

City of Huntington Beach letterhead

July , 2023

Federal Aviation Administration
U.S. Department of Transportation (DOT)
Docket Operations, M-30, 1200 New Jersey Avenue SE, Room W12-140, West Building
Ground Floor
Washington, DC 20590-0001

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

The City of Huntington Beach welcomes the opportunity to comment upon the significant noise burdens that were imposed on it by NextGen and the Southern California Metroplex starting in approximately 2016, and to support changes to the manner in which noise burdens and mitigation are measured. FAA's historical measure for assessing noise significance (65 DNL) fails to measure actual impacts by any reasonably understood definition of "significant," particularly where the noise effects might be at lower decibels but are virtually non-stop. This comment addresses question Nos. 2 (Operations of Air Vehicles), 3 (DNL), 4 (Averaging), 5 (Decision Making Noise Metrics), 6 (Communications), 7 (NEPA and Land Use Noise Thresholds Established Using DNL or for Another Cumulative Noise Metric), 8 (FAA Noise Thresholds Using Single-Event or Operational Metrics), and 11 (Literature Review).

FAA uses metrics for noise mitigation assessment, currently 65 DNL. But since mitigation entails significant economic cost, FAA has little incentive to materially alter this metric for assessing significance. Huntington Beach expects many parties will submit their own comments including specific metric recommendations. Huntington Beach supports any of those that materially lower the existing threshold for noise "significance."

What Huntington Beach more specifically proposes, however, is that an entirely separate metric for measuring real-world noise impacts on communities such as ours be developed that would not involve mitigation expense. Rather, this metric would help inform airspace management determinations such as Metroplex. This metric could include **[NEED EVERYONE'S INPUT ON WHAT THIS ANNOYANCE METRIC SHOULD ACCOUNT FOR.]** Adding these variables to computer models should result in airspace management that is not controlled by noise considerations, but which also does not gaslight that the real-world consequences of airspace management decisions are not "significant" simply because they do not meet the mitigation metric. More important and as demanded by fundamental fairness, it would more equitably spread the regional noise burden from three major airports that Metroplex has singularly imposed on Huntington Beach in Southern California.

Beyond assessing noise metrics academically, FAA needs to acknowledge these real-world noise impacts of Metroplex on communities such as Huntington Beach, and work in good faith with local representatives on mitigating alternatives. As mentioned, we are located between three major airports in the Southern California region; Long Beach (LGB), Orange County (SNA), and Los Angeles (LAX). Arrivals and departures from each of these airports now fly

constantly over our residents spaced only a few minutes or less apart during waking hours and intermittently at all hours of the night seven days a week. There is no respite. Prior to NextGen, aircraft were much more dispersed and at higher altitudes on approach. Unfortunately, the NextGen changes have routed aircraft along much more condensed flight paths over Huntington Beach at significantly lower altitudes.¹

Arrivals are a particular noise problem as Huntington Beach is simultaneously overflowed for approaches into all three of these airports. LGB arrivals are generally at 2500 ft. and below over Huntington Beach; SNA arrivals are around 5000 ft.; LAX arrivals are around 7000 ft. However, some flights into LGB fly over Huntington Beach as low as 1300 ft. for no discernible reason.²

While all jet aircraft are noisy, there is a direct correlation between aircraft altitude (proximity) and noise burden. But it is the cumulative “drip, drip, drip” effect of constant overflight noise minutes and at times seconds apart seven days a week into three separate airports with no relief that has dominated the noise complaints emanating from Huntington Beach residents. In fact, the number of noise complaints from Huntington Beach residents since the implementation of Metroplex have consistently outnumbered complaints from Long Beach residents because Long Beach residents only have to deal with noise from one airport while Huntington Beach has been getting non-stop approach noise into three major airports since the Metroplex implementation.³

In response to substantial noise complaints from citizens following the implementation of Metroplex, Huntington Beach formed a citizens’ Jet Noise Working Group and subsequently a Jet Noise Commission. The Working Group and Commission separately tried on multiple occasions to engage FAA in discussions about the impacts of Metroplex and proposed alternatives. FAA has consistently failed to meaningfully engage or to even acknowledge that Metroplex created a significant noise burden over Huntington Beach.

Huntington Beach is not seeking to expand noise mitigation costs. Rather, we are suggesting that real-life noise impacts need to be considered beyond those which would require costly mitigation outlays. Those can be as simple as making minor adjustments to aircraft approaches and altitudes that would ease the noise burden at least some. For example, Huntington Beach is under an approach path into LGB that has an IFR procedure to cross waypoint “LUCIG” at 3000 ft. and to do a continuous descent approach into the LGB RW30TZ. On VFR, pilots can fly close to that given permission from TRACON provided there are no safety issues. However, it appears that TRACON routinely directs aircraft to cross “LUCIG” at 1600 ft. unless pilots request a higher approach. Roughly 80% of the time pilots from one particular carrier request and receive approval for the 3000 ft approach. However, other carriers have not been as sympathetic, and TRACON generally directs these flights to cross at 1600 ft.

¹ FAA needs to acknowledge that the noise burdens imposed by Metroplex over Huntington Beach dramatically increased noise exposures to residents, and indeed shifted the aircraft noise burden that previously had been spread more broadly across the region. If nothing had changed as periodically suggested by FAA, there would have been no need for Metroplex in the first instance. FAA needs to abandon any notion that it would be “unfair” to shift to other areas any increased noise burdens imposed on Huntington Beach by Metroplex. The unfairness was shifting the burden of **three** major airports to Huntington Beach in the first instance.

² These low-level approaches are still 10 miles from LGB, requiring aircraft to power up to maintain this low-altitude approach. This only increases noise levels, burns additional fuel, and creates unnecessary carbon emissions. These outcomes are entirely inconsistent with the stated goals of NextGen.

³ This does not include the higher altitude departures and overflights that add an additional noise burden to Huntington Beach.

There is likely a > 1.5dB shift between crossing LUCIG at 3000 ft. and 1600 ft. Defaulting all commercial traffic to 3000 ft. at LUCIG would make a noticeable difference to the City's noise exposure and reduce noise complaints into LGB. It also would not require any changes to Metroplex; it simply would be a direction to TRACON to default to the 3000 ft. altitude approach rather than 1600 ft. Safety exceptions would always apply.

Despite support for this change from Long Beach Airport and at least one major carrier, FAA refused to even consider such a minor modification that would (1) reduce the noise burden over Huntington Beach, (2) save fuel, and (3) reduce carbon emissions. It is unknown why FAA has not supported such a modification other than it appears FAA does not want to open a "can of worms" by acknowledging that noise is a significant problem below existing thresholds for economic mitigation. That defies common sense and ongoing studies evidencing adverse health effects from aircraft noise at levels well below 65 DNL.

FAA also ignores that the 1600 ft. approach not only unnecessarily burns extra fuel and adds to the carbon burden, it is well below the 3000 ft. mixing threshold for jet emissions. FAA has determined that 3000 ft. and above represents the altitude where aircraft emissions do not mix with air near the ground. The corollary is that mixing with ground air does occur when jet aircraft are below 3000 ft. If TRACON uses the 3000 ft. approach into LBG as the default rather than 1600 ft., that should significantly reduce pollution at ground level.

Huntington Beach residents have been materially harmed by Metroplex in their quiet enjoyment of their properties and FAA's continued reliance on the 65 DNL standard for noise "significance." FAA needs to step up and acknowledge the material and adverse effects concentrated, low-altitude jet aircraft have had on the City, and to work with the City particularly on approach alternatives that would provide at least some relief. Future airspace use determinations also need to be informed by actual impacts over the ground as opposed to those designated for economic mitigation.

We thank you for your consideration of these vitally important issues to Huntington Beach.

Mayor Tony Strickland