TESTIMONY OF US-CITIZENS AVIATION WATCH ASSOCIATION
FOR THE INTERNATIONAL CIVIL AVIATION ORGANIZATION MEETING
SEPTEMBER 25 - OCTOBER 5, 2001

US-Citizens Aviation Watch Association is the leading public advocacy group focusing on aviation issues, whose mission is "Protecting the public's health, environment, and property; promoting safety; and advocating a sustainable, equitable and accountable aviation industry." The Association is comprised of local airport-affected groups, environmental organizations, civic groups, cities and townships, and Baylor University School of Aviation Sciences. We are concerned about noise, environment, public health, and other quality of life issues related to aviation operations. The Alliance is also a non-governmental organization representing member and associate organizations in 27 other countries. (www.us-caw.org)

We are greatly saddened by the loss of life caused by the attacks on September 11, and express our sincere condolences to those directly affected by such loss, including the family and friends of the people in and around the World Trade Center, the Pentagon, the rescue workers, pilots, and the crews and passengers of the hijacked airplanes.

It is in a spirit of great concern about aviation's effects that we express our strong disapproval for the expected acceptance by the Assembly of a number of key environmental proposals. These proposals include a new, extremely weak "Chapter 4" aircraft noise standard that would continue to allow noisy planes to fly, a complete lack of any improved standards for protecting air and water from jet emissions, and a complete lack of any standards to control the climate-changing nature of jet emissions.

The grave, worldwide problems caused by aviation include:

(1) airport and aircraft operations cause massive amounts and unusual types of serious and deadly air, water, noise and ground pollution;

(2) The United States Federal Aviation Administration ("FAA") grossly underestimates the number of people (500,000) exposed to airport and aircraft noise. Among its protections for the aviation industry, the FAA uses the unscientific (65DNL) measurement to describe noise. This number severely undercounts the number of people whose health and quality of life is harmed by aviation noise pollution. Moreover, just using the air industry's unscientific metric, quantitative evidence demonstrates that well over 600,000 people are affected by the noise from one airport alone, Chicago's International O'Hare Airport[1];

[1] 600,000 people affected by airport noise represents only a limited number of communities that monitor noise in the Chicago area. It is estimated that over 1.6 million people are located in the 65 DNL of Chicago's O'Hare Airport, whereas the FAA erroneously claims that they have substantially reduced the airport noise problem to a total of "only 500,000 people" who are "significantly impacted" in the whole United States.

(3) aircraft noise harms the health, development, education, and general well-being of 10 million children living near airports in the United States[2];

(4) according to several sources, the relatively few thousand commercial jet planes operating use a highly disproportionate amount of the world's oil supply, and over ninety (90) percent of those toxic jet engine emissions are emitted at or near the airport, creating a severe local impact. Studies show that airport and aircraft air emissions contaminate an area greater than 20 miles away from a small airport, yet seventy (70) percent of the U.S. populace lives within twenty miles of a major airport;

(5) the effect on local air quality of hundreds of thousands of airplanes idling, taxiing, taking off, and landing at U.S. airports every year remains almost completely uncontrolled because of loopholes previously written into the Clean Air Act and other environmental laws for airports and aircraft;

(6) air pollution generated from airport and aircraft operations rivals local power plant, incinerator, and refinery air pollution, yet is exempt from rules other industrial polluters in the U.S. must follow;

(7) smog compromises millions of people's ability to breath, and additional sources of smog-forming chemicals from one type of uncontrolled source are an unacceptable threat to the public health;

(8) contained in the volatile organic compounds emitted by jet planes are benzene, a known human carcinogen, formaldehyde, a suspected human carcinogen, and 1,3 butadiene, another suspected human carcinogen, and deaths, illness, and associated suffering from additional cancers caused by one type of uncontrolled source are unacceptable;

(9) the emissions from airports and aircraft operations pose a major health threat. They have been linked to cancer, asthma, brain tumors, emphysema, heart disease, leukemia, Hodgkin's disease, kidney damage, and numerous other conditions. Evidence shows air emissions from airports and aircraft operations expose an extremely large percentage of people living and working at distances greater than 20 miles from a facility. A study[3] commissioned by four Chicago-area communities found that O'Hare International Airport emitted over 200 air toxins and that it presented unacceptable cancer risks to people living and working within 32 miles of the airport;

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[2] "Psychophysiological stress processes linked to coronary heart disease; central cognitive processes, including speech perception, memory, and basic reading skills; motivation; and emotional affect are all associated with chronic exposure to (airport) noise among children." Chronic Noise and Psychological Stress. American Psychological Society. Vol. 6, No. 6, November 1995. p. 333.

[3] City of Park Ridge, et. al. "Preliminary study and analysis of toxic air pollutant emissions from O'Hare International Airport and the resulting health risks created by these toxic emissions in surrounding residential communities." August 2000. Note: Study does not include flight track impacts.

(10) a Los Angles School district health study showed that flight volumes of only about fifteen jets per day are associated with significantly increased cancer rates among people living under the flight paths;

(11) air travel is increasing twice as fast as car travel and is projected to at least double within the next ten to twenty years, if left uncontrolled;

(12) the Federal Aviation Administration reports that at least 60 of the 100 largest airports in the U.S. are proposing to build additional runways;

(13) the General Accounting Office states that about 2,000 general aviation airports are also expanding, and many will now have regional jet service;

(14) existing delays can be controlled by instituting demand management programs instead of building new runways at existing airports;

(15) the Intergovernmental Panel on Climate Change, the General Accounting Office, and other sources have concluded that aviation causes significant damage to the upper atmosphere -- it is not necessarily the amounts of pollutants but the types and that they are emitted directly into the upper atmosphere. For example, carbon dioxide, combined with other gases and particulates emitted from jet engines, could have two to four times as great an impact on the atmosphere as carbon dioxide emissions alone;

(16) jet contrails are contributing to climate change by radiation warming: a National Aeronautics and Space Administration researcher stated: "The number of clear days over the U.S. has decreased in the last 30 years, and we suspect that much of that is due to an increase in cirrus clouds, which we suspect is probably due to an increase in air traffic"[4];

(17) existing environmental and public health safeguards for aviation impacts are inadequate. (For example, aviation industry-related laws and bills in the U.S. are generally written so that the National Environmental Policy Act's environmental process will not be allowed regarding expansion of airports or increases in flights. See, e.g., City of New York, et al. v. Mineta, et al., 2nd Circuit Court of Appeals, No. 00-4124, 8/20/01, holding that NEPA's environmental process may not be undertaken regarding the increases in flights at the New York airports caused by the

(18) "AIR 21" law because of the mandatory nature and short deadlines of the "AIR 21" law); and

(19) passenger jet aircraft are inherently unsafe because of the thousands of gallons of highly inflammable jet fuel which they must carry, as proven by the tragic events of September 11, 2001. Therefore, they should be phased out in

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[4] Patrick Minnis, NASA researcher. NBC Nightly News, 7-28-98.
http://cloud1.arc.nasa.gov/espo/success/index.html
See also, studies by the Intergovernmental Panel on Climate Change.

their current form and replaced with safer, more efficient, and more environmentally sustainable modes of transportation, such as high-speed passenger rail and alternative fuel-powered aircraft.

US-CAWA'S RECOMMENDATIONS FOR IMPROVEMENTS TO THE NOISE STANDARDS FOR THE CURRENT ICAO ASSEMBLY MEETING:

US-CAWA's Chapter 4 decibel recommendations are: an 18dB (decibel) reduction with a gradual phase-out:

-10dB for ALL planes after 2003 (not just new production)
-12dB for ALL planes after 2006, -18dB for new plane production
-15dB for ALL planes after 2010, -20dB for new plane production
-18dB for ALL planes after 2015, -23dB for new plane production

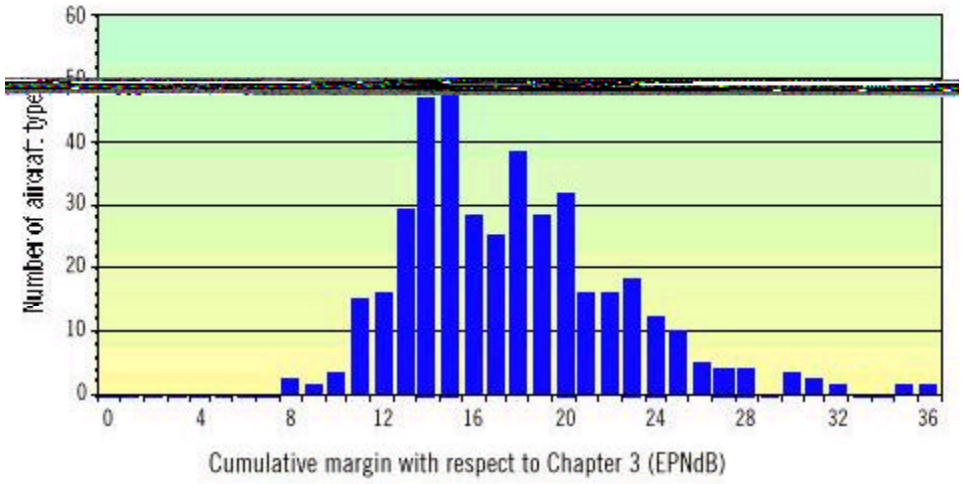

Figure 1. Distribution of margins in aircraft types using today's best noise reduction practices.

(Source: ICAO)

In summary, we strongly recommend that ICAO 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. The ICAO should begin to objectively examine the very serious damage that the air transport industry causes. The U.S. should take the lead on these very important environmental and public health matters. Any Chapter 4 specifications should incorporate protection from adverse aviation impacts as detailed herein.

c: Kofi A. Annan, Secretary-General