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RE: RFI Response: Advanced Air Mobility, Docket No. DOT–OST–2023–0079

The City of Los Angeles appreciates the opportunity to submit comments to Docket No. DOT-OST-2023-0079 on Advanced Air Mobility (AAM). AAM provides cities an opportunity to enhance their transportation networks and provide a new mobility option that improves safety, access, and reliability for residents. This letter incorporates input from various City departments, agencies, and elected offices, to convey critical local perspectives that can inform a national strategy that effectively regulates AAM.

In Los Angeles, decades of vehicle oriented planning redirected investments to streets and freeways designed to move cars as quickly as possible from suburban hubs to urban job centers. Today, cities like Los Angeles are working to repair the harm caused by decisions that continue to disproportionately burden low income communities of color with higher rates of traffic deaths and poor air quality, and less access to jobs and critical services. The City of Los Angeles is focused on ensuring that every Angeleno has dignified, reliable, safe, and affordable mobility options because nobody should be denied education, employment, housing, or healthcare because they don't have access to reliable transportation. How we narrow and ultimately eliminate the divide in transportation is the most critical issue for transportation professionals to solve at every level of government, and one that USDOT has also made a key priority.

This commitment must be reflected in a national AAM strategy that delivers mobility options that meet community needs, without unintended consequences. Local engagement must inform the use cases, deployment, infrastructure guidelines and operational plans reflected in a national strategy to regulate and guide AAM deployment.

Role of Local Government

Many questions remain about the timing, scale, and flight patterns of AAM deployment. Additional information from Original Equipment Manufacturers (OEMs) about future operations would help ensure the success of AAM implementation. In particular, OEMs should provide more detailed information about the operations and use cases that give cities like Los Angeles a deeper understanding of this new mode, its potential benefits, and impacts on local communities. Clear and quantifiable third-party estimates of demand for future services, use cases, and routes are needed in order to understand the true need for AAM and to begin planning for the scale of infrastructure that may be required.

Regarding the research, development and testing environment, cities will need to better understand route analysis methodology and the rationale behind weighing the benefits and impacts of different route options that also take into consideration equity and environmental justice issues of past ground transportation and aviation decisions. The USDOT can support local governments preparing for AAM implementation by requiring and sharing this information.

In order to fully incorporate local perspectives and ensure better public support, the federal government could include local governments in its Interagency Working Group (IWG) subgroup on community roles, led by the National Aeronautics and Space Administration (NASA) and the Federal Aviation Administration (FAA). The City of Los Angeles appreciates recent opportunities to engage with the FAA and NASA on this effort, and continued coordination across all levels of government can further inform a national AAM strategy that delivers cohesive messaging to support broad public acceptance.

Local governments have been at the forefront of new transportation technologies, and have developed the regulatory and digital tools needed to allow for innovation to thrive without compromising the quality of life of local neighborhoods. The federal government should encourage mobility service providers to use data standards and specifications that have proven successful in managing digitally operated modes in cities and could help integrate AAM into the existing transportation systems managed by local agencies.

USDOT should continue to fill information gaps and can provide funding for local feasibility, design, planning, community engagement, and environmental studies to further the work local governments are pursuing to prepare for new modes.

The federal government should also consider working with OEMs that have advanced in the FAA certification process to date to provide demonstrations at locations around the country. This will allow local government officials and community members to experience firsthand the noise and vibration generated during takeoff, landing, and flight, and begin to shape public perception.

Additionally, it would be helpful to begin development of regulations that are separated out by use case so that if/when the demand evolves, the regulations can be amended for that particular use case/demand change with a focused effort accordingly.

Local Transportation Policy Goals

Safety, equity, sustainability, and workforce development remain critical policy goals in the City of Los Angeles. We support USDOT's focus on these issues as critical to a national AAM strategy.

The FAA has an excellent record over decades ensuring that commercial aviation is one of the safest modes of travel available. Los Angeles expects safety to remain a number one top priority for the FAA as it certifies new AAM platforms for flight. AAM, in its mature form, will introduce aviation in novel ways to all corners of Los Angeles and our neighboring jurisdictions. It is vital to implement a robust communication network that guarantees local municipalities and jurisdictions will be alerted in real time to incidents to ensure rapid response by the closest first responders. Such a communication network would ideally include standardized data exchanges readable by the FAA, but also by all local jurisdictions including those where origin and destination vertiports are located and also flyover areas.

The City of Los Angeles is fostering innovation to create a center of transportation tech businesses and jobs. USDOT can support this goal through AAM implementation by requiring operators to recruit from and train local employees from low income communities and communities of color. The incorporation of a just transition focused workforce policy for AAM industry positions if projects receive federal funding in addition to establishing targeted local hire for hard to employ populations (ie. unhoused, formerly incarcerated, etc.) could help ensure the benefits of a new industry accrue to those in our local communities. These strategies can support the FAA's goals to create educational pathways and training programs to build a skilled workforce in the AAM ecosystem.

Considerable research and analysis is needed to better understand the potential environmental impacts of AAM. A national strategy should incorporate several environmental considerations, including: an energy grid analysis at the state and regional level; a heat island impact analysis in various types of settings, including at-grade and on top of buildings in varying temperatures; land use planning considerations that do not exacerbate vehicle miles traveled, related greenhouse gas emissions, and additional consequences of sprawl; and environmental justice analyses to ensure that communities impacted by past aviation and transportation decisions would not be further impacted with this new modality. AAM will bring forth new aircraft which requires the FAA to reevaluate the relationship between aircraft noise exposure and its effects on communities. Specifically, vibration and frequency analysis aggregated to noise impact analysis and an annoyance metric must be analyzed. These studies must also be conducted in various sound corridors that have differing impacts with high-, mid- and low-rise structures. Wildlife analysis is needed to understand impacts to wildlife,

migration and nesting patterns as well as nighttime wildlife activities. Cumulative impacts of this new modality must also be analyzed to understand the scope of all impacts that must be mitigated.

Data collected on flights should be available to all jurisdictions, and would ensure safety, equitable distribution, and support future planning purposes. Sharing AAM vehicle information can help identify alternative emergency landing locations quickly and within range of the aircraft during emergency situations or change in weather. This may include locations in cities and jurisdictions that are not active participants in this new modality; however, their facilities may be needed to provide alternative landing locations in emergency situations. Data protection principles that balance public interest and policy goals appropriately with rights to privacy must also be concurrently developed to ensure any undue impacts on individuals or an AAM's providers' proprietary information.

Local Infrastructure Needs

Most AAM platforms will require the equivalent of Direct Current Fast Charging (DCFC) infrastructure, which at scale will require both a lot of power, and provision of that power quickly. Statewide and regional energy grid analysis and grid vulnerability are necessary, especially considering ongoing efforts to electrify ground transportation. This is to ensure that there is an equitable distribution of and access to energy at all times, but particularly during heat waves and extreme heat events. Local utility providers likely do not have Public Safety Power Shutoff (PSPS) programs, but federal funding and permit streamlining would be needed to expand transmission and distribution systems and ensure a reliable supply of clean power. Establishing standardized charger connector types would be beneficial and maximize existing transportation electrification upgrades. An added bonus would be charger connectors that are interchangeable with other electric vehicles like cars, buses, and other vehicles.

In considering national security and aviation security implications, the TSA screening process and requirements will need to be established for non-airport departure locations. It would also be desirable to have requirements of surety bonds for all operators to ensure compliance with standards and operations.

Regarding vertiport development and operations, local land use suitability modeling resources would be extremely helpful to understand the implications of locations on private property and how those locations impact abutting and adjacent properties. The Fire Code and Building Codes both need to be updated to include regulations for vertiports located at-grade as well as on top of buildings with payload analysis and emergency plans for unscheduled maintenance onsite. Should there be various fuel options like lithium batteries and hydrogen onsite, storage of those highly flammable options would need to be analyzed for high heat temperatures. The FAA should consider the location of vertiports and connect them to existing transit networks and mobility hubs to serve as an extension of the public investments made into the

transportation network. Additionally, clarification on access to vertiports on private property would need to be established particularly for vertiports located on rooftops. Lastly, this new modality should be able to pivot from commercial operations to serve as supportive vehicles in emergency situations.

Airports are a special consideration for vertiport placement. EVTOL companies are particularly interested in serving Los Angeles International Airport (LAX), the nation's largest origin and destination airport where more passengers start or end their trip than anywhere else. Commercial airlines have also expressed interest in their passengers arriving at LAX in EVTOLs where they would transfer to their flights. However, there are challenges. Class B airspace, the designation for the skies around large airports, is highly regulated for safety reasons. It is difficult to know where on airport property an EVTOL will safely take off and land without interfering with existing commercial airline operations, making planning for vertiports a challenge at this time.

Cities have seen firsthand the negative impacts that can occur when new transportation technologies and modes enter the market without adequate community engagement and effective regulation. We also know the consequences of not fully considering the impacts of transportation planning policies on communities. Aerial mobility holds promise but only insofar as it helps reach our wider goals of a safer, equitable, more sustainable city that provides access to economic opportunity and greater mobility for residents. In conclusion, the City of Los Angeles has several questions in order to fully understand this new modality and how it would be able to best serve Angelenos, and looks forward to continued participation in federal efforts to answer these questions and support local communities. We appreciate this opportunity to share our comments.

With appreciation,

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