EAGAN
ESTABLISHED 1860

March 2, 2021

Mr. Kevin Welsh
Director, Office of Environment and Energy
Federal Aviation Administration

Docket Operations M-30
US Department of Transportation
1200 New Jersey Avenue SE
Room W12-140, West Building, ground Floor
Washington, DC 20590

Re: Docket No. FAA-2021-0037
"Overview of FAA Aircraft Noise Policy and Research Efforts"

Dear Mr. Welsh:

On behalf of the City of Eagan, thank you for the opportunity to offer commented on the FAA's recently completed Neighborhood Environmental Survey.

The City of Eagan is located adjacent to MSP International Airport, with properties located within the 65+ dB DNL noise contours. Eagan has long balanced the benefits from its proximity to the airport with the burden of aircraft noise. Eagan is a member of the MSP Noise Oversight Committee (NOC), and as such, supports the comprehensive findings and observations documented in the NOC's letter to the FAA dated February 17, 2021.

In support of the NOC's comments to the FAA, the City's advisory Airport Relations Commission and City Council offer the following points of emphasis in response to the FAA's survey findings.

1. **Reducing noise at the source is the most effective way to manage noise.**

   Research on new noise reduction technology should continue, and incentives to bring those technologies to the fleet should be implemented. Modeling of low-noise procedures should be incorporated into the Aviation Environment Design Tool (AEDT) to analyze and study how such procedures could reduce the frequency of flights over residential land.

2. **Non-acoustic factors occurring during the survey contributed to annoyance.**

   The findings demonstrated that concern over FAA procedural changes grew nationally and the discussion around Area Navigation (RNAV) locally caused more activism on the topic.

As a witness to the contention caused by RNAV, we respectfully request the FAA involve the communities early in any dialogue or considerations pertaining to RNAV or procedures that would alter existing noise or current operational conditions.

3. **Noise annoyance does not end at 65 dB DNL.**

The FAA should recognize actual annoyance levels are significantly higher than previous studies, and thus areas outside of the 65 dB DNL threshold should be considered when policy decisions are made regarding the impact of aircraft noise. Nearly 500 Eagan homes between the 60-65 db DNL contour received noise mitigation as a result of a legal settlement reached between the Metropolitan Airports Commission (MAC) and surrounding communities. Satisfaction rates from those receiving mitigation are over 95%, demonstrating the success of mitigating to the 60 db DNL contour. Likewise, we encourage the FAA to work in tandem with aviation noise professionals, such as those in the MAC Noise Office, along with aviation industry members. The more we can work as partners, the better the outcomes for our communities.

4. **Alternative noise metrics are necessary to fully understand noise exposure.**

DNL as an average does not fully represent an individual's experience. Eagan is a perfect example of the ineffectiveness of DNL in that overflights are significantly more prevalent during southerly winds. Thus, a resident may experience 100+ operations overhead on a beautiful, summer day while experiencing zero operations on a cold, winter day. The way DNL averages noise does not depict a realistic snapshot of what residents are experiencing on a daily basis. We request the FAA expand its use of alternative noise metrics as a better way to quantify aircraft noise exposure.

5. **The remaining scientific research included in the notice needs to be completed so that the results can inform future policy discussions.**

The City of Eagan commends the FAA for the research and survey work done to date. We encourage the FAA to prioritize the completion of the research in order to begin public policy discissions. We respectfully request the FAA data be properly used and communicated when policy decisions are made. Most residents do not have the time to read or respond to 900-page research documents. Thus, please be mindful of the end-user and concisely communicate any future findings. Likewise, we ask the FAA to meaningfully engage communities and the NOC prior to considering any noise policy or operational changes at MSP Airport.

On behalf of the Eagan City Council and Airport Relations Commission, thank you for your efforts to complete and communicate the survey findings. We look forward to working with the FAA so that together we can find balanced solutions to promote the successful operation of MSP International Airport while minimizing the burden of aircraft noise on our community.

Sincerely,

Mike Maguire
Mayor