

## Letter to the Honorable Pete Buttigieg: Request from 91 Community Organizations



July 18, 2024

The Honorable Pete Buttigieg  
Secretary  
U.S. Department of Transportation  
1200 New Jersey Avenue SE  
Washington, DC 20590

Re: Communities Seek Sufficient Representation for FAA Committees and Community Feedback Provisions in FAA Reauthorization Act of 2024

Dear Secretary Buttigieg,

We applaud the FAA's Office of Environment and Energy, who lead the FAA Noise Policy Review, for notably including grassroots community groups as key stakeholders for the first time on national initiatives:

- [FAA and AICA virtual panel discussion on FAA Noise Policy Review](#)
- [Joint presentation by FAA and AICA on the panel discussion at the Aviation Noise & Emissions Symposium 2024](#), and
- [Panel session on FAA Noise Policy at NOISE-CON 2024](#) with FAA, AICA, Airlines for America, ACI-NA, and Penn State University.

We look forward to the continued collaboration and meaningful dialog as key stakeholders for FAA's Noise Policy Review for **Sec.792. Aviation Noise Advisory Committee (ANAC)** as well as in additional community engagement provisions in FAA Reauthorization Act of 2024. Historically, the 91 impacted communities that we collectively represent have had no effective voice in any FAA Advisory Committees. These committees are weighted in favor of members within the aviation industry and have disproportionate representation, such examples include the NextGen Advisory Committee (NAC), the Advanced Aviation Advisory Committee (AAAC), and the Research, Engineering and Development Advisory Committee (REDAC).

To ensure the inclusion of aviation-impacted communities by grassroots organizations representing impacts from Commercial and General Aviation, **we request that you direct the FAA to sufficiently represent grassroots impacted communities for FAA Advisory Committees and community engagement provisions in the FAA Reauthorization Act of 2024.** The FAA Administrator has discretion on committee membership composition, appoints the committee members, and specifies the purview of and who is included for community engagement.

The FAA asserts "Communities concerns regarding noise have and continue to be a primary factor underlying the FAA's noise-related policies", *inter-noise 2023*. We can think of no better opportunity than the intent of **Sec.792. ANAC**, with the directive for "a report on any recommended changes to current aviation noise policies", to have sufficient representation of impacted communities to honor the required coverage and fulfillment of the Noise Policy Review scope. **13%** (643) of the comments for FAA

Noise Policy Review Federal Register Notice were an endorsement of the comment made by the Aviation-Impacted Communities Alliance (AICA).

Sufficient representation of communities for **Sec.792. ANAC** would be a minimum of four members to cover the purview of the noise policy, who collectively have in-depth understanding of and are substantially and directly impacted by Commercial Aviation and General Aviation including extensive NextGen overflights (SIDS, STARS and Approaches), helicopter flights, flight training, and near airport issues from geographically diverse regions. The community representatives should have no financial conflict of interest for aviation related individual or private organization gain from the FAA<sup>1</sup>, include both Roundtable and Non-Roundtable members, have not served as previous FAA Advisory Committee members representing community or environmental stakeholders, and have a proven track record of working with impacted communities and grassroots organizations.

Furthermore, two health experts should be members of the committee per **Sec.792. ANAC** “at least 1 representative of each of...institutions of higher education”. We recommend an emissions expert as well as a physical and mental health expert who are currently or previously affiliated with institutions of higher education; have published articles on the impacts of aircraft noise and/or emissions on health; have served on academic, government and community committees addressing adverse effects of noise on health; and have experience working with communities affected by aircraft noise.

In addition to **Sec.792. ANAC**, sufficient grassroots community inclusion is needed in FAA Reauthorization Act of 2024 provisions: **Sec.786. Part 150 Noise Standard Update** - community feedback, **Sec.793. Community Collaboration Program** - interviews and recommendations solicited from impacted residents adversely impacted, and **Sec.916. Unmanned and Autonomous Flight Advisory Committee (UAFAC)** - community advocate member. Both **Sec.792. ANAC** and **Sec.916. UAFAC** will likely operate as Federal Advisory Committees in accordance with the Federal Advisory Committee Act (FACA) requiring Federal advisory committees “to be fairly balanced in terms of the points of view represented and the functions to be performed by the advisory committee.” 5 U.S.C. app. 2 § 5. The FACA provision clearly asserts the intent of sufficient representation by impacted communities and not just or overly weighted by aviation interests.

The [DOT letter to the Quiet Skies Caucus dated 6/30/22](#) states “Fundamentally, the agency agrees community input is important” and then lists a number of concrete actions that demonstrate its commitment to this concept such as the FAA Noise Portal, noise related directives in the 2018 FAA Reauthorization Act, and “enhanced community engagement initiatives”. Unfortunately, many of the community actions taken by the FAA have not been effective or improved engagement based on AICA’s solicitation of feedback from its community groups via the [FAA Community Engagement Scorecard](#), for example, when asked the question: “Do the following national programs improve community engagement?”, the response for the FAA Noise Portal was 81% Not Improve, 14% Not Familiar, and 5% Blank. There were similar responses to additional FAA community engagement initiatives. For the **FAA’s Metrics Report from the 2018 FAA Reauthorization Act**, the Quiet Skies Caucus issued a press release

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<sup>1</sup>No organizations funded by and/or whose members include airlines, aircraft manufacturing companies, or aviation services. No non-academic consulting or services firms who have or will receive funding by the FAA.

[“Norton, Bass and 27 House Members send Letter to Federal Aviation Administration Following Inadequate Report on Aircraft Noise Mitigation Efforts”](#) including Representative Norton stating “Along with my colleagues, I find the FAA's report wholly inadequate” and “I fought successfully to include provisions in the enacted 2018 FAA Reauthorization Act that mandated that the FAA evaluate alternative airplane noise metrics and provide Congress a report of its findings, but this report shows the FAA didn't evaluate those alternative metrics. The FAA must provide Congress a report that meets the standards enacted in law, and it should take care to answer the questions raised in this letter as well.”

We believe that sufficient community representation by aviation-impacted community representatives would increase the likelihood of successful outcomes for FAA initiatives and support a national airspace system that works for all. Members of [our AICA groups nationwide](#) have qualified individuals ready to serve on FAA Advisory Committees and provide thoughtful feedback from the impacted community perspective for 2024 FAA Reauthorization provisions. As subscribers to FAA's future updates on FAA Noise Policy Review, we look forward to receiving information on applying for **ANAC**, as well as continued FAA engagement with the AICA groups in the spirit of the missives on actual community engagement and the issues that substantially affect them.

Thank you for considering our request on behalf of aviation-impacted communities.

**Signatories:**

**National Organizations**

aiREFORM  
Aviation-Impacted Communities Alliance (AICA)  
Citizens for Quiet Skies  
Concerned Residents Against Airport Pollution (C.R.A.A.P.)  
National Quiet Skies Coalition  
NextGenNoise.Org  
Quiet Communities, Inc.  
Sky Justice National Network

**State/Local Organizations**

Advocates for Viable Airport Solutions, CA  
Airport Concerned Citizens (ACC) of Georgetown, TX  
Airport Impact Relief Incorporated (AIR Inc.), MA  
Alliance for a Regional Solution to Airport Congestion (ARSAC), CA  
Arlington County Quiet Skies Coalition (ACQSC), VA  
ATL Neighbors Needing Quiet Skies, GA  
Auburndale Improvement Association, Inc., Flushing, Queens, NY  
Bay Area Jet Noise, CA  
BOS Fair Skies, MA  
Browne Park Civic Association, NY  
Burbank for Quiet Skies, CA  
Charlotte Airport Community Roundtable, NC  
Citizens Against Airport Noise and Pollution (CAANP), CA  
Citizens Against Gillespie Expansion and Low Flying Aircraft (C.A.G.E.L.F.A), CA  
Citizens Against Runway Expansion (C.A.R.E.), IL  
Citizens for Airpark Safety, MD

Citizens 4 Quiet Skies - Goodyear, AZ  
Coalition to Prevent Expansion of Westchester Airport, NY  
Coalition to Transform East Hampton Airport, NY  
Concerned Residents of Palo Alto, CA  
FAiR Chicago, IL  
FumeFighters United VNY, CA  
GrotonAyerBuzz of Ayer, MA  
GRRift (Gilpin Residents Refuse Increased Flight Traffic), CO  
H.A.R.N.E.S.S. (Helping Aviation Respect Neighbors, Environment, Sustainability & Silence), OR  
Hull Neighbors for Quiet Skies, 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  
Long Beach SANER (Small Aircraft NoisE Reduction Group), CA  
Los Angeles Area Helicopter Noise Coalition (LAAHNC), CA  
Lower Makefield Township Trenton-Mercer Airport Review Panel, PA  
Melrose Place Against Nuisance, Baton Rouge, LA  
Montgomery County Quiet Skies Coalition, MD  
Mothers Out Front East Boston, MA  
Northwest Bayside Civic Association, NY  
Oregon Aviation Watch, OR  
Pacific Sky Watch, CA  
Palisades Community Association, DC  
Plane Sense 4 Long Island, NY  
Quiet Florida, FL  
Quiet Skies, AL  
Quiet Skies Boulder County, CO  
Quiet Skies Coalition, WA  
Quiet Skies Hawaii, HI  
Quiet Skies Jefferson County, CO  
Quiet Skies LA, CA  
Quiet Skies La Jolla/San Diego, CA  
Quiet Skies Lake Arrowhead, CA  
Quiet Skies Long Beach, CA  
Quiet Skies Maui, HI  
Quiet Skies Northeast Miami-Dade County, FL  
Quiet Skies Over Arapahoe County, CO  
QuietskiesPacifica94044, CA  
Quiet Skies Puget Sound, WA  
Quiet Skies Santa Monica Mountains, CA  
Quiet Skies Woodland Hills, CA  
Reduce Jet Noise Naples, FL  
San Francisco's Concerned Residents Experiencing Annoying Aircraft Maneuvers (S.C.R.E.A.A.M.), CA  
Save Our Skies Alliance, CO  
Save Our Skies East Bay (S.O.S.E.B.), CA  
Save Our Skies LA (SOSLA), CA  
Save Our Skies Santa Cruz, CA

Serra Mesa Community Council, CA  
SCANA (Scottsdale Coalition for Airplane Noise Abatement), AZ  
Sherman Oaks & Encino for Quiet Skies, CA  
Sky Posse Los Altos, CA  
Sound Defense Alliance (S.D.A.), WA  
South Flow Alliance, VA  
STOP Jet Noise NOW! SFOAK North S.F. Bay Area, CA  
Still Protecting Our Newport (SPON), CA  
Stop the Chop, NY/NJ  
Studio City for Quiet Skies, CA  
Sunnyvale / Cupertino Airplane Noise Group – Save My Sunny Skies, CA  
10,000 Hawks, CT  
350 Seattle, WA  
Trenton Threatened Skies, NJ  
Truckee Communities for a Better Airport, CA  
Twin Cities Metro Airport Neighbors for Change, MN  
UproarLA, CA  
Vashon Island Fair Skies, WA  
West Adams for Quiet Skies, CA

Cc:

The Honorable Eleanor Holmes Norton and Stephen F. Lynch, Quiet Skies Caucus Co-Chairs  
Members of the Quiet Skies Caucus  
FAA Administrator Michael G. Whitaker