

The City of Edina, Minnesota submits the following public comment regarding the FAA's proposed plans to implement Section 213(c)(2) of the FAA Modernization and Reform Act of 2012 and the development of the Net Noise Reduction method.

The City of Edina has expressed concern regarding the language included in Section 213 (c) (2) in the form of letters to the FAA and during previous public comment periods. The City reiterates its concern about the ambiguous language included in Section 213, particularly our belief that noise impact cannot be meaningfully or accurately measured on a per flight basis. The City is also concerned that because the proposed Net Noise Reduction Method is based on legislative language, which the City believes should be amended or removed from law, it should not be implemented.

As we have stated in previous comments and communications, the City supports thorough review of impacts for a Performance Based Navigation (PBN) procedure implementation. We believe that because of the substantial magnitude of the potentially negative environmental consequences which may result from proposed changes in PBN procedures, namely the increase of frequency and concentration of flight patterns and emissions, the current process for reaching any regulatory CATEX is insufficient to accurately measure the true noise and environmental impact. We support robust community education and engagement throughout PBN implementation at all OEP and non-OEP airports in the United States.

Scott



**Scott H. Neal, City Manager**

952-826-0401 | Fax 952-826-0390

[sneal@EdinaMN.gov](mailto:sneal@EdinaMN.gov) | [www.EdinaMN.gov](http://www.EdinaMN.gov)

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