

Memorandum



CITY OF DALLAS

DATE October 28, 2022

TO Honorable Mayor and Members of the City Council

SUBJECT **Update on the Stakeholder Process for Modifications to the Voluntary Noise Abatement Program at Dallas Love Field**

As the City continues the stakeholder process for modifications to the Voluntary Noise Abatement Program at Dallas Love Field, there have been a number of issues raised by some of the participants in the process. **Please find below the questions and the City's response.** Please bear in mind the City is committed to taking the time and analysis necessary to find consensus among the stakeholders and the FAA prior to bring final recommendations to the City Council.

Question

The City of Dallas hasn't performed a comprehensive overview of the Voluntary Noise Control Program in 30 years, yet according to their predetermined schedule (also attached) we have one meeting to brainstorm ideas following very sparse advance neighborhood engagement - most of which has been on the part of the individual stakeholders and not sponsored by the City of Dallas.

Response

The Department of Aviation has no plans to rush through a process and there is no set deadline. A reasonable schedule was developed to ensure adequate time was spent to consider modifications to the existing Voluntary Noise Program and most effectively use available resources. If additional time/meetings are needed to reach consensus on recommendations from the stakeholder group, then that can be accommodated.

Question

Per a recent congressional study based on recent FAA research, serious discussions are being had at the Federal level as relates to measuring airport noise and its effect on surrounding communities. There has been no reference to this thus far in the City-sponsored narrative.

Answer

Modifications to the Voluntary Noise Program are not dependent on and should not wait on any possible changes with the FAA. The FAA continuously reviews all of its policies and Advisory Circulars regarding noise and its impact. The City will always follow those Federal rules, regardless of the Voluntary Noise Program, and in fact, part of the recommendations considered are in fact as a result of changes in Federal Law regarding the ability of the City to control aircraft noise. Additionally, one of the components suggested for the Love Field VNP is a more frequent review of the program where

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additional modifications may be considered. Everything discussed thus far regarding the Voluntary Noise Program is within the context of current Federal regulations and will be necessarily modified in the future if those rules change.

Question

If the City has waited 30 years to retool the Voluntary Noise Program - why rush now? Let's do this correctly with maximum community engagement. One of the common characteristics of successful Voluntary Noise Abatement Programs including those in Chicago, Minneapolis-St. Paul, and San Diego is an even-paced, methodical process that includes substantial community engagement and robust analytics

Response

The City has no plans to "rush" the stakeholder process. The City is committed to take the necessary time to engage all of the stakeholders that will be affected by modifications to the Voluntary Noise Program. It is important to note that this engagement extends to all those affected, not just the neighborhoods that surround Dallas Love Field. As development continues to encroach on the airport, there must be a balance between the residents that live near the airport and the economic impact of having a convenient airport with over 40 non-stop destinations that drive much of the City's economic vibrancy. Dallas Love Field supports over 10,000 jobs and has an over \$2.5 Billion impact for the City of Dallas. For over 105 years the airport has successfully co-existed with the surrounding neighborhoods and has been an important asset to the City.

Question

No changes to the Voluntary Noise Program should be considered until after new Love Field noise data is collected and analyzed based on post-pandemic flight activity; this could push well into 2023. Given Dallas has waited 30 years to "retool" the noise control program we should not rush the process now.

Response

Modifications to the Voluntary Noise Program are not dependent on and should not wait on any possible changes with the FAA. The FAA continuously reviews all of its policies and Advisory Circulars regarding noise and its impact. The City will always follow those Federal rules, regardless of the Voluntary Noise Program, and in fact, part of the recommendations considered are in fact as a result of changes in Federal Law regarding the ability of the City to control aircraft noise. Additionally, one of the components suggested for the Love Field VNP is a more frequent review of the program where additional modifications may be considered. Everything discussed thus far regarding the Voluntary Noise Program is within the context of current Federal regulations and will be necessarily modified in the future if those rules change.

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Question

Any approach to a revised program should be crafted based on sufficient metrics, ample community engagement, and in the context of a Federal regulatory framework that is highly likely to change in 2023.

Response

The City has years of metrics and analysis of the noise footprint just as the airports mentioned. All of that data is available for review and will be used in guiding the final recommendations. The City will always follow those Federal rules, regardless of the Voluntary Noise Program, and in fact, part of the recommendations considered are in fact as a result of changes in Federal Law regarding the ability of the City to control aircraft noise. Additionally, one of the components suggested for the Love Field VNP is a more frequent review of the program where additional modifications may be considered.

Question

The burden of community engagement in this issue lies with the City of Dallas and independent of the Department of Aviation, which should be represented on even terms with community stakeholders and other involved parties. San Diego, Chicago O'Hare, and Minneapolis-St. Paul have established independent noise control agencies at the departmental level for this purpose.

Response

The City of Dallas has had a long history of stakeholder engagement. Opportunities for improving airport operations and enhancements to the efforts by the airport to mitigate the impact of noise have been ongoing for years. The Love Field Environmental Advisory Committee has been meeting quarterly for decades and have made several recommendations to improvements to the Voluntary Noise Abatement Program. The current stakeholder process to make additional modifications is a continuation of that commitment. The goal of the process is to modify the program with input from both the community surrounding the airport as well as the businesses that operate on the airport. To be clear, the above mentioned airports do not have independent "agencies" that "control" noise at the airports. Many airports, like those mentioned, have similar programs to Dallas Love Field and engage the community in the same way. All of these groups make recommendations to the airport in the context of the Federal rules that dictate the authority of the airport to regulate aircraft operations. Each airport is different, however, with regard to litigation, pre-Airport Noise and Control Act restrictions, and geography. The stakeholder process to modify the Voluntary Noise Program modification can only be done in the context of the specific history and situation of Dallas Love Field.

Question

Only after sufficient discourse and inclusion should an updated voluntary noise program be finalized.

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The City is committed to do exactly that.

Question

We feel this narrative is far too important to be rushed through the Department of Aviation's three step meeting framework. Please partner with us in a measured, rational process based on solid metrics and sufficient community engagement.

Response

The City has no plans to “rush” the stakeholder process. The City is committed to take the necessary time to engage all of the stakeholders that will be affected by modifications to the Voluntary Noise Program. It is important to note that this engagement extends to all those affected, not just the neighborhoods that surround Dallas Love Field. As development continues to encroach on the airport, there must be a balance between the residents that live near the airport and the economic impact of having a convenient airport with over 40 non-stop destinations that drive much of the City’s economic vibrancy. Dallas Love Field supports over 10,000 jobs and has an over \$2.5 Billion impact for the City of Dallas. For over 105 years the airport has successfully co-existed with the surrounding neighborhoods and has been an important asset to the City.

Should you have questions or need additional information, please feel free to contact me or Mark Duebner, Aviation Director, mark.duebner@dallas.gov.



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