

Community Engagement or DIS-Engagement?

Darlene Yaplee • ANE Symposium 2022

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FAA's Community Engagement



“...the FAA’s commitment to give **the public** an opportunity to be informed, become involved, and have their **concerns and views considered as the FAA makes aviation decisions that might affect them.**”

“Community involvement is the process of **engaging in dialogue and collaboration** with **communities affected by FAA actions.**”

Overarching Problem

- FAA Community Engagement pursues “community understanding and acceptance”.
PBN Blueprint Community Outreach, NAC Task Group June 2016
- Residents expect meaningful dialogue to address negative impacts of past FAA actions and of future FAA actions before decisions are made.
- **These Goals for Community Engagement are Not Aligned.**

Framing the Problems: Overview

1	2	3	4	5
 <p>IF the Community is Involved, it is Underrepresented</p>	 <p>“Community” May Not Include You</p>	 <p>Understanding If You Will Be Affected and How</p>	 <p>Missing “Dialogue and Collaboration”</p>	 <p>The DNL 65 Gatekeeper For Engagement</p>

For representative examples of community input, see Appendix.

Problem 1 IF the Community is Involved, it is Underrepresented – 3 Examples

NextGen Advisory Committee (NAC)

30 Members

- 10 Airlines
- 6 FAA Non-voting Members
- 6 ATC Automation
- 3 Labor (e.g., Pilots)
- 3 Manufacturers
- 2 International
- 2 Airports
- 1 Dept of Defense
- 1 ATC Infrastructure
- 1 Avionics
- **1 Environment (3%)**

NAC PBN Blueprint Community Outreach Task Group - 2016

50 Members

- 14 Airlines
- 11 Aviation Consultants
- 6 Airports
- 5 FAA
- 4 Labor
- 3 Airlines for America
- 3 Aviation Non-profit
- 2 Manufacturer
- 1 Intl Air Transport Assoc
- **1 Environment (2%)**

PBN Full Work Group (FWG): Procedure Development*

31 Members

- 23 FAA
- 5 Airlines
- 3 Airports
- **0 Environment (0%)**

*Example for new SERFR RNAV to the original ground track of BSR STAR:
June 4-5, 2019

Interests of Airports and Airlines Are Understandably Different From Community Interests

Problem 2 “Community” May Not Include You

WHAT IS POSSIBLE

FAA’s Community Involvement Manual Terminology/Audience
Airports
Airlines
FAA
Govt/Elected Officials <i>E.g. City Council Members</i>
Business Interests <i>E.g. Chambers of Congress</i>
Public Interest Groups <i>E.g. NGOs, Community Action Groups, Roundtables</i>

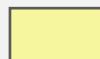
IN PRACTICE (EXAMPLES)

Procedure Development and/or Initial Environmental Review	FAA Community Involvement Survey in June 2020
Airports	Airports
Airlines	Airlines
FAA	FAA
Govt/Elected Officials <i>E.g. Historical Properties</i>	Govt/Elected Officials
Business Interests <i>E.g. Chambers of Congress</i>	Business Interests
Public Interest Groups	Public Interest Groups

Community:
All residents harmed by FAA actions (their elected or appointed reps and grassroots groups)



Participation/Input



Ad Hoc Participation/Input



No Participation/No Input

Problem 3 Understanding if You Will Be Affected and How

I can't raise a concern if I don't know of the FAA action.



I can't raise a concern if I don't understand if I will be affected and how I will be affected.



I need transparency and rigor on how findings are determined.

In almost every case, not all communities potentially harmed by FAA actions are notified

Information on impacts is either missing, insufficient, or unclear: communities cannot tell who is affected and how they are affected

Transparency is inadequate and rigor needs improvement

Problem 3 Understanding if You Will Be Affected and How

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I can't raise a concern if I don't understand if I will be affected and how I will be affected.



I need transparency and rigor on how findings are determined.

Posted on the IFP Gateway

Shared at Public Workshop

Not Made Public

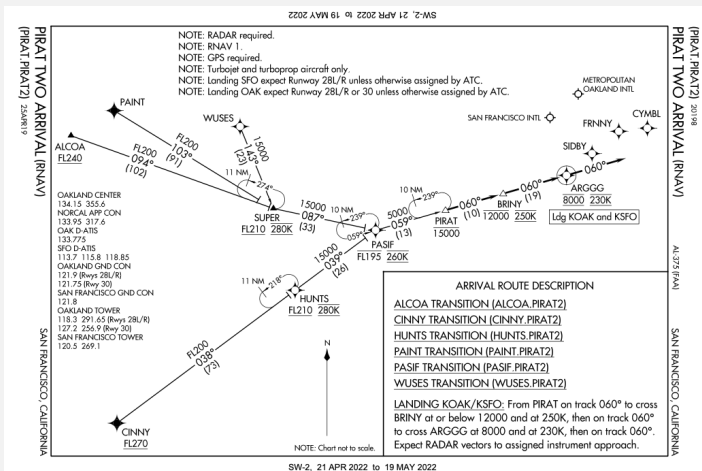
What is the PIRAT Arrival?

Procedure

- Arrival procedure for oceanic flights to SFO and OAK.
- Aircraft cross the PIRAT waypoint at 10,000 feet.
- SFO arrivals fly the procedure to the ARGGG waypoint, then are vectored to the final approach.
- ARGGG waypoint located near the Woodside VOR.

Examples:

- FAA NES 2021 full de-identified data set not available
- FAA Metrics Report 2020, Quiet Skies Caucus letter states report is "wholly inadequate"¹
- AEDT error bars not disclosed
- Research indicates AEDT is a poor predictor² for locations away from airport



Excerpt from FAA Instrument Flight Procedures (IFP) Information Gateway, April 2019

Source: FAA Information Poster Board, Virtual Public Workshop, July 2021






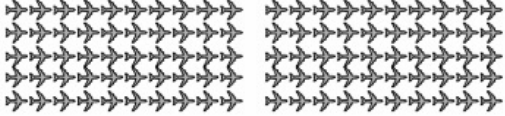

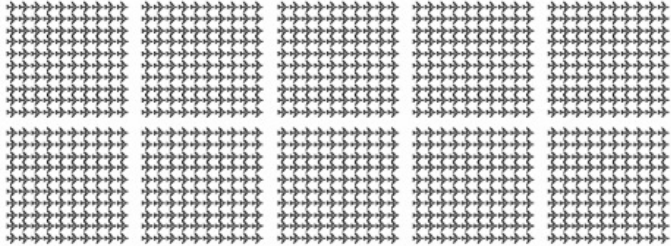
¹Source: QSC letter to FAA Administrator Dickson September 2020

²Source: Giladi and Menachi, 2020, "Validating Aircraft Noise Models"

Problem 3 Understanding if You Will Be Affected and How

“DNL...does not provide a clear picture of the flight activity or associated noise levels at a given location.”

GAO Noise Report, 2021

Number of flights per day and sound exposure level in decibels (dB) ^a			Day-Night Average Sound Level (DNL) ^b
Scenario A:	<p>1 flight per day at 114.4 dB</p> <p>Less loud  Loud</p> <p>▲ 114.4 dB</p>		65 dB
Scenario B:	<p>10 flights per day at 104.4 dB</p> <p>Less loud  Loud</p> <p>▲ 104.4 dB</p>		
Scenario C:	<p>100 flights per day at 94.4 dB</p> <p>Less loud  Loud</p> <p>▲ 94.4 dB</p>		
Scenario D:	<p>1,000 flights per day at 84.4 dB</p> <p>Less loud  Loud</p> <p>▲ 84.4 dB</p>		

Source: GAO analysis of Federal Aviation Administration information. | GAO-21-103933

Figure 3: Different Numbers of Flights and Sound Exposure Levels Result in a Day-Night Average Sound Level (DNL) Of 65 Decibels

Problem 3 Understanding if You Will Be Affected and How

FAA Statement - Dramatic Reduction

“During the last 50 years, we have seen a **dramatic reduction** in noise exposure despite a nearly five-fold increase in the number of passengers transported in the U.S. aviation system.”

Kevin Walsh – FAA, March 2022
House Transportation Committee Hearing

FAA Statement – Substantial Increase

“Compared with the existing Schultz Curve, the new National Curve shows a **substantial increase** in the percentage of people who are highly annoyed by aircraft noise over the entire range of aircraft noise levels considered, including at lower noise levels.”

FAA Neighborhood Environmental Survey Website
Retrieved April 16, 2022

Problem 3 Understanding if You Will Be Affected and How

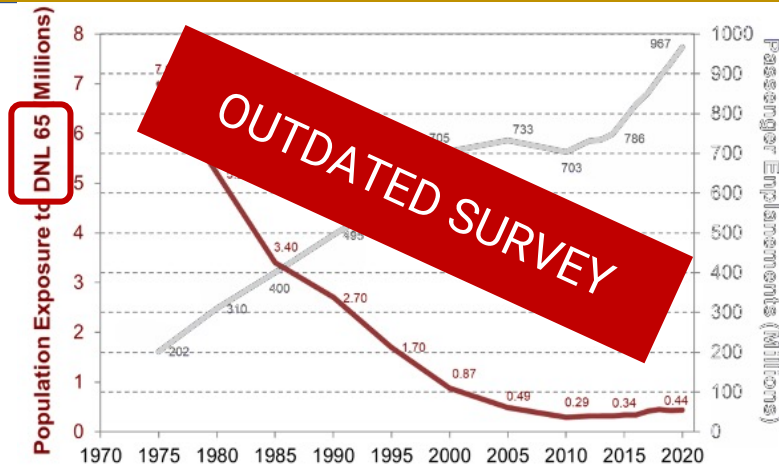
FAA Statement - Dramatic Reduction

“During the past 50 years, we have seen a dramatic reduction in noise exposure despite a nearly 10-fold increase in the number of passengers transported in the U.S. aviation system.”

Kevin Walsh – Chairman
House Transportation Committee Hearing

MISLEADING

FAA Cites Outdated 1992 Survey



OUTDATED SURVEY

FAA Statement – Substantial Increase

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FAA Neighborhood Environmental Survey Website
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FAA Cites Recent 2021 Survey

Table 1: Percentage of People Highly Annoyed by Aircraft Noise

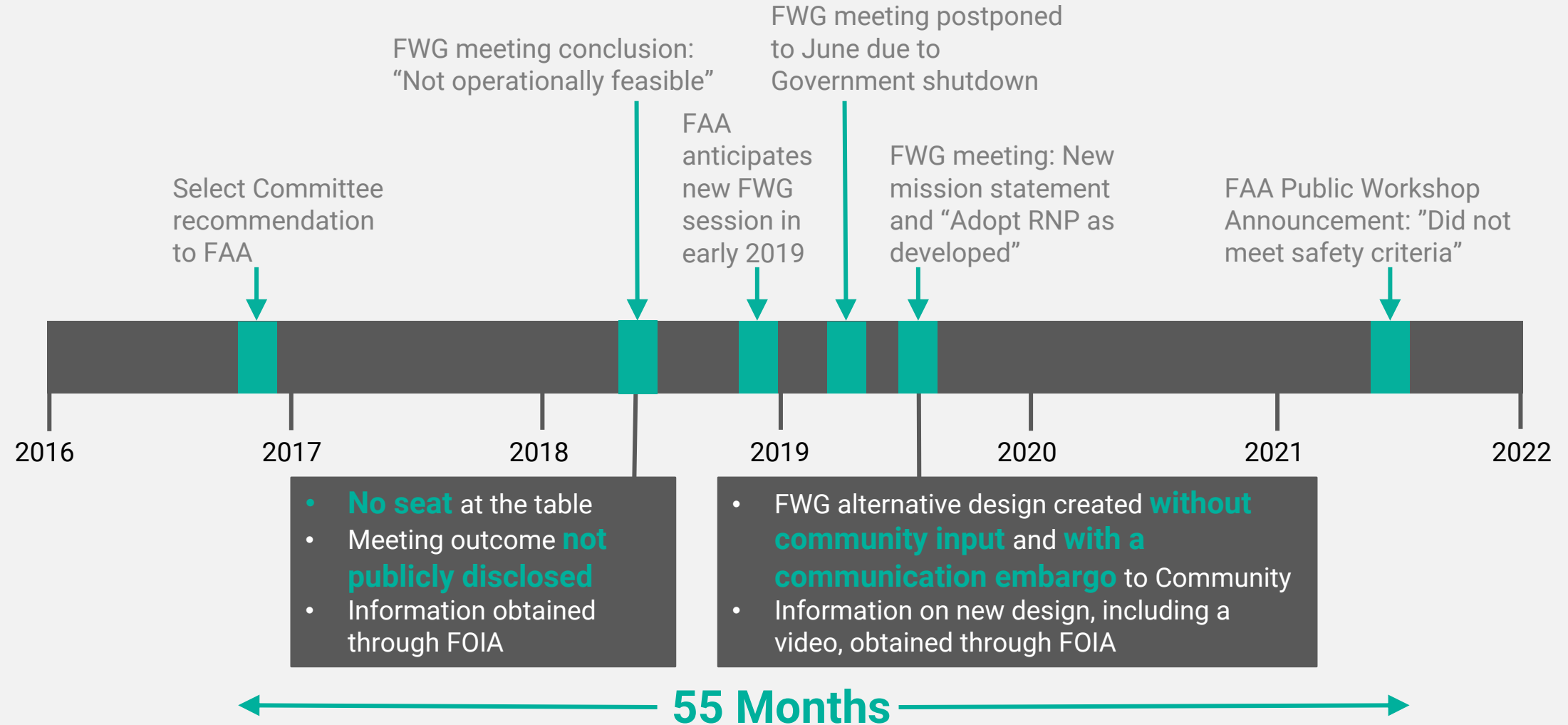
Survey	Percentage of people highly annoyed at Day-Night Average Sound Level (DNL) 50 decibels (dB)	Percentage of people highly annoyed at DNL 55 dB	Percentage of people highly annoyed at DNL 60 dB	Percentage of people highly annoyed at DNL 65 dB
1992 updated Noise Annoyance Curve ^a	1.7 %	3.3 %	6.5 %	12.3 %
2021 Neighborhood Environmental Survey ^b	15.4 – 23.4 %	27.8 – 36.8 %	43.8 – 53.7 %	60.1 – 70.9 %

Source: Federal Aviation Administration. | GAO-21-103933

60.1 – 70.9 %

Problem 4 Excluded From “Dialogue and Collaboration”

Example: New Procedure Proposal



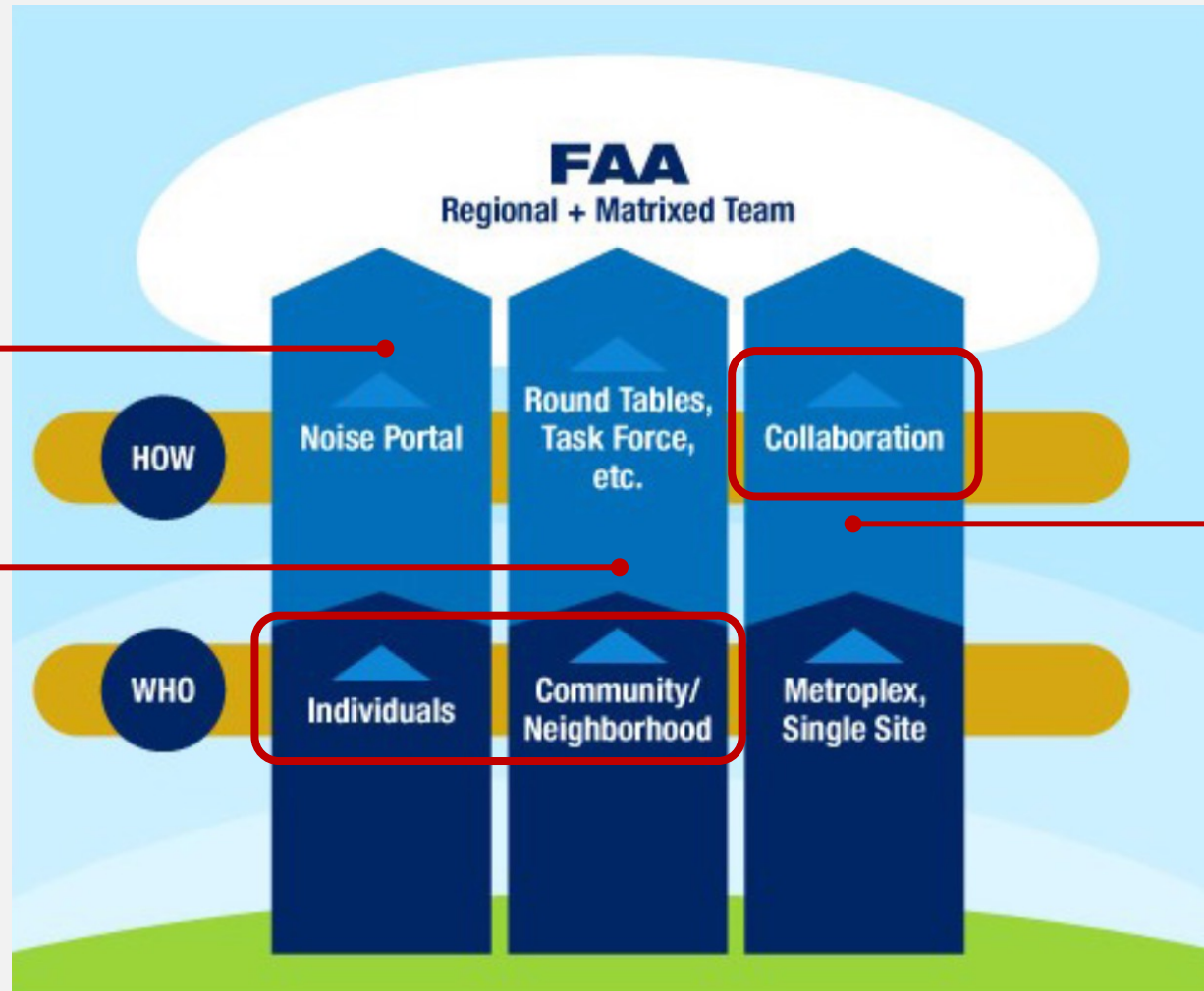
Note: FWG means Full Work Group; used by FAA for new procedure designs

Problem 4 Excluded From “Dialogue and Collaboration”

FAA’s Engagement Framework Illustrates the Problem

- One complaint per lifetime
- Lacks transparency
- No solutions provided

- Many harmed residents are not represented
- FAA provides no or inadequate technical resources
- No FAA person accountable for identifying solutions to reduce harm



- Excludes Individuals and Community/Neighborhood
- Procedure design missing unbiased community representation
- “Community Engagement is the process of engaging in dialogue and collaboration with communities affected by FAA actions”



Engagement Framework

FAA Community Engagement Website, April 2022

Problem 5 The DNL 65 Gatekeeper For Engagement

FAA Interpretation of “Significant Impact” (NEPA 1970) → Community Engagement

- DNL 65 dB determines the level and outcome of Environmental Review
- Example: Categorical Exclusion (CATEX) does not require public outreach
- National Environmental Policy Act (NEPA)

Problem 5 The DNL 65 Gatekeeper For Engagement

DNL 65 dB is the Wrong Threshold to Indicate a “Significant Impact” of Aviation Noise and Excludes Community Engagement with Those Highly Impacted

Aviation Safety and Noise Abatement Act of 1979

(1) establish a single system of measuring noise, for which there is a highly reliable relationship between projected noise exposure and surveyed reactions of people to noise, to be uniformly applied in measuring the noise at airports and the areas surrounding such airports;

GAO Aircraft Noise Report 2021

“DNL...does not provide a clear picture of the flight activity or associated noise levels at a given location.”

Table 1: Percentage of People Highly Annoyed by Aircraft Noise

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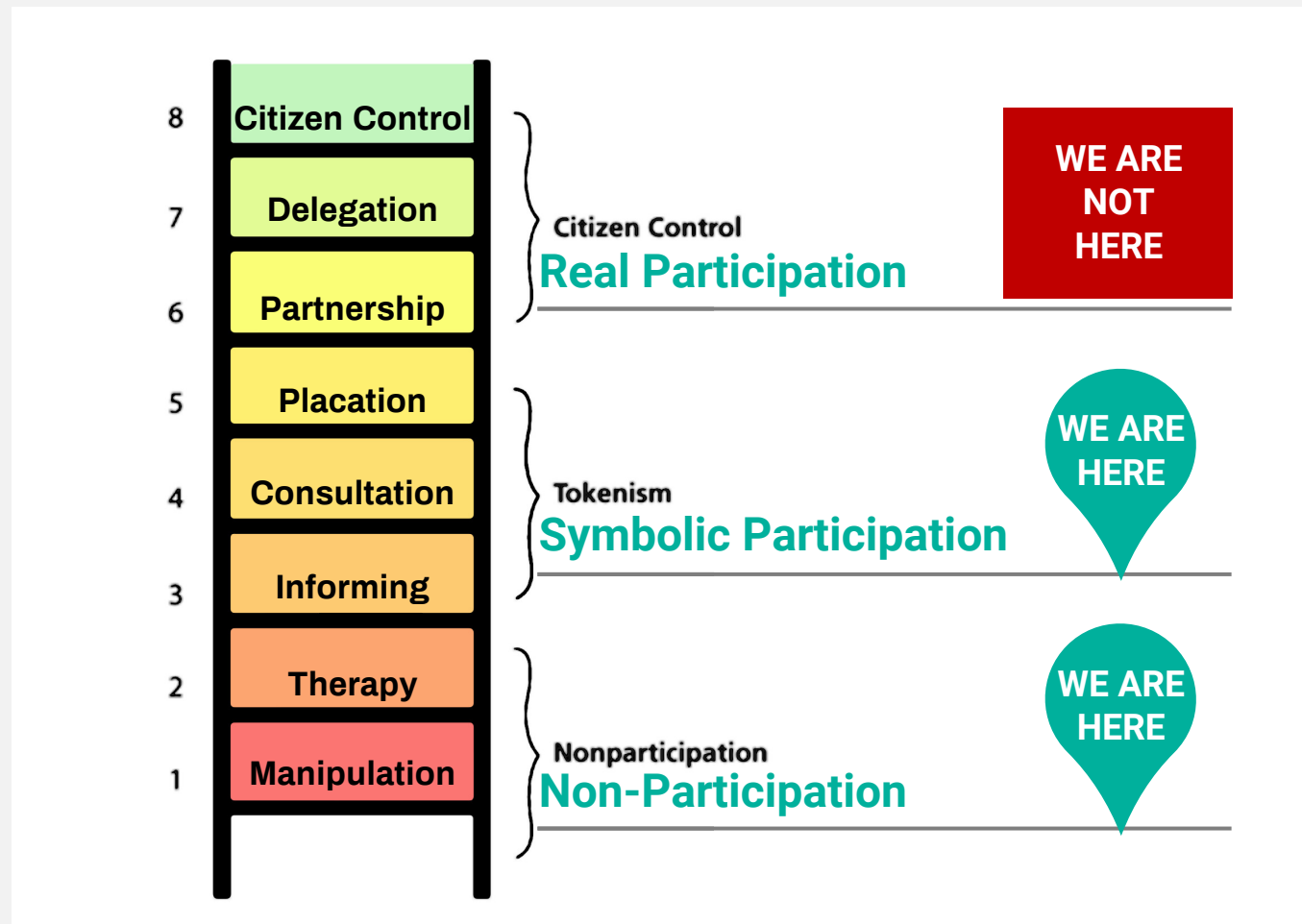
- I. Framing the Problem**
- II. Examples of Meaningful Engagement**
- III. Recommendations**

Examples of Meaningful Engagement

Community Representation	<ul style="list-style-type: none">• GAO Noise Report (September 2021) Based on 58 Interviews including 14 Grassroots Groups and 9 RTs• Several Roundtables Include Grassroots Groups and/or Neighborhood Group Members
Understanding Impacts	<ul style="list-style-type: none">• Neighborhood Environmental Survey, NES (January 2021)• Noise and Departure/Arrival Speed, AEDT (June 2020, Section 179, FAA Reauth 2018)• N-Above: Stanford MONA, MIT, and ATAC• Noise Monitoring: Noise Measurements Linked Via Known Aircraft Location + Time Versus Threshold & Duration<ul style="list-style-type: none">• Harding, Ferrier and B&K, and Giladi• Validating Aircraft Noise Models (AEDT): Giladi and Menachi
Meaningful Dialogue	<ul style="list-style-type: none">• TRACON Collaboration, Montgomery County Quiet Skies Coalition (MCQSC)• SFO GBAS Infor Tools: Interactive Workshops, Q&A, and Noise Measurement Report• Community Proposed Procedures: TBD/In process, Requires Further Analysis• Transparency<ul style="list-style-type: none">• Ombudsman Reports (1997-1999)• DOT Report, FAA Has Made Progress in Implementing Its Metroplex Program, But Benefits for Airspace Users Have Fallen Short of Expectations (April 2019)

“...the FAA’s commitment to give the public an opportunity to be informed, become involved, and have their concerns and views considered as the FAA makes aviation decisions that might affect them.”

FAA Community Involvement Manual 2016



Degrees of Citizen Participation from Arnstein’s Ladder (1969)

Better Impacts Communication: Understanding if You Will Be Affected and How



WHAT IMPACTS

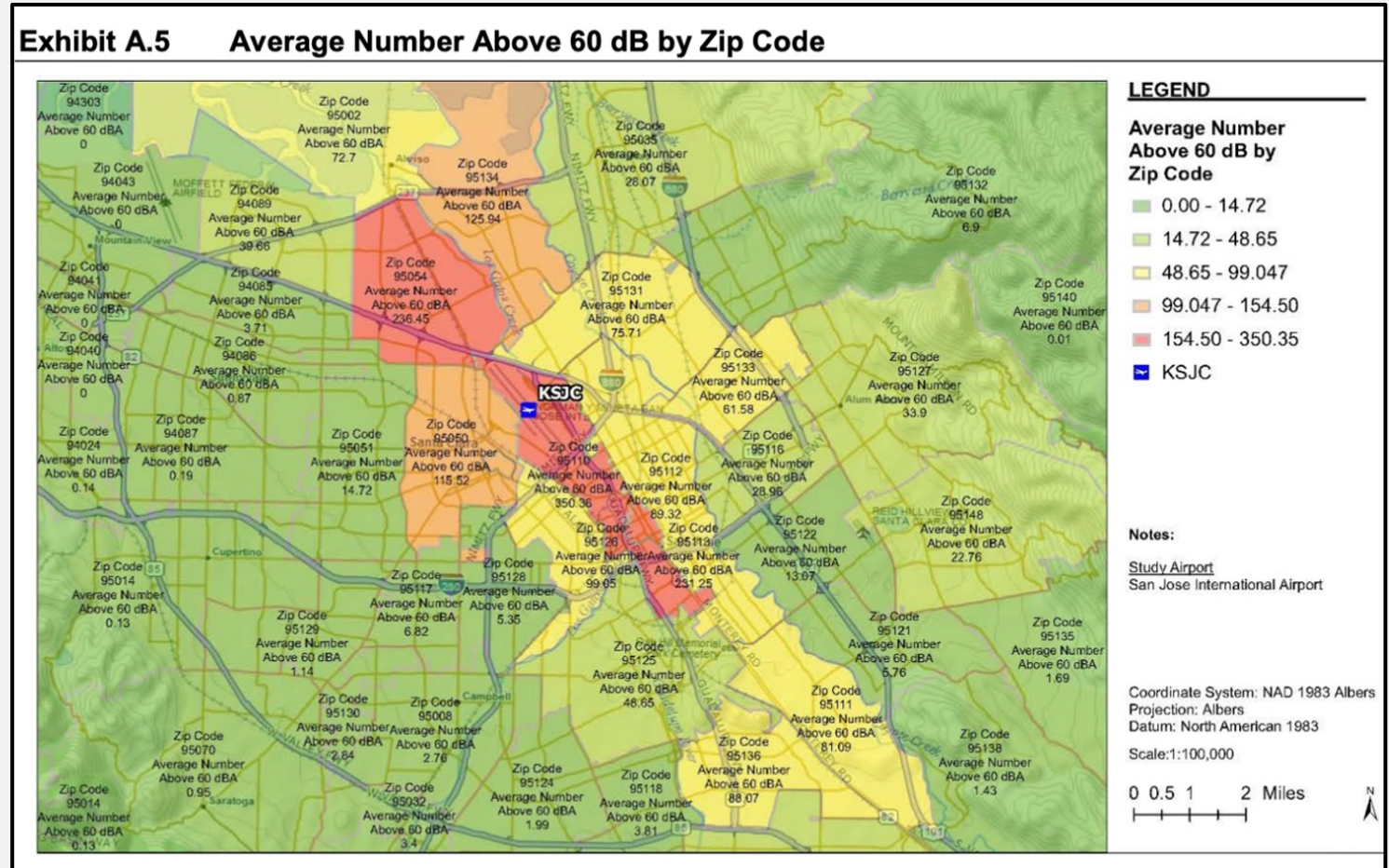
- Number of Aircraft at a Noise Level



WHO

- By Zip Code

Figure from ATAC, Aviation Analysis Consultants, Supplemental Aviation Noise Metrics: Assisting Communities in Understanding Noise Impacts Relative to Dispersion of Aircraft (2021)



Measuring Progress: FAA Scorecard For Community Engagement

- Why a Scorecard?
- What is Measured?
- Who Fills it Out?

FAA Scorecard Community Engagement		
<i>Community defined by all residents harmed by FAA actions, their elected or appointed reps and grassroots groups regardless of membership status in a Roundtable or dues paying organization</i>		
FAA REGION: xxxxxxxx	COMMUNITY GROUP: xxxxxxxx	
FAA PERFORMANCE		
Green	<ul style="list-style-type: none"> • FAA performance meets expectations 	
Yellow	<ul style="list-style-type: none"> • FAA performance needs improvement 	
Red	<ul style="list-style-type: none"> • FAA performance is unsatisfactory 	
CATEGORY	RATING	COMMENTS
Community is Adequately Represented		
Community Receives Notifications in a Timely and Proactive Manner		
Community Understands if it is/will be Impacted and By How Much		
Community Considers the FAA as an Engaged, Collaborative Partner		
Community Perceives the FAA as Being Transparent in Communications and Sharing Data/Analysis		
Community Views the FAA as Being Consistent in its Actions and Conclusions		
Community Concurs that the FAA is Rigorous in its Analyses, Conclusions, and Interpretations		
Community Observes that the FAA is Accountable for its Actions		

Framing the Problems: Recommendations and Review

1	2	3	4	5	
 <p>IF the Community is Involved, it is Underrepresented</p> <ul style="list-style-type: none"> • Increase Community Representation for Balanced Representation: NAC, Reports, Surveys, etc. 	 <p>“Community” May Not Include You</p> <ul style="list-style-type: none"> • Include and Notify All Potentially Harmed/Harmed Communities, Beyond Roundtables • Unbiased Technical Community Rep on FWG • Specify Who in the Community Will Be Included/Required 	 <p>Understanding If You Will Be Affected and How</p> <ul style="list-style-type: none"> • Outreach to All Potentially Harmed/Harmed Communities, Beyond RTs • Make Clear Who is Impacted and the Impacts • Improve Transparency/Rigor • Increase AEDT Accuracy • Update Claims/Messaging • Include Health/Emissions Impacts 	 <p>Missing “Dialogue and Collaboration”</p> <ul style="list-style-type: none"> • Timely and Authentic Engagement for Potentially Harmed/Harmed Communities, Beyond RTs • Unbiased Technical Community Rep for Procedure Design • Provide Knowledgeable Technical Resources • Empower Ombudsman 	 <p>The DNL 65 Gatekeeper For Engagement</p> <ul style="list-style-type: none"> • Revise Environmental Review Process • Change Significant Impact to Reflect NES, GAO Report, and How Residents Experience Impacts 	
←		<ul style="list-style-type: none"> • Use FAA Scorecard 	→		

APPENDIX

Recommendations

- **Increase/Include Community Representation and Who Receives Outreach**
 - Include all potentially harmed or harmed communities from FAA actions such as communities reported in airport complaint data and beyond Roundtable members. Communicate directly to residents and City Councils.
 - Allow unbiased Technical Community Representative (not from Airport) at FWG meetings
 - Add Community Members at NextGen Advisory Committee (NAC)
 - Specify the Community Members who will be included and required per activity, auditable
- **Make Clear Who is Impacted and the Impacts**
 - Clearly define who is impacted e.g., zip codes
 - Include health/emissions impacts
 - See Revise Environmental Review Process below
- **Use Scorecard for Systematic Evaluation of FAA Community Engagement**
 - Review regional scorecards annually and update practices accordingly
 - Use scorecard as guidance for activities such as: NES follow up, NAC, reports, research, surveys, communication tools and notifications, presentations, community opportunities to engage with FAA, projects (e.g., Noise Portal), noise reductions achieved (e.g., noise abatement procedures, success stories, etc.), Ombudsman, CEOs, ...
- **Create Authentic Opportunities for Dialogue and Collaboration to Reduce Aviation Impacts**
 - Be proactive in addressing known aviation impacts and be open to exploring scenarios
- **Revise Environmental Review Process**
 - Update interpretation of Significant Impact (currently DNL 65) to reflect NES findings, GAO study, and how residents experience impacts. This will change the required level of Environmental Review, e.g. fewer CATEX decisions
 - Disclose Environmental Review documents, including IERs, through automated notifications to relevant airports and potentially impacted communities at least 3 months before finalizing environmental decisions
 - Provide clear, understandable infor. on who is impacted and projected Impacts (e.g., use zip codes and N-Above)
 - Notify and outreach to all potentially affected communities of changes that are being considered, environmental reviews that started, and key FAA decisions that were made
 - Do not use DNL 65 for notification filter, use N-Above & NES survey of people highly annoyed at 12.3% minimum
 - Validate actual noise vs. expected noise within 6 months of major change being implemented and remedy problem as necessary

Recommendations (Cont.)

- **Provide Technical Procedure Designer Resources**
- **Increase Transparency**
 - Make data available to the public (such as NES full data set using methods to de-identify data, 50 year reduction in noise exposure, etc.)
 - Publish FAA data documents to avoid FOIA requests (see revise Environmental Review Process)
 - Respond to FOIA requests according to the timelines defined by the law
- **Increase Rigor:**
 - Update claims/messaging to be more representative of how people experience noise
 - E.g., 50 years of dramatic reduction in noise exposure only for 65 dB DNL, quieter engines reduce departure not arrival noise, arrivals don't glide to the airport (they fly dirty, thus are noisy), etc.
 - Improve AEDT:
 - Disclose error bars/level of accuracy on expected levels of noise
 - Increase AEDT modeling accuracy for locations away from airport and calibrate modeled noise against actual noise for locations away from airport
 - Publish success stories to include:
 - Date when community(ies) made initial request and when FAA agreed to evaluate the change
 - Description of the initial request and what the FAA was willing to change (e.g., airport, departure, arrival, change of flight tracks, expected number of planes affected per 24 hours, expected noise change, etc.), when the change took place, how actual impact of the change will be measured after implementation
- **Allow Community Engagement Officers (CEOs) to Engage with the Community**
- **Empower Ombudsman and Review Effectiveness**
 - Enable Ombudsman to provide meaningful dialogue with the potentially harmed or harmed communities, beyond Roundtables
 - Make separate from CEOs and independent from FAA; Ombudsman should not be a stakeholder
 - Reinstate Ombudsman public reports: every 6 months/region and ability to elevate an aviation issue to the Administrator when and if necessary
 - Publish Ombudsman performance metrics, scorecard evaluation, dashboard of recommendations to address public concerns and improve public comments in decision-making process, and best practices by airport

Problem 1 IF the Community is Involved, it is Underrepresented

Does community have an independent, non-FAA, non-airport representative in Full Working Group meetings for procedure changes or in other changes considered by the FAA (such as Air Traffic Control requests)?

Is community representative considered as important as airport representative by the FAA?

Same terms for stakeholders (e.g. give NAC members 2 mins to speak, one-way).

Community needs a real seat at the table. (e.g., not 1 token representative in a 20-people body). In other words, the community representative is viewed as a partner by the FAA and the airport, receives proactive communication on changes proposed by the FAA or airport, can propose changes to the FAA or airport.

Roundtables should not be used to circumvent or by-pass communication with other community stakeholders.

Problem 1 IF the Community is Involved, it is Underrepresented (Cont.)

Seat at the table for impacted communities is not just government officials

Community groups (people that are not affiliated with the government or airline industry) should have some voting rights at community meetings, they should have the ability to set up meetings with representatives of the FAA and be able to get any information or data they require from the FAA or airport in a timely manner

There should always be a section during community Roundtable meetings where the FAA specifically answers community questions, not just questions sent to them in advance months earlier

Need Opt in/subscription notification for FAA contact for notices in new PBN procedures

Do not confine communications only to formal roundtable groups

Problem 2 “Community” May Not Include You

The people most directly impacted by a change should be notified about the change. For example, when a PBN is being introduced, a workshop should be held, and notices delivered in the community under the PBN, not in communities 20 miles away that are un-affected by the change as the FAA currently does

The FAA is a captured regulator that places its emphasis on promoting aviation, not regulating. The FAA does not address conflicts of interests that arise from the incestuous nature of the piloting community. Pilots go to work for the FAA, and the current and former FAA employees go to work within the private sector of the piloting community

For notification, need First Class USPS mail to all residents within 1000 meters of a PBN line *before* the change

Despite millions of complaints there have only been Finding of No Significant Impact (FONSI) for all NextGen implementations

Need a seat at the table with all affected parties and regulators to discuss solutions for aircraft noise

Very unhappy about the deliberate exclusion of the Public

Problem 2 “Community” May Not Include You (Cont.)

Communities need representation at FAA procedure design meetings and .41 meetings. The FAA needs more than a staff person ticking a box that the FAA considered the procedural requirements for NEPA. Ultimately, impacted communities need to be considered a "stakeholder" too

Missing inclusion in interim meetings with communities to hear progress in the design of new procedures, and follow-up meetings after publication of new procedures to solicit feedback and incorporate changes as-needed. In other words, a true iterative process (and the same process that stakeholders like the airlines and airport authorities get)

The FAA does not involve all impacted communities in flight procedures changes early on and throughout the process. Must hold regular meetings with communities not just Roundtable meetings

Community not currently involved from the start (e.g., definition of problem, goals & objectives in seeking a change, review of constraints, development of alternatives, etc.)

FAA not directly notifying communities that are likely to be impacted of potential changes

Problem 3 Understanding if You Will Be Affected and How

I was told by the executive director of the airport that my perception of frequent, low, loud aircraft over our neighborhood "was not reality". That did not sit well with me, not how I am affected

There is no single metric that captures the true impacts of noise nuisance events. Multiple measures need to be included in impact assessments. Also, context matters. Factors e.g., ambient noise levels, population density, terrain features that result in reverberation, etc. need to be addressed

It means no BS, maps with common reference points large and clearly marked, multi layered altitude representations of how ATC stacks planes in holding patterns and for approach. Knowing or anticipating our Qs and coming to meetings prepared with the actual truth short and simple; we can fix this, we can't fix this, we don't want to fix this in weeks, months, or years

Data, information, and analyses should be readily available and easy to understand – use the internet to make data public

Problem 3 Understanding if You Will Be Affected (Cont.) and How

Maps must include accurate and accurately placed geographical locations with legible highways and major streets and include projected flight path, flight path density, altitudes, a map with land tracks of where the path would be

Need public disclosure of FAA criteria used to determine the feasibility of proposed changes to airspace designs and runway use. Need public disclosure of noise analysis of all proposed changes using metrics acceptable to communities before changes are considered for implementation

Need communication of the projected impact on communities of new procedures BEFORE they are published including supplemental metrics like single event noise and frequency of noise

The disclosures need to state in everyday language what the on-the-ground changes would mean for the affected communities

Missing a clear description of the noise problem based on metrics that help everyone understand what is going on with daytime and nighttime aircraft noise

Problem 4 Excluded From “Dialogue and Collaboration”

Meaningful community engagement should entail the residents knowing their concerns will be heard and changes being made

Engagement should be done before project alternatives are researched and decisions are made. Engagement should include the right of refusal or the possibility of project alteration

Good engagement must include equal talking time, back and forth, disclosure of honest information, and mitigation possibilities. Bad engagement is where presenters talked at us and their stakeholders kept silent and had no follow up or dialogue about community comment or future plans

I have participated in roundtable meetings but there is never direct feedback from those representatives. This results in feeling like you are talking into an echo chamber

Problem 4 Excluded From “Dialogue and Collaboration” (Cont.)

Need an exchange of thoughts and ideas for solutions from all sides, a willingness to commit to action. Need effective, and cooperative engagement to achieve results

Missing back-and-forth dialogue with all parties and the ability to engage over a significant period of time

Excluded from engagement: Q & A with the FAA's technical designers of the procedures instead of just public relation folks, and a conduit for continued responsive follow-up on technical questions

Do not let the FAA dictate the format, membership or other requirements for community participation

Problem 4 Excluded From “Dialogue and Collaboration” (Cont.)

Missing meaningful engagement: (1) mutually respectful process in which (2) the FAA makes a serious effort to understand community perspectives and the harms that aviation is causing to communities, and (3) uses that understanding to inform and adjust its internal decision-making procedures and its decisions to (4) address and mitigate the harms. It is the opposite of the "check the box" process the FAA currently uses which does not treat community feedback respectfully, nor does it incorporate community feedback into internal procedures and decisions. Thus, the agency keeps running afoul of community groups and is not respected or trusted by them

It's BAD when the FAA sends representatives to community roundtables who (a) do not have a good grasp of the issues and (b) have no authority to speak for the Agency or engage in decision-making conversations with the reps on the RT

Need active engagement with follow up and deliverables by the airport authorities and FAA

Problem 4 Excluded From “Dialogue and Collaboration” (Cont.)

Need Project Proponents (PP) to provide a list of community perspectives, viewpoints, objections, and concerns gathered in a pre-scoping Social and Environmental Impact Review process. Need PP to provide a budget and time for community stakeholders to acquire technical and legal consultation. Missing a list of community issues provided in the Social and Environmental Impact Review (the Impact Review) process done prior to project planning for consideration. The engagement process should include an Impact Review Report produced by the PP addressing the list of community ideas and perspectives, the project impacts, and concerns and laying out potential alternatives and mitigation strategies. Need the PP to hold a pre-scope, pre-alternative selection meeting with known Environmental Justice and community advocacy stakeholders covering the Impact Review the Report's listed concerns and providing community members an opportunity to discuss the PP's responses. Need the PP to select the least damaging project alternative

Unless the FAA is willing to really listen to community concerns and take actions that mitigate those concerns, any form of engagement with the community is meaningless

Problem 5 The DNL 65 Gatekeeper For Engagement

The FAA's reliance on DNL makes almost all of the FAA's community engagement meaningless because it hides the true impact to communities

The DNL measurements system simply does not represent impact accurately. We have sound events reaching well over 80 decibels multiple times per day (measured on handheld devices) yet are 'outside' the DNL 65 area, and because of this are given very literally zero consideration when noise absolutely impacts health, wellbeing, and ability to sleep

Bad community engagement is when officials refuse to even acknowledge a problem because impacts not at DNL 65

The reality is the game is rigged

FAA was not honest when inquires were made and said no significant noise (DNL 65), means not a noise problem

NEPA using DNL 65 is a disclosure process, not a community engagement process

Additional

The FAA refuses to accept more than one "like" complaint per day. This is patently absurd - it's like saying if five people are murdered in the same general way during a day, the police will only accept a report for one murder since the others were basically the same. Refusing to recognize multiple complaints from a resident who experiences up to 100 flights per day is not "meaningful" community engagement. In addition, anyone who has tried to file complaints with the FAA has received inherently meaningless replies from them which either fail to respond, deny that there is anything to complain about, or refer the complainant somewhere else where they can get the same meaningless, non-responsive replies

If the FAA schedules flights so that residents are forced to listen to 50-100 flights a day spaced as closely together as 1 minute, the FAA should be forced to respond to each complaint

As a taxpayer-funded governmental agency, the FAA needs to meaningfully address citizen complaints and recognize the extreme hardship it has inflicted on residents living along NextGen flight paths without offering any recourse

Additional (Cont.)

Expose the FAA's lack of transparency and disinformation

The CEOs (Community Engagement Officers) we have had didn't understand the problems, did not provide any updates to the community that had any substance, and had no authority to engage in discussions with the community

Need engaged negotiation, timely follow up, and responsive results

Need FAA to consider proposals in good faith and make all warranted changes

Need: 1. Collaborative format, 2. Residents more important than industry in all discussions, 3. Legislators and council members supporting the community when engaging with Aviation Industry officials, 4. Addressing problems to enact solutions

Need to come up with real solutions, not just having mindless meetings in which a lot is said, but nothing is ever done

The community should not have to FOIA for information. Any, and all information requested should be sent with minimal or no fees

Additional (Cont.)

A bad example of community engagement is the community engagement webinar that the FAA held last year with lots of great infographics that ultimately just attempted to explain various flight paths and why they couldn't do more to help the community. It lacked substance and momentum. It was a waste of time because no person's opinion mattered, and nothing changed as a result of the meeting

Missing meaningful engagement which is a response from those who are listening

Everyone needs to understand that - citizens can demand that airports stop accepting federal funds so they can restore local control of their airports

A problem is one-sided Zoom meetings in which the public is not heard

Need to create a formal process to allow the public to track FAA deliverables

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SLIDE 1 – FAA’s COMMUNITY ENGAGEMENT

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SLIDE 2 – OVERARCHING PROBLEMS

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SLIDE 3 – FRAMING THE PROBLEMS: OVERVIEW

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SLIDE 4 – PROBLEM 1: IF THE COMMUNITY IS INVOLVED, IT IS UNDERREPRESENTED

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SLIDE 7 – PROBLEM 3: UNDERSTANDING IF YOU WILL BE AFFECTED AND HOW

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