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# ***Airport Noise Report***



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## ***Drone***

### **COMMUNITY ALLIANCE TELLS FAA ITS USE OF DNL TO ASSESS NOISE IMPACT OF PACKAGE DELIVERIES REPEATS MISTAKES OF NEXTGEN**

*[Following is an excerpt from the comments the Aviation Impacted Communities Alliance (AICA) submitted to FAA on its draft Programmatic Environmental Assessment for Drone Package Deliveries Operations in the U.S.]*

The Draft PEA proposes to establish a nationwide programmatic approval framework for drone package delivery operations. Once adopted, future delivery hubs, routing decisions, and operational expansions may be approved incrementally as implementation of an already approved program, rather than as new federal actions subject to separate, location-specific Environmental Assessments (EA). As a result, the Draft PEA does not merely evaluate current operations but establishes the procedural structure that will govern how future approvals are reviewed, disclosed, and evaluated under NEPA.

The Aviation-Impacted Communities Alliance (AICA) is a coalition of more than 90 local and national organizations advocating on a bipartisan basis for aviation policy that reflects the lived experience of affected communities, reduces harmful noise and health impacts, and promotes the safe and accountable management of the National Airspace System (NAS).

### **Repeating the Mistakes of Nextgen**

The FAA's NEPA framework, as implemented for NextGen, relied primarily on DNL-based noise significance thresholds and related analytical constructs that no longer reflect how communities experience aircraft noise. By treating DNL as the most consequential determinant of noise significance, the framework functionally predetermines Finding of No Significant Impact (FONSI) and limits meaningful disclosure, engagement, and recourse. As a result, impacts are predominately treated as insignificant under FAA policy not because they are insignificant in daily life, but because the analytical framework does not capture high counts of overflight events,

sequencing, and disruption. At a December 16, 2025 House hearing on the State of American Aviation, the FAA Administrator described NextGen as a “boondoggle.”

That same DNL-centered framework is reflected in the to-date 23 FONSI s issued for drone delivery operations. Rather than evaluating effects in a manner that reflects lived experience, the FAA continues to rely on DNL-based screening that presumes no significant impact in advance.

## **FAA Can Address Concerns Within Its PEA**

Many of the concerns raised in this comment can be addressed by the FAA within the scope of this PEA. The FAA has discretion to revise the structure and limits of its programmatic approval framework, including the analytical approaches used to evaluate impacts, the definition of thresholds and review triggers, and the circumstances under which location-specific environmental review and public involvement are required. Where the Draft PEA fails to do so, it is not because the FAA lacks authority, but because the FAA has adopted a framework that prioritizes administrative streamlining over substantive environmental evaluation and public accountability under NEPA.

Against this backdrop, the Draft PEA is fundamentally deficient in three interrelated ways that undermine meaningful environmental review.

## **Three Overarching Deficiencies**

- **Failure to Disclose and Represent Community Lived Experience:**

The Draft PEA fails to adequately disclose how large volumes of very low-altitude drone operations would be experienced by communities on the ground. The analysis does not meaningfully characterize exposure associated with hundreds to thousands of daily overflight events at altitudes between approximately 150 and 375 feet.

A representative depiction of community lived experience would address the count of overflight events, cadence and clustering, concentration of operations over specific neighborhoods, hovering time over residences, assumed operating altitudes, expected ground-level noise, and permissible hours of operation. These defining elements of daily exposure are obscured through averaged proxies, generalized descriptions, and simplistic assumptions.

- **Second, FONSI Predetermination Through an Antiquated Metric and Threshold:**

The Draft PEA relies on an analytical framework structurally predisposed to FONSI and a DNL metric and threshold that are no longer aligned with the new National Curve derived from the Neighborhood Environmental Survey (NES) published in early 2021.

By relying on an antiquated, pre-established screening threshold that is insensitive to a high count of events (the same DNL level can be achieved by 10 very loud events or 100 medium loud events or 1000 loud events), the framework treats the introduction of

drone hubs or operations into any community as insignificant at the outset. In communities with little or no existing aviation noise, this approach normalizes first-time exposure as insignificant, while in already burdened communities it dismisses additional and cumulative impacts by relying on averaged cumulative constructs that do not meaningfully represent incremental burden or lived experience.

- **Third, Failure to Evaluate Local Conditions and Potential Noise Impacts:**

The Draft PEA establishes a framework that relies on internal FAA discretion to determine whether and how local conditions and potential noise impacts are analyzed, disclosed, and relied upon in approval decisions, rather than a framework that defines objective criteria and decision points, which govern when such analysis must occur prior to approval.

By relying on tiering and internal determinations without defining and describing objective triggers for a separate, location-specific, project-level EA, or explaining how noise-sensitive land uses will be evaluated, the proposed framework provides no transparent mechanism for reassessing significance when community-level impacts differ from programmatic assumptions.

[AICA's entire 33-page comment to FAA on its Draft PEA on Drone Package Deliveries in the U.S. is attached to the email that brought this week's issue of ANR.]