

FAA Community Engagement Scorecard

Is the FAA's Community Engagement Improving?

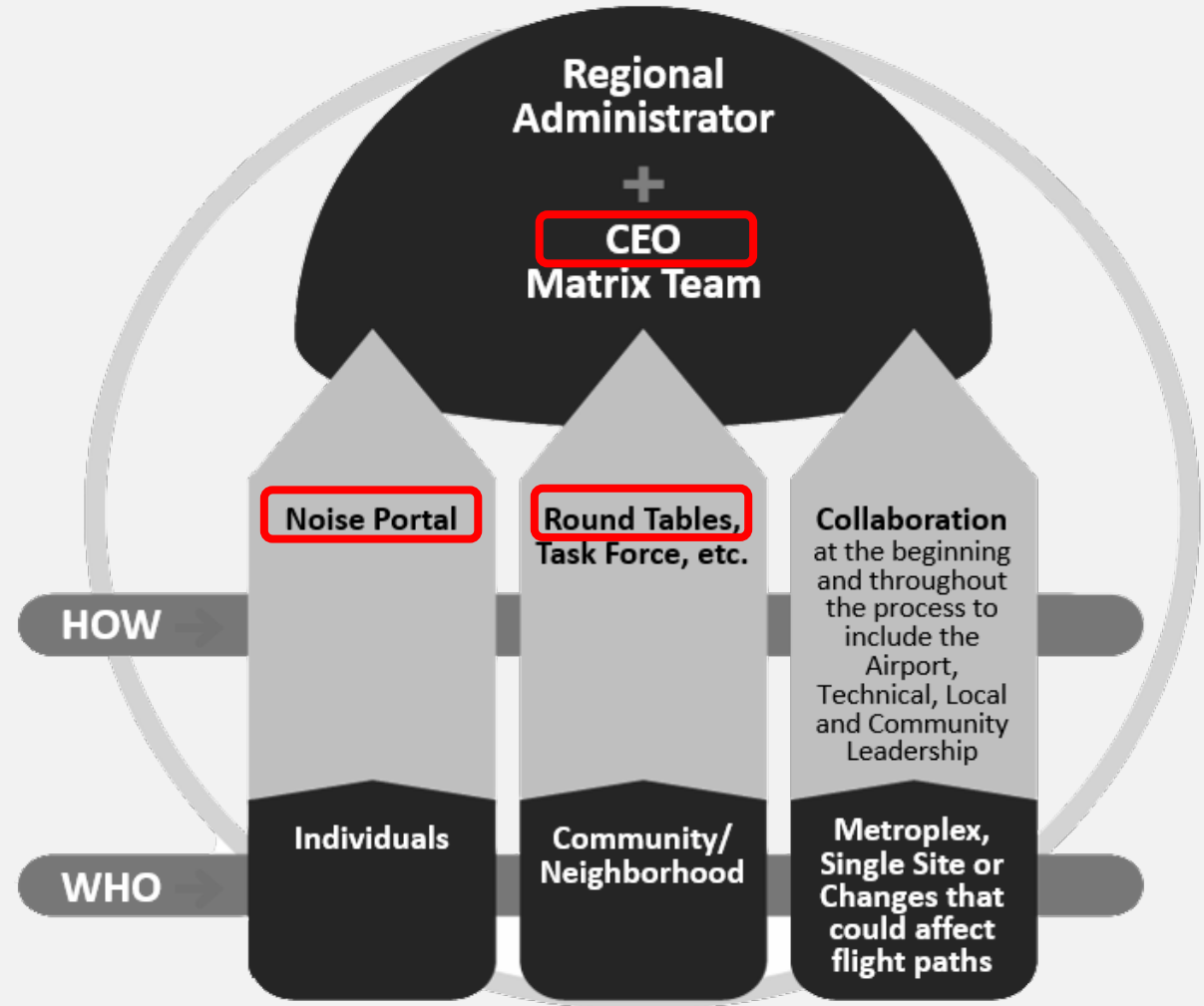
Darlene Yaplee | ANE Symposium 2023

Co-Founder of Aviation-Impacted Communities Alliance

Background: FAA Community Engagement

Over the last few years, the FAA has made efforts to improve its community engagement strategy by implementing tools and programs to address community engagement concerns.

FAA published the Community Involvement Manual and Desk Guide and on-boarded all Chief Engagement Officers (CEO) 2019-2020.



Source: FAA (Modified)

FAA Community Engagement Scorecard (FAACES)

- **The Project**

Solicit and summarize feedback from community groups on their experience with FAA community engagement for local and national topics in 2020, 2021, and 2022 compared to pre-2020. Has there been improvement from the perspective of communities?

---Future FAACES report, [link](#).

- **The Outcome**

Use responses on FAA's community engagement to identify response themes and suggest recommendations

2. Community Engagement Questions: National Topics
FAA National Topics Engagement in 2020, 2021, and 2022

How much has the FAA improved its community engagement on national topics during 2020, 2021, and 2022, compared to before 2020?

It has gotten much worse
 It has gotten somewhat worse
 No improvement
 Some improvement
 Much improved
 No engagement
 Unknown

Does the FAA include adequate community representation for environmental concerns on national topics? Please identify the efforts that your community group is familiar with and its assessment of FAA's community representation:

	Not Adequate	Adequate	Not Familiar
NextGen Advisory Committee (NAC)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Noise Policy Review Process (FAA's follow up to NES)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Advanced Aviation Advisory Committee (AAAC)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Research, Engineering, and Development Advisory Committee (REDAC)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National Parks Overflights Advisory Group (NPOAG)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

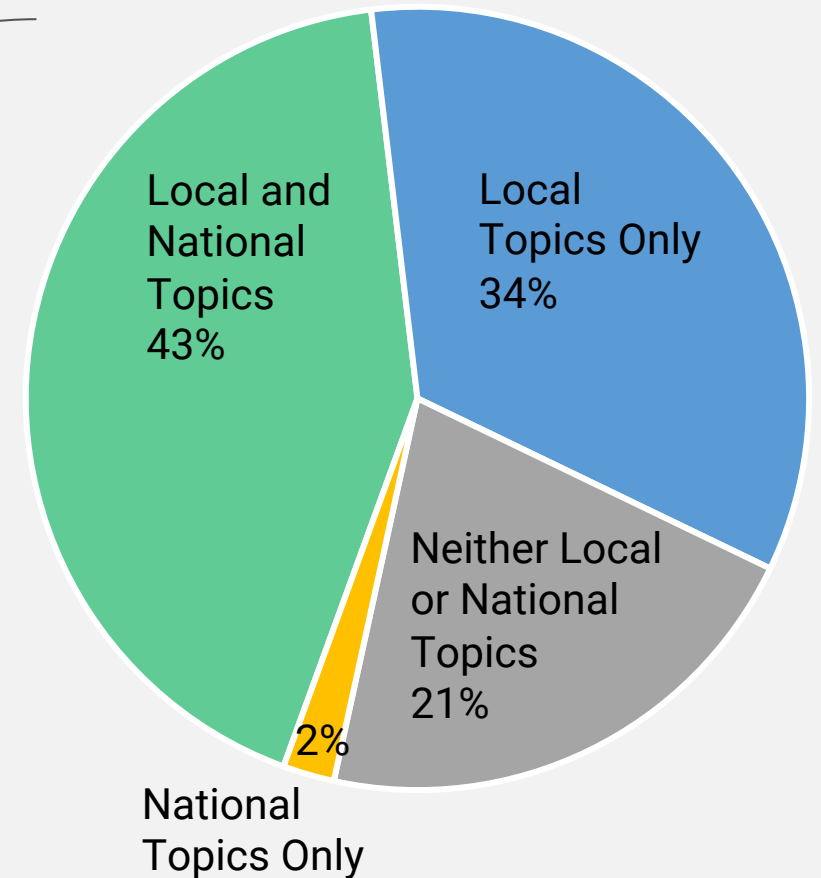
Has the FAA Community Engagement Officer (who also has the designation of Regional Ombudsman) improved community engagement on ***national topics*** for your community group?

Yes
 No
 Not applicable

Comments (optional)

Survey Context

- **Input via an On-line Form**
- **Outreach to 77 Community Groups, 61% Response Rate**
 - Outreach to communities that make up the Aviation-Impacted Communities Alliance (AICA)
 - One participant per community group
 - Engaged with the FAA during 2020-2022
 - Does not include experiences with FAA community engagement before 2020
- **FAA Survey Precedent**
 - FAA Reauthorization Act of 2018 - Section 176, Community Involvement Review 2020
 - Air Traffic Organization (ATO) internal survey
- **FAACES includes FAA Community Engagement for Local and National Topics**

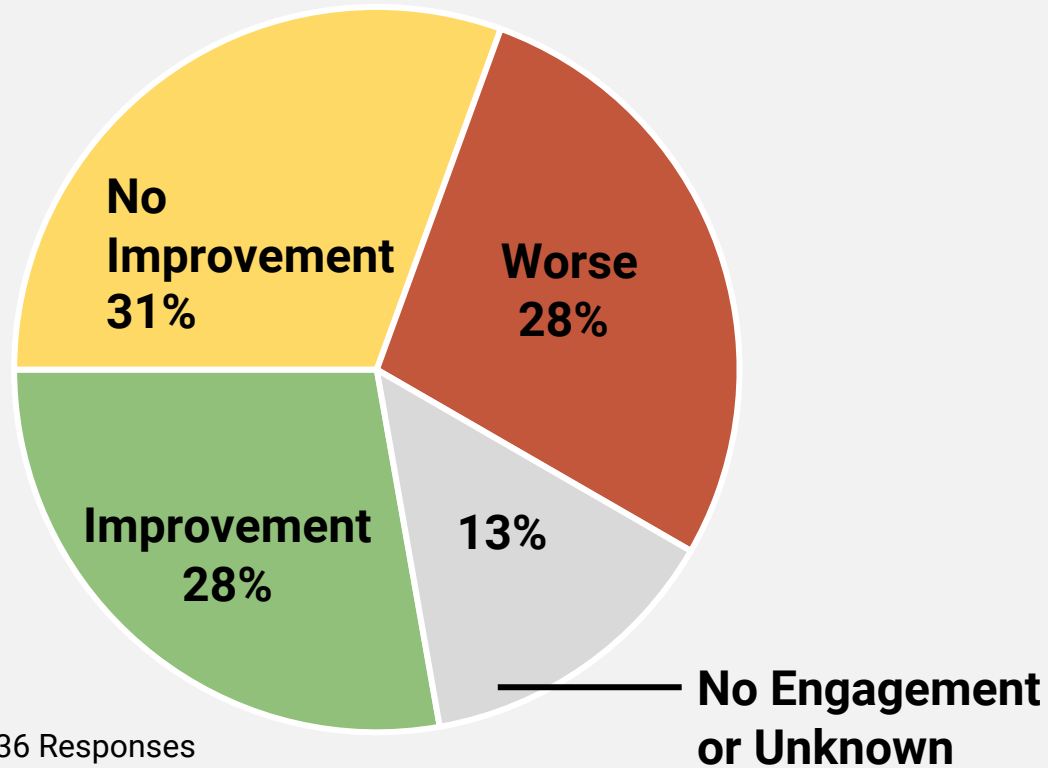


FAACES Survey Summation Highlights

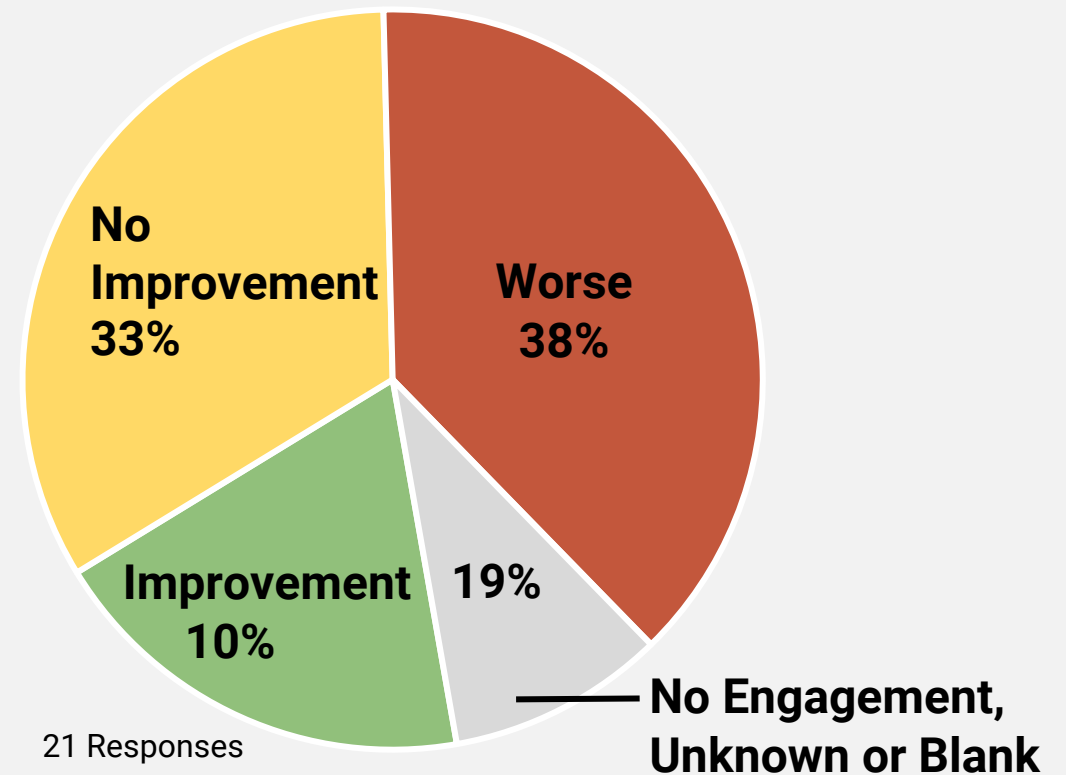
- **Local topics**
 - For example: new or changed procedures and noise complaints
- **National topics**
 - For example: FAA advisory committees and the FAA Noise Policy Review process

How Much Has the FAA Improved Its Community Engagement During 2020-2022, Compared to Before 2020?

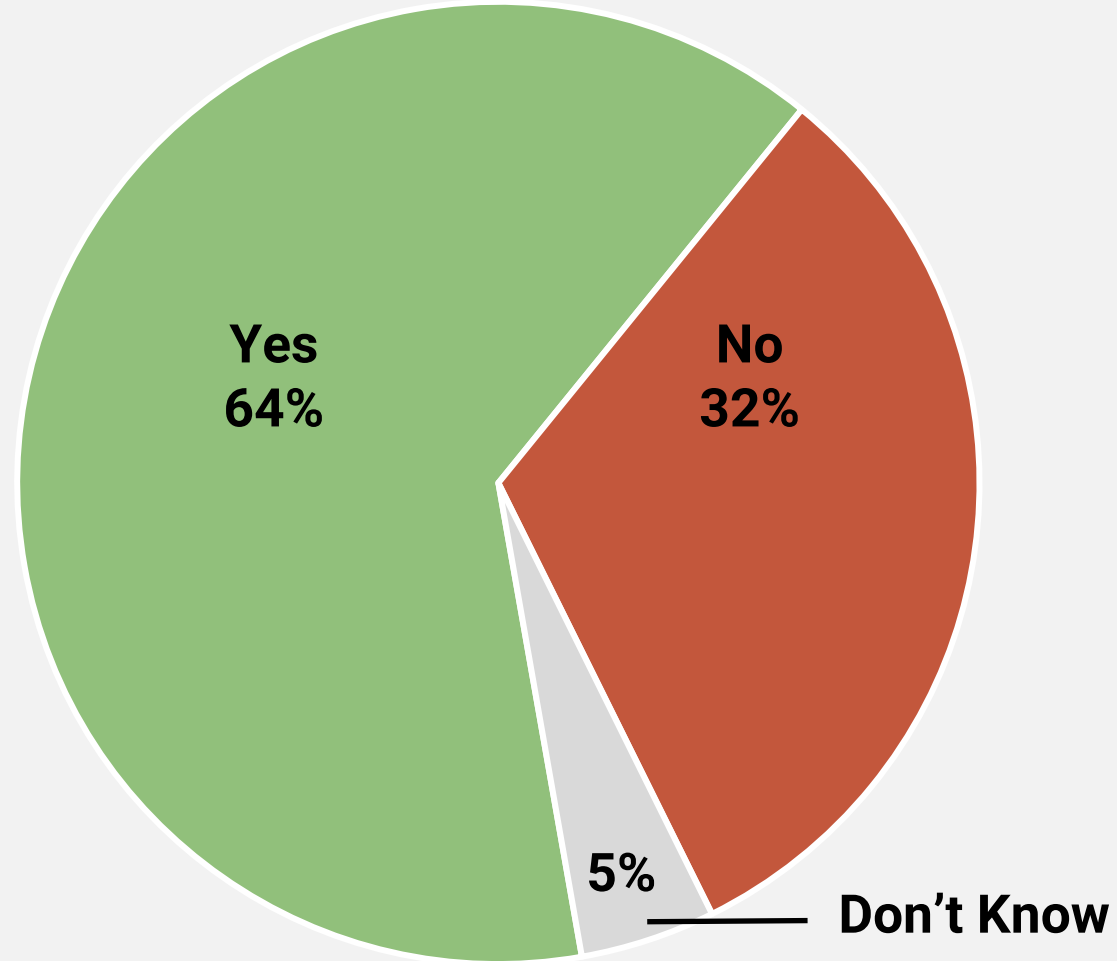
LOCAL TOPICS



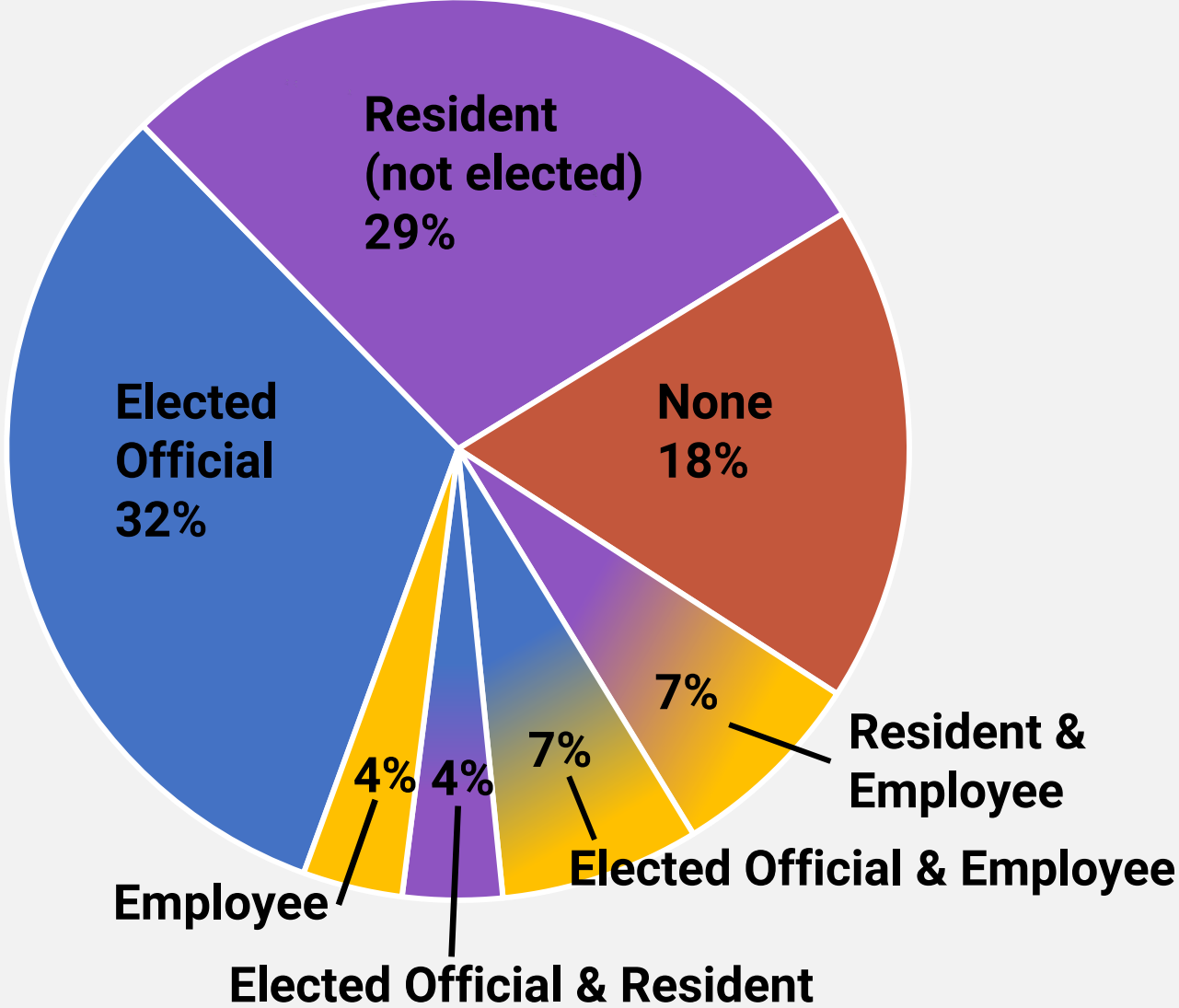
NATIONAL TOPICS



Is there a Roundtable (or Similar Community Advisory Body) Affiliated With the Primary Airport?

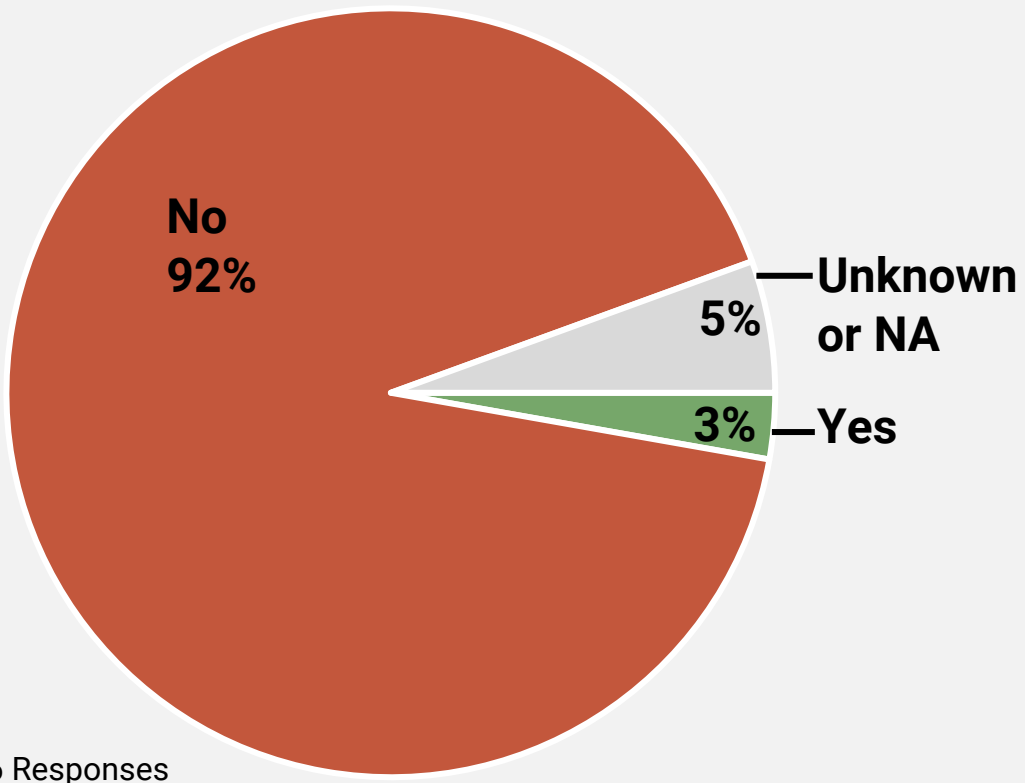


Who is Representing Your Community Group on the Roundtable?

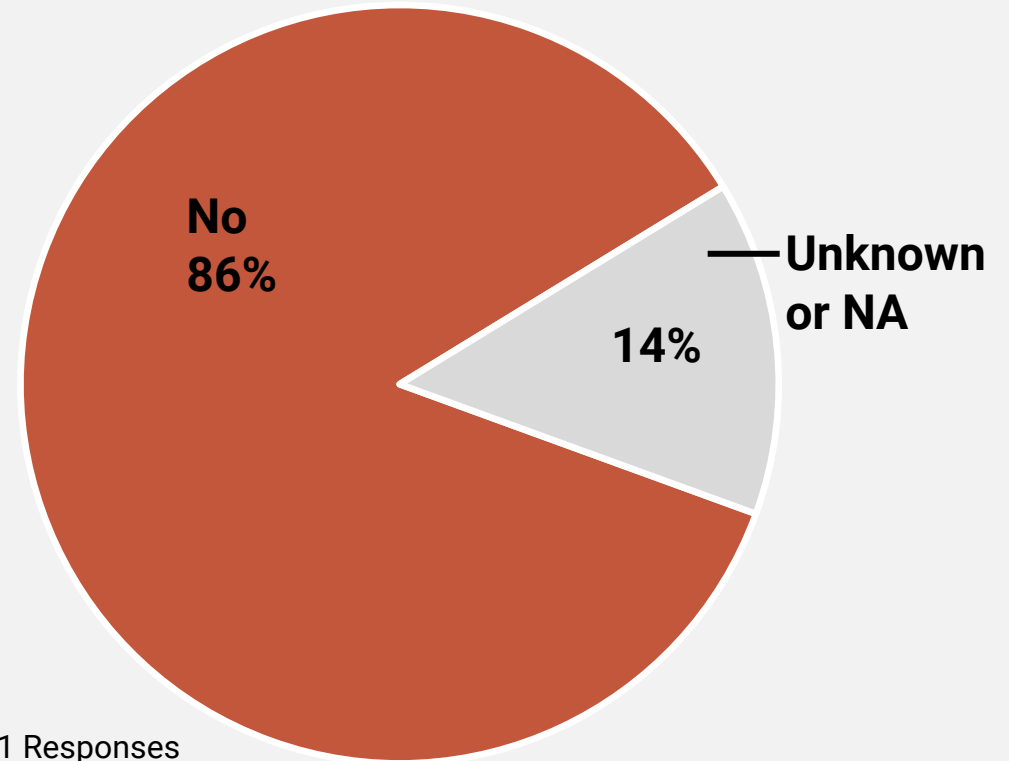


Has the FAA Community Engagement Officer/Ombudsman Improved Community Engagement?

LOCAL TOPICS

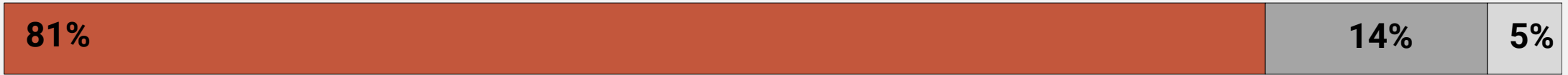


NATIONAL TOPICS



Do the Following National Programs Improve Community Engagement?

FAA Noise Portal



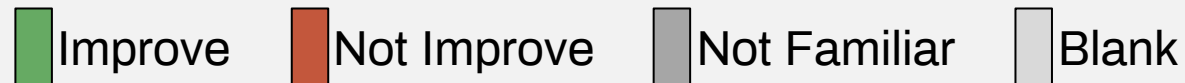
FAA Chatbot



Webinar about the Neighborhood Environmental Survey (NES)

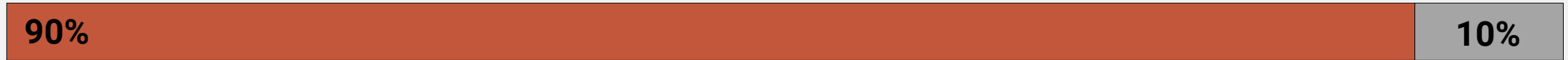


FAA notices in the Federal Register (e.g., NES)



Does the FAA Include Adequate Community Representation?

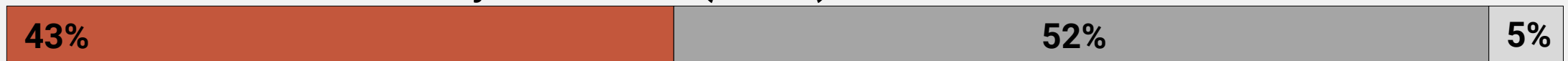
NextGen Advisory Committee (NAC)



Noise Policy Review Process (FAA's follow up to NES)



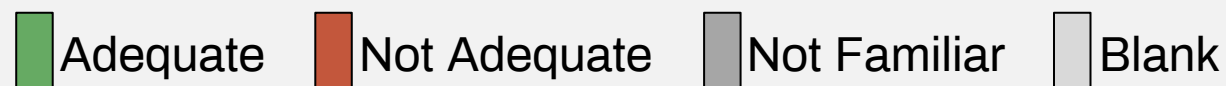
Advanced Aviation Advisory Committee (AAAC)



Research, Engineering, and Development Advisory Committee (REDAC)



National Parks Overflights Advisory Group (NPOAG)



FAACES Insights

Survey Response Themes and Recommendations

Insight #1: Beyond Safety & Efficiency

Imbalance Between Aviation Safety & Efficiency and Environmental Impacts

SURVEY RESPONSE THEME

- “This mission [safest and most efficient] also includes addressing the environmental impacts of aviation, such as climate change, local air quality, and noise.” Kevin Walsh, FAA Director of Office of Environment and Energy, 2022
- “Congress relieved FAA of responsibility for promoting civil aviation in 1996, yet no changes to regulatory goals.” Fidell and Mestre, 2021
- Under weighting of environmental impacts -- citizen concerns are not a priority nor addressed sufficiently
- Limited FAA organizational structure, focus and resources to address environmental

Elevate the Priority of Environmental Impacts

RECOMMENDATION

- Elevate the importance of environmental impacts (noise, health, and emissions) as a co-equal priority to efficiency and restructure FAA organization, focus, and resources accordingly

Insight #2: FAA Interpretations are Limited

Constrained by DNL 65

SURVEY RESPONSE THEME

- Community engagement is constrained because FAA's interpretations are limited to the DNL 65 threshold for Significant Impact

Update FAA Interpretations and Processes

RECOMMENDATION

- Implement updated interpretations, processes, and policies to address community concerns and the true impacts for people on the ground e.g., DNL 65 as Significant Impact, NEPA, NextGen impacts, etc.
- Comply with ASNA: 1) a single system, not a single metric and 2) surveyed reactions of people (Note: NES survey data showed more people are highly annoyed than every before over the entire range of noise levels)

Insight #3: Communities Not Co-Equal Stakeholders

**Not a Co-Equal, Communities
Are Not Key Stakeholders**

SURVEY RESPONSE THEME

- Adversely affected communities are not co-equal with other key external stakeholders
- Not represented, underrepresented, or questionably represented on FAA advisory committees and key initiatives e.g., the FAA Noise Policy Review - FAA/FMCS Interagency Agreement (2021)

**Recognize Community as
Co-Equal Key Stakeholder**

RECOMMENDATION

- Regard communities and their interests and engagement with FAA as co-equal with other key stakeholders e.g., FAA Noise Policy Review process, FAA advisory committees such as NAC, and FAA's interpretations/policies/practices

Insight #4: Ensure FAA Accountability for Mitigations

FAA Not Set Up for Problem Solving

SURVEY RESPONSE THEME

- FAA recognizes that NextGen increased the concentration and number of flights over certain communities but disowns the responsibility for the mitigation
- After creating the problem with e.g., NextGen, the FAA expects the community to propose mitigations
- No clear FAA person is accountable for problem solving
- Current policies and processes restrict problem solving and instead the FAA focuses on the outcome of “understanding and acceptance”

Focus on Mitigation Actions and Strategies

RECOMMENDATION

- FAA to propose and implement actions and strategies for mitigation, e.g. increased concentration and number of flights over certain communities
- FAA is uniquely qualified
- FAA to engage in meaningful dialogue to address negative impacts – past and future before decisions are made versus “community understanding and acceptance”

Insight #5: Need for Meaningful Collaboration

Deficient Collaboration Including Ombudsman, Noise Portal, and Chatbot

SURVEY RESPONSE THEME

- Few examples of collaboration: corner cases, limited repeatability
- Insufficient early FAA collaboration on procedures, policies, and programs so input can be incorporated
- What is not sufficient FAA collaboration:
 - A presentation without dialogue
 - Focus on understanding and acceptance
 - Shared information on impacts that is not understandable and misleading
 - Not notified and engaged up front

Provide Sufficient Dialogue and Collaboration

RECOMMENDATION

- “Community involvement is the process of engaging in dialogue and collaboration with communities affected by FAA actions” FAA CI Manual 2016
- Provide early notification for upcoming procedure changes to help build community trust
- Implement dialogue and collaboration regarding FAA actions, procedures, and programs to address community concerns
- Enhance and improve functionality of tools and programs

Insight #6: Some Communities Are Excluded

Inadequate FAA Engagement With All Highly Impacted Communities

SURVEY RESPONSE THEME

- FAA engagement strategy limited to constituencies with roundtables
- FAA does not engage with all roundtables
- Some roundtables restrict membership regardless of impacts
- Non-roundtable/FAA non-participating roundtable communities are relegated to ineffective tools with no proactive engagement

Fulfill Ombudsman Mandate

RECOMMENDATION

- Implement FAA Reauthorization Act of 2018 - Section 180 regarding Regional Ombudsmen
- Ombudsman/CEOs to engage proactively and collaboratively with communities (roundtable/non-roundtable) such as new procedures being considered, updates on the FAA polices and regulations, feedback on FAA programs, write annual report, and consider recommendations from FAACES project
- Resource sufficiently to ensure appropriate level of problem solving, engagement, and follow up

Insight #7: Build Community Trust

Misalignment and Mistrust

SURVEY RESPONSE THEME

- The FAA commitment to improve community engagement is appreciated
- FAA community engagement reflects misalignment e.g., check the box mindset, insufficient interpretations of Congressional mandates, misleading statements regarding community expectations, over focus on process vs outcomes
- FAA presents not understandable and misrepresented information on impacts
- FAA actions, research, and presentations do not adequately address community concerns
- FAA pursues “community understanding and acceptance” and the community expects meaningful dialogue to address negative impacts – past and future before decisions are made

Build Trust Through Demonstrated Results

RECOMMENDATION

- Obtain feedback on and design actions, research, and presentations that adequately address community concerns
- Provide clear statements for community expectations, understandable/complete impact info, and fulfill mandates
- Minimize focus on process/maximize on outcomes

Support Independent Assessments By GAO

RECOMMENDATION

- GAO to review systemically and biennially FAA community engagement including CEO/Ombudsman

Final Thoughts

Where Have We Seen the **Most Improvement?**


- Higher local improvement (31%) than national improvement (10%)
- New for some communities: local sound insulation program and CEO attending meetings
- Communication - Neighborhood Environmental Survey Webinar (24%)
- A few collaborations with sizeable resourcing by FAA and state agency/roundtables

Where Have We Seen the **Least Improvement?**

- Focus on mitigation actions and strategies
- Updated FAA interpretations and processes
- Community recognized as co-equal stakeholder
- Effectiveness of new tools and programs: CEO/Ombudsman, Noise Portal, and Chatbot
- Building community trust through demonstrated results

APPENDIX

FAACES Insights

SURVEY RESPONSE THEME 	RECOMMENDATION
Imbalance Between Aviation Safety & Efficiency and Environmental Impacts	Elevate the Priority of Environmental Impacts
Constrained by 65 DNL	Update FAA Interpretations and Processes
Not a Co-Equal, Communities Are Not Key Stakeholders	Recognize Community as Co-Equal Key Stakeholder
FAA Not Set Up for Problem Solving	Focus on Mitigation Actions and Strategies
Deficient Collaboration Including Ombudsman, Noise Portal, and Chatbot	Provide Sufficient Dialogue, Collaboration, and Functionality
Inadequate FAA Engagement With All Highly Impacted Communities	Fulfill Ombudsman Mandate
Misalignment and Mistrust	Build Trust Through Demonstrated Results
	Support Independent Assessments by GAO

FAA Community Engagement Resource: Regional Ombudsmen/CEO – FAA Reauthorization Act of 2018

SEC. 180. REGIONAL OMBUDSMEN.

(a) IN GENERAL.—Not later than 1 year after the date of enactment of this Act, with respect to each region of the Federal Aviation Administration, the Regional Administrator for that region shall designate an individual to be the Regional Ombudsman for the region.

(b) REQUIREMENTS.—Each Regional Ombudsman shall—

(1) serve as a regional liaison with the public, including community groups, on issues regarding aircraft noise, pollution, and safety;

(2) make recommendations to the Administrator for the region to address concerns raised by the public and improve the consideration of public comments in decision-making processes; and

(3) be consulted on proposed changes in aircraft operations affecting the region, including arrival and departure routes, in order to minimize environmental impacts, including noise.

- Chief Engagement Officer (CEO) fulfills role as the dedicated Ombudsman per region
- The CEO is a position and the Ombudsman is a role

References

SLIDE 0 – FAA COMMUNITY ENGAGEMENT SCORECARD

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- PBN Blueprint Community Outreach Task Group, June 2016
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SLIDE 1 – BACKGROUND: FAA COMMUNITY ENGAGEMENT

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- Role of the Ombudsman
 - <https://www.faa.gov/faq/what-role-faa-ombudsman>
 - <https://www.faa.gov/faq/what-difference-between-community-engagement-officer-and-regional-ombudsman>
 - FAQ - <https://www.faa.gov/airtraffic/communityengagement/frequently-asked-questions>
 - https://www.faa.gov/about/office_org/headquarters_offices/apl/noise_emissions/airport_aircraft_noise_issues/noise_ombudsman, Dickson letter 1/24/2020
- FAA Community Involvement Manual, February 2016
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 - https://anesymposium.agrc.ucdavis.edu/sites/g/files/dgvnsk3916/files/inline-files/UCD_ANE_Session3_Slides_HowAirportsCanWork_May2022.pdf

SLIDE 2 – FAA COMMUNITY ENGAGEMENT SCORECARD (FAACES)

- Aviation-Impacted Communities, FAACES Project Page, Brief and Future Report, May 2022
 - <https://aviationimpactedcommunities.org/faa-community-engagement-scorecard-faaces-may-2022-current/>
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 - <https://aviationimpactedcommunities.org>

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SLIDE 3 – Survey Context

- FAA Report to Congress on Community Involvement in FAA NextGen Projects Located in Metroplexes, Reauthorization Act of 2018, Section 176, July 1, 2020
 - https://www.faa.gov/sites/faa.gov/files/2021-11/Community_Involvement_in_NextGen_Projects_PL_115-254_Sec176.pdf

SLIDE 12 – Insight #1: Beyond Safety & Efficiency

- Sanford Fidell, Fidell Associates and Vince Mestre, Landrum and Brown, Legislation in the next Congress: Priorities, Perspectives, and Predictions, ANE Symposium, February 2021
 - https://anesymposium.agrc.ucdavis.edu/sites/g/files/dgvnsk3916/files/inline-files/ANES21~1.PPT_0.pdf
- Section 180, FAA Reauthorization Act of 2018
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SLIDE 13 – Insight #2: FAA Interpretations are Limited

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 - <https://www.gao.gov/products/gao-21-103933>
- Aviation Safety and Noise Abatement Act of 1979
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SLIDE 14 – Insight #3: Communities as Co-Equal Stakeholders

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 - <https://aviationimpactedcommunities.org/wp-content/uploads/2022/04/ANR34-14nac-NAC-only.pdf>
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SLIDE 14 – Insight #3: Communities as Co-Equal Stakeholders Cont.

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- Sean Doyle, Senior Aviation Noise Specialist, Summary of Comments from FAA Noise Research Federal Register Notice, Environment and Energy Subcommittee, REDAC, March 2022
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SLIDE 17 – Insight #6: Some Communities Are Excluded

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SLIDE 18 - Insight #7: Build Community Trust

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