

March 30, 2016

Docket Operations, M-30
U.S. Department of Transportation
1200 New Jersey Avenue, S.E., Room W12-140
West Building Ground Floor
Washington, D.C. 20590-0001

Re: Docket No. FAA-2015-3782, "Stage 5 Airplane Noise Standards"

Dear Sir or Madam:

The following constitutes comments by the City of Culver City concerning the Federal Aviation Administration's proposed regulation implementing Stage 5 noise standards for new aircraft put in service in the United States after 2017. Culver City is a community located 2.5 miles northeast of Los Angeles International Airport ("LAX"), and has become subject to steadily increasing impacts of large numbers of low altitude approaches to LAX's North Runway Complex. Culver City, therefore, has a substantial interest, not merely in operational changes, but in improved technology as well.

Culver City understands that the proposed Stage 5 noise standard is cumulatively 17 dB lower than Stage 3 noise levels, and 7 dB than Stage 4 noise levels. The proposed regulation would require new large subsonic jet aircraft with a maximum gross takeoff weight of 121,254 pounds or greater to comply with the new noise limits by December 31, 2017, and new regional jet and turboprop aircraft with a maximum takeoff weight of less than 121,254 pounds to comply with the new standard by December 31, 2020. On that basis, Culver City finds the proposed regulation useful and acceptable.

There is, however, a notable omission from the proposed regulation that warrants further comment. The earlier template for the proposed regulation, the Airport Noise and Capacity Act of 1990, now codified as 49 U.S.C. § 47521, *et seq.*, not only mandated the implementation of Stage 3 technology by the end of 1999, but also provided for the phase out of all Stage 2 aircraft over 75,000 pounds by the same time. In other words, there was no dilution of the noise reduction impacts of the Stage 3 phase out by the maintenance in the fleet of the remaining noisy Stage 2 aircraft.

The proposed regulation does not, however, contain a similar phase out. Unspecified numbers of Stage 3 aircraft would, therefore, remain in the fleet, reducing the impact of the proposed regulation.

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As the recipient of increasing noise impacts from the operations at LAX, caused by other FAA initiatives, including the SoCal Metroplex OAPM, Culver City will be affected not merely by reduction of noise at its source in aircraft engines, but also cumulatively through the composition of the aircraft fleet as a whole. Culver City therefore requests, on behalf of its citizens, that FAA accommodate the interests of surrounding communities like Culver City by promulgating, at minimum, a staged phase out of Stage 3 aircraft, to begin contemporaneously with the implementation of FAA's Stage 5 regulations. Culver City understands that there are economic ramifications to this request, but asks that the economic interests of the airline industry be weighed against the economic and societal interests of the surrounding communities, as reflected in, among other things, decreasing home values and health impacts of continuing, and even increasing, noise and emissions resulting from the maintenance of Stage 3 aircraft in the United States fleet.

Culver City appreciates FAA's consideration of its recommendations, and looks forward to a continuing and amicable working relationship in the effort to find solutions to these issues.

Sincerely,

BUCHALTER NEMER
A Professional Corporation

By



Barbara Lichman