

My family and I are residents of Huntington Beach, California. We are requesting your urgent assistance in getting the FAA to mitigate the intolerable aircraft noise created by the NextGen project. This is a nationwide, non-partisan problem. We sincerely would appreciate anything you can do get the FAA to pay attention to, and resolve, the massive noise assault before passing the FAA Reauthorization Act presently before the Senate.

Cities across the country, including Huntington Beach, have experienced a vast increase in aircraft noise over the past several years. Aircraft are flying at lower altitudes than before and air traffic patterns have concentrated flights - and corresponding noise and pollution - over particular neighborhoods. The aircraft noise in Huntington Beach is almost constant, with an average gap of only 3-4 minutes between planes for approximately 17 hours per day, 7 days a week. Inbound flights to LAX over Huntington Beach now run 24 hours per day. The noise from each jet lasts between 10-20 seconds over any ground point, and reaches levels anywhere from approximately 55-80 dB.

NextGen has been implemented by the FAA in Southern California through the SoCal Metroplex. The result for Huntington Beach has been a dramatic shift in jet traffic patterns into very narrow, compacted half-mile geographical corridors covering multiple approaches and takeoffs at all of the major Southern California airports, including LAX, Orange County, and Long Beach. This has placed massive and virtually non-stop noise burdens on those of us unlucky enough to live under those newly implemented corridors.

Based purely on changes in the number of flights overhead, the jet activity increases appear to have exceeded 1,000-1,200% despite the fact that Huntington Beach is more than 12-15 miles from the closest of the involved airports. Under previous flight patterns, the noise burden was spread out and shared much more broadly among the Southern California populace. The NextGen project has now unfairly burdened Huntington Beach with the noise outputs generated by airports throughout the region.

It has become clear nationwide that the NextGen design and implementation by the FAA lacked transparency, that the actual impacts of the project have exceeded the modeled impacts, the impact assessment process was grossly faulty, and that the project is an abuse of the FAA's preemption powers over airspace. This has fundamentally altered our property rights and quiet enjoyment without due process.

The FAA's standard for assessing whether the project would have significant impacts on Huntington Beach ignored any measure of the actual and gross differences between historical and current noise burdens. In a recent court filing in the Culver City case, the FAA asserted that, "In many cases, historical flight tracks were used instead of designing procedures that would overfly new areas, so as to reduce the possibility of adverse noise and pollution impacts on new communities." Along the same lines, it claimed that, "Throughout their design process, [the project designers] tried to keep aircraft within historical flight tracks to minimize noise impacts." This is akin to an argument that if the FAA put an eight-lane freeway on top of a two-lane country road, there would be no impact because the route previously existed. This defies logic and common sense, and brings to life George Orwell's description of government "double-speak."

The FAA uses a standard for assessing whether noise changes would have a "significant impact" based on a measure (65 DNL) that can almost never be met regardless of the number of aircraft or their frequency passing overhead. DNL is a noise metric which

describes an average day/night sound level. To meet a 65 DNL threshold, which is the only level deemed “significant” by the FAA, noise would have to average 65 dB over an entire 24 hour period. Any spacing or gaps in jet noise, such as between flights or overnight when traffic is significantly reduced or at higher altitudes, makes it virtually impossible to achieve a 65 DNL level almost anywhere. Jets could be screaming overhead at a few hundred feet literally nonstop for several hours each day seven days a week and that would never reach a “significant” level because of the ambient noise levels over the balance of the 24-hour period. The use of DNL also conflicts with California’s noise measurement standards (CNEL), which at least takes into account the extra disturbance to residents during evening hours.

The FAA has shown no inclination to change anything. To the contrary, various FAA spokespersons have defiantly pronounced that their sole mission is aviation safety and be damned anyone who may have to suffer the consequences on the ground, no matter how severe. The FAA’s summary Environmental Assessment that there would be “no significant impact” from NextGen on noise - and therefore no need for an EIR - is agency deception and arrogance at its worst.

Thank you for any assistance you can provide.