FAA Noise Policy Review - FAA and AICA Panel Discussion
July 13, 2023, Meeting Notes

The following meeting notes, offered by AICA, reflect the July 13, 2023, conversation between FAA and AICA related to the noise policy. These notes incorporate some FAA technical corrections and, where noted by an asterisk (*), post meeting clarifying edits. In accordance with FAA and AICA agreement, comments made by FAA are not attributed to individual staff. Initial questions were provided in advance. Follow up questions were not provided in advance.

ATTENDEES

Facilitators - FMCS (Federal Mediation Conciliation and Service):

- Kayla Mack [Commissioner, Federal Mediation & Conciliation Service]
- Moira Caruso [Commissioner and Strategy Officer, Office of Strategy and Development, Federal Mediation & Conciliation Service]

FAA:

- Donald Scata Jr. – Manager, Noise Division, Office of Environment and Energy
- Krystyna Bednarczyk – Environmental Policy Advisor, Environmental Policy Division, Office of Environment and Energy

AICA (Aviation-Impacted Communities Alliance):

- Darlene Yaplee (DY) – Co-Founder, President
- Cindy L. Christiansen (CC) – Co-Founder, Chief Technology Officer
- Amy McCoy (AMC) – Founding Member (Groton Ayer Buzz), GA Liaison to AICA

Participants

- Over 111 AICA individuals from 55 community groups.
- FAA noise policy team members.

NOTES:

- The panel discussion was held at the request of the AICA.
- The FAA and AICA Panel Discussion invitation is found here.
- Any comments/ideas shared today should also be submitted to the Docket for FAA to consider during the NPR.

INTRODUCTION

FMCS: What are your respective goals for this dialogue?

AICA - DY: After presenting "Scorecard on the FAA's Community Engagement" at the Airport Noise and Emissions (ANE) Symposium (May 2023), I was asked about the Noise Policy Review (NPR) and stated I was hopeful. Don and I envisioned a panel discussion as a step in this direction. Thank you, Don.

What is distinguishing about today's event? This is not a repeat of the webinars. We will have dialogue with follow up questions directly between the FAA and significantly impacted communities at the national level - which is the first time that this has been available to us. It builds on the webinar series and will focus on a small number of topics with the opportunity for deeper discussion. And it is moderated by FMCS.

Statement of goals:

- To have a meaningful and constructive dialogue with FAA to gain more context to make relevant, consequential, and better FRN comments to get our concerns addressed in the new noise policy.
- Based on the example set today, AICA alliance groups are hopeful they will be included in future FAA engagement with key stakeholders for the NPR, advisory committees, and other pertinent forums.
- Communities and FAA learn from this to improve future FAA engagement with communities.

FAA Speaker 1: Statement of goals

- Continue the conversations FAA started as part of our webinar series. FAA saw a progression of the questions that were received at each webinar, and questions were getting deeper and more substantive as the webinars went on. The goal is to continue this discussion and continue to answer deeper and more substantive questions.
- Have a positive and useful dialogue that helps communities to prepare useful comments on the NPR.
- Conduct a transparent and inclusive process and this is part of that effort. What does that mean? FAA did our best to write the Federal Register Notice (FRN) in a way that was understandable to lay people, created a companion paper and video series to explain the technical issues in more accessible ways, translated materials into Spanish and soon Mandarin Chinese, but have struggled to find a way to have a dialog with community groups at scale. This event represents an opportunity to address meeting with community groups at scale including over 70 different groups from across the US.

FMCS: What feedback has the AICA received from communities?

AICA-CC: It's very time consuming to answer the 11 NPR FRN questions. Community members have a lot of other responsibilities. Volunteers are willing to invest their time in the chance that problems will be solved.

There is anger and frustration that the FAA has already decided not to apply a new noise policy to its current problems. They are hoping for some clarification on this.

There are worries and concerns about emerging technologies. We don't know what is ahead with new types of aviation vehicles. People find it difficult to understand how to come up with a metric or system of metrics to deal with noise they have not experienced yet. There is also some post-traumatic stress

that people have experienced caused by the current aviation noise environment and noise that was dropped into their neighborhoods.

AICA-AMC: A lot of people are expressing frustration and concerns that the information in the NPR FRN and questions don't address piston-driven aircraft. Likewise, they are concerned that new noise metrics will be one-size-fits-all and not address our lived experience.

The NPR FRN questions are very difficult to understand. The terms are difficult to grasp: decision metrics, alternative metrics, supplemental metrics, etc. – seems inaccessible. People are overwhelmed. The webinars did not make it clear how General Aviation communities will get relief from a suite of new metrics. People would like assurances that the FAA will be able to interpret their personal stories and turn that into meaningful input into the NPR.

FMCS: How does this community feedback fit with the feedback received by FAA?

FAA Speaker 2: This feedback tracks with what FAA has heard from people and industry. We very much struggled with trying to make the documents more accessible to people. An industry group called us "evil geniuses" because we are trying to address the core issues at hand regarding our noise policy by putting all our stakeholders into the same situation that we are in, which is to define a problem and find a solution. We are not spending the time to develop a solution until we know what core issues are of most concern to ensure that the solutions we develop are calibrated to respond to the correct problem.

As you read through the FRN, the questions get more complex so there is the opportunity to answer what you feel equipped to answer.

We also heard from a number of people that they appreciated having an opportunity to give input early in the process, rather than putting out a particular solution that might not address community concerns.

We also heard appreciation about opportunities to engage with non-English speaking communities. We analyzed census and recent noise data for noise exposure levels down to DNL 50 dB around the 30 largest airports in the US and then picked languages for translated NPR materials that represented 70% of the people affected.

We also heard that some questions were too complex and technocratic. We are very thankful for your comments.

Facilitator: Attendees were polled for the order in which they wanted to proceed with the discussion of the following topic areas for the remainder of the meeting.
The results of the polling ranked the topics as followed:

#1 METRICS & THRESHOLDS
#2 HEALTH EFFECTS
#3 APPLICABILITY

#4 EXTERNAL ENGAGEMENT
#5 ACCESSIBILITY (topic was not addressed separately due to lack of time)

METRICS & THRESHOLDS

Facilitator: Cindy, what elements of the metrics topic are of most interest to your communities?

AICA-CC: There are three things we want to learn more about:

1. Understand better what a system of metrics might look like:
   - No one-size fits all: different vehicle types, different locations, different airports might need different metrics
   - Need to represent the people's experiences
   - What is the FAA thinking would make up a system of metrics as required by the Aviation Safety and Noise Abatement Act (ASNA)? What is the agency thinking is possible?
2. People are paying attention to the results of the NES study which looked at high annoyance based on DNL. To get the same percentage of people who are Highly Annoyed (HA) in the NES as the research based on the Shultz Curve the DNL would have to drop to about DNL 45 dB. However, most people don't understand DNL other than that it is not reflecting their experience, they don't know their own DNL, and they only know that their DNL is not over 65 dB.
3. Understand clearly how decision metrics will be used in noise policy. What decisions will be made for what legal purpose?

Facilitator: FAA, as you know there is a broad interest in knowing whether a new system of metrics is really being considered and for what purpose?

FAA Speaker 1: FAA already has a system of measuring noise as required by ASNA. However, today's system is only 1 metric, DNL. I assume you are asking whether we are considering adding new metrics to the system? The answer is YES, we are considering adding new metrics. We are interested in feedback about how you would like us to do so.

The option space under consideration definitely includes expanding noise metrics used and updating thresholds. We could also use brand new metrics that don't exist. For example, here is a scenario, not a decision: we could keep the DNL metric and add the Number-Above (NA) metric. For National Environmental Policy Act (NEPA) purposes, Significant Impact (SI) could require the value to exceed the threshold for just DNL, for just NA, or for both metrics. There are lots of ways to do that.

DNL is not the easiest metric to understand. One can't hear DNL. You can't easily calculate DNL because you need to use noise data over a whole year. However, DNL serves a purpose: it is the noise experienced over the course of a year, which is good for doing comparisons.

FAA could also replace DNL. One scenario could be that we use some metrics for some projects, and other metrics for other projects. NA might be a better metric for new entrants and also for areas further away from airports.

We have the tools and capabilities within the Aviation Environmental Design Tool (AEDT) to model all the metrics we are discussing. However, the level of detail regarding inputs to the models may need to change. For example, for the Time-Above metric (TA) or NA metric, both are very sensitive to individual aircraft operations and require extremely accurate flight track data.

AICA-CC: Do you have software that can consider ambient noise for these metrics?

FAA Speaker 1: No. It is difficult to calculate ambient noise due to a variety of factors and the specificity of the surrounding environment.

AICA-DY: There is a lot of interest in ambient noise. Ambient noise is typical background noise in an environment without noise caused by all air vehicles. The impacts on the community are not only the number of disturbances, but also the severity of disturbances, which is related to the difference between the level of the noise event and the ambient noise level. This is why some communities experience the noise impacts more than other communities at the same DNL level. We hope people will comment on the severity of the disturbance relative to their background noise. We need to find a way to calculate ambient noise. It needs to be considered in the policy to represent the severity of the noise impacts. It's not just one flat threshold.

FAA Speaker 1: This is the kind of comment we like to get. This is an interesting idea. It would be a shift in how we do things. Right now, we only look at the noise from aviation impacts. Thank you for making that comment. It expands the scope of our conversation. We could extrapolate ambient noise based on community characteristics. To design a national policy, it is really difficult to have specific ambient noise. This kind of feedback is very helpful.

Cindy, you asked how communities could know about the level of noise. The policy will fail if we don't have the right tools to communicate. We need to know what info people want at their fingertips.

AICA-DY: Many airports do noise monitoring. This could be tapped to potentially determine ambient noise levels.

AICA-CC: Would you use different thresholds for different locations? Is it possible? Or one threshold for everyone or different thresholds? 60 dB at the airport could be a Significant Impact and 50 dB away from the airport could also be a Significant Impact?

FAA Speaker 1: This would be really hard to implement; it would be complicated. However, if you have ideas on how a system considering ambient noise would work, we value that input. We will need to explain to the layperson how the system works and not have the explanation be overly complex. There are lots of possibilities to tailor a revised system of noise metrics and thresholds to the communities.

AICA-DY: For example, you could use DNL and thresholds at the airport, and use other metrics and thresholds away from airport.

FAA Speaker 2: The significance threshold for land use compatibility with airport operations and a change in noise based on a change associated with an action need to also be considered. The significance of the change could be different for airport communities versus those that are not airport communities. These could end up being different values.

AICA-CC: A back doorway to think about solving the need to account for differences in ambient noise is an assumption that people close to the airport have higher ambient noise versus people further away, and so, the thresholds would be different to reflect that.

AICA-AMC: Away from airports communities are not the focus of the FAA. From a General Aviation (GA) perspective, there are multiple operational scenarios and types of vehicles. These include:

- Concentrated flight maneuvers/flight training areas
- Aerobatic practice boxes/areas
- Touch-and-go's/traffic pattern operations - these are close to the airport operations
- Skydiving operations
- Tow planes and gliders
- Preferred helicopter routes
- Private jet approaches and departures (typically at lower altitudes than commercial jets)
- Some communities have simultaneous air traffic of different scenarios and types - private jets, commercial jets, and flight training.

Can your experience as a certified flight instructor (FAA Speaker 1) help people think about a metric that could capture all these varied experiences? Is it TA? NA?

FAA Speaker 1: One of the biggest challenges in modeling flight training is the inputs. The VOLPE National Transportation Center, did a lot of modeling for aerobatic practice boxes/areas for air shows and looked at the number of operations that it would take to trigger a significant noise impact. Some operations, such as touch-and-go's and pattern operations are easy to model. For flight training over a practice box/area, we need the input to model the impact: we need to know where the planes fly and what they do. It can be very difficult to get that data. FAA would have to get the data from the flight school. However, if you have the data, then you could model the NA and TA metrics which could be candidates that would better speak to these activities.

AICA-AMC: People are dealing with abrupt changes of altitude. Starts and stalls are unbelievably disturbing and alarming to people. People are looking for a metric that will help describe what they are experiencing.

AICA-DY: If you created a model for GA activities, would you be willing to consider different thresholds because it is a different environment? TA for duration and NA for quantity. We want the policy to reflect people's lived experience and there are many different experiences.

FAA Speaker 1: FAA is open to any of these ideas. However, there also needs to be consideration given regarding the context of the analysis: is the analysis associated with an Environmental Review (ER) pursuant to NEPA, or a Part 150 for example.

AICA-DY: What about cumulative impact - multiple airports, vehicle types? Is cumulative impact on the FAA's radar?

FAA Speaker 1: Absolutely. That is something the FAA already considers.

AICA-DY: Our experience with ERs is that you look only at one procedure at a time, and you don't look at cumulative impacts.

Facilitator: Is it possible that FAA could make different policy decisions for NEPA versus Part 150?

FAA Speaker 2: Yes, it is a possibility. It is not a statutory requirement that FAA use the same metric and threshold for NEPA and Part 150. For this review, one of the items being considered is if these decisions should continue to be conjoined or if there should be different decision points/thresholds?

Facilitator: Is the FAA currently updating NEPA policies and procedures (1050.1f) separate from the NPR?

FAA Speaker 1: The FAA is updating its NEPA policy. NEPA was a very stable environmental policy for about 40 years, since the mid-80s. This changed in the last Administration; since then, the Council on Environmental Quality (CEQ) has rolled back some of the changes and is pursuing another rulemaking (Rule) to change still more provisions. Once the Phase 2 Rule is finalized, agencies will be expected to update their regulations to conform with the new changes. This would affect FAA Order 1050.1f as it will be a legal requirement to update it.

Facilitator: What are the steps to get the DOT and CEQ approval to changes to NEPA regulations given a new noise policy?

FAA Speaker 2: There are 4 steps for approval:

1. The FAA policy office takes the lead to revise internal policies for NEPA. Then we go through an internal clearance process.
2. Then, it is submitted to the DOT's Office of the Secretary for review by policy and legal staff for consistency, technical, and legal sufficiency.
3. Then, FAA submits the proposal to CEQ as there is a consultation requirement in the CEQ regulations that CEQ legal and policy staff must review.
4. In addition to that, there is an interagency process under the Office of Management & Budget prior to publication of a proposed document in the Federal Register. Agencies that interact with FAA may offer feedback on the policies and procedures may impact them and if any revisions are needed to FAA's policies and procedures, they are returned to FAA, begin the clearance and consultation process anew before the FAA receives final clearance to publish a draft in the Federal Register for public notice and comment.

Once these four steps are completed, an FRN is published for people to comment. Then the FAA reviews the comments and tries to incorporate them implement the proposed revision. This process is then repeated as needed for further revisions to NEPA policy.

AICA-CC: We heard that the FAA uses DNL 65 dB because it is used by other transportation agencies. Would DOT and FAA accept a noise metric system different from other transportation noise?

FAA Speaker 2: That is not quite accurate. The FAA does not need to align with other agencies. It is not required for surface transportation and air transportation to have the same requirements. There is not a statutory requirement for the same threshold for aviation and other forms of transportation. As such, FAA could use a different set of noise metrics and associated noise thresholds than other federal agencies.

AICA-CC: That's good to hear. Also – we do have to think about Environmental Justice considerations close to the airport when we consider ambient noise.

FAA Speaker 2: Environmental Justice is something we are thinking about too.

AICA-CC: I don't mean to imply in my previous comments that close to airport versus away from airport is a good idea. This needs to be thought through. I used that to suggest a back-door way of dealing with ambient noise.

Facilitator: Attendees were polled for what other topics they would like to see discussed regarding noise metrics and thresholds using a word cloud. The discussions that follow reflect the topics that were most frequently identified in the word cloud by attendees.

AICA-DY: Concentration is coming up. NA is related to concentration. In the FAA Metrics Report from 2020, there is a chart and check mark for both DNL and NA satisfying the column "Number of Events". To avoid confusion, what is the distinction between "Number of Events" for NA versus DNL?

*FAA Speaker 1[1]: DNL reflects cumulative averaged noise energy derived from the total number of aircraft noise events over the course of a year divided by 365 days to get to an annual average day (AAD). NA similarly could use the concept of an AAD, but instead of representing averaged cumulative noise energy, NAA represents the count of the number of events that exceed a certain specified maximum sound level (like 60 dB). Since DNL is a measure of cumulative noise energy, and not the number of events, if people want a metric that counts the number of events then NA would be a better suited metric.

AICA-DY: We want to count the number of intrusive events. So, we should use Number-Above or "counts the number of events" in our comment for a metric.

[1] This response includes post-meeting clarifications from FAA.

AICA-AMC: I have a plane circling my house 10 times. Is it counted as one? GA communities use the term concentrated to describe the amount of noise over their homes because that is the lived experience. Is it Number-Above and Time-Above?

AICA-DY: It is both Number-Above and Time-Above.

AICA-CC: From a statistician's point of view, you cannot say that DNL accounts for frequency. You can get the same DNL with many different scenarios.

*FAA Speaker 1[2]: The number/frequency of operations is accounted for in the calculation of the DNL metric. However, it is not the only factor as the DNL metric also factors in the duration and intensity of a noise event as part of the DNL calculation.

AICA-DY: Sections 173 and 188 of the 2018 FAA Reauthorization Bill dated 2020 evaluated alternative metros to DNL and the DNL 65 standard. The conclusion was no change, continuing with DNL 65. Why would the evaluation be different this time? Are the same people of Sections 173 and 188 involved in the NPR?

FAA Speaker 1: For Sections 173 and 188, we did exactly what Congress asked us. This project is different: we are looking at our noise policy. We thought we were doing what Congress expected at that time, and I hope it's clear we are absolutely looking at changing the metrics and thresholds now.

AICA-DY: Are the same FAA people involved?

FAA Speaker 1: Yes, the same people are involved for the most part.

AICA-DY: The Quiet Skies Caucus sent a letter to the FAA saying that the content of the reports for sections 173 and 188 were not what Congress asked for.

HEALTH EFFECTS

Facilitator: What is most important to AICA communities in terms of health effects?

AICA-CC: We are being asked to respond to questions 7C and 7D which both relate to health. The FRN asks how research findings should be considered by the FAA when it decides whether to retain or modify the noise policies. Who are your FAA partners given that the FAA has aviation experts and doesn't have health experts? The FAA says that they need reliable information such as epidemiological evidence. However, there are other sources of reliable data such as case studies (like the 100+ people listening today). How will the FAA use epidemiological information and why are you not thinking about other ways to consider the damage to people's health and quality of life? The complaints, letters, pleas from public officials that noise is affecting public health. How is current information on health being used for the current policy?

[2] This response includes post-meeting clarifications from FAA.

Question 7C and 7D also ask what amount of epidemiologic information is sufficient? This is difficult to answer. I am a health policy researcher and I don't know how to answer it. How will you use epidemiologic information when considering the damage to people's health and quality of life? How will it be incorporated in the new policy?

Facilitator: How is scientific research on the health impacts of noise exposure used currently in the FAA's noise policy and regulations? How will it be incorporated in the new policy?

FAA Speaker 1: It should be pointed out we rarely see clear policy answers on results of studies like the NES. There is a new curve derived from the NES results as it relates to annoyance, but there is no obvious answer. We expect the same will be true with findings on cardiovascular research and our national sleep study. We will take into account input we receive during the FRN comment period with regards to health impacts and from there look at different policy options. However, in considering options we will also need to consider the impacts of operating air space and cannot implement policy changes that may have unintended consequences.

The answer is that when we see research it does not lead to a clear answer about what to do with that information. I expect the same will be true with the ongoing national sleep study and cardiac study. We hope the sleep study will be published late 2025. We are going to take into account the information we receive from this FRN, but this process is not going to stop airplanes from flying.

Regarding the comments on complaints, we have to consider correlation versus causation. While complaint data is useful and helps identify areas of concern regarding aviation noise, the FAA doesn't use complaint data to make policy changes. We want to base our policy on a broad base of stakeholders, and as don't want to focus policy changes on only those who complain. We want to hear from all people equally, regardless of if they file complaints or not.

AICA-CC: Unintended consequences were not a concern when the FAA rolled out the NextGen program, so people are skeptical about whether that has changed. Why are they a concern now, when they clearly were not then? On correlation versus causation, one cannot do an experimental (causal) study on the health impacts of aviation noise. It would be unethical. But there are epidemiological and statistical methods that get you very close to understanding causation. So that should not be part of your concern. Also, at one recent House hearing, someone from the Air Traffic Organization admitted that the NextGen implementation led to winners and losers in communities. A lot of people are not affected. You don't hear from everyone (re. complaints) because the procedures have concentrated the noise over certain people, and those people need to be heard because they have been unfairly treated by the government. You are hearing from the people who are at their wits' ends. People did not consent to have 200 or 300 planes per day over their homes.

Facilitator: Other questions?

AICA-DY: The feedback in the comments received from the FRN on FAA noise research portfolio was "no more research." There is a concern about the FAA waiting for the sleep study. There is plenty of research

already on health effects. Can you reconsider and not wait to do a National Academies consensus report of health studies and make decisions regarding the NPR based on existing research?

FAA Speaker 1: We have not made a decision one way or the other on a consensus report. However, how would FAA handle the current NPR if we were to do a consensus report? This could result in the NPR being stopped now to wait for the results of the report to be published. Likewise, it could result in lengthening the NPR should the results come out as the review may be drawing to a close to consider the study's findings. It is contrary to what we were told in the comments we received from the FRN on our noise research.

AICA-DY: You could do both in parallel because you will need to continue to innovate and gather new information throughout this process.

FAA Speaker 1: Thank you Darlene for that feedback. We recognize that taking 40 years to revisit our noise policy was too long. We recognize that research is maturing and we need to be able to respond to that more quickly. We want feedback on whether to revisit our policy on a regular basis such as every 3-5 years to consider new information. We would very much appreciate your feedback on that.

APPLICABILITY/RETROACTIVITY

Facilitator: How would a new noise policy be applied going forward?

FAA Speaker 2: Policy development is forward looking and will not provide an avenue to revisit past decisions. A policy is a predictive statement of how and when an agency might act. Here, in the context of the noise policy review, we are focusing on how the FAA will analyze and present information regarding exposure to aircraft noise. The FAA is not looking at applying the NPR retroactively. This policy will not be backdated like an insurance policy might be to cover actions the FAA took before the effective date of the new policy and will not revisit past decisions. Those are final. Rather, this predictive statement will apply to the thousands, and hundreds of thousands future actions the FAA takes. To the extent we can make better decisions going forward under a new policy, that's what we will do.

Facilitator: Here is a hypothetical scenario: a resident is currently in DNL 60 dBA and is not eligible for soundproofing. If the new policy for compatible land use changed from DNL 65 dBA to DNL 60 dBA, would the resident be now eligible for future mitigation/soundproofing?

FAA Speaker 1: Hypothetically, one would imagine that another Part 150 study completed or updated following implementation of any recommendations coming out of this project could have a different outcome based on those changes. If we lowered the level for compatible land use, for example, then I'd imagine that the future part 150 would be based on that new level and theoretically that could change which locations could be eligible for mitigation. But that's hypothetical – we'd need to see exactly what the recommended changes are and how they are implemented.

AICA-CC: There is a lot of anger from people who are currently negatively affected by past FAA decisions and will not be helped by the NPR. They are currently living in hell. To hear from the FAA that they won't fix the current problems is a huge issue. Nobody consented to the noise they are experiencing today.

FAA Speaker 1: I empathize with people. The scope of this review is to review the foundational elements of the FAA's noise policy. A scope beyond that would have been too much for us to take on at one time. I am hopeful that this is a positive step for future decisions and builds a foundation to consider these impacts. However, we acknowledge the scope of this review was never intended to solve all the problems that exist and that everyone was hoping for.

AICA-DY: I have 3 questions.

(1) Airports are interpreting significant impact at DNL 65 dB, and they can't do monitoring outside DNL 65 dB. How about those people outside DNL 65 dB? Is there no process for those people to get monitors that the new noise policy would trigger? (2) In Section 190 of the 2018 FAA Reauthorization, there was a $5 million pilot program allocated for mitigation. Is there some possibility of funding to help mitigate people already impacted? (3) What recourse do we have if the new policy is not retroactive? Is it legislation?

FAA Speaker 1: Unfortunately, we don't have anyone here to answer the first question right now. I did not hear back from or Office of Airports. Regarding Section 190. I wish I had known the question because I could have looked that up before we met today. It was not on the list of questions so I would need to get back to you.

AICA-DY: Can we get a raincheck on Section 190?

FAA Speaker 2: Regarding the question on recourse, this requires legal advice, which we cannot give. In the context of this policy review, you can provide public comments. If you think the scope of the review is too narrow, you can say that and then we can grapple with that when we move forward. The FAA will read, review, and consider all the comments. We spent months reading the 4000+ comments that came in on the NES.

AICA-DY: So, step 1 is to make a comment on the policy being retroactive.

FAA Speaker 2: We can't lobby Congress. You are empowered to use your resources to make sure your voice is heard.

AICA-CC: Who at the FAA made the decision on the policy not being retroactive?

FAA Speaker 1: There isn't any one person that makes these decisions which is the case for decisions at FAA. The decision was made based on consultation among various interagency groups. Policy updates by nature are forward looking, and having the scope of this project look forward to future changes is not unique.

AICA-CC: Some airports analyze their data. If under the new policy more people have "significant noise" how will you use that information?

FAA Speaker 1: When we determine how we will change our noise policy, we will have to explain how it will be implemented and applied. Once we have identified and communicated recommended policy changes, airports that analyze their own data may choose to start publishing contours or calculating noise exposure based on new thresholds. For example, if the threshold of significance for land use was reduced from DNL 65 dB to DNL 60 dB, airports that analyze their own data may start publishing noise contours down to DNL 60 dB.

AICA-CC: What if an airport analysis says that this area has significant noise?

FAA Speaker 1: If it is for NEPA, then we would look at the impacts in light of the new noise policy.

FAA Speaker 2: This situation would potentially trigger a higher level of review. If there are concerns, we could explore some mitigations. The FAA's goal is to reduce the number of people exposed to "significant impact". We need to allow airplanes to fly while at the same time work toward reducing impacts. We are looking at how we can use approval processes and technological improvements to mitigate the impacts. If you find yourself in a land use that is no longer considered "compatible" then you could apply for mitigation. Applying for sound insulation, however there is a funding program and priorities. The Part 150 program is completely voluntary for airports to participate in, and many do. There are other mitigation measures like avigation easements and others that are completely outside the FAA's purview such as land use decisions in the vicinity of airports made by local governments.

EXTERNAL ENGAGEMENT

Facilitator: Can you describe the FAA efforts on external engagements for the NPR?

FAA Speaker 2: FAA has focused for the NPR on having a variety of resources and opportunities accessible asynchronously to reach the maximum number of people. This includes multiple virtual opportunities for the public to hear information about the project and to learn how they can further interact with FAA staff regarding these issues via virtual public involvement and social media. This area in particular was intended to provide as many varied opportunities for parties who might not normally know about or contact the FAA regarding noise issues due to the timing of engagement opportunities; language challenges, or the accessibility and technical nature of the materials. You've heard about the videos, written materials that we developed, but we also have provided a dedicated phone number and email address at which we can receive questions and provide clarifying information for those who wish to submit a comment.

Separate from virtual outreach, we have also used the Regional Administrators and asked them to reach out to local roundtables. We have reached out to Congress to offer to have briefings for their communities (and in some cases members reached out to us). We have also accepted invitations to brief people at conferences, other meetings, a tribal nations symposium and have used the Executive branch to reach out to other agencies that deal with noise. We have also provided information on the FAA ChatBot, in written responses to concerns submitted to the Noise Portal, and relied on our Regional Administrators

and Community Engagement Officials to raise awareness of this project and provide information to affected members of the communities they serve.

Lastly, having this kind of external dialog. We have looked for opportunities to reach communities and provide information in a scalable, equitable, meaningful, transparent, and consistent way while meeting our dialogue partners where they are in terms of their knowledge about the FAA, its authority to regulate in this space, the technical issues at hand. We are trying to be careful to not treat some stakeholders differently than others, and to be transparent. We knew that we would not be able to hit the mark on everything as far as engagement so we've tried to be accessible and hear from the public about how we need to adjust direction and have looked at opportunities for scalable options to engage.

Facilitator: What is being contemplated to ensure that meaningful input from affected communities will be considered throughout the review?

FAA Speaker 2: Everyone has a voice. The FAA will look at all the comments. It may take multiple months, but we will categorize and synthesize the comments, identify themes, and discuss with the project team opposing views and what that means in terms of policy development. We committed to data-driven decisions and will compare how comments align with science and data. We will read every comment and we will not prioritize comments from one group over another. At the end of the review process, we will issue another FRN announcing our recommendations for policy changes. We want to follow a democratic and participatory process at the earliest moment.

AICA-AMC: I sat at an airport meeting and the FAA CEO was not very well informed about the NPR. There is still an issue with the technical language. If a community uses descriptions like starts & stalls, being buzzed, etc., will these scenarios they are experiencing be specific enough for the FAA to understand how to develop a metric that will capture their experience?

FAA Speaker 1: I think so, yes.

FAA Speaker 2: We have a diverse group of people with a broad base of expertise looking at these comments including pilots and NEPA specialists among many others. We will try to leverage our team to look at these comments as broadly as we can. We will not be having only one person reviewing comments.

AICA-AMC: Will the new suite of metrics be applied to areas away from airports?

FAA Speaker 1: This is hard to answer with certainty as we don't know what changes we will be recommending. Providing comments on where metrics should be applied would be useful input.

AICA-CC: I appreciate hearing about the engagement process. But while the FAA is meeting, reading, writing, conversing with its stakeholders and Congress, there are people right now who are suffering, who are not getting good sleep, who are not enjoying the outdoors. Please proceed with expediency.

FAA Speaker 1: The FAA understands that people are experiencing noise. We have 50,000 employees and some of us are also the people you are talking about who are impacted. We are doing what we can to move the review along quickly.

AICA-CC: There was a task in the modified Interagency Agreement with FCMS where it stated that the FAA has consulted with external stakeholders. Who has been part of that task?

FAA Speaker 1: I am not prepared to answer that, I'm sorry.

AICA-DY: The NPR process is like meeting with an architect for the first time to discuss and provide input. In the architectural process, the next step would be to see the architect's interpretation of your input before plans are drawn and building begins. There should be a step before the FAA publishes its final decisions. Going from this FRN to the final noise policy FRN is a big jump. Can you comment on this?

FAA Speaker 2: This is a good question. We hear on one hand that the FAA needs to go fast and expedite the policy review, while hearing at the same time we also need to have more steps. When we publish the next FRN announcing recommendations for changes to our noise policy, that will allow for feedback and comment from the public before they are implemented. As the recommendations are implemented there will be changes to various orders and FAA regulations and operating procedures that will include opportunities for further public comments and input, which in some instances will likely be through subsequent FRN's for implementation of the policy in specific areas. The step of publishing an FRN with recommended changes to the noise policy will not be the last step in making policy changes and the public will have further opportunities for input in the process.

AICA-DY: We are most concerned about the metrics and thresholds for decision making.

FAA Speaker 2: The next FRN will be our recommendations for policy changes. It will be an initial set of plans for changes to our policy for which the public will have the opportunity to provide comments and feedback on. I think what you are asking for is exactly what we are going to be doing. The next FRN will afford the opportunity for the public to provide feedback on if our plans do or do not align with expectations. The next FRN will also explain how various administrative mechanisms will be engaged going forward in terms of implementing policy changes.

AICA-DY: After the next FRN, will we see a delta based on the input we provide compared to what is published?

FAA Speaker 2: That is what we are hoping to accomplish. There are some areas we may be able to meet your expectations based on input and other we may not.

CLOSING REMARKS

AICA-DY: I want to recognize that communities are frustrated with the noise impacts experienced daily, hourly, and every few minutes. Frustration is a motivator for activism. Today we channeled that frustration to have a constructive dialogue with the FAA to add another tool, not to negate the frustration.

We also thank the FAA for extending the deadline for making comments on the NPR FRN. Here is the call to action:

- Make a comment, it matters.
- Declare what you want. Be specific.
- Share personal experience. Share facts.

The AICA will be also sending out recommendations for you to consider for your comment. Hopefully you heard content today you can use to make a relevant, consequential and better comment. Thank you to all the fellow advocate attendees, panelists, FAA, and FMCS.

FAA Speaker 1: Thank you all for this opportunity and to the community panelists for working with us. I know all of you are volunteers. Hopefully, you learned something. Thank you also to the facilitators.

Facilitators: Thank you everybody.

FAA Group Attendee List
FAA - National Engagement and Regional Administration (ARA) FAA - Noise Division, Office of Environment and Energy

AICA Group Attendee List	
National aiREFORM Aviation-Impacted Communities Alliance Citizens for Quiet Skies Quiet Communities, Inc. Sky Justice National Network **State/Local** Airport Impact Relief Incorporated (AIR Inc.), MA Airport Concerned Citizens (ACC) of Georgetown, TX Alliance for a Regional Solution to Airport Congestion (ARSAC), CA ATL Neighbors Needing Quiet Skies (ANNQS), GA BOS Fair Skies, MA Bucks Residents for Responsible Airport Management (BRRAM), PA Citizens Against Runway Expansion (C.A.R.E.), CA Citizens for Airpark Safety, MD Charlotte Airport (CLT) Community Roundtable, NC Concerned Residents of Palo Alto, CA FAiR Chicago, IL FumeFighters United VNY, CA GrotonAyerBuzz of Ayer, MA Keep It Down Up There, CA Keystone Point Neighborhood Association, FL King County International Airport Community Coalition (KCIACC), WA Logan Aircraft Noise Working Group, MA Los Angeles Area Helicopter Noise Coalition (LAAHNC), CA Lower Makefield Township Trenton-Mercer Airport Review Panel, PA Montgomery County Quiet Skies Coalition, MD	**State/Local (cont.)** Oregon Aviation Watch, OR Plane Sense 4 Long Island, NY Quiet Florida, FL Quiet Skies, AL Quiet Skies Boulder County, CO Quiet Skies Coalition, WA Quiet Skies LA, CA Quiet Skies La Jolla/San Diego, CA Quiet Skies Lake Arrowhead, CA Quiet Skies Maui, HI Quiet Skies Over Arapahoe County, CO QuietskiesPacifica94044, CA Quiet Skies Puget Sound, WA Quiet Skies Santa Monica Mountains, CA Quiet Skies Woodland Hills, CA Save Our Skies East Bay (S.O.S.E.B.), CA Save Our Skies LA (SOSLA), CA Sierra Club, Hawai'i Island Group, HI Sky Justice Miami, FL Sky Posse Los Altos, CA Sound Defense Alliance (S.D.A.), WA Southern Maryland Fair Skies Coalition, MD Stop the Chop, NY/NJ Studio City for Quiet Skies, CA Sunnyvale/Cupertino – Save My Sunny Skies, CA 10,000 Hawks, CT Trenton Threatened Skies, NJ Twin Cities Metro Airport Neighbors for Change, MN UproarLA, CA Vashon Island Fair Skies, WA