



March 21, 2022

The Honorable Delores Kelley
Chair, Senate Finance Committee
Miller Senate Office Building, 3 West
11 Bladen Street
Annapolis, MD 21401

Dear Chair Kelley:

On behalf of Airlines for America (A4A)¹, the trade association for the leading U.S. passenger and cargo airlines, I provide the following comments on SB 658. SB 658 would create the “Maryland Aviation Infrastructure Impacts Commission” to study and make recommendations to the Maryland General Assembly regarding public health, medical and environmental impacts of commercial aviation in airport communities, particularly Baltimore/Washington International Thurgood Marshall (BWI Marshall) Airport. A4A and our members have long supported efforts to evaluate and communicate the potential health and environmental impacts associated with aviation activities as essential to the development and implementation of sound public policy. However, because SB 658 would create a regime that would unnecessarily duplicate the comprehensive and robust mechanisms already in place to review and communicate health and environmental impacts related to aviation activities, A4A respectfully opposes the legislation.

Robust mechanisms already exist to comprehensively review and communicate potential impacts of aviation projects, including the “hard infrastructure such as construction projects” and so-called “soft infrastructure projects such as flight paths and related procedures” explicitly mentioned in the bill. BWI Marshall and other Maryland airports, together with the Federal Aviation Administration (FAA), conduct comprehensive evaluations of aviation projects in accordance with the National Environmental Protection Act (NEPA). For example, the FAA – which has **exclusive** authority to develop, approve and implement flight procedures – undertakes necessary NEPA reviews before approving and implementing those procedures. A4A strongly supports efforts to communicate these impacts to the public and has championed and led efforts to improve the FAA’s process for developing new flight procedures to better ensure communities are heard and their views are taken into account as the procedures are developed and implemented. A4A members also have proactively engaged with communities, participating directly in community roundtables dedicated to addressing aircraft noise issues at airports throughout the country, including the citizen-led BWI Community Roundtable. Similarly, all major airport development (e.g., construction) projects requiring FAA approval are studied and the results reported to the public in accordance with NEPA. This is on top of the approval process for major capital projects that is conducted by the Maryland General Assembly, the

¹ A4A’s members are Alaska Airlines, Inc.; American Airlines Group, Inc.; Atlas Air, Inc.; Delta Air Lines, Inc.; Federal Express Corporation; Hawai’ian Airlines, Inc.; JetBlue Airways Corp.; Southwest Airlines Co.; United Airlines Holdings, Inc.; and United Parcel Service Co. Air Canada, Inc. is an associate member.

Maryland Department of Transportation and the Maryland Board of Public Works, all of which provide avenues for public comment.

Regarding health impacts, the FAA has, among other efforts, established a cooperative aviation research organization co-led by Washington State University and the Massachusetts Institute of Technology – the Aviation Sustainability Center (also known as the Center of Excellence for Alternative Jet Fuels and Environment, ASCENT) – which undertakes multiple research projects to understand such health impacts and ensures public policy is based on peer-reviewed science. Currently, the FAA is undertaking a comprehensive review of aviation noise policy which will be informed by such research (see *Overview of FAA Aircraft Noise Policy and Research Efforts: Request for Input on Research Activities to Inform Aircraft Noise Policy*.⁸⁶ Fed. Reg 2722 (January 13, 2021). With respect to noise monitoring, the establishment of a virtual noise monitoring system authorized in the bill is unnecessary given the robust noise monitoring program already in place at BWI and administered by the Maryland Department of Transportation's Maryland Aviation Administration.

We strongly believe that, because of the comprehensive mechanisms already in place, this legislation is unnecessary and would expend resources duplicating the work that is already being done.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Sean Williams', is positioned above the typed name.

Sean Williams
Vice President, State and Local Government Affairs
swilliams@airlines.org