12/28/10
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AGL 1's note JBS

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AGL-1

October 26, 2010

Barry Cooper, FAA
Great Lakes Regional Admin.
2300 East Devon Ave.
Des Plaines, IL 60018

Dear Mr. Cooper,

Thank you for your response letter dated Sept. 23, 2010. It seems there is confusion regarding what to call high school athletic fields. Ms. Amy Hansen and Ms. Lindsay Butler have both stated the fields are a "park". Your letter to Citizen No. 13 states "school athletic fields are, in fact, designated as school property...." However, your recent letter states they are neither, but are "outdoor arenas and spectator sports" and thus compatible up to 75 decibels(dB) provided special sound reinforcement systems are installed." I have concerns regarding this I would like to address.

I agree with your statement to Citizen No. 13 when you said "school athletic fields are, in fact, designated as school property, rather than public parks, when their primary function is to support school activities." However, I disagree with the notion that they are "outdoor arenas and spectator sports". The *only* use of the athletic fields at Maine South is for school activities, including instruction. Signs are posted around the perimeter of the school grounds designating them as such. No one is allowed unless on school business. "Outdoor arenas and spectator sports" seems to connote one person being a passive observer or spectator of an event taking place that one would go "watch" on a weekend or an occasional special event. This is hardly what happens on a day to day basis during school when physical education is being taught or during band instruction or when any class chooses to use the out of doors as an extension of the classroom. Nor is it what happens after school as students are learning a sport which they then compete in. All of these purposes require a teacher and/or coach to offer verbal instruction and feedback to students and students to be able to answer and ask questions.

The athletic fields adjacent to the school are noise sensitive areas because noise interferes with the speech communication necessary for the education of these students. Because it is out of doors, these students are left without protection. Again, I must ask what measures are being made to mitigate the impact of the noise over these fields? You state in your letter that FAR Part 150 specifically defines school athletic fields as outdoor sports arenas. I have not been able to find where this is specifically written. Would you please forward me a copy of the document where it states high school athletic fields are outdoor sports arenas?

My review of FAR Part 150, Appendix A, Table 1 appears to support the concept that athletic fields are, in fact, a portion of the educational site. Footnote 1 which appears in that Table referencing schools notes that proscribed building noise attenuation will not be effective in outdoor areas. This seems to recognize that areas used for physical education are unable to be protected.

Your letter also states that supplemental noise metrics are not required and were only provided in the OMP EIS for disclosure and informational purposes. Although they may not be required, if they were provided they should be accurate and inclusive. Maine South was not studied as a park as Amy Hansen and Lindsay Butler originally called it. It was studied as a school, yet the school's DNL is less than the adjacent fields DNL. The noise contour maps from the EIS show the athletic fields within the 65DNL. This is incompatible with an outdoor teaching environment. Therefore, I am requesting the FAA invest

monies into a comprehensive, *independent*, noise analysis which would take a hard look at the noise impacted areas and offer possible solutions or mitigating measures. Your comment that Maine South has a state of the art sound system as a solution appears to be callous and implies an institutional disregard for the health and well being of these students. Even if it were a legitimate solution, what about the fields to the west of the stadium (closer to the airport) where the band practices, and soccer, cross country, track, and baseball are played without a sound system?

Sincerely,

Cc: Susan Hedman, Regional Admin., EPA
Sherry Kamke, US EPA
Dr. Ken Wallace, Supt., H.S. Dist 207
Sean Sullivan, Board President, H.S. Dist 207
Ann Limjoco, Suburban Dir., US Rep. Jan Schakowsky
Trevor Reuschel, Legislative Asst., US Sen. Richard J. Durbin