



## Metropolitan Airports Commission

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July 6, 2020

Docket Operations, M-30  
US Department of Transportation  
1200 New Jersey Avenue, SE  
Room W12-140, West Building Ground Floor  
Washington, DC 20590-0001

Re: Noise Certification for Supersonic Airplanes NPRM

SUBMITTED VIA FEDERAL eRULEMAKING PORTAL

To Whom It May Concern,

Thank you for the opportunity to respond to the Notice of Proposed Rulemaking (NPRM) on Noise Certification of Supersonic Airplanes.

The Metropolitan Airports Commission (MAC) owns and operates the Minneapolis-St. Paul International Airport (MSP) and six reliever airports within the Minneapolis and St. Paul metropolitan area. The MAC has a long history of reducing aircraft noise to the extent possible given its highly regulated environment. We have come a long way in this endeavor, and it is imperative we do not go backward. The MAC is submitting this letter to express concerns about the proposed certification standards for supersonic aircraft as proposed by this NPRM, which in our opinion is a step backward.

Before discussing our concerns, I would like to affirm that the MAC continues to support 14 CFR 91.817, which prohibits civil aircraft from operating at a speed greater than Mach 1, which would create sonic booms over land in the United States. Until such time that new aircraft technology can provide a demonstrable reduction in current sonic boom impacts to residents on the ground, the MAC will hold this position.

The FAA has the statutory mandate through 49 USC 44715 to protect the public health and welfare from aircraft noise. It is our belief that requiring new supersonic entrants to meet or exceed noise standards set by the current Stage 5 noise standards for subsonic aircraft represents the most reasonable approach to fulfilling that mandate. For over 30 years, the FAA has promulgated consistent policy that all civil supersonic airplanes must comply with subsonic aircraft noise limits prescribed in 14 CFR Part 36 in order to operate in the United States.

The FAA specifically recognized the dangers of lowering noise certification standards to accommodate supersonic aircraft in the May 1990 *Civil Supersonic Aircraft Noise Type Certification Standards and Operating Rules*, 55 Fed. Reg. 22021:

*As Stage 2 aircraft are phased out of service the noise-impacted areas around the nation's airports will continue shrink in size. To allow the introduction of new, noisier aircraft would seriously undermine the*

*orderly expansion of aviation and reverse long-standing efforts to achieve increasingly effective noise abatement at its source.*

More recently, after the adoption of the Stage 4 noise certification standard in 2008, the FAA reiterated and updated its policy that any noise certification standards for new supersonic aircraft must meet noise certification standards for subsonic aircraft:

*The [FAA] is committed to aviation's long-standing efforts to achieve increasingly effective noise abatement at its source. We anticipate that any future Notice of Proposed Rulemaking issued by the FAA affecting the noise operating rules would propose that any future supersonic airplane produce no greater noise impact on a community than a subsonic airplane. Subsonic noise limits are prescribed in 14 CFR part 36.*

The MAC strongly objects to a departure by the FAA from its long-standing and admirable commitment. Doing so will allow supersonic civil aircraft to be among the loudest aircraft types operating at our country's airports. As a result, a new noise issue will arise and may lead to land use compatibility issues and further challenge public support for airport improvement projects.

Should this class of aircraft be allowed to operate at our airports with less stringent noise standards, more public involvement between the MAC and our communities would be necessary and noise exposure would increase. The MAC has developed noise abatement procedures, instituted the largest residential sound insulation program in the country and worked with neighboring communities to require appropriate land use measures.

The MAC urges manufacturers, engineers and policymakers to continue advancing efforts to reduce noise at the source, an important pillar in reducing aircraft noise impacts. Approving the less stringent noise standard proposed by the FAA would adversely affect decades of progress and expose residents around airports to greater noise impacts, potentially impacting local noise mitigation and abatement programs. As a result, the MAC believes that this NPRM may cause a financial burden to airports and would thereby constitute an unfunded mandate.

The MAC respectfully requests that the final supersonic noise certification standards require that supersonic airplanes operating at subsonic speeds during the landing and takeoff phase of flight be subject to current Stage 5 noise certification requirements. Further, should more stringent subsonic levels be defined in the future, we request that standards for supersonic aircraft would meet those levels as well.

Thank you for the opportunity to provide comments on the FAA's Noise Certification of Supersonic Airplanes. It is critical the FAA consider the costs to airports and communities of increasing noise impacts in developing this and future policies for supersonic aircraft.

Sincerely,



Brian Ryks  
Executive Director / CEO