Comment on Notice of Proposed Rulemaking: Waiver of Specified Statutory Requirements for Commercial Space Launch and Reentry Actions

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The Aviation-Impacted Communities Alliance (AICA) appreciates the opportunity to comment on the Federal Aviation Administration's notice of proposed rulemaking, "Waiver of Specified Statutory Requirements for Commercial Space Launch and Reentry Actions." AICA is a national coalition, bringing together more than 90 aviation-impacted community organizations across 22 states and the District of Columbia. Through its community-led model, AICA engages with governmental, technical, industry, and community stakeholders to advance informed approaches to aviation noise and its effects on public health and quality of life.

AICA's Overall Position

FAA's Objective and the Governing Protection Standard

FAA states that the proposed rule is intended to implement Executive Order 14335 by expediting commercial space approvals and reducing regulatory burdens. AICA understands that the Executive Order directs FAA to pursue those objectives consistent with applicable law. AICA further understands that, under federal commercial space law, FAA may waive a legal requirement only after determining that the requirement is not needed to protect public health and safety or the safety of property. The protection of public health, safety, and property is therefore a condition that must be supported by the record, not an outcome that can be assumed. The notice of proposed rulemaking (NPRM) states that the proposed General Waiver provision would satisfy this standard. However, the current record does not provide a law-by-law, site-specific, or operation-specific analysis demonstrating how a waiver covering 13 laws, multiple types of approvals, and differently situated sites satisfies it.

The Proposed Waiver Would Remove Safeguards Under 13 Federal Environmental and Preservation Laws Nationwide Without Clear Limits or Reassessment Requirements

AICA understands that the proposed rule would exempt commercial space launch and reentry approvals nationwide from requirements under 13 federal environmental and preservation laws. In AICA's assessment, the rule could permit FAA to approve new or expanded space operations without conducting an action-specific environmental review. The approval process could therefore omit otherwise applicable disclosure, public participation, governmental and Tribal consultation, alternatives analysis, and mitigation. The proposal does not clearly limit where, when, or under what circumstances these safeguards could be removed.

The waiver could apply to launch and reentry site licenses, vehicle licenses, experimental permits, license renewals and modifications, airspace closures, certain airport-development approvals, and leases of federal land. The proposal does not distinguish between an existing operation that remains within previously reviewed limits and a new site, major expansion, increased launch frequency, new trajectory, new vehicle or fuel or expanded nighttime operations. The proposed framework includes no stated expiration date, objective eligibility criteria, operational thresholds, monitoring requirements, or mandatory reassessment triggers.

The NPRM Does Not Evaluate the Full Burden on Society

The NPRM states that federal regulatory policy requires agencies to impose the “least burden on society.” However, its economic discussion focuses on anticipated savings for applicants without quantifying those savings or evaluating the broader costs and risks of eliminating federal review. Those consequences could include costs incurred by State, local, and Tribal governments and affected communities to obtain information, evaluate potential impacts, monitor operations, and plan for emergencies. They could also include longer-term costs and harm when impacts not identified before approval require mitigation, remediation, emergency response, or operational changes. AICA does not understand the current record to demonstrate that the proposed General Waiver provision would impose the least burden on society.

Removing Review Could Leave Safety Risks Unidentified and Increase Long-Term Infrastructure Costs

AICA does not suggest that the proposed rule would eliminate all FAA launch-safety requirements. The concern is that the environmental review and consultation associated with FAA licensing actions can identify site-specific risks and impacts relevant to public health, safety, and property, including hazardous materials, emissions, debris, emergency-response needs, noise and vibration, effects on water and surrounding land, and risks to nearby communities. The NPRM does not explain how these risks would be identified and addressed when those action-specific review and consultation requirements no longer apply to the FAA licensing decision.

These concerns are particularly significant because commercial space operations are rapidly evolving and expanding, and Executive Order 14335 calls for substantially increased launch frequency and novel space activities by 2030. Although eliminating review may reduce some near-term applicant costs and approval time, durable space transportation infrastructure depends on identifying impacts before substantial investments are made. If safety or environmental impacts are identified only after licensing, construction, or operations begin, addressing them may require operational restrictions, facility modifications, remediation, or other corrective action that adds costs and delays. The NPRM does not quantify its anticipated savings or evaluate these longer-term costs and risks.

AICA’s Recommendation: Withdraw the General Waiver and Preserve Protections for Public Health, Safety, and Property

Consistent with Executive Order 14335, AICA recommends that FAA withdraw the proposed General Waiver provision and pursue licensing efficiencies without broadly removing safeguards for public health, safety, property, communities, and environmental resources. To determine whether an alternative approach would impose the “least burden on society,” FAA should consider applicant savings alongside costs and responsibilities for State, local, and Tribal governments and affected communities, including longer-term costs when impacts are not identified until after approval.

If FAA continues to consider waivers, it should establish nationally consistent eligibility criteria and procedural safeguards while retaining site- and operation-specific determinations. Specifically, FAA should:

- Limit each waiver to a specific site, proposed operation, and licensing decision;
- Provide public notice of each legal safeguard proposed for removal and demonstrate that its removal would not weaken protections for public health, safety, property, communities, or environmental resources;
- Exclude new sites, major expansions, and materially changed operations;
- Establish enforceable operating limits based on the site and proposed operation, including limits addressing operational frequency, operating hours, and noise and vibration where relevant
- Evaluate applicant savings together with the costs and responsibilities that may fall on State, local, and Tribal governments and affected communities and the longer-term costs of impacts identified only after approval;
- Notify affected Tribes, State and local governments, and communities and meaningfully consider the information and concerns they submit;
- Require monitoring and mandatory reassessment when operations, conditions, or impacts change;
- Reduce duplication through coordinated agency review and reliance on current environmental analyses that fully cover the proposed operation.

This approach would advance the Executive Order's licensing-efficiency objectives while supporting safe, sustainable, and durable commercial space infrastructure.

I. Scope and Operation of the Proposed Waiver

Under the proposed General Waiver provision, requirements under 13 federal environmental and preservation laws and their implementing regulations would not apply to launch-site licenses, reentry-site licenses, experimental permits, and launch and reentry vehicle licenses issued or modified after the final rule's effective date.

As AICA understands the proposal, the waiver could also extend to license renewals and modifications, airspace closures, certain Airport Layout Plan approvals, and leases of federal land. The proposed General Waiver provision describes the related actions covered by the waiver as "including, but not limited to" the four listed categories. The proposal therefore does not appear to define the waiver's full reach.

The NPRM states that the identified requirements "may not be necessary in some or all licensing circumstances." The proposed regulation would provide more broadly that those requirements "shall not apply" to the covered licenses and permits. AICA understands the proposed text to make the identified requirements inapplicable across the covered licenses and permits, without a process for determining, based on a specific site and licensing decision, whether removing a safeguard would weaken protections for public health, safety, or property.

The proposal also does not appear to distinguish between an established operation that remains within previously reviewed limits and:

- Development of a new launch or reentry site;
- Major expansion of an existing site;
- A material increase in launch or reentry frequency;
- Introduction of a new vehicle, propulsion system, or fuel;
- Adoption of a new or changed trajectory;
- Expansion of nighttime operations; or
- Construction or land disturbance affecting communities or sensitive resources.

The need for environmental review and consultation depends on the location, proposed operation, affected communities, and surrounding environment. Relevant conditions may include:

- Proximity to residential communities, schools, hospitals, Tribal lands, historic properties, and other sensitive locations;
- Launch and reentry trajectories and the communities beneath them;
- Interaction with the National Airspace System, including airspace closures, debris-hazard areas, emergency procedures, and effects on other airspace users;
- The number, frequency, timing, and concentration of operations, including nighttime operations, existing background noise, and the anticipated noise and vibration affecting surrounding communities;
- Vehicle type, propulsion system, fuel, emissions, debris, and accident-response requirements;
- Effects on air, water, wetlands, coastal areas, wildlife, marine resources, and historic properties;
- Construction, land disturbance, dredging, and infrastructure development; and
- The combined effects of multiple operators or expanding operations at the same site.

These conditions may change as commercial space technologies, operating models, and launch frequency evolve. The proposal does not provide for a site- or action-specific determination of whether removing a safeguard would weaken protections for public health, safety, or property. Instead, it would make the identified requirements inapplicable across the covered licenses and permits.

II. Licensing Efficiency and Protection from Harm

AICA recognizes the value of federal reviews that are coordinated, timely, and free from unnecessary duplication. The NPRM identifies situations in which FAA and another federal agency may review related aspects of the same commercial space activity. This concern could support designating a lead agency, conducting reviews concurrently, sharing technical information, and establishing clear schedules.

The NPRM identifies reduced applicant costs, shorter review times, and less duplication as reasons for the proposal. It does not demonstrate that achieving those efficiencies requires making the underlying legal requirements inapplicable rather than improving coordination among the agencies responsible for conducting the reviews.

Under the current process, an FAA licensing action does not necessarily require preparation of an environmental assessment or environmental impact statement. A categorical exclusion may be used when an action falls within an established category and presents no extraordinary circumstances, but that determination is made for the particular action. The proposed General Waiver provision would instead make NEPA requirements inapplicable to covered licenses and permits without first considering the particular site, proposed operation, scale of activity, or potential impacts.

Environmental review and consultation help prevent or reduce harm by identifying affected communities and resources, evaluating potential consequences and alternatives, and developing mitigation before decisions are made and operations are approved. They also incorporate information from agencies, Tribes, State and local governments, and the public while less harmful or less costly alternatives remain available.

These reviews can also provide information relevant to public safety. Depending on the site and proposed operation, they may identify hazardous-material risks, emergency-response needs, potential debris effects, emissions, water contamination, anticipated noise and vibration affecting surrounding communities, effects on surrounding land, and risks to nearby communities. This information may become particularly important as commercial space technologies and operations evolve. A license modification, increased launch frequency, new vehicle or fuel, changed trajectory, expanded operating hours, or enlarged site may create impacts that were not evaluated when the original facility or operation was approved. If action-specific review and consultation requirements no longer apply, relevant safety and property risks could remain unidentified before approval.

FAA explains that another federal agency may still be required to conduct an environmental review even if FAA does not conduct a separate NEPA review for its licensing action. This presents an opportunity for the agencies to coordinate their reviews, share information, and designate a lead agency. When another agency's current environmental review fully evaluates the site, proposed operation, and licensing decision, FAA could rely on that review and limit its own analysis to aspects of the operation that were not already evaluated. When multiple reviews are required, the agencies could coordinate in advance, divide responsibilities, share information, and conduct their reviews concurrently. Coordination should also address the interaction of launch and reentry operations with the National Airspace System, including trajectories, debris-hazard areas, airspace closures, emergency procedures, and effects on other airspace users. This approach could reduce duplication and delay while preserving the safeguards that help identify and prevent harm.

III. Unquantified Costs and Risks of Eliminating Review

A. Costs Not Evaluated in the NPRM

Section IV.A of the NPRM states that regulations should impose the "least burden on society" and that the benefits of a regulation should justify its costs. The NPRM predicts significant reductions in applicant costs and review time but does not quantify those savings. It also does not evaluate two potential consequences of eliminating FAA's action-specific environmental review: the cost to other governmental entities and affected communities if they attempt to perform work that would otherwise occur through federal review, and the costs and harm that may result if that work is not performed.

First, State, local, or Tribal governments or affected communities may attempt to replace functions that would otherwise occur through the federal review process. The resulting costs may include:

- Collecting baseline environmental information;
- Conducting technical analysis;
- Evaluating effects on communities and environmental resources;
- Consulting technical experts;
- Reviewing proposed mitigation; and
- Monitoring approved operations.

Second, if these review functions are not performed, potential impacts may remain unidentified and unaddressed when an operation is approved. The resulting costs and harm may include:

- Emergency planning and response;
- Noise, vibration, emissions, water-quality impacts, or hazardous-material exposure;
- Impacts on property and community use;
- Damage to cultural, historic, coastal, marine, and natural resources; and
- The added cost of correcting problems only after operations begin.

B. Unfunded Mandates and Federalism

Section IV.D of the NPRM concludes that the proposal would not produce an unfunded mandate of $193 million or more in any one year. Section V.A also concludes that the proposal would not substantially affect the States, the relationship between the Federal Government and the States, or the distribution of governmental responsibilities.

Neither conclusion addresses whether eliminating federal review could leave State, local, or Tribal governments with additional responsibilities or costs for obtaining information, monitoring operations, planning for emergencies, responding to impacts, or correcting problems after operations begin, even if those costs fall below the $193 million threshold. FAA should consider these effects when evaluating the proposal's total costs and benefits, its burden on society, and its practical effect on governmental responsibilities.

A balanced evaluation should quantify the expected applicant savings and separately consider the costs of replacing eliminated review functions and the costs and harm that may result when those functions are not performed.

C. Environmental Analysis of the Final Rule

Section IV.G of the NPRM applies a categorical exclusion to publication of the proposed rule on the ground that the proposal is not yet operative and therefore has no present environmental effects. FAA also states that the appropriate level of environmental analysis will be determined at the final-rule stage. The categorical exclusion applied to publication of the NPRM does not resolve AICA's concern about the environmental analysis conducted before issuance of a final rule or the loss of action-specific NEPA determinations for later licensing actions. AICA therefore recommends that FAA evaluate the reasonably foreseeable environmental consequences of the General Waiver provision before issuing a final rule.

That evaluation should address whether removing environmental review and consultation from the covered licensing actions could allow impacts to go unidentified or unmitigated. It should also consider the proposal's nationwide reach, its application to differently situated sites, the potential for new or expanded operations, rapidly evolving vehicles and fuels, increased launch frequency, changed trajectories, sensitive communities and resources, and cumulative activity at individual sites.

If FAA proposes to rely on a categorical exclusion for the final rule, it should explain why these circumstances do not present the potential for significant environmental effects or otherwise warrant preparation of an environmental assessment or environmental impact statement. The conclusion should be supported by an analysis of the final rule's operation and foreseeable consequences, rather than solely by characterizing the NPRM as procedural.

IV. Safeguards for Any Site-Specific Waiver

AICA supports a nationally consistent framework governing when waivers may be considered, but the decision to remove a particular safeguard should be based on the site, proposed operation, prior environmental review, and potential impacts. Consistent national standards would provide applicants with a predictable process while allowing FAA to account for material differences among sites and operations. If FAA continues to consider waivers, the national framework should include the following safeguards:

1. A Specific Site and Licensing Decision

A waiver should be limited to a particular site, proposed operation, and licensing decision. It should not automatically cover future expansions, materially changed operations, or unrelated approvals.

2. Public Disclosure of Safeguards Proposed for Removal

FAA should not remove a legal safeguard from the approval process unless it first demonstrates, based on the conditions at the site and the characteristics of the proposed operation, that its removal would not weaken protections for public health, safety, property, communities, or environmental resources. Before granting a waiver, FAA should publicly identify each safeguard proposed for removal and provide the factual and technical basis for that determination. Reducing regulatory delay, by itself, should not be treated as sufficient justification for removing a safeguard.

3. Exclusion of Materially New or Changed Operations

The waiver process should not apply to new sites, major expansions, new or materially changed trajectories, substantial increases in launch frequency, new vehicles or fuels, expanded nighttime operations, or activities with previously unevaluated effects on communities or sensitive resources.

4. Reliance on Current Environmental Review

When another agency's current environmental review fully evaluates the site, proposed operation, and licensing decision, FAA could rely on that review. FAA could limit its own analysis to aspects of the operation that were not already evaluated. When multiple agency reviews are required, the agencies could coordinate in advance, divide responsibilities, share information, and conduct their reviews concurrently.

5. Evaluation of Broader and Longer-Term Costs

Before granting a waiver, FAA should evaluate whether it would impose the least burden on society. The evaluation should consider anticipated applicant savings together with any additional information, monitoring, planning, response, or corrective-action costs that may fall on State, local, or Tribal governments and affected communities. It should also consider longer-term costs that may arise when impacts are identified only after licensing, construction, or operations begin.

6. Enforceable Operating Limits

Each waiver should include enforceable operating limits sufficient to keep the approved operation within the conditions evaluated by FAA. As applicable, those limits should address launch frequency, operating hours, trajectories, vehicles, fuels, emissions, noise and vibration, construction, land disturbance, and mitigation. Operations exceeding those limits should require additional review and a new FAA determination before proceeding.

7. Notice to Affected Governments and Communities

Before granting a waiver, FAA should notify affected Tribes, State and local governments, and communities and provide a meaningful opportunity for them to submit information about location-specific public health, safety, property, community, and environmental conditions. FAA should consider this information before making its decision and publicly explain how the concerns raised were evaluated and addressed.

Separately, at the rulemaking stage, Section V.B of the NPRM states that FAA will identify unique or significant effects on Tribes and engage with affected Tribes as necessary. That evaluation and engagement should occur before FAA issues a final rule that could remove statutory consultation requirements from later licensing actions. FAA should document the information received, explain how it was evaluated, and identify any resulting changes to the proposed rule.

8. Monitoring and Mandatory Reassessment

FAA should require monitoring to determine whether actual operations remain within the conditions supporting the waiver. Monitoring results, incident data, information from affected communities, and experience from actual operations should be used to identify emerging effects, inform future licensing decisions, and refine the nationally consistent waiver criteria as commercial space technologies and operations evolve. Reassessment should be mandatory when operations change, impacts exceed prior assumptions, new information becomes available, or monitoring or incident data indicate that existing protections may no longer be sufficient.

9. A Defined Authorization Period

A waiver should have a defined duration. Before renewing it, FAA should confirm that the site and operation remain within the approved conditions and demonstrate that continuing the waiver would not weaken protections for public health, safety, property, communities, or environmental resources.

V. Responses to Selected FAA Questions

A. Should Applicability Be Limited to Specific Sites?

Yes, but AICA does not recommend making all federal sites, licensed launch or reentry sites, or exclusive-use sites categorically eligible for a waiver. Any waiver should instead be limited to a specifically identified site, proposed operation, and licensing decision. FAA should demonstrate that removing the applicable legal safeguards would not weaken protections for public health, safety, property, communities, or environmental resources.

Federal ownership, an existing site license, or exclusive use should not independently qualify an operation for a waiver. FAA should consider the proposed operation, affected communities and resources, the scope of prior environmental review, and whether the operation remains within previously evaluated and enforceable limits.

B. Do Differently Situated Sites Warrant Different Treatment?

FAA should evaluate each site individually rather than make all sites within a category automatically eligible for a waiver. Relevant differences may include population, land use, existing background noise, anticipated noise and vibration, launch frequency, trajectories, ecology, coastal and marine conditions, cultural resources, Tribal interests, emergency-response capacity, and cumulative activity. FAA should consider these differences when determining whether removing particular legal safeguards would weaken protections for public health, safety, property, communities, or environmental resources.

FAA should therefore neither apply the same waiver across differently situated sites nor treat a site's classification as sufficient grounds for a waiver. Each determination should reflect the conditions, proposed operation, and potential impacts at the particular site.

C. How Have the Identified Laws Reduced Environmental Harm?

The 13 laws serve different purposes. Depending on the law and the proposed action, they may require public disclosure, specialized agency review, consultation, alternatives analysis, permits, operating conditions, mitigation, or monitoring.

A complete evaluation of the proposed waiver should draw on FAA’s licensing records and the records of the federal agencies responsible for administering these laws. Relevant information includes:

- Impacts identified through prior reviews;
- Changes made through alternatives analysis or consultation;
- Permit conditions and mitigation measures;
- Monitoring requirements and results;
- Harm avoided or reduced;
- Agency and Tribal consultation outcomes; and
- Corrective or enforcement actions.

These records could show how the laws have affected past licensing decisions, what harm was identified or avoided, and what could be lost if the associated safeguards are removed.

The NPRM asks members of the public submitting comments in this docket to provide quantifiable technical data showing how the 13 laws have reduced legally cognizable environmental harm. FAA and the federal agencies responsible for administering these laws possess the relevant environmental reviews, consultation records, permits, monitoring data, licensing histories, and technical expertise. These agencies are best positioned to compile the available quantifiable technical data, develop additional analysis where needed, and evaluate how the laws have identified, prevented, or reduced harm. To strengthen the objectivity and public credibility of this analysis, FAA should make the supporting data and methods publicly available and obtain independent peer review through a transparent process. Relevant financial and institutional interests of the reviewers should be disclosed and appropriately managed. Public comments can supplement this record, while the final rule should also reflect a comprehensive technical analysis by the responsible agencies before FAA decides whether to remove any safeguards.

D. Would the Waiver Promote Economic Growth and Expedite Licensing?

This question cannot be evaluated solely by considering applicant savings or faster approvals. The NPRM states that regulations should impose the “least burden on society,” which requires consideration of burdens beyond those incurred by applicants. Executive Order 14335 directs FAA to expedite licensing consistent with applicable law, and FAA’s waiver authority is conditioned on protecting public health and safety, safety of property, and specified national interests. Economic growth and licensing efficiency therefore must be considered together with the potential costs and harm created by making environmental review, consultation, permitting, and mitigation safeguards inapplicable to the covered licensing actions.

The NPRM predicts near-term applicant savings but does not provide a sufficient basis to evaluate the proposal’s net economic effects or determine whether its initial time savings would produce a more efficient overall approval process. It does not quantify expected reductions in cost or review time. It also does not evaluate the additional costs or responsibilities that may fall on affected communities or State, local, and Tribal governments, or the longer-term costs of addressing impacts identified only after approval.

Eliminating review may defer rather than eliminate costs and delays. Impacts that are not identified before approval may require emergency response, operational changes, mitigation, remediation, or corrective action after operations begin. A meaningful economic analysis should account for these consequences rather than treating reduced applicant review costs as the full economic effect of the proposal.

The safeguards described in Section IV provide a more balanced means of implementing the Executive Order. Limiting waivers to specific sites and licensing decisions, coordinating agency reviews, evaluating broader and longer-term costs, establishing enforceable operating limits, and requiring monitoring and reassessment could reduce duplication and delay while continuing to identify and prevent harm.

E. Would the Waiver Strengthen and Expand Space Transportation Infrastructure?

Although the waiver may expedite some approvals and support near-term infrastructure expansion, the NPRM does not evaluate whether those benefits would outweigh the costs and risks that may arise when impacts are not identified before licensing, construction, or operations begin. As discussed in Section V.D of the NPRM, those broader consequences must be considered when determining whether the proposal would strengthen space transportation infrastructure.

Strong space transportation infrastructure depends not only on the speed of development, but also on informed siting, protection of public health and property, coordination with affected governments, effective mitigation, and the ability to address risks before substantial investments are made. If impacts emerge after approval, they may require operational restrictions, facility modifications, remediation, or other corrective action that increases costs and delays.

The safeguards described in Section IV could preserve the efficiency benefits of coordinated review while supporting more durable infrastructure. They would reduce duplication where prior reviews remain applicable and retain site-specific review, enforceable operating limits, monitoring, and reassessment where additional protections are needed.

VI. Conclusion

AICA's opposition to the proposed General Waiver provision is not opposition to a more efficient, coordinated, and predictable commercial space licensing process. Consistent with Executive Order 14335 and FAA's waiver authority, licensing efficiencies must be pursued while continuing to protect public health and safety, safety of property, and specified national interests.

The current record does not provide a law-by-law, site-specific, or operation-specific analysis demonstrating how the proposed General Waiver provision, covering 13 laws and multiple types of approvals across differently situated sites, satisfies that condition. Although the proposal would not eliminate all FAA launch-safety requirements, it would make action-specific environmental review and consultation requirements inapplicable to covered FAA licensing decisions. Those reviews can identify site-specific risks and impacts relevant to public health, safety, property, communities, and environmental resources. The NPRM does not explain how that information would be obtained and evaluated when no other federal agency conducts a review that fully covers the site, proposed operation, and licensing decision. It also does not evaluate whether the resulting responsibilities and costs would fall on State, local, or Tribal governments or affected communities.

The proposal does not establish site-specific eligibility criteria, distinguish routine renewals from materially new or expanded operations, define the waiver's full reach, or require enforceable limits, monitoring, and reassessment. Its analysis of the "least burden on society" focuses on anticipated applicant savings without evaluating costs and responsibilities for governmental entities and affected communities or the longer-term costs of addressing impacts identified only after approval. Durable space transportation infrastructure depends on identifying and preventing harm before substantial investments are made, thereby avoiding later operational restrictions, facility modifications, remediation, and corrective action. Before issuing a final rule, FAA should complete the environmental, federalism, Tribal, and economic analyses necessary to evaluate these consequences.

AICA therefore recommends that FAA withdraw the proposed General Waiver provision. Licensing efficiency should be achieved without broadly removing the safeguards needed to protect public health, safety, property, communities, and environmental resources. If FAA continues to consider waivers, each waiver should be limited to a specific site, proposed operation, and licensing decision and should incorporate the safeguards described in Section IV. FAA should not remove a legal safeguard unless it first demonstrates, based on the particular site and proposed operation, that its removal would not weaken those protections. Each waiver should include enforceable operating limits sufficient to keep operations within the conditions evaluated by FAA, including limits addressing operational frequency, operating hours, and noise and vibration where relevant. It should also require monitoring and mandatory reassessment when operations or impacts change.

Thank you for your consideration of these comments.

Sincerely,

Darlene Yaplee
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Aviation-Impacted Communities Alliance (AICA)