime runway rotation programs because it alleviates some of the concentrated noise over communities by promising predictability and balancing the aircraft noise exposure among communities surrounding an airport.

ONCC applauds the FAA’s continued commitment to conduct additional research to better understand the effects of aircraft noise on individuals and communities. We urge the gathering and analysis of research data on (a) the potential effects of aircraft noise on reading comprehension and learning motivation in children; (b) potential physiological impacts from noise exposure; (c) impacts on cardiovascular health; (d) quantifying the impact of noise exposure on sleep; and (e) an empirical assessment of the economic impacts to businesses located underneath aircraft flight paths.

Finally, ONCC supports the Quiet Skies Caucus request to “appoint FAA officials who will use creative approaches to solve aircraft noise problems”. We are very proud of our efforts to abate nighttime noise with a nighttime runway rotation program. The first in the country. It was simple, it was creative, and it was a community approach to problem solving.