

DOT Request for Information on Advanced Air Mobility (AAM)

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This comment is in addition to any previous comment.

1. This comment supports Aviation-Impacted Communities Alliance, Comment ID [DOT-OST-2023-0079-0104](#) and Studio City for Quiet Skies, Comment ID [DOT-OST-2023-0079-0021](#).

2. State and local governments, not the federal government, should control AAM

- a. airspace lease laws,
- b. aviation easement laws,
- c. laws that vest landowners with air rights,
- d. nuisance, privacy, trespassing, licensing, insurance requirements, land use, zoning, police operations, and operating unmanned aircraft under the influence or other policing laws.

3. FAA must conduct rigorous, transparent, and independent research on the potential negative impacts of AAM including:

- National Academies:
 - peer-reviewed report to determine a measurement system of the expected aviation noise impacts and annoyance on the environment
 - study of the Public Health Impacts
 - cost benefit analysis of AAM
- Studies of the:
 - Environmental Impacts.
 - Governance options and implications.
 - Communities' Security and Privacy Concerns.
 - Noise exposure and multiple metrics contours (DNL, N-above Lmax, T-above L-max) using AAM early pilot implementation data.

4. The evaluation and decision making for AAM environmental impacts should represent the layperson's lived experience by using the metric N-Above in Lmax bands, some reasonable threshold(s), ambient noise consideration, and total noise and visual impacts of ALL current aviation impacts from multiple:

- airports/helipads/drone launching and landing pads
- vehicle types,
- flight paths - procedure or vector,
- specialized vehicle operations (e.g., hovering).

Noise metrics and thresholds should penalize sensitive time of day occurrences using multiple time blocks and must reflect local ambient noise environments.

5. Changes to airspace design and/or new AAM routes must be published, must require an environmental review, and cannot use a Categorical Exclusion.

6. Do not use the NextGen implementation as a best practice model for AAM. NextGen excluded the community as a key stakeholder and DNL did not reflect NextGen impacts.

7. Do not use the inadequate FAA's 2016 Community Involvement Manual (CIM) for AAM Community Engagement. The CIM has not delivered on its assertion "commitment to inform and involve the public and to give meaningful consideration to community concerns and views as the FAA makes aviation decisions that affect them".

8. Include Community as a key stakeholder in all high-level activities of the AAM Integrated Master Schedule versus Community only after Phase 5: "Post-implementation".

9. Abandon the community engagement model of "Decide, announce, defend" (TR NEWS 2020) and instead practice "...meaningful dialogue to address negative impacts of past FAA actions and of future FAA actions before decisions are made." "Formal research on airport public involvement, research on other transportation modes, and research on other institutions that deal with the public all confirm that the "we vs. they" or "decide, announce, defend" approach has failed and must transition to strengthened two-way communications to have a better chance for long-term success.

10. Innovate 28 (I28) should require that "collecting data" include environmental impacts, the type of AAM uses, and community engagement reports. For example, monitoring reports for counts of AAM events using Lmax bands in 5dB increments between 45dB and 80dB and T-Above data capturing the duration of AAM "hovering" events. Reports on community engagement activities should include the type of outreach, number and type of attendees, timing relative to the decision-making process, feedback on the laymen's experience of noise and visual impacts. Information on the type of AAM uses should include the number and percent of operations for transporting non-medical passengers, medical personnel and patients, goods, etc. Given that AAM is an emerging aviation ecosystem, detailed data is needed for I28 implementations to inform advanced regulations and to create a cost and benefits profile.

11. Require at least one Community member to serve as an Environmental representative on the FAA Advanced Aviation Advisory Committee. Such Community member, or direct relatives, must not be affiliated with, receive funds from, or provide services to the FAA or aviation industry or aviation industry consultants.

12. Set up a "Questions and Answers" task force in 2023, with adequate representation of potentially impacted communities, to identify and answer the public's AAM concerns.

13. Regulations should provide strict operational limits during sensitive hours for flyovers over residences and should be governed by local noise ordinances e.g., no package delivery permitted between 6pm and 8am.

14. Address the issues of the Scorecard on FAA Community Engagement that are relevant to AAM presented at the ANE Symposium 2023.