

The Sound Defense Alliance is a coalition of groups in the Pacific Northwest with the mission to protect communities and the natural environment from harmful military activity around the Salish Sea, Puget Sound, and the Olympic Peninsula. The ongoing noise from the F-18 Growler Jets continue to pose a significant threat to the economic and physical health hazard for our region.

We are writing in response to the FAA's request for comments regarding its Neighborhood Environmental Survey (NES) on civil aircraft noise.

Recently, the scientific international community found that the 1978 studies and 1992 revision of the Schultz dose/response curve to be flawed, invalidating the 65 DNL threshold as a usable standard. Hence, the International Organization for Standardization (ISO)—an independent, non-governmental organization of 162 national standards bodies (including the U.S.)—published a revision of ISO standard on measurement and assessment of environmental noise.

The revised ISO standard reflects 5 years of analysis by an ISO technical committee, which produced the new dose/response curve based on 21st century research. An American National Standards Institute (ANSI) version of the ISO standard followed, which further mirrors ISO findings and validates the ubiquitous concurrence of worldwide noise experts. Those findings invalidating the Schultz curve made clear that to be consistent with 12.3% annoyance standard, the correct high annoyance threshold level is 55 DNL. And even 55 DNL may understate annoyance given that aircraft noise is known to be more annoying than other forms of noise (e.g., highway noise); hence many scientists submit that a DNL penalty is actually necessary for aircraft noise.

Realizing that a 10 dB difference doubles perceived loudness, the flawed 65 DNL standard (vs. 55 DNL) significantly under-represents loudness and approximately doubles to 25% the highly annoyed population. The FAA cannot claim to honor and uphold science and concurrently rely on the 40-year-old, scientifically discredited 65-dB DNL standard, which if used, would understate and falsify the DNL threshold for high annoyance. **The FAA must revise the 65 DNL to 55 DNL.**

We further request that the FAA to recognize the impact of noise as well beyond “an annoyance”. Comprehensive research has been completed that documents the health hazards of noise that include issues related to cardiovascular health, sleep disruption, mental health such as anxiety, and impacts on children's learning. **Please recognize noise as harmful to the health of humans, animals, and the environment.**

The FAA has acknowledged the detrimental effects of aviation noise on health and learning and spent hundreds of millions of dollars installing sound insulation in schools and residences. Although these measures are laudable, they are insufficient. Much more is needed. Investment in further research is a waste of taxpayer dollars. The paramount duty of the FAA should be to implement changes to alleviate the

suffering of so many in and around the flight paths of aircraft to eliminate the well-researched health hazard that constant exposure to loud aircraft is proven to cause. **Protecting the public from harm needs to be the focus of the FAA.**

The FAA needs to translate the findings of the NES into health, learning, productivity, and economic implications using statistical modeling methods implemented by independent health outcomes and health economics experts. This modeling will enable the **FAA, health agencies, and Congress to work together, using an informed precautionary principle, to develop plans that are feasible for industry but that prioritize protecting public health.**

The population of communities adversely affected by aircraft noise needs to be expanded. The NES report is limited to “those living near airports.” This definition is insufficient and leaves unprotected those communities just as negatively impacted that are located **along aircraft flight paths, including but not limited to those residing in rural areas.**

Finally, the FAA should implement noise mitigation policies that not only consider indoor noise but also **residents’ rights to the peaceful enjoyment of their private outdoor property and public outdoor parks and public spaces** funded by taxpayers.