

Mr. Joe Goffman
Acting Assistant Administrator
for Air and Radiation
Environmental Protection Agency
Washington, DC 20460

February 8, 2022

Dear Joe,

Thank you for taking the time to meet with us last Wednesday (2/1). We are grateful for the attention you gave us, given the many demands on the Air Office.

We believe that EPA can benefit greatly by ending the long period of neglect of noise as a major environmental and public health issue. The legal mandates for EPA remain. Preemption remains in place, restricting what states and municipalities can do. States and localities have been unable to fill the gap, and communities – particularly environmental justice neighborhoods – are especially harmed by noise. The unconstrained growth of noise is also causing extensive harm to wildlife.

Our aim is to help you restore EPA to its previous position as the national leader in addressing this harm, even if we need to start small. As you and your team consider what EPA might do in terms of a “high leverage strategy,” we want to be clear about how we might help.

Quiet Communities has a substantial and growing community network. We are able to involve these groups with any initiatives that we can bring forward. Our aim is to get this network to a point where it can do much of what Chuck Elkins referred to when he mentioned ONAC’s “Each Community Helps Others” (ECHO) program. Even though our funding is limited, we believe that interest is so strong that, working with EPA, we can quickly form this national community network as a first priority for a national effort.

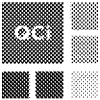
In 2022, we will organize a conference series to bring communities together around noise, related pollution, and alternative solutions. (A good example is our national conference – [The Quiet Transition: Leading by Example in Clean, Quiet Land Care](#) held in Dec 2021 -- that featured communities that have successfully taken action.¹ Nearly 200 people participated and it received a very positive response). Future conferences will address transportation and industrial operations, including solutions such as soundproofing; equipment powered with quieter, less polluting energy alternatives; legal mechanisms, and cultural and educational approaches. We want to emphasize the importance of addressing noise now – as new infrastructure projects are considered – so that we avoid the mistakes of the past that placed a disparate burden on poorer communities. We hope EPA will be interested in participating in these events in some way.

We also have a network of scientific, legal, and health professionals who have worked on noise for many years, and would be able assist EPA in developing internal education, interagency education, or any similar initiative.

We also stand ready to respond to your staff’s suggestions of ways that noise can be incorporated into ongoing EPA programs that address multiple pollutants. For instance, leaf blowers and lawn mowers might be good candidates for the Energy Star program.

Lastly, we heard loud and clear that your financial resources are limited and your ability to request funds (a move we think is necessary to comply with the law) may be limited by the extent of other concerns. Therefore, we have attached

¹ <https://www.bu.edu/rccp/2021/12/17/739/>



a scaled-down sample budget, which we think could get things started and something we hope you feel comfortable proposing. Although this version is not adequate to fully meet the challenge, it will be something, which will be a vast improvement over what is essentially an absence at the table.

- **One last question: Would you be able to help us arrange a meeting with the Assistant Administrator for Enforcement and Compliance Assurance so we can make a pitch for including money in his budget for enforcement of current regulations?**

The opportunity to begin a new era of action may not seem to be a priority issue to some, but we believe this misperception can be countered with accurate information. To those now suffering from excessive noise, the benefit of seeing EPA take up the issue again will be enormous.

We look forward to working with you and your team.

Sincerely,

Jamie Banks, PhD, MSc, Founder and President,
Quiet Communities Inc

Arline Bronzaft, PhD, Board of Directors, GrowNYC;
Professor Emerita, City University of New York

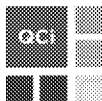
Chuck Elkins, JD, Former Director, Noise Control
Program, US EPA

Joel Mintz, JD, Professor Emeritus of Law and C.
William Trout Senior Fellow in Public Interest Law

Rick Reibstein, JD, Lecturer, Boston University,
Harvard Continuing Education; Board of Directors,
National Pollution Prevention Roundtable

Sidney Shapiro, JD, Frank U. Fletcher Chair in
Administrative Law, Wake Forest Law School

David M Sykes, MA, Boston University and
Rensselaer Polytechnic Institute, Professor (retired)



SAMPLE BUDGET

Resources Needed for a Re-start of the Noise Control Office			
Area	Staff	Funds: staffing payroll	Funds: Contracts, grants, and other
1. Outreach and Support to state and local noise programs	2	\$0.2 million	\$0.1 million
2. Grants for Communities with emphasis on Environmental Justice	2	\$0.2 million	\$ 1.5 million
3. Enforcement of current regulations (OECA)	2	\$ 0.2 million	\$0.3 million
TOTALS	6	\$0.6	\$1.9 million
GRAND TOTALS	6	\$2.5 million	