

My comments on the Stage 4 Aircraft Noise Standards; Proposed Rule are aimed primarily at the continued lack of regard for the environmental impacts that aircraft under 75,000 pounds have on a large section of American society. I am also very concerned with the environmental impacts of air traffic regardless of their weight.

- Under Stage 4 Operation

Section 91.851, Section 91.853, and Section 91.855 state that these rules apply to airplanes over 75,000 pounds.

The huge increase in Commuter Jet traffic (that use fractional jet ownership and other unscrupulous methods to circumvent commercial flight classification) has dramatically increased already intolerable levels of noise and air pollution to the countless American citizens that live around the smaller General, Regional, or Business Aviation Airports. These commuter jets are almost entirely under the 75,000 pound weight, making them exempt from your proposed regulations.

It is reprehensible that air traffic is exempt from standards and regulations other industries must abide by. Who benefits from these exemptions? Certainly not the citizens who endure the noise of aircraft operations around the clock, seven days a week. Certainly not the citizens who are forced to breathe the toxic emissions from idling jets and other aircraft emissions.

- Compare Economic Evaluation and Environmental Analysis

There is approximately ten times the space allotted to the economy versus the environment in the Proposed Rule, you are carrying over to Stage 4 the blatant environmental injustices that already exist. Is it not a fact that the economy and the value of the dollar would suffer tremendously when our air, water and soil are ruined by thoughtless contamination? And what about the basic quality of life we Americans are guaranteed? The noise in the skies is ever-increasing. It is becoming the background noise. To believe that an ever-increasing number of aircraft operations are necessary for our economy to grow lacks logic. We need to invest in cleaner, safer, more economically sound, and more sustainable forms of transportation that do not unfairly impact the lifestyles of our fellow Americans.

I agree with the US-CITIZENS AVIATION WATCH ASSOCIATION in calling for the ICAO to change its mission from protecting the air transport industry to a mission of protecting the health, safety, and welfare of the global populace first, above industry profits.

I agree too that the United States should be a leader on these environmental and public health matters.

Martin Rubin - Co-founder of: Concerned Residents Against Airport Pollution  
E-mail: [jetairpollution@earthlink.net](mailto:jetairpollution@earthlink.net)