



**Oakland Mills Community Association**  
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Docket No. FAA-2023-0855

Request for comments on the Federal Aviation Administration's Review of the Civil Aviation Policy (Policy)

From; Oakland Mills Community Association (OMCA)  
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## BACKGROUND

Oakland Mills is one of ten villages in the Master Planned community of Columbia, MD. It has approximately 3,400 housing units that include single family, multifamily, and apartments and about 10,000 residents. Since 2016 with the start of implementation of NextGen Performance Based Navigation (PBN), OM has experienced increased overflights from the Baltimore Washington International Airport (BWI) and noise from aircraft. Seventy percent of all departures from BWI are made from Runway 28. Airplanes come directly over OM, its village center, Oakland Mills High School, Oakland Mills Middle School, and Talbott Springs and Stevens Forest Elementary Schools. OM's boundaries are approximately seven to eight nautical miles from the end of Runway 28. Noise contours show impacts of 55 to 60 DNL from these overflights. Until 2016, airplane noise from BWI airplane departures was not an issue since airplanes were vectored and dispersed over a wide area. Now with PBN, airplane noise is concentrated in a narrow corridor with high frequency departures over a 24 hour and 365 day annual period. We refer to this corridor as the "FAA Interstate Highway in the Sky." Unfortunately, noise barriers commonly installed along highways to temper noise cannot be installed in the sky.

## COMMENTS AND RECOMMENDATIONS

### COMMENTS RELATING TO QUESTIONS

While we appreciate the ability to comment, it is unrealistic for the FAA to expect OM to give detailed comments using your Appendices, etc. as the basis for our comments/recommendations. The OM is a volunteer organization and not a research organization. We, therefore, will selectively comment:

1. (Question 6.a) BWI was once known as Friendship Airport and had a fairly low level of annual aircraft operations. Southwest Airlines now uses BWI as a hub which is vastly different from point to point aircraft routes utilized by airlines until deregulation. Communities in Howard County mobilized to oppose PBN. Lawsuits were filed alleging lack of constructive notice, but proper notice was given of the proposed PBN changes. The next question became how to effect changes to PBN already approved? The FAA instructed us and other affected communities around BWI to form a “Roundtable” as a focal point for communities affected by PBN. We understand that the FAA will not participate in airplane community issues unless a “Roundtable” is formed with appropriate community representation. However, there is nothing in the FAA statute, regulations, etc. that requires a “Roundtable.” **We recommend for better community communications that the FAA in its next reauthorization include the formation of Roundtables as the voice for communities affected by airplane operations seeking PBN and other changes. This is a potential improvement in how, where, and with whom the FAA communicates.**
2. (Question 7.e) The FAA references as a metric and a reason for PBN (Footnote 49, page 22, dated April 28, 2023 – “The Foundational Elements of the Federal Aviation Administration Civil Aviation Noise Policy” (FOUNDATION) that in the 1970’s over 7 million persons were affected by “significant noise exposure” and it is now reduced to 400,000 today. While fewer may be affected utilizing the 65 DNL cutoff, many more are affected when repetitive noise is factored into a PBN route that is fixed. In conversations with FAA representatives, none of your models for noise contour impacts has ever been validated. It is strictly a model. No one can say that these models actually reflect reality. They need to be validated. This is basic Modeling 101. **We recommend where there are community issues with aircraft noise that noise monitors are deployed acceptable to the FAA to validate the scope/noise contours of the noise problem. This could be done by regulation since the FAA already uses these models.**
3. (Question 10) This Policy is prospective and not retroactive if and when it is adopted. Local land use decisions were made anticipating that uses would be compatible over the next 50+ years (since the 1970’s). Daily US aircraft operations are now reaching 2.8 million. It is expected to increase exponentially over the next decade, particularly at hub

airports like BWI (An additional runway is proposed in the BWI Master Plan). This Policy should also address land areas such as ours that are impacted and will continue to be impacted by increased flight operations. It is disingenuous to say that airports are responsible for increased flight operations and not the FAA. The FAA is facilitating more flight operations through changes such as NextGen. Additionally, drones, flying cars, etc. are proposed to use the National Air Space. With the FAA approving these new uses, this will again add to negative impacts on areas such as ours. The tendency will be to place the noise and overflights from drones and flying cars into existing areas such as ours so as to not rock the boat from potential complaints from newly impacted areas.

4. (Questions 3-5) deals with the existing calculation of DNL and whether it should be changed as the determining metric for NEPA. Our experience is that this metric oversimplifies noise doses with the changes made by NextGen as here is no consideration of flight operations frequency. Averages are very misleading and using a typical day out of an averaged year makes the metric very questionable. It is like the frog half in and out of the boiling pot, on average, the frog is fine. The same occurs with the inclusion of nighttime operations in the 24 hour averaging to determine the DNL. Even with the penalty for nighttime operations, the true DNL is masked because so many nighttime hours with zero or few flights are averaged in a year. We suggest that there be a separate alternative day and nighttime metric. (“An alternative metric is a noise metric that is used in lieu of another metric, such as DNL, for decision making.”) Day should be defined as between the hours of 7 AM and 10PM. Night as between the hours of 10PM and 7AM. Sleep disruption is a big issue and health studies show that aircraft noise disruption leads to high blood pressure, susceptibility to strokes, etc. Another potential alternative metric is to provide the times for peak operations and provide a metric for those hours. Aircraft pulse arrivals and departures and those times are particularly an issue for an area with large numbers of overflights. We suggest that the Aviation Cooperative Research Program at the National Academy of Sciences explore these and other options/alternative metrics.

We suggest that the threshold for NEPA should be reduced to 50 DNL if only one alternative metric is used in the future. Reduction to 5 would recognize that most areas around airports are now built up and that local land use options have in many cases been already made and implemented. This is not a perfect solution since the same areas will still be impacted by NextGen, airport expansions, and increased flight operations. Mitigating measures such as increased insulation and triple pane windows can help dampen aircraft noise in residences but cannot help with outside noise and the loss of use of outdoor space such as decks and screened in porches. Our residents cannot hear each other speaking outdoors when overflights occur.