

[The following article was originally published in *Airport Noise Report* newsletter on pages 61-62 in Volume 34, Number 16, May 6, 2022.]

# ***Airport Noise Report***



A weekly update on litigation, regulations, and technological developments

Volume 34, Number 16

May 6, 2022

## ***UC Davis Symposium***

### **SCORECARD NEEDED TO MEASURE PROGRESS BY FAA ON COMMUNITY ENGAGEMENT GOALS**

A critical step needed to measure FAA's progress in engaging with communities on NextGen implementation is to begin using a scorecard to assess how well the agency is focusing on issues important to communities, Darlene Yaplee, a founding member of the Aviation-Impacted Communities Alliance, told participants at the UC Davis Aviation Noise and Emissions Symposium.

The recipients of community engagement – not intermediaries such as FAA ombudsmen/community engagement officers – should complete the scorecard on an annual basis for their FAA region, she asserted in a May 2 presentation at the symposium, which was held on the UC Davis campus.

There needs to be a comparison of FAA's goals for community engagement with the agency's actual practices and results, she stressed.

Yaplee identified the following five "key, inter-related areas" that are problematic in the way FAA currently engages with communities in implementing Next-

***(Continued on p. 62)***

***Symposium, from p. 61*** \_\_\_\_\_

Gen procedures and airspace redesigns:

- If the community is involved, it is underrepresented:
- The term "Community" may not include everyone who believes they should be in that category;
- Community members cannot understand from the information provided by FAA if and how they will be affected by a NextGen procedure;
- The goal of "Dialogue and Collaboration" between FAA and communities is missing; and FAA's 65 DNL threshold for significant noise impact serves as the "Gatekeeper" for FAA community engagement.

The overarching problem, Yaplee noted, is that FAA's goals for community engagement are not aligned with the communities' goals. FAA pursues "community understanding and acceptance" of NextGen implementation while communities expect "meaningful dialogue to address negative impacts of past FAA actions and of future FAA actions before decisions are made."

Yaplee thanked Yolanka Wulff, executive director of the Community Air Mobility Initiative (CAMI), for her comment earlier in the symposium that "acceptance does not equal engagement" in the Urban Air Mobility industry's definition of successful community engagement on the introduction of UAM vehicles, such as air taxis, in urban areas. The success of UAM depends on a genuine collaboration with local communities on the conditions for allowing UAM, Yolanka told the symposium.

Regarding the problem of community under-representation in NextGen implementation, Yaplee noted that only one community member is included on the 30-member NextGen Advisory Committee and on the 50-member NAC PBN Blueprint Community Outreach Task Group of 2016, which developed detailed best practices for FAA community engagement.

Regarding the problem of community notification, Yaplee said, "In almost every case, not all communities potentially harmed by FAA actions are notified. 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."

Regarding understanding how one will be affected by an airspace change, she noted that the GAO's 2021 report to Congress (FAA Could Improve Outreach through Enhanced Noise Metrics, Communication, and Support to Communities) stated that "DNL ... does not provide a clear picture of the flight activity or associated noise levels at a given location."

Yaplee said communities are excluded from dialogue and collaboration on proposals for new airspace procedures and FAA's Noise Portal allows only one noise complaint per lifetime on the issue of aircraft noise. In terms of airport/community noise roundtables, she said that not all communities harmed by aircraft noise are included on them, FAA provides no or inadequate technical resources for them, and no FAA person is accountable for identifying solutions to reduce harm.

"FAA needs to engage beyond Roundtables to include all harmed communities," Yaplee asserted.

Regarding collaboration on Metroplex projects, she said community representation is missing in PBN procedure designs. As for the DNL 65 threshold for significant noise impact acting as a gatekeeper for community engagement, Yaplee noted that 65 dB DNL is FAA's level of significant noise impact for environmental review under the National Environmental Policy Act but NEPA does not require public outreach for Categorical Exclusions (CATEX), which FAA often uses in implementing NextGen procedures. 65 DNL is the wrong threshold to indicate "significant impact" of aviation noise, she told the symposium. It excludes community engagement with those highly impacted by noise.

Yaplee provided several examples of what she considers to be "meaningful" engagement with communities on NextGen implementation.

- She noted that several airport/community roundtables include members who are from grassroots or neighborhood groups in addition to elected officials;
- Montgomery County, MD, Quiet Skies engages in collaborative discussions with their local TRACON (Terminal Radar Approach Control Facilities); and
- Airspace procedures proposed by communities were evaluated by San Diego International Airport and Charlotte-Douglas International Airport and procedures for Reagan National Airport were evaluated jointly by Montgomery County, MD, and Arlington County, VA.

“Today, Community Engagement is not where it needs to be,” Yaplee told the symposium. Referring to the well-known Arnstein ladder of degrees of citizen participation in government, she said, “We are not at real participation. We are at non-participation and symbolic participation. We are participating in participation. The public deserves more.”

## **CE OFFICERS HAVE HAD POSITIVE EFFECT**

Justin Biassou, the FAA Community Engagement Office for the agency’s Northwest Mountain Region, spoke at the same session of the UC Davis symposium, asserting that FAA’s new Community Engagement Officers have had a positive impact on community engagement and at FAA.

The Community Engagement Officers, who are located in each FAA region, have had a meaningful impact on the agency, Biassou said. “Now there is someone whose sole focus is on noise and identifying concerns prior to procedure design,” he explained. Community Engagement officers listen to voices in the community at workshops and roundtable meetings and public comment periods at the beginning of projects to note community concerns and to be sure that questions are answered adequately. Each of these are vital opportunities that did not exist before with such specificity.”

[ANR will provide more coverage of the UC Davis Aviation Noise and Emissions Symposium in next week’s issue.]