



October 14, 2020

Via Electronic Delivery

Colleen D'Alessandro
New England Region Regional Administrator
Federal Aviation Administration
1200 District Avenue
Burlington, MA 01803-5299

Lisa S. Wieland, CEO
Massachusetts Port Authority
1 Harborside Drive, Suite 200S
East Boston, MA 02128

Re: Feasibility Response

Dear Colleen D'Alessandro and Lisa Wieland,

The recent FAA response commenting on the MIT area navigation (“RNAV”) Study proposals for 33L equitable dispersion of aircraft take-off noise, documented in the August 14, 2020 letter to Massport Community Advisory Committee (“MCAC”) Executive Director Matthew Romero, was immensely disappointing. Our communities were counting on your institution for feedback and solutions to the aircraft take-off noise concentration problem caused by your performance-based navigation (“PBN”) procedures. Departure concentration is a well-documented matter that has adversely affected many thousands of Americans at numerous airports nationwide. The optimism and hope that was broadly shared in the Greater Boston area for an equitable dispersion of aircraft take-off noise is slowly yielding to frustration due to FAA’s categorical rejection for all of MIT’s RNAV Study concepts, specifically concerning modifications to the 33L RNAV Standard Instrument Departure (SID) at Logan International Airport.

It should be no surprise that we are dismayed and surprised by FAA’s assessment, particularly after a meeting was held at the FAA’s Regional Office on November 18th, 2016 with community officials and representatives and attended by Carl Bursleson, FAA Deputy Assistant Administrator and Jodi McCarthy, Deputy Vice President, FAA Air Traffic Organization. At this meeting, sponsored by Congresswoman Clark, the FAA acknowledged the serious issue of concentrated 33L departure flight paths and attendant increased take-off noise concentration and represented that they fully supported having the MIT RNAV Study explore alternatives. We are dismayed that in the August 14th response *every* alternative dispersion concept for 33L departures was rejected for further study, with no modifications proposed; and we are further surprised that, after four years of periodic dialogue between MIT, Massport and the FAA during the MIT RNAV Study, the FAA has only now announced that none of the alternatives are considered feasible and that none merit further study. From our perspective, it now appears that the FAA’s commitment to its “good neighbor” pledge and to its role as a cooperative partner in the MIT Study process is in serious jeopardy.

Our message to you now is that after seven years of the 33L RNAV SID, the problem is not going away: our residents are *not* getting used to the noise caused by flight path concentration. Our message is

simple and straightforward: **the FAA needs to take responsibility for a problem it has caused by fixing the problem.**

Sections 176 and 175 of the 2018 FAA Reauthorization Act provides that the FAA will seek to “improve community involvement practices” and will “consider the feasibility of dispersal headings or other lateral track variations to address community noise concerns”. FAA must do more to honor and address these obligations.

Prior to the current COVID-19 pandemic, the combined effects of RNAV flight path concentration and unprecedented growth at Logan in both volume and incursion into late-night hours created unsustainable conditions for many citizens in 33L communities. The response to these effects is clearly evidenced in historically high and sustained numbers of citizen complaints to Massport/FAA, and also documented in the MIT RNAV Study. RNAV concentration of departures has created permanent environmental problems in areas where it has been implemented, and that is a fact that cannot be denied. When the current pandemic begins to wane and the jets return, the suffering will resume, and so will the unprecedented numbers of citizen complaints.

The FAA exists in the service of the American people and must do better to honor its privileged responsibility as the steward of domestic aviation in the widest sense: embracing and implementing changes that preserve and restore the quality of life for fellow Americans who live on the ground near airports, in addition to meeting efficiency targets for industry stakeholders, airports and travelers.

We request that the FAA earnestly and promptly apply the considerable resources at its disposal to propose an alternative departure procedure for runway 33L that would disperse jet noise more equitably.

Sincerely,

Mayor Breanna Lungo-Koehn
City of Medford

Louis A. DePasquale
City Manager, City of Cambridge

Adam Chapdelaine
Town Manager, Town of Arlington

Mayor Gary Christenson
City of Malden

cc:

Senator Elizabeth Warren
Senator Edward Markey
Congresswoman Katherine Clark
Congresswoman Ayanna Pressley
State Senator Patricia Jehlen
State Senator Sal DiDomenico
State Senator William Brownsberger
State Senator Joseph Boncore
State Senator Cindy Friedman
State Representative Sean Garballey

State Representative David Rogers
State Representative Marjorie Decker
State Representative Mike Connolly
State Representative Denise Provost
State Representative Jonathan Hecht
State Representative Christine Barber
State Representative Paul Donato
State Representative Jay Livingstone
Massport Community Advisory
Committee (MCAC) Members