

May 18, 2020

(VIA ELECTRONIC MAIL)

Colleen D'Alessandro, ANE-1, FAA New England Regional Administrator

<u>Colleen.Dalessandro@faa.gov</u>

RE: Proposed Runway 4L Environmental Assessment Timeline and Process

Dear Ms. D'Alessandro:

Thank you for your continued engagement with the Massport Community Advisory Committee (MCAC), as well as the participation of your fellow colleagues at the Federal Aviation Administration (FAA), especially during these extraordinary circumstances. Due to this unprecedented health crisis and the resulting changes in standard business practices across the nation, I have been asked to request that FAA delay an upcoming environmental review process.

As you presented at our MCAC General Meeting in January, the FAA had tentatively scheduled the Environmental Assessment (EA) process for the proposed Boston Logan International (Logan) Airport Runway 4 Left (4L) Approach Procedure for the third quarter of calendar year 2020. This proposed process included a draft EA 30-day public comment period during which the FAA would hold two public workshops. Furthermore, FAA staff proposed to hold a public workshop separate from and prior to the formal public workshops following an MCAC General Meeting. We discussed the issue with our membership and determined that while a workshop prior to the formal EA comment period was important, a more appropriate venue would be within the communities and neighborhoods affected by this proposed change. The MCAC membership also expressed reservations at the FAA's proposed use of a workshop format versus a formal public hearing and questioned the ability of commenters to effect any meaningful change on a proposed procedure. In response to a request for an update on the timeline for the 4L EA process, you indicated on May 6, 2020 that the FAA is tentatively planning to begin the 30-day public comment period on September 21, 2020.

On May 14, 2020, the MCAC's Milton representative, Tom Dougherty, brought forward the request to delay the 4L EA process citing three main reasons:

First, the neighborhoods impacted by the proposed 4L RNAV flight path include two densely populated areas – Mattapan (82% African American) and Dorchester (43% African American) – where residents are dealing with high incidence of COVID-19 health and economic impacts. There are many working in the area – healthcare workers at Carney Hospital, a COVID-19 dedicated facility, mass transit employees – that are essential employees working to provide basic services to the region. Other families are dealing with unemployment, small business loss, food stamp needs, and home childcare issues. These families need to focus on these urgent needs.

Second, due to the COVID-19 restrictions related to group gatherings and urging social distancing, residents have been unable to have their own preparatory meetings among affected community members to address and ready collective thought on the EA issues.



The 4L EA has previously been deferred by FAA for several years for other reasons. The need for safety review of a 4L RNAV track is less at present given the very few flights occurring. For those reasons, awaiting a time when such preparatory meetings can occur would be advisable.

Third, residents likely will not be in a position to do the field work and analyses for which they have engaged an independent consultant because so few planes are flying now. That field work and analyses will aim to compare actual flight activity with FAA model assumptions over the course of the 4L arrival path.

As you and I have discussed over email, there are serious equity concerns over the use of virtual meetings with residents in lieu of the originally planned in-person public meetings. Virtual meetings are especially problematic for low income communities whose residents may lack the resources to participate; moreover, there is ongoing debate about whether a virtual meeting would be an adequate substitute for a community gathering such as this.

At a virtual meeting on May 14, 2020, the MCAC Executive Committee directed me to request that the FAA defer the 4L EA process until the later of either January 1, 2021 or two months after flights to and from Logan Airport resume with volume and frequency similar to what can be expected in future years.

As previously mentioned, at the January 2020 MCAC meeting, we requested that the FAA meet with 4L EA affected residents prior to the comment period to provide information (such as the EA Documentation itself and Volpe Center or other analyses) and to allow residents to provide input before FAA finalizes and submits its EA for public comment. We reiterate that request, adding now that considering the COVID-19 guidelines, such pre-comment period meetings should occur at the start of the deferred schedule as proposed above.

We appreciate the FAA's commitment to conduct a full Environmental Assessment process after the initial 2015 public meeting on this proposal and its recognition that conducting this enhanced review process properly and thoroughly will provide a meaningful benefit to the affected communities, businesses, and residents.

I look forward to working with you on this matter moving forward.

Sincerely,

Matthew A. Romero

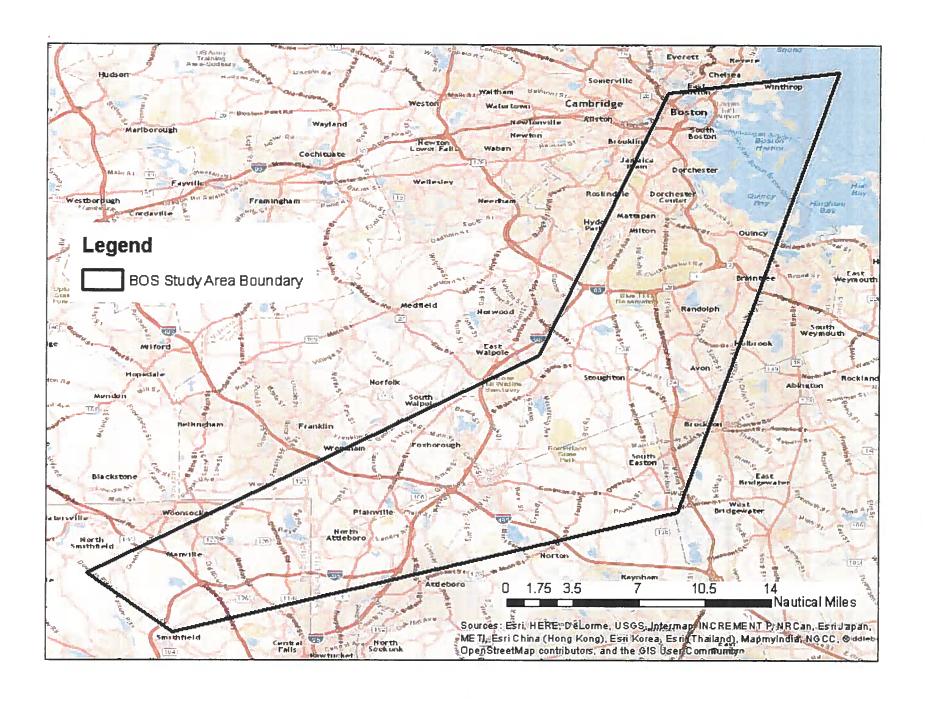
Massport CAC Executive Director

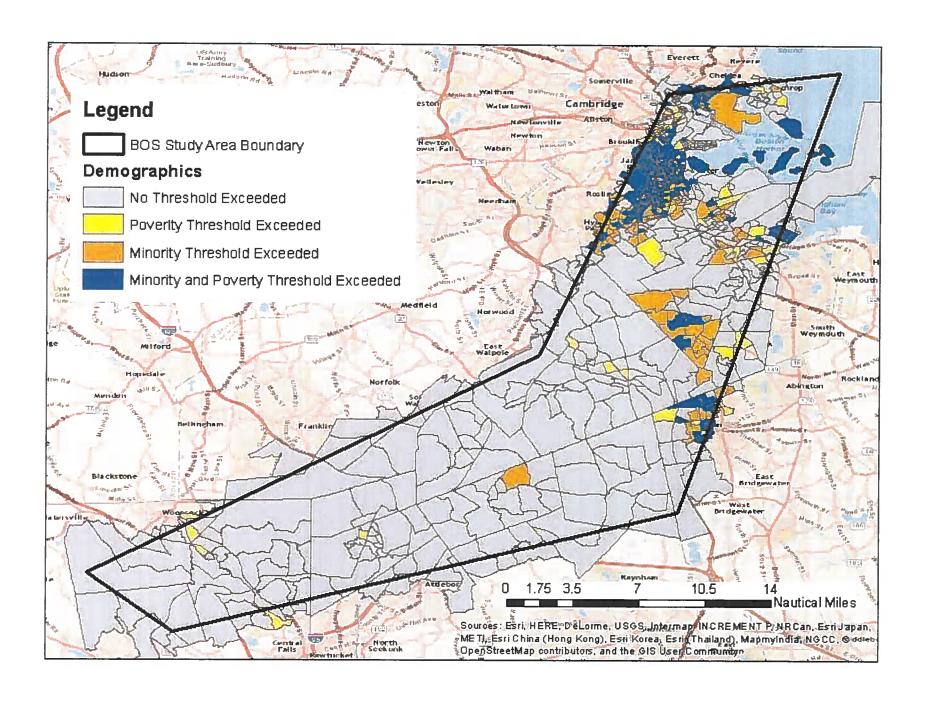
cc: David Carlon, MCAC Chairman

Thomas Dougherty, MCAC Milton Representative and Treasurer

Flavio Leo, Massport Director of Aviation Planning and Strategy

Anthony Gallagher, Massport Community Relations





RUNWAY 27 WAYPOINT RELOCATION

MILTON'S SUPPORT WITH REDESIGN:

NOVEMBER 14: TOWN MEETING SLIDE

DECEMBER 26: REDESIGN ADOPTED

SO THAT A 27 WAYPOINT RELOCATION:
WOULD NOT SHIFT TRAFFIC
TO NEIGHBORHOODS TO THE EAST
THAT ARE ALREADY EXPOSED TO
ARRIVING TRAFFIC HEADING TO
LANDINGS ON RUNWAY 4L AND 4R—
NAMELY THE BOSTON
NEIGHBORHOOD OF MATTAPAN AND
MILTON

MIT RNAV STUDY

RUNWAY 33L DEPARTURES
VARIOUS DISPERSION IDEAS
RAISED WITH MIT
BY BELMONT, CAMBRIDGE,
SOMERVILLE, ARLINGTON, MEDFORD...

MAY 15: MIT PROVIDED 33L UPDATE MY SUMMARY: INDETERMINATE... DISCUSSION CONTINUES

RUNWAY 4R ARRIVALS
VARIOUS DISPERSION IDEAS
RAISED BY MILTON AND MIT
MIT UPDATE TO BE SCHEDULED NEXT.

FAA RESPONSE TO MY REQUEST THAT IT SPECIFY ANY 4L ARRIVAL PATHS IN ADDITION TO 4L RNAV

- 1) When weather goes below a 3000ft. ceiling we can make an instrument approach to Runway 4R and circle to Runway 4L.
- 2)We also can conduct an ILS approach to Runway 15R and when the pilot reports BOS in sight, the Tower clears the aircraft for a Visual Approach over the harbor to Runway 4L.

The 15R situation is only good down to weather conditions of 1500ft. ceiling and 5 miles visibility.

- 3)When circling from Runway 4R we can use about an 800ft. ceiling and 2 miles visibility.
- 4)When pilots are aware that they will be getting a Visual Approach to Runway 4L, they have the ability in their FMS to build a course and artificial glide slope if they choose. It would all depend on workload and Company requirements.