Expectations for Communities

- Change evaluated in the context of **FAA priorities and other considerations**:
  - Safety and efficiency priorities, not noise
  - Considerations: airspace constraints; standards; ripple effects on other procedures, flying miles, airport throughput, ATC and pilots workload; noise shifting
- Procedural changes typically **incremental,** not transformative
- Return to same **previous dispersion patterns unlikely**
- **Multi-year** process (4 to 5 years)
- **Actual outcomes may differ** from initial community preferences and objectives
- Even well-developed proposals may not ultimately be implemented

Implications for Communities

- **Technically-viable proposal** must be developed for the FAA to consider change
  - Airport support necessary because Airport sponsors the change with FAA
  - Analytical and technical resources necessary to develop compliant proposal
    - Airport or other sources
- **Early alignment among community stakeholders** is essential
  - Desired outcomes
  - Moving noise

Environmental Review and Community Engagement

- FAA environmental review process mandated by NEPA (National Environmental Policy Act)

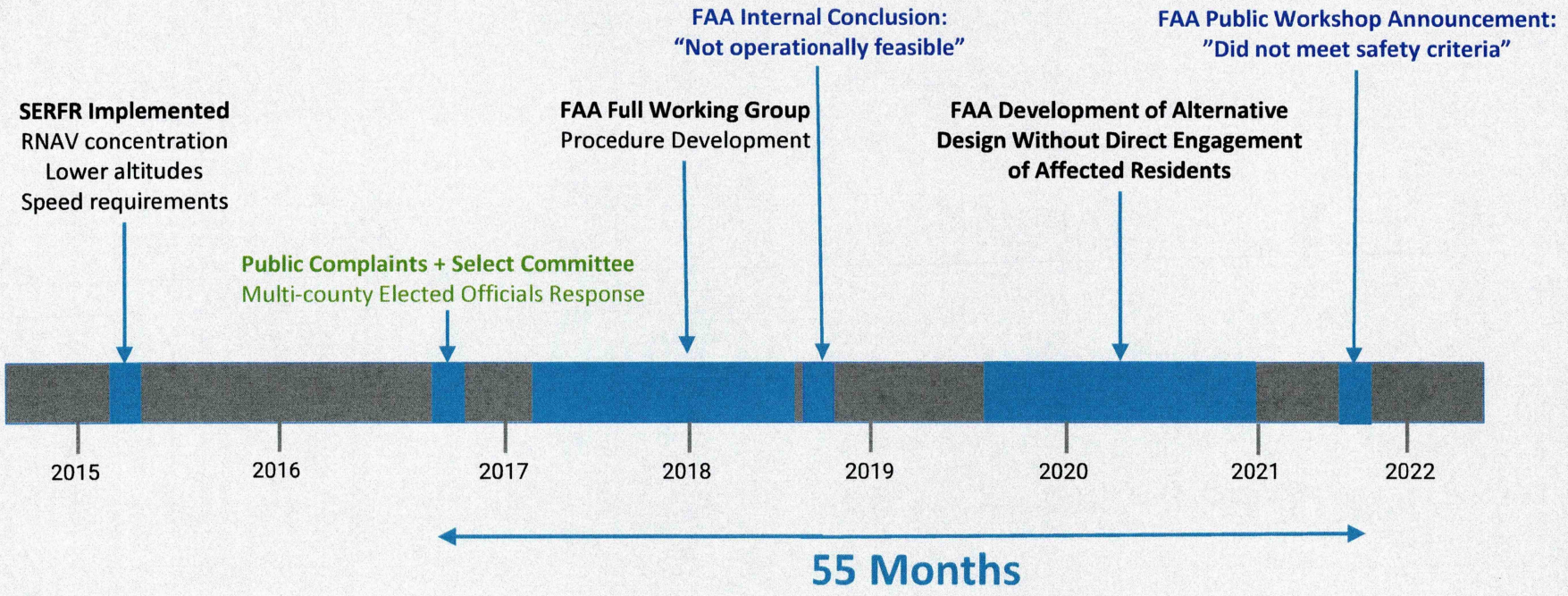
NEPA level	Community Engagement
Categorical Exclusion (CATEX)	Not Required
Environmental Assessment (EA)	Required
Environmental Impact Statement (EIS)	Required

- **NEPA level determines Community engagement,** not who submits the proposal
- **CATEX**: default environmental review determination **for vast majority of procedure changes**
  - Public notification and Community engagement not required
  - **Extraordinary circumstances**
    - typically triggers next NEPA level
    - list in Table 6.3 of FAA document or Section 304 of FAA document
    - noise increases over noise sensitive areas, **public concern**

FAA Process Overview for Procedure Change Requests

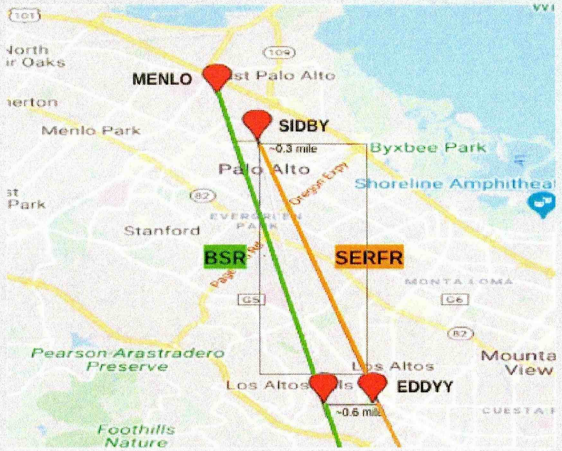
- Once IFP request is accepted, FAA evaluates **technical and operational feasibility**
  - Technically infeasible are rejected
  - Community consensus and political support do not override FAA operational determinations
  - Proposals that clear both hurdles advance to NEPA review
- Critical limitations
  - FAA **process evaluates submitted proposals.** It does not exist to resolve underlying community concerns.
  - **NEPA does not require FAA to redesign procedures** unless the FAA determines that impacts are significant

Case Study: Community-requested Procedure Change (2 of 2)

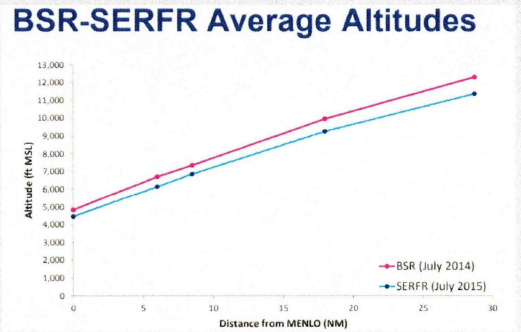


Case Study: Community-requested Procedure Change (1 of 2)

- March 2015: new NextGen RNAV SFO arrival called SERFR
  - New ground track, lateral concentration (RNAV corridor), lower altitude, new speeds
  - 2014 NorCal Metroplex NEPA Environmental Assessment issued FONSI
  - Thousands of noise complaints/day as soon as SERFR started
- Mid 2016: Congressional Representatives from impacted communities established Select Committee
  - 12 elected officials from 3 different counties



Source: Concerned Residents of Palo Alto



Source: FAA presentation to Select Committee, August 4, 2016

Procedure Change Requests: Who Can Ask, and Why?

Applies to new procedures or amendments to existing procedures

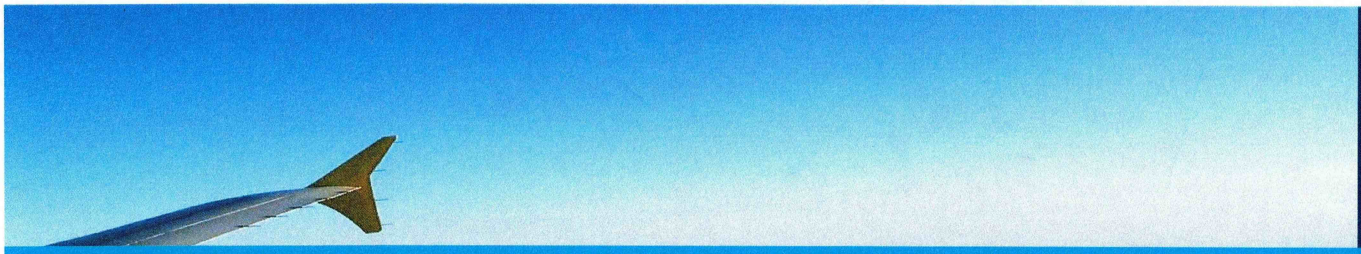
	Industry	Community
Who Initiates?	FAA, ATC, Airlines, Airports	Airport on behalf of Community
Why They Initiate?	• Safety • Efficiency / Capacity • Modernization • Repeatability (Pilots, ATC) • Airline proprietary route • Airport GBAS installation	Noise abatement • Night procedures • Ground tracks • Deconcentration/Dispersion • Altitude and speed • Flaps and speedbrakes

Process Requirement

- All changes must be submitted through IFP Request Form
- Airport submits on behalf of community

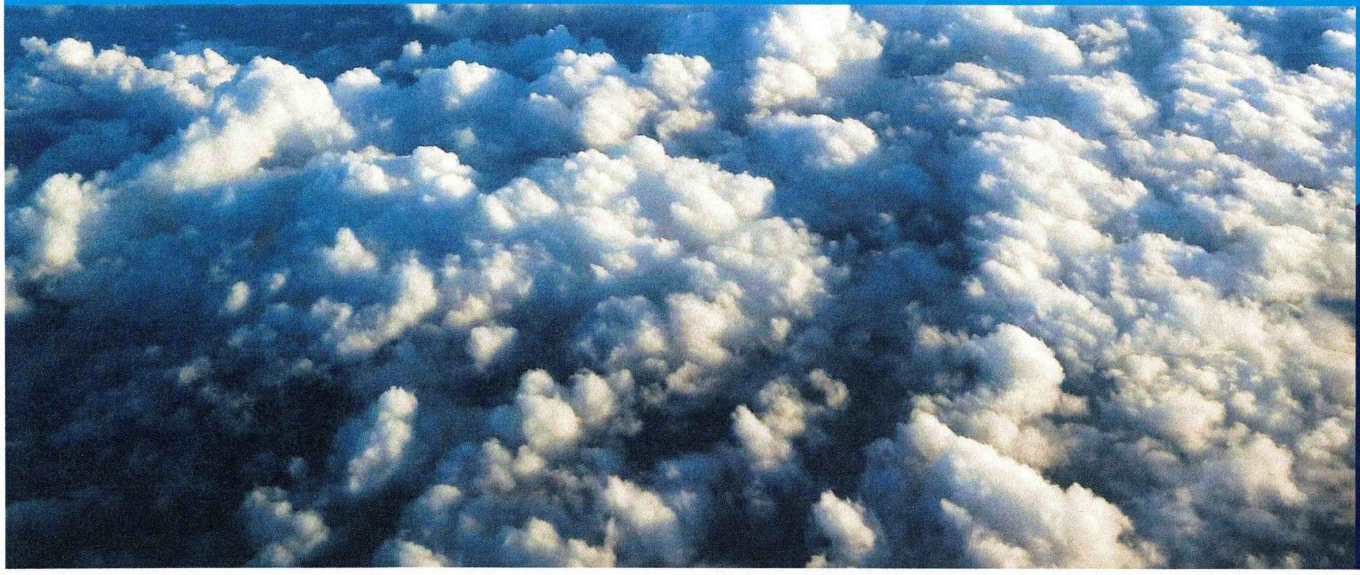
Key Topics

- Start of procedure changes
- Case study: Community-requested procedure change
- FAA process overview of procedure change requests
- Implications and expectations for Communities
- Strategic considerations
- Key takeaways



Community-Requested Procedure Changes: Process and Strategic Considerations

Marie-Jo Fremont | Concerned Residents of Palo Alto



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