



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 the final bullet point: Impacts of emerging technologies, new entrant vehicles, and dynamic operations within the National Airspace System.

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 Urban Air Mobility (UAM), also known as Advanced Air Mobility (AAM), will result in **thousands** of densely packed, low flying rotor-driven aircraft – as low as **350 feet** above homes, schools, parks, offices and hospitals – and will bring pain to new communities and increase pain for those who have recently found themselves below NextGen relocated and concentrated flight paths.

The assumption that adding 2-4 passenger aircraft will benefit the general public by reducing traffic on congested roads does not ring true. Filling the sky with aircraft will not reduce the number of cars on the roads. At extraordinarily low altitudes, AAM will stack additional adverse impacts to health, safety, privacy, security, and quality of life onto people on the ground, resulting in a benefit for the privileged few who use AAM, in exchange for a startling cost to the many.

The aviation industry, FAA, and the City of LA are all **rushing headlong toward implementation** of this entirely new mode of aircraft. Commissioners of Los Angeles World Airports (LAWA) were given an AAM presentation from LAWA staff on November 3, 2022. One enthusiastic Commissioner expressed that he wants “LA to lead the world” with this new modality, exclaiming, “they have to be here!” This is without any consideration of impacts to the over 4 million people who live in LA.

AAM Implementation must not occur or be accepted as a foregone conclusion, without first establishing the following:

- Cost-benefit assessment and determination of public benefit to society.
- Community Stakeholder representation.
- Regulatory framework.
- Environmental framework.

COST-BENEFIT ASSESSMENT AND DETERMINATION OF PUBLIC BENEFIT TO SOCIETY:

The assumption of public benefit is industry-driven and not supported by evidence and data. The human cost has not yet been considered. The FAA must prove that there is a net benefit to the general public, not just the “aviation public,” as a requirement to move to the next step toward implementation.

It is our expectation that the FAA's “Benefit Cost Analysis” used by Airport Division, will be applied in the case of 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. 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.

FAA must determine the need for and consequences of the addition of AAM to the NAS.

Considered consequences **must not be limited to consequences to the “aviation public,”** but extend to the **general public on the ground.** New Technologies should be considered separately and **cumulatively** with existing aircraft.

Furthermore, we are requesting research and analysis required for a **thorough assessment of all potential adverse impacts to the public,** with emphasis on **impacts to people on the ground.** This will require data to quantify the cost of these impacts, **including safety, health, privacy, security, and economic impacts,** as well as impacts that **cause environmental degradation to public resources,** such as air, water, and energy resources, and **harm to wildlife, habitat, and public parklands.** These costs must be weighed against the benefit to the general public.

We cannot afford to assume a public benefit without this **crucial examination.** To do so would express a willingness to retrofit regulation and delay examination of safety and adverse impacts until after implementation.

COMMUNITY STAKEHOLDER REPRESENTATION:

We recommend the immediate inclusion of COMMUNITY GROUPS as full Stakeholders and participants in critical decision-making leading to potential implementation of AAM.

“Community acceptance” must not be the goal. Research will provide data that citizens need to enter the discussion and to remain adequately represented. This will bring balance and credibility to what has thus far been an insider, industry conversation, financed by billions of dollars. Furthermore, **this conversation guides not only technology, but POLICY affecting the general public.** Those who are at risk of adverse impacts from AAM must be represented in

order to prevent another unannounced and unstudied implementation of great consequence, such as was the case with NextGen.

In the case of the City of Los Angeles, the cofounders of the community group Studio City For Quiet Skies, known to the City and to LAWA, have requested information regarding AAM and inclusion in this process, and yet have been **excluded from participation**. Although we have communicated with both City and LAWA about the expected and potential impacts of AAM for **more than two years**, we are still being told, **“it’s too early.”**

REGULATORY FRAMEWORK:

The City of Los Angeles foresees multiple levels of regulation – Federal, State, Regional, and City. The City alone would have multiple departments involved in development and operations. At this point, nothing is clear except the **intention to implement as many AAM as soon as possible, and in time for the 2028 Olympics**.

According to the FAA’s Response Memo to the 8/27/19 OIG Report, the aviation **“industry and community stakeholders have competing priorities.”** This concept also applies to AAM. Airports and AAM innovators/investors will push for this technology despite the communities’ competing interests. We see this conflict unfolding now.

The Public deserves to be made aware that new technologies including AAM are coming their way. Notice via the Federal Register is not adequate. A clear and transparent timeline for a staged process leading to potential implementation should be written and made available to the public. We need formalized procedures prior to implementation that guarantee disclosure and opportunity for public comment – no surprises, no shortcuts.

ENVIRONMENTAL FRAMEWORK (Including Land Use & Special Circumstances):

Los Angeles Department of Transportation URBAN AIR MOBILITY Policy Framework Considerations, September 13, 2021, states the following regarding Land Use considerations:

“Certain land uses that may be ***sensitive to noise should be carefully considered***. Acceptable community **noise levels for UAM aircraft are still unknown** as there are **limited studies and manufacturer data available** at this time. However, we anticipate future policy will reflect today’s in that acceptable noise levels will vary for different land uses, as shown in the Land Use Compatibility Table above, from the Los Angeles County Airport Land Use Plan (2004).”

However, without changing the way noise is measured and modeled by applying the findings of the FAA’s Neighborhood Environmental Survey of January 2021 and adding Supplemental Metrics, any framework regarding noise will not effectively assess noise or lead to any level of **“community acceptance.”**

In addition, there are ***special circumstances*** that **exacerbate noise and the perception of noise**. **Low ambient noise levels** and noise in **hillside/canyon/mountain terrain** that **amplifies and echoes** should be recognized as areas for aircraft to avoid, and residents should be protected

by instituting lower noise thresholds that take into consideration these *special circumstances*. Areas with **wildlife and natural habitat** in **public parklands** and open space, whose **viability are threatened by loud noise**, should be considered and preserved. **Very High Fire Severity Zones** should be off-limits for AAM. We request research to support additional protection for these sensitive areas.

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>