



STUDIO CITY FOR QUIET SKIES

AGENDA REDAC Meeting 11/18, 10-12:00 EST

At the meeting, the agenda will cover the following topics:

- FAA's Unmanned Aircraft System-Advanced Air Mobility Integration Research Plan
- FAA Research and Development Strategies, Initiatives and Planning,
- Impacts of emerging technologies, new entrant vehicles, and dynamic operations within the National Airspace System.

This comment will focus on: Impacts of emerging technologies and new entrant vehicles.

REVISED FOR ORAL PRESENTATION **THE HUMAN COST OF UAM/AAM AVIATION INNOVATION**

Lost in the flurry of excitement over aviation innovation, is the **human cost of aircraft impacts**. The addition of UAM and AAM will bring painful impacts to new communities and increase impacts on those who have recently found themselves below NextGen' relocated and concentrated flight paths.

For this reason, AAM Implementation must not occur -- or be accepted as a foregone conclusion -- without first establishing a Cost-benefit assessment and Determination of public benefit to society:

- 1.) *We are asking REDAC to identify and undertake research, and perform a **Cost Benefit analysis**, with the goal of protecting communities and their residents from harm.*

Assumption of public benefit is industry-driven but not supported by evidence and data. The human cost has not yet been considered. It is our expectation that **FAA's "Benefit Cost Analysis"** used by Airport Division, will be applied in the case of the **introduction of new technologies**, including AAM, **that will dramatically change the aviation landscape, cities and neighborhoods, and impact the general public in entirely new ways.**

The FAA must demonstrate that there is a net benefit to the general public, not solely the "aviation public," as a requirement to move to the next step toward implementation

- 2.) *As part of the Cost Benefit Analysis, we are requesting research and analysis required for a **thorough assessment of all potential adverse impacts to the general public**, with emphasis on **impacts to people on the ground**. This will require data and analysis necessary to quantify the costs of **safety, health, privacy, security, and economic impacts to people**, as well as impacts that **cause environmental degradation to public resources**, such as air, water, and energy resources, including **harm to wildlife, habitat, and public parklands**. These costs must be weighed against the benefit to the general public.*
- a. *REDAC's research regarding impacts on people, communities, and community resources, will serve to inform both the **Regulatory and Environmental frameworks** that will be required before AAM implementation.*
 - b. *Importantly, REDAC'S data and analysis will inform **POLICY** regarding these new technologies that will have considerable, widespread, and ongoing consequences for people, and communities throughout the nation. It is our hope that a thorough, scientific examination will thus prevent unforeseen harm and degradation.*
 - c. *Finally, REDAC'S Cost Benefit Analysis will give citizens the information they need to enter the conversation about AAM, as Stakeholders, and to remain adequately represented. We realize that Community Engagement is not in REDAC's purview, but the work that you do is crucial for Communities and should be undertaken, completed, and made available to the public as soon as possible.*

The Public deserves to be made aware that new technologies including AAM are coming their way. Notice via the Federal Register will not be adequate. A clear and transparent timeline leading to any potential implementation of AAM should be provided to the public. Currently, the public is in the dark and at risk.

Our final request is regarding the ENVIRONMENTAL FRAMEWORK (specifically Land Use, Noise and Special Circumstances):

- 3.) *We are requesting that REDAC undertake research to support additional protections for **Noise Sensitive Areas with Special Circumstances**. We are requesting data and analysis regarding these special circumstances that exacerbate noise and the perception of noise.* The goal is to recognize these Noise Sensitive Areas with Special Circumstances and to institute lower thresholds of significance and regulations that encourage aircraft to avoid them, thus protecting residents and the natural environment.
- a. **Areas with Low ambient/background noise levels** that exacerbate the impacts of noise events from aircraft.

- b. Noise in **Areas with hillside/canyon/mountain terrain**, where noise is amplified and echoes, resulting in multiple noise events for every aircraft overflight.
- c. **Areas that include wildlife, natural habitat, public parklands and open space**, whose **viability and purposes are threatened by loud noise**, should be considered and preserved.
- d. **Very High Fire Severity Zones** should be considered as **Areas With Special Circumstances** and made off-limits for AAM. We request research to support additional protections for areas at high risk for catastrophic wildfires, often accompanied by difficult access/egress.

We thank you for your attention.

Respectfully submitted,

Suellen Wagner and Kimberly Turner, Cofounders

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Links to supplemental information:

- Link to LAWA BOAC meeting:
https://lawa.granicus.com/player/clip/912?view_id=4&redirect=true&h=6fc282cb79a0f89d197833abd229114c (start at 1:01)
- FAA Benefit Cost Analysis: https://www.faa.gov/airports/central/aip/benefit_cost
- Los Angeles Department of Transportation URBAN AIR MOBILITY Policy Framework Considerations, September 13, 2021:
<https://ladot.lacity.org/sites/default/files/documents/ladot-uam-policy-framework-considerations.pdf>