



6040 28th Avenue South, Minneapolis, MN 55450 • 612-467-0741

January 31, 2024

Mr. Erik Amend
Regional Administrator, Great Lakes Region
Federal Aviation Administration
2300 Devon Avenue
Des Plaines, IL 60018

Re: MSP NOC RNAV Recommendations

Dear Mr. Amend:

Thank you for inviting feedback from the Minneapolis-St. Paul International Airport (MSP) Noise Oversight Committee (NOC) regarding the proposed Area Navigation (RNAV) departure procedures at MSP.

The NOC took action and unanimously supported recommendations that were submitted to the FAA on November 29, 2023. The FAA responded on January 5, 2024, noting the FAA's continued commitment to consider the NOC's feedback provided on or before February 1, 2024 for this initial feedback period. The NOC puts forward the following additional recommendations in conjunction with the recommendations submitted on November 29, 2023, which the NOC continues to endorse, and FAA has stated they will review in totality.

On January 31, 2024, the MSP NOC took action to approve additional recommendations and forward them to the FAA. The motion passed by unanimous vote.

On behalf of the entire NOC, we respectfully submit the recommendations dated November 29, 2023 and January 31, 2024 to the FAA,

Cheryl Jacobson
MSP NOC Community Co-Chair
City Administrator
City of Mendota Heights

Paul Buckley
MSP NOC Airport User Co-Chair
Director of Airport Operations
Delta Air Lines

Attachments:

January 31, 2024 Noise Oversight Committee Recommendations
November 29, 2023 Noise Oversight Committee Recommendations



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January 31, 2024 Noise Oversight Committee Recommendations

The Minneapolis-St. Paul International Airport (MSP) Noise Oversight Committee (NOC) appreciates the opportunity the FAA has afforded for the NOC to share insight related to aircraft overflights, noise and meaningful public engagement. The NOC acknowledges that this opportunity to provide feedback to the FAA this early in the FAA's procedure design process is not typical and, due to that, the FAA had limited data available to share regarding its proposed procedures, in part because broader public engagement has not yet formally begun.

The recommendations provided by the NOC are based on the information currently available from the FAA. The NOC understands that the FAA has stated more information will be made available to the public at a later date, during the FAA's broader public engagement efforts that are planned for Summer 2024. The NOC will continue to share insight with the FAA throughout the duration of this FAA initiative and looks forward to reviewing additional information and hearing from residents during broader public engagement.

The NOC submitted recommendations to the FAA on November 29, 2023. The submitted recommendations were developed with the goal of building trust, dispelling misinformation, and providing adequate public accessibility to project materials. The FAA responded on January 5, 2024, noting the FAA's continued commitment to consider the NOC's feedback provided on or before February 1, 2024 for this initial feedback period. The NOC puts forward the following additional recommendations in conjunction with the recommendations submitted on November 29, 2023, which the NOC continues to endorse, and FAA has stated they will review in totality. The following additional recommendations were developed to encourage meaningful public engagement, effective communication, opportunities to replicate existing procedures and reduced concentration of aircraft activity over residential neighborhoods.

Provide opportunities for meaningful public engagement

- Provide a public comment period of up to 90 days related to FAA's proposed procedures and resultant environmental review to allow members of the public sufficient time to be informed and equipped to participate in the FAA's comment process.
- In order to have broad and effective outreach, the NOC would like the FAA to avoid scheduling its public workshops during major holidays.
- As noted in the FAA's January 5, 2024, response to the NOC's recommendations submitted on November 29, 2023, the FAA plans to hold virtual open houses due to the FAA's perspective that they are convenient, provide greater reach and flexibility and are more cost effective. The NOC recommends the FAA provide in-person FAA personnel for at least one hybrid public workshop, as this would honor the points raised by the FAA and offers the most inclusivity by being accessible

both to those who cannot travel to an in-person meeting and to those less familiar with technology or who lack reliable internet access.

Increase transparency and communicate effectively

- As the governmental agency responsible for this project, FAA is the appropriate lead to actively communicate and engage with the public regarding FAA's proposed procedure updates. Community leaders should not be put in the position of representing the FAA's project.
- Prior to public workshops, the NOC recommends the FAA develop a short video presentation to share simple and concise information about what RNAV is and what process the FAA will follow to develop, study and implement the new procedures.
- The NOC recommends the FAA communicate the benefits that the FAA identifies associated with implementation of its proposed procedures, including unrestricted climbs that may help offset some of the noise impacts on the new flight paths.
- The NOC recommends the FAA include all common airport configurations in its analysis and public presentation materials to ensure the public has a full picture of how the new procedures may be used. Specifically, the NOC would like to see the following configurations be included: North Flow (arrivals and departures on Runways 30L and 30R and arrivals on Runway 35); South Flow (arrivals and departures on Runways 12L and 12R and departures on Runway 17); and Mixed A (arrivals and departures on Runways 30L and 30R and departures on Runway 17).

Effectively communicate environmental impacts

- The NOC requests the FAA explain the process used to determine the appropriate level of environmental review for the project and carefully consider Environmental Justice, Socioeconomic, and Extraordinary Circumstance factors when making this determination. There are census tracts in the region which are recognized as overburdened, underserved, and disadvantaged by the Climate and Economic Justice Screening Tool. Additionally, due to the history of RNAV in this community, there may be potential for "substantial dispute involving reasonable disagreement over the degree, extent, or nature of a proposed action's environmental impacts or over the action's risks of causing environmental harm."
- Publish a robust environmental review document for public access and transparency, including an executive summary, and present these findings to the public, regardless of the level of review that FAA deems appropriate for the project.
- Given the community's long-standing history of active involvement regarding noise issues at MSP, the NOC recommends the FAA model and present the changes in the noise environment that residents can expect to observe from the FAA's implementation of its proposed procedures, regardless of whether the impacts meet FAA's level of significant noise impact threshold.

Identify additional opportunities for proposed procedures to reduce overflight concentration over neighborhoods

- The NOC recommends the FAA not create a concentrated RNAV departure path for straight-out departures from Runway 17, in consideration of the areas currently impacted by arriving aircraft to Runway 35.
- The NOC appreciates the efforts by the FAA to use VI-CF legs to concentrate aircraft activity within the established boundary of the Egan-Mendota Heights Corridor. The same departing aircraft overfly residential land uses within the corridor and as they exit the end of the corridor, where aircraft concentration would not be beneficial. Therefore, the NOC recommends the FAA evaluate VA-DF leg types for greater dispersion as an alternative to the proposed VI-CF for Runways 12L and 12R departures.

Identify additional opportunities to enhance use of existing noise abatement practices

- During South Flow operations, aircraft departing with a 120-degree heading from Runway 12L utilize the established noise abatement procedure, Crossing-in-the-Corridor. This benefits surrounding communities by directing aircraft over more compatible land in the center of the Egan-Mendota Heights Corridor. Since RNAV provides more precise and predictable routes and the FAA has stated that during South Flow operations Runway 12R is only used for departures when operationally necessary, the NOC recommends the FAA assign a 120-degree heading to additional Runway 12L RNAV departures to route aircraft over the center of the corridor **without increasing overflights over residential areas of Sunfish Lake.**
- Aircraft departing over the Minnesota River reduces the instances of aircraft overflying residential areas. The NOC recognizes the FAA's high use of the existing Runway 17 turn point noise abatement procedure to keep westbound turns over the Minnesota River today. The NOC recommends the FAA take this opportunity to keep Runway 17 departures that are designed to fly over the Minnesota River, over the River for as long as possible before flying over homes and other noise sensitive areas.
- The NOC recommends the FAA's procedures minimize shifts in flight patterns that may be due, in part, to planes staying on runway heading longer than they do today. Staying on runway heading may lead to shifts in areas of overflights and conflicts with a noise abatement principal of the MAC and NOC, which is to reduce straight out departures over communities already impacted by arrival noise. Using a 500-foot per nautical mile (NM) climb gradient may allow an aircraft to initiate a turn on course closer to the departure end of the runway. The NOC recommends the FAA evaluate a 500-foot per NM climb gradient.

Identify additional opportunities for proposed procedures to replicate existing flight paths

- Currently, only departure procedures with 230-to-285-degree headings for Runway 17 are designed with altitude restrictions at seven nautical miles DME (distance measure equipment). Commonly used Runway 17 departure headings of 120-to-170-degrees are not currently designed with a crossing restriction. The NOC requests that Runway 17 departure procedures that do not require altitude restrictions be designed without waypoints at seven miles, to replicate existing procedures and continue to disperse aircraft departures to the extent feasible.

- The westbound (260-degree) heading off Runways 30L and 30R overflies residential areas to the north and west of the airport. The NOC understands from the FAA that the new RNAV procedures may concentrate flight paths as aircraft approach the proposed first waypoints if aircraft are not vectored off the initial 260-degree heading. To prevent concentration near the first waypoint, the NOC recommends that the FAA evaluate opportunities for designing the procedures with the goal of spreading out tracks, replicating existing aircraft dispersion, and preventing concentration. Opportunities may include air traffic controllers turning aircraft off the 260-degree prior to reaching the first waypoint for departures ultimately going south- and southeast-bound, shifting the location of the first waypoint, or identifying additional headings.
- Similar to the point above, the NOC recommends the FAA evaluate opportunities to spread out tracks and prevent concentration in residential areas off the end of the Egan-Mendota Heights Corridor. Opportunities may include air traffic controllers turning aircraft off the 105-degree heading for aircraft departing Runway 12L after exiting the Egan-Mendota Heights Corridor and prior to reaching the proposed first waypoint, similar to how most departures operate today.
- In keeping with the points above, the northeast bound (340- and 360-degree) headings off Runways 30L and 30R overfly residential areas to the north and east of the airport. The NOC recommends that the FAA evaluate opportunities to spread out tracks, prevent concentration, and replicate aircraft dispersion experienced today in these residential areas. Opportunities may include air traffic controllers directing aircraft on these headings similar to how most departures operate today, shifting the location of the first waypoints, or identifying additional headings.



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November 29, 2023 Noise Oversight Committee Recommendations to the FAA

The Noise Oversight Committee (NOC) understands and appreciates that the Federal Aviation Administration (FAA) is committed to complete, open, and effective participation in agency action, and that the agency regards community involvement as an essential element in the development of its actions, programs, and decisions.

Effective community involvement broadens FAA's information base and improves decisions. FAA collaboration with the public and airport stakeholders is critical during the planning and design of proposed Area Navigation (RNAV) procedures. The first step in meeting the needs of the public is to understand the public's needs.

The NOC wishes to be strategic partners in community involvement regarding the proposed RNAV procedures at MSP, particularly in an effort to assist FAA in better understanding the public's concerns and needs. The NOC therefore puts forward the following recommendations.

Provide opportunities for meaningful public engagement

- Conduct engagement that seeks community input and does not simply inform the public. The FAA *Community Involvement Manual* emphasizes the importance of establishing ongoing, two-way communications that gives the public an opportunity to understand the proposed project and to ask questions and raise concerns before decisions are made. Therefore, the FAA should:
 - Allow sufficient time for public input to shape the outcome of the project.
 - Thoughtfully consider all input received from the NOC and the public and incorporate into procedure design as feasible (i.e., where safety and efficiency would not be negatively impacted).
 - Clarify why any input received is not feasible to be incorporated into procedure design by explaining how it would negatively impact safety and efficiency.

Provide additional opportunities to engage with the public

- Community involvement should start in the design phase. The FAA has stated, and the NOC agrees, that community concerns should be identified as early as practicable and considered in the planning process. FAA's *Community Involvement Performance Based Navigation Desk Guide* recommends sharing preliminary designs with the community to solicit feedback to inform decision making and project refinements. The FAA's *Community Involvement Manual* acknowledges that meeting with specialized groups (such as NOC or MAC) may not entirely capture views of the community. FAA should provide the following additional opportunities to engage the public regarding procedure design:

- Conduct broader public engagement efforts by presenting the proposed procedures at a workshop/meeting with NOC open to the public on or before January 3, 2024. This will afford the FAA the opportunity to provide necessary context about the design as leaders of the project. Additionally, it will allow the FAA to understand if the proposed procedures would be highly controversial on environmental grounds prior to making a determination of the appropriate level of environmental review. This would not take the place of the public workshops the FAA plans to conduct in the Summer 2024.
- A combination of techniques is usually needed to reach all the relevant communities. Therefore, the FAA should conduct one virtual and two in-person public workshops. A combination of virtual and in-person workshop options offers the most inclusivity by being accessible both to those who cannot travel to an in-person meeting and to those less familiar with technology or who lack reliable internet access.

Increase transparency and communicate effectively

- Recognize and develop a communication approach that considers community sensitivity to RNAV design and information gaps based on previous projects. This communication approach should include:
 - Explanation of the project benefits and efforts made to consider noise and incorporate community concerns into the proposed design.
 - Presentation of the proposed procedures in a manner that is accessible to non-technical audiences while providing sufficient detail and technical information to communicate procedure design and how aircraft will operate.
 - Use of creative tools to increase community understanding (i.e. online illustrative and interactive tools).
 - Accessible information to communities across the Minneapolis/St. Paul Twin Cities area with translation services available as needed (Spanish, Hmong, Somali, and ASL interpretation).
- During the public workshops, communicate the impact of the procedures to residents, anticipated changes in noise exposure and what it means for them and their experience of aircraft over their homes today.
- Advertise the public workshops to communities across the Minneapolis/St. Paul Twin Cities area and have translation services available as needed (Spanish, Hmong, Somali, and ASL interpretation).
- Increase public awareness and clarify opportunities for public participation by:
 - Sharing details with the NOC about the timelines, technical design steps, and engagement required to implement the procedures to decommission the MSP VOR on schedule.
 - Providing NOC members with information that can be shared with their stakeholders.

Identify additional opportunities for proposed procedures to replicate existing flight paths

- The proposed West SID ultimately separates into three routes; however, areas near the airport when aircraft are at their lowest altitude, are more concentrated and located in areas that receive arrival overflights to Runways 12L and 12R. Include more dispersion of these straight-out departures on Runways 30L and 30R in consideration of the areas currently impacted by arriving aircraft.
- The aircraft modeled on the 360-degree COULT, and 340-degree North and Northeast SIDs departing Runways 30L and 30R indicates aircraft will turn tighter and earlier, changing the area where aircraft are turning southeast-bound (COULT SID) and northeast-bound (North and Northeast SIDs). If this is an accurate representation of day-to-day departure operations to the north, it will put aircraft operations over areas that currently do not receive these types of overflights. Operations on these departures should fly further on the 360- and 340-degree headings prior to making their next right turn, similar to how they fly these departure procedures today with the goal of spreading out tracks and preventing concentration. This may also require adjustments to arrival routes to accommodate this request.
- The aircraft modeled on the West and KBREW SIDs, departing Runways 12L and 12R indicates a change in the area where aircraft are turning west-bound (West SID) and north-bound (KBREW SID). If this is an accurate representation of day-to-day departure operations to the south, it will put aircraft operations over areas that currently do not receive these types of overflights. Operations on these departures should fly further to the north prior to making their next left turn, similar to how they fly these departure procedures today with the goal of spreading out tracks and preventing concentration. This may require adjustments to arrival routes to accommodate this request.