

## MY PUBLIC REPORTING

### SELECT BOARD MEETINGS SIX REPORTS

NOVEMBER 14, 2019  
FEBRUARY 2, 2020  
MAY 20, 2020  
AUGUST 12, 2020  
SEPTEMBER 16, 2020  
OCTOBER 6, 2020

## MY PRIORITIES

### MCAC/FAA INITIATIVES

#### MIT RNAV STUDY: 4R ARRIVALS

- **DISPERSION**
- RESTORE EQUITY

#### FAA 4L RNAV

#### 4L EA

- DEFER IT
- **ALTER PROCESS**
- **ADDRESS IT**

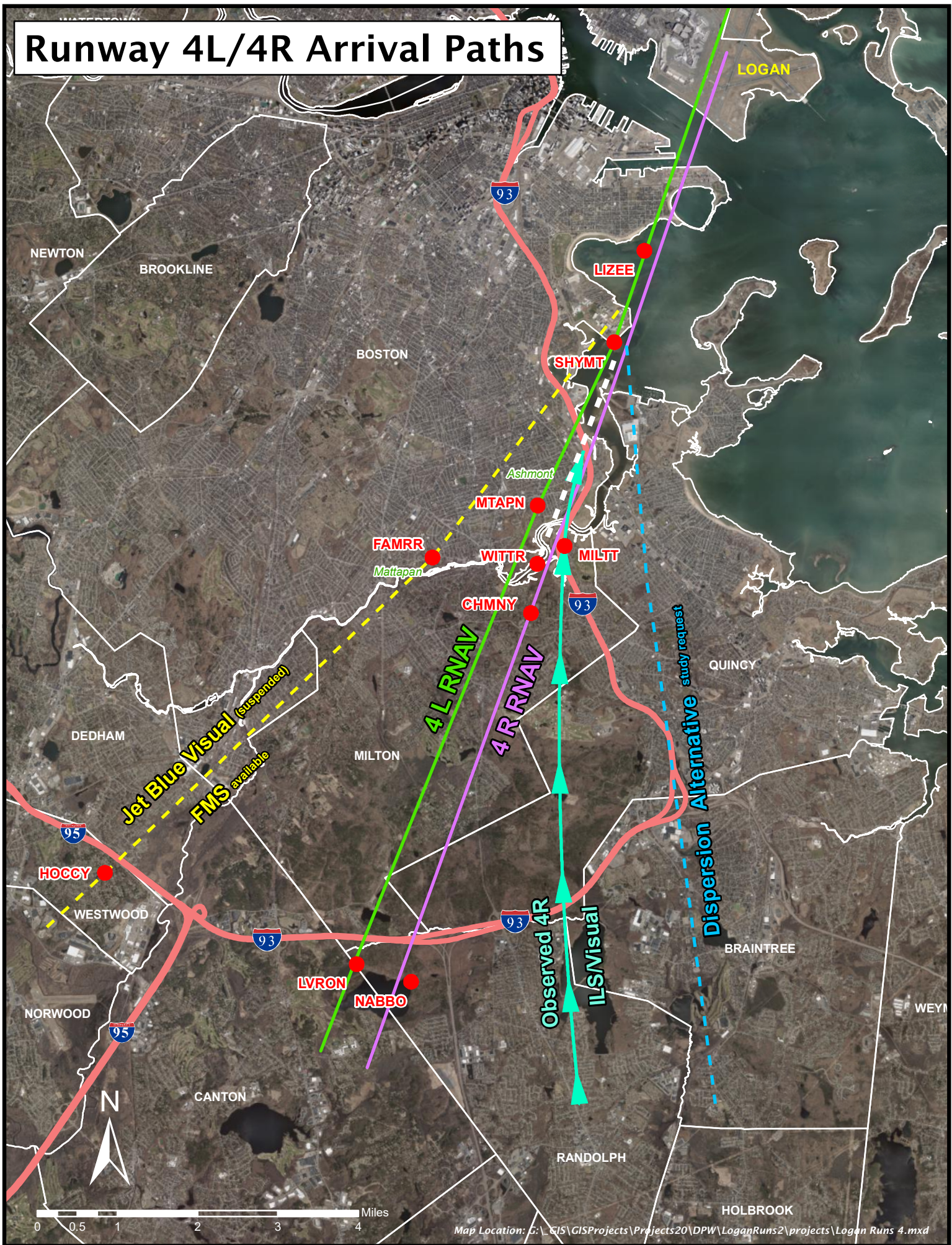
#### MIT STUDY:

#### 27 NEW WAYPOINT

- EARLIER TURNS:
- NORTH & WEST
- **NOT SOUTH**



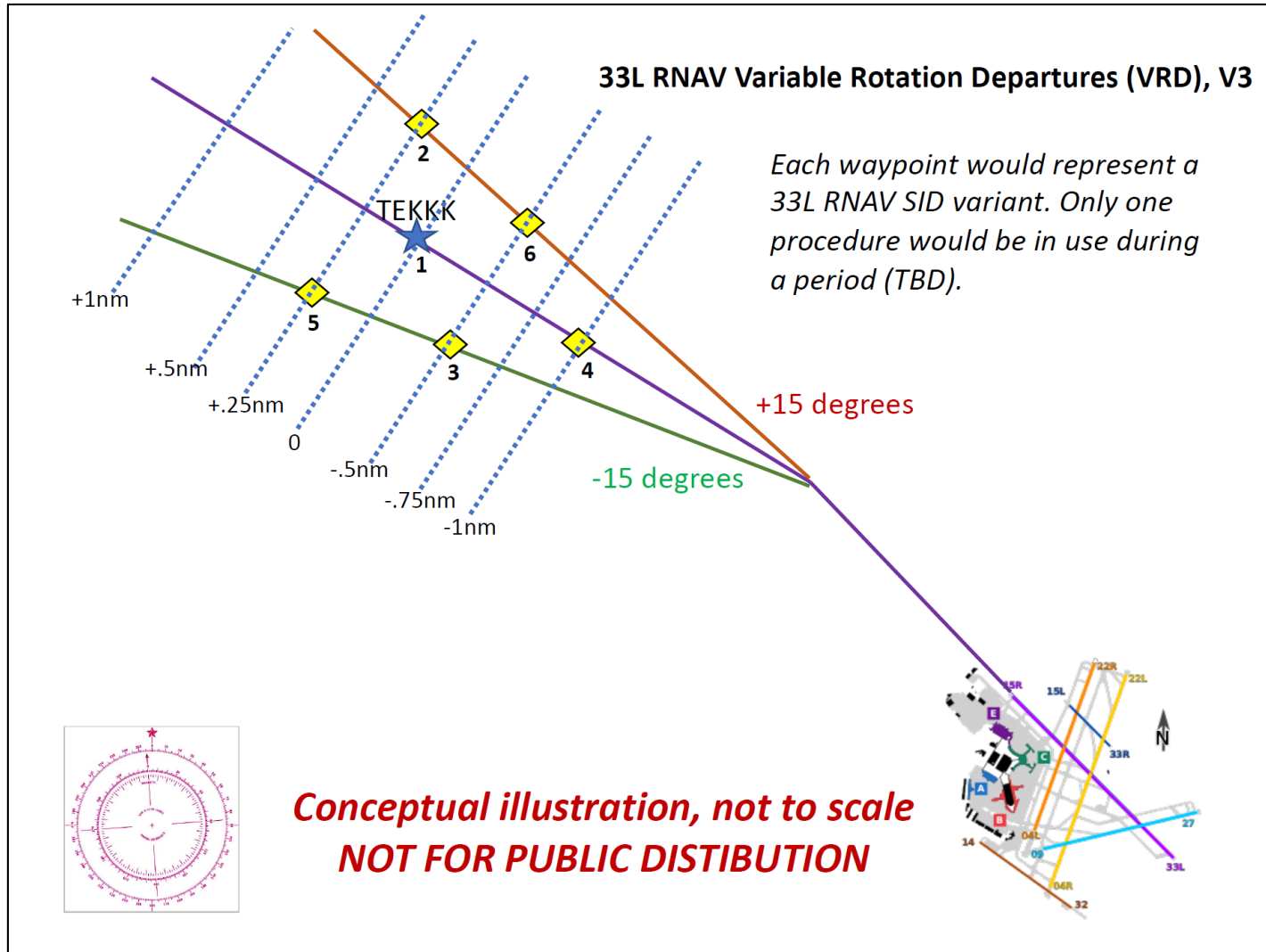
# Runway 4L/4R Arrival Paths





# Community Dispersion Suggestion Variable Rotation Departures (VRD)

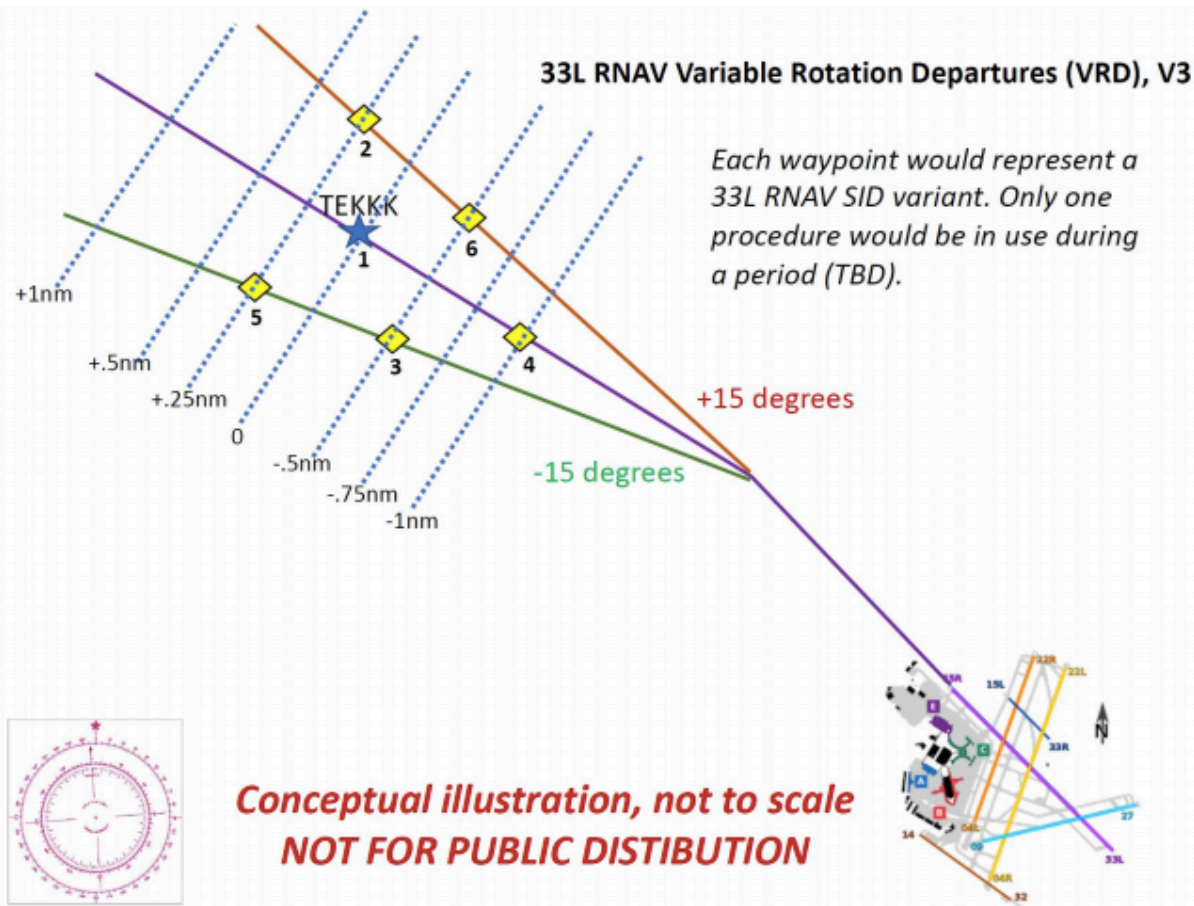
Analysis done on full peak day of operation using a single waypoint  
Other rotations possible.



- - Complex procedures for ATC and Pilots
- Requires numerous procedures in the Flight Management System
- Rotating between waypoints from day to day does not take advantage of the separation requirements satisfied by divergent headings



# Community-suggested Variable Rotation Departures (VRD)



- Presents SID naming issues discussed for RWY 22 idea.
- Would require up 48 new procedures (6 “TEKKK” locations x 8 existing RNAV end fixes)
- How would rotation be managed (eg by day of significant 33 operation)



### **Proposal 3: Divergent Heading Dispersion – Charted by Enroute Fix RWY 33L**

MIT design proposal:

Divergent heading dispersion utilizing 15° divergent headings either off the runway or after flying an initial runway heading. The aircraft would then fly a direct routing to the transition waypoint.

FAA/Industry response:

This **concept requires relocating the RNAV waypoint TEKKK**. Placing TEKKK where it currently resides was very difficult to achieve due to an airspace boundary 1.5 NM to the east. Alternatives to the current location were carefully evaluated, and the panel is confident the fix cannot be relocated.

The easterly movement of TEKKK would conflict with JFUND RNAV STAR arrivals, and the westerly movement of TEKKK shortens the leg length between TEKKK and COUSY. COUSY has an altitude restriction to allow positive separation from RWY 27 departure traffic, and reducing TEKKK to COUSY presents fly-ability issues.

MIT indicates options of using VI/CF and VA/DF legs; however, the panel discovered issues with passing FAA design criteria preventing certification and publication (Issues have been identified with VA/DF departure legs in another section).

To the question of whether a waiver could be pursued for any criteria failures, industry indicates there is no equivalent level of safety to justify such a proposal.

**Assessment: Not a Candidate for Further Evaluation Reason(s):**

**The proximity of conflicting airspace.**

**Failure of the procedure construction due to leg length and altitude criteria. The proposal creates design criteria failures.**





MIT

International Center for  
Air Transportation

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# RWY 4L/R APPROACH



MIT

International Center for  
Air Transportation

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# **Field Observations of 4R Approaches** August 1, 2019

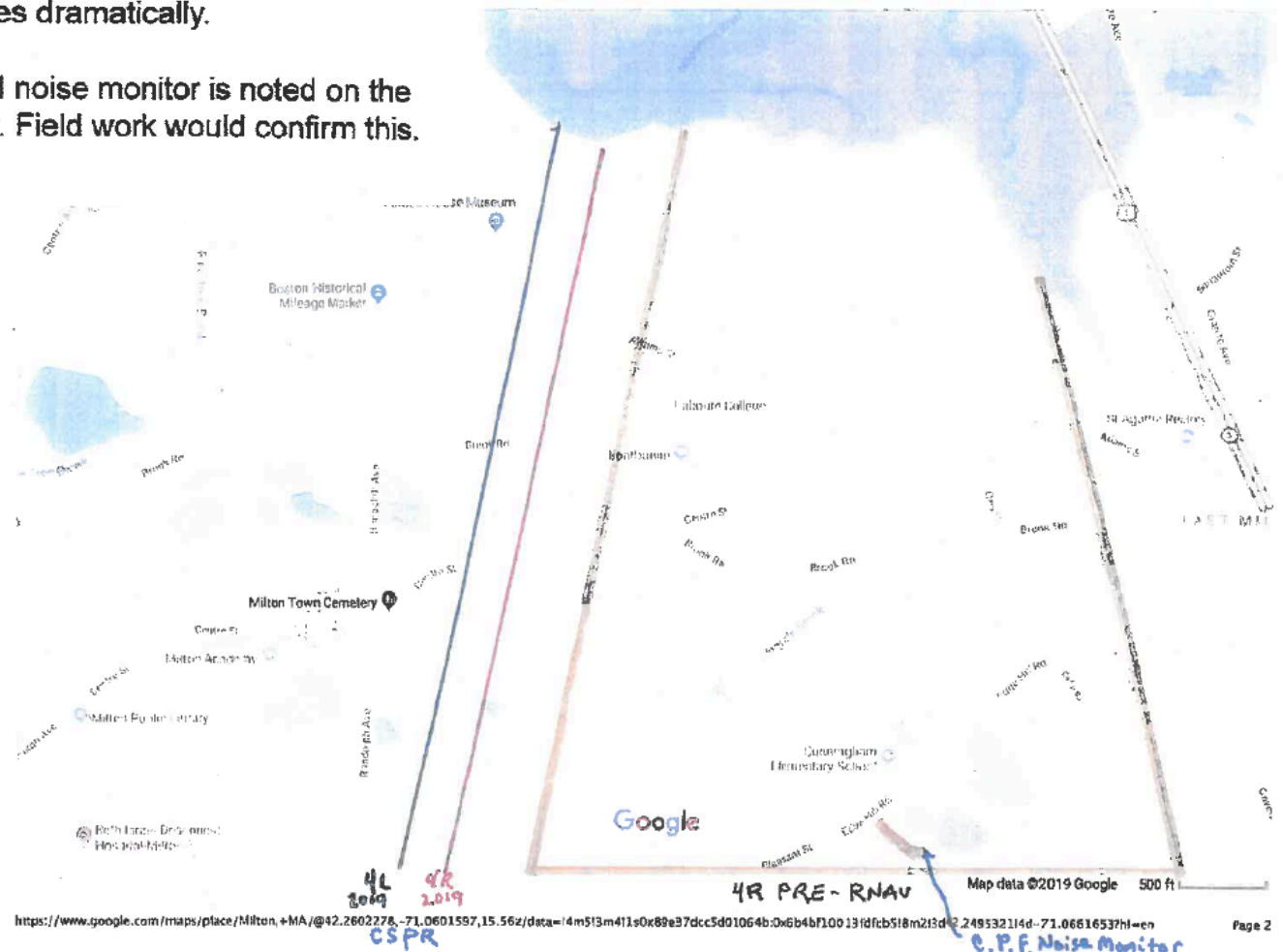
#### 4.4 Recognize the westward shift of the CSPR skyrails:

The first of the following slides illustrates the significant westward shift of the 4L/4R flight path center lines.

The CSPR center flight lines, as flown, are to the west of the pre-RNAV dispersed 4R flight path, increasing the noise for residents under the CSPR lines dramatically.

The Cunningham Park-Fullers End noise monitor is noted on the slide. It is far from the noise center. Field work would confirm this.

5/26/19, 11:41

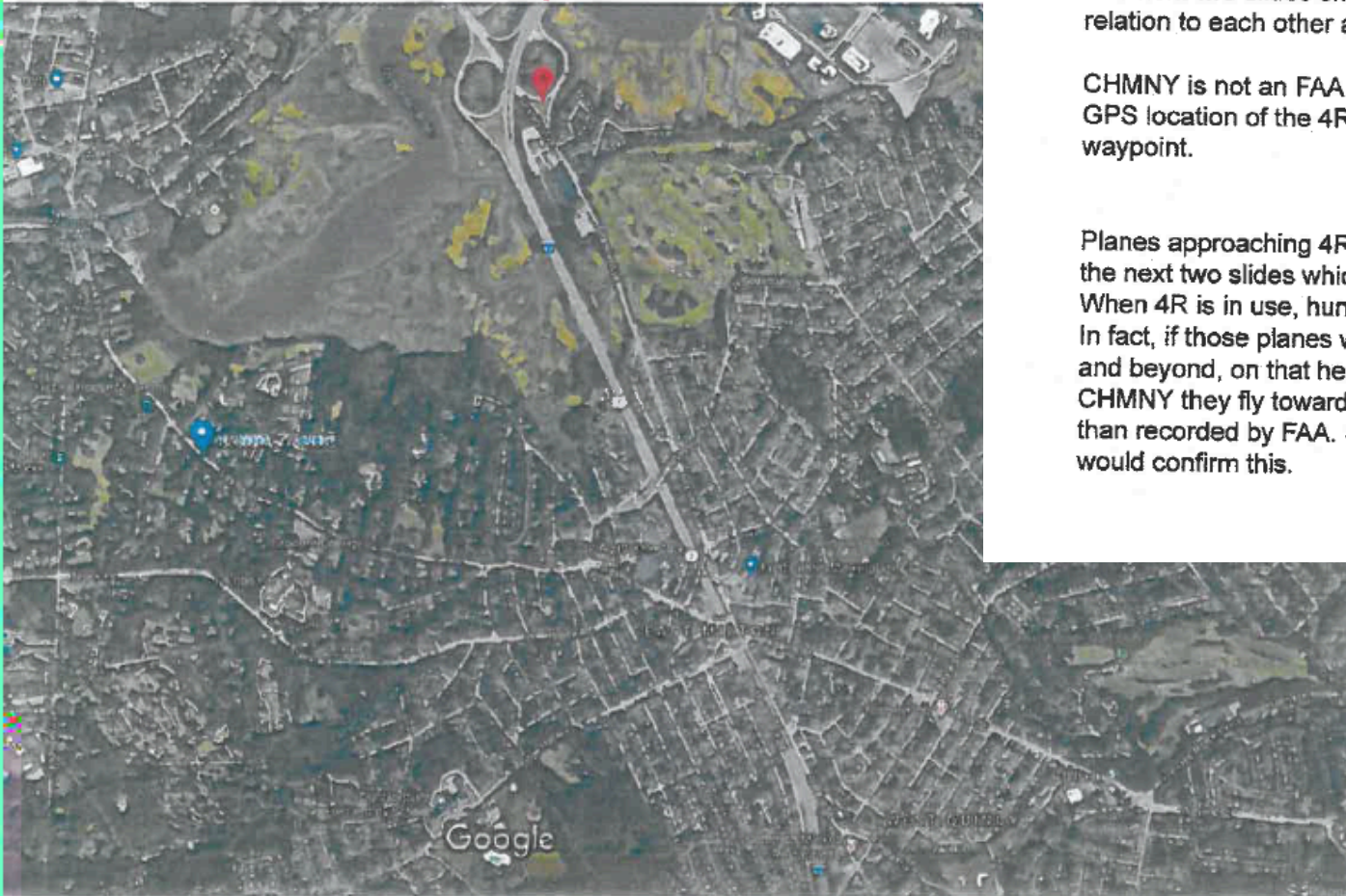




42°16'25.1"N 71°02'57.1"W - Google Maps

S 42°16'25.1"N 71°02'57.1"W

MILTT 42.273650



Imagery ©2019 Google, Map data ©2019 Google 1000ft

↑  
CHMNY

42.263146  
-71.062565

#### 4.5 CHMNY and MILTT apart and in relation to Logan

The next two slides show CHMNY (blue) and MILTT (red) in relation to each other and then in relation to Logan.

CHMNY is not an FAA waypoint. We use it to mark the actual GPS location of the 4R track which is west of the MILTT FAA waypoint.

Planes approaching 4R fly over the point labeled CHMNY on the next two slides which is to the west of the waypoint MILTT. When 4R is in use, hundreds of flights a day fly over CHMNY. In fact, if those planes were to head from CHMNY to MILTT and beyond, on that heading they would head out to sea. From CHMNY they fly toward 4R over areas closer to 4L overflights than recorded by FAA. See Section 4.4 above. Field work would confirm this.

# MILTT Rotary





# MILTT Rotary





# Governor Hutchinson's Field



# Governor Hutchinson's Field



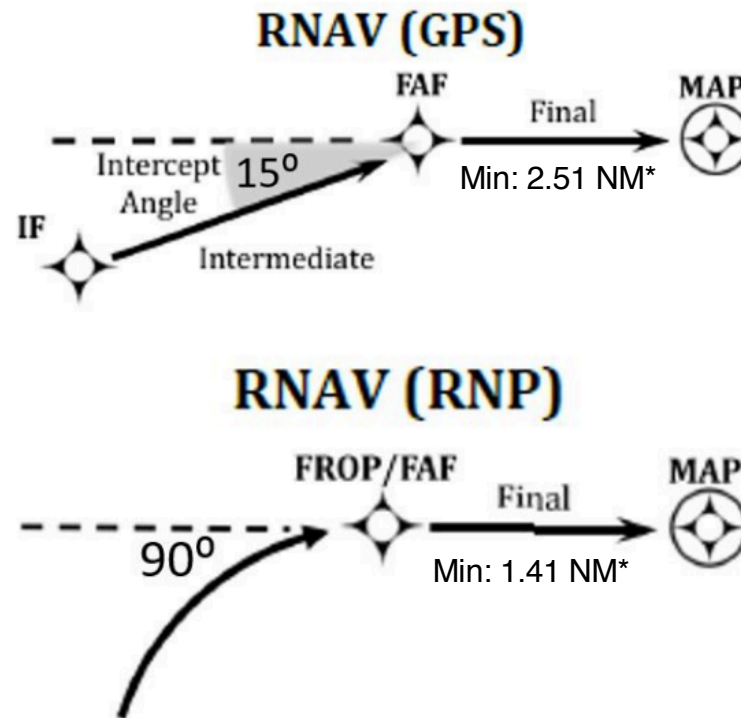
# RWY 4L/R Arrivals

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- Objective: Reduce Exposure to Highly Impacted Communities (requested by Communities)
- Block 2 Options Active:
  - RNAV/RNP-Enabled Lateral Modifications
  - Increased use of Continuous Descent Approaches
  - Delayed Deceleration Approaches
- Block 2 Options Evaluated and Rejected:
  - Steep Approaches
  - Delayed Gear Extension



# RNAV/RNP Approach Limits



\*Assumes an 800 ft PFAF altitude, which is only possible for runway ends without significant obstacle constraints along the first 3 miles of the extended runway centerline.

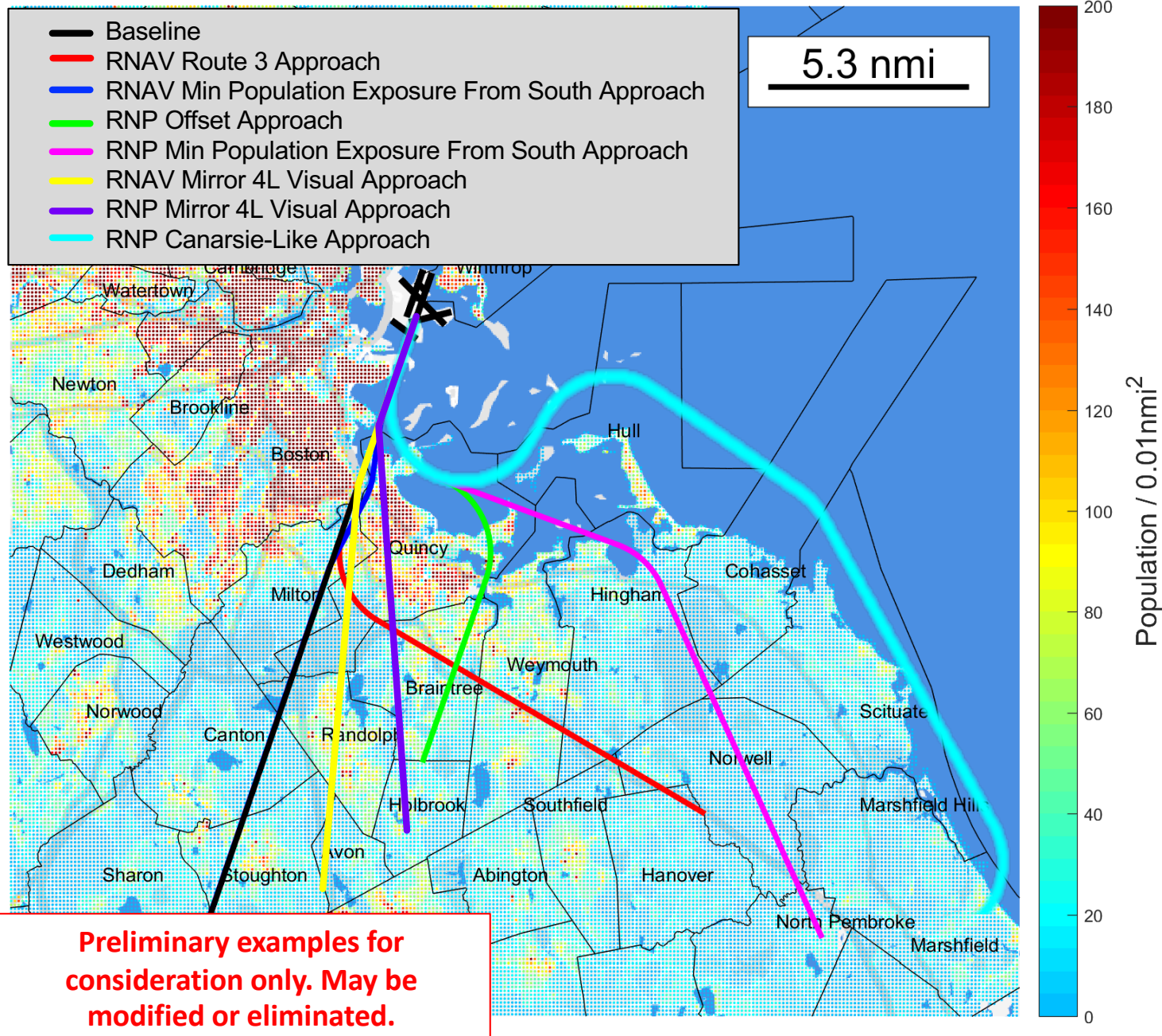
# RWY 4L/R

## RNAV/RNP Enabled Lateral Modifications

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- RNAV Options Evaluated
  - Route 3 Overflight
  - Minimum Population Exposure (from South)
  - Converging Late Intercept (requested by Communities)
- RNP Options Evaluated
  - Minimum Population Exposure (from South)
  - Canarsie-like Late Intercept (opposed by Hull)
  - 4 Mile Offset with Late Intercept
  - Converging Late Intercept

# Example 4R RNAV and RNP Approaches

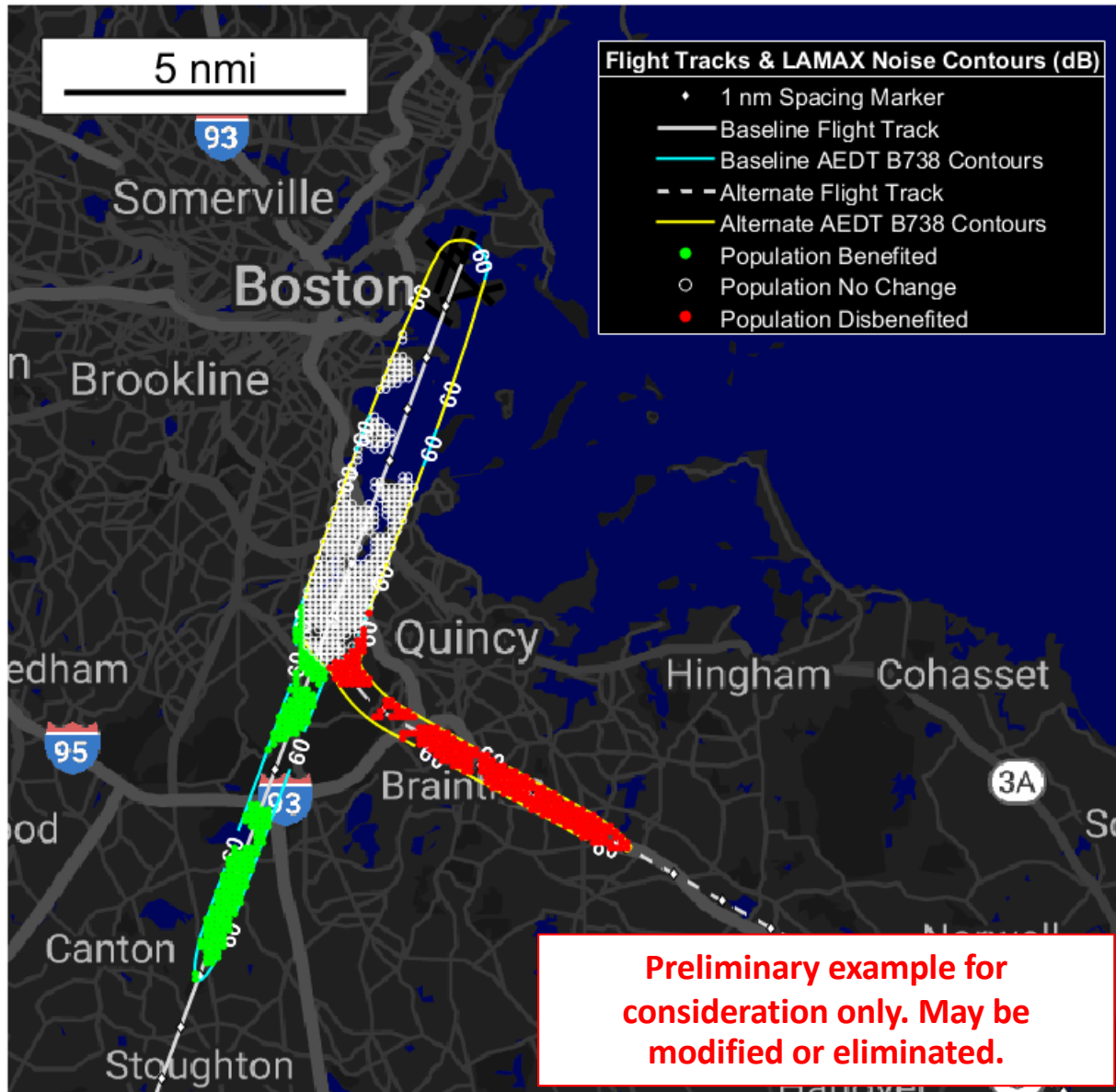


- Several approaches to 4R shown as examples
- RNP technology allows approach to be kept overwater near final approach



# 4R RNAV Approach – Route 3 Initial

B737-800 60dB  $L_{A,max}$  Noise Exposure



**B737-800  
Population Exposure ( $L_{A,max}$ )**

	60dB
Straight In	32,232
RNP	38,353
Difference (Straight In – RNP)	-6,121

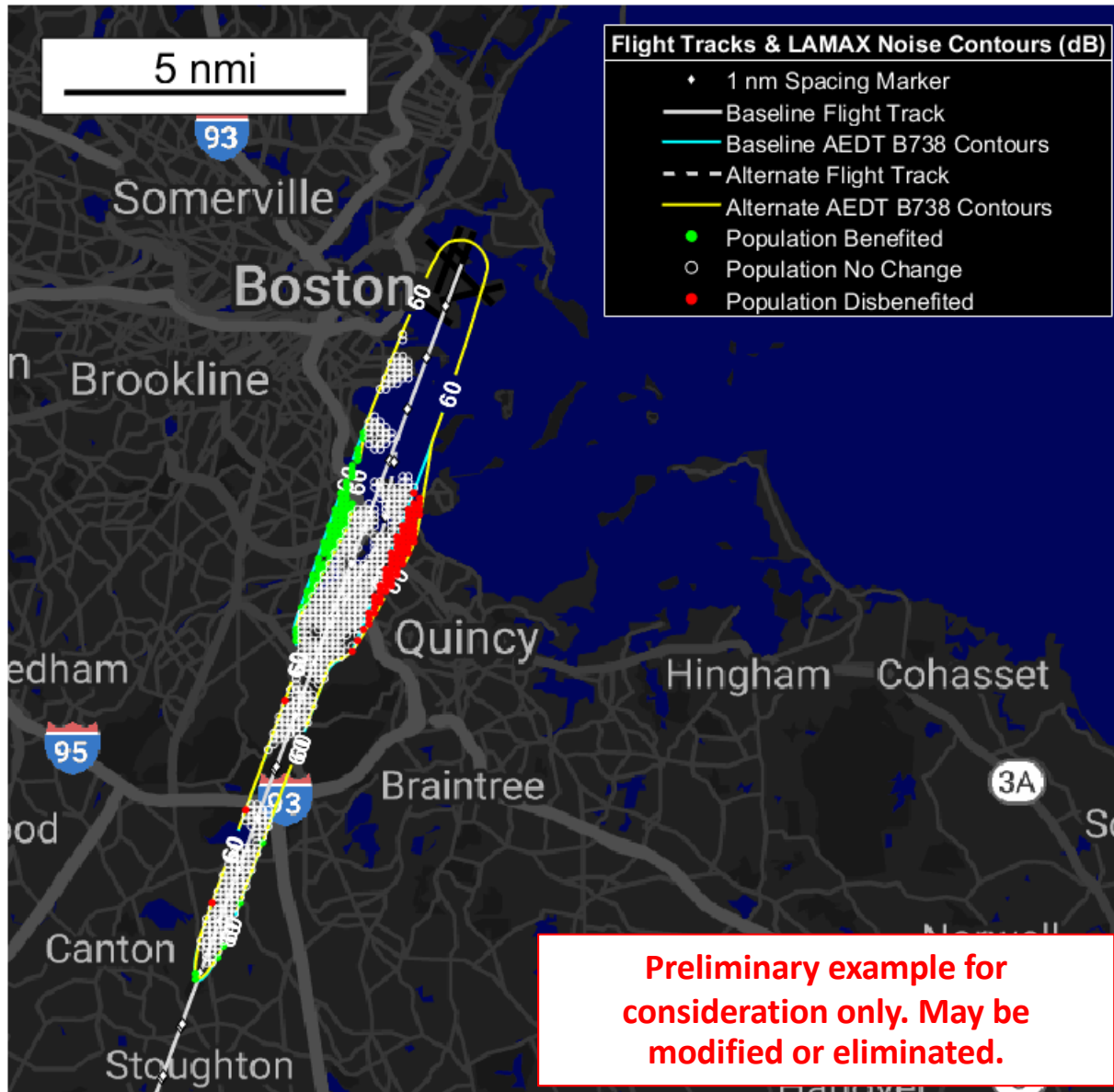
5.5nmi final segment  
80° 2nmi radius-to-fix turn

Population exposure calculations do not take advantage of noise masking

- Procedure within RNAV criteria.
- Air traffic control concerns with merging with straight-in flight track.
- Community support unclear.

# 4R RNAV Approach – Minimum Population Exposure From South

B737-800 60dB  $L_{A,max}$  Noise Exposure



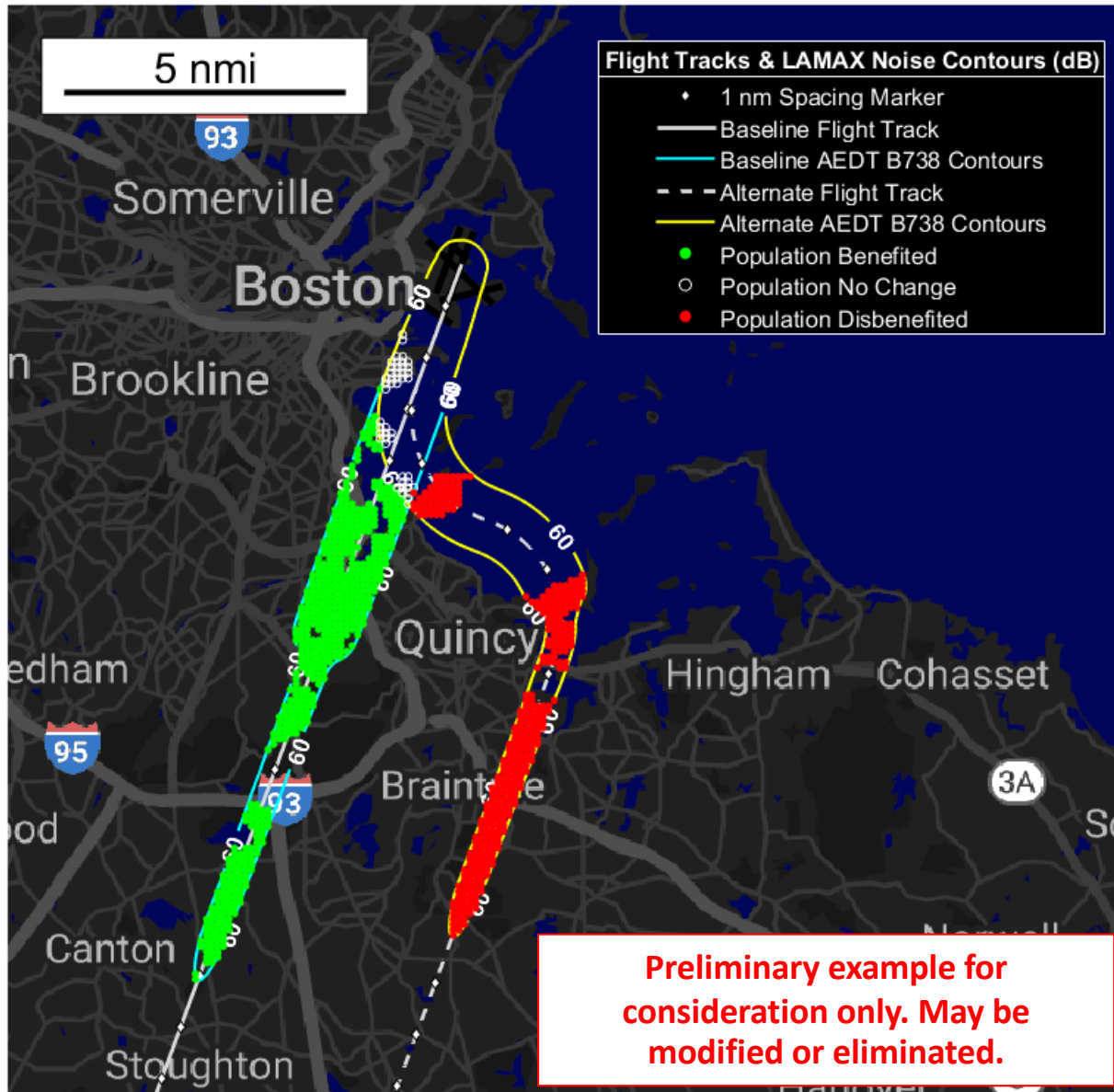
**B737-800  
Population Exposure ( $L_{A,max}$ )**

	60dB
Straight In	32,232
RNP	32,018
Difference (Straight In – RNP)	214

- Procedure within RNAV criteria.
- Community support unclear.
- Limited noise benefit

# 4R RNP Approach – 4 Mile Offset Initial

B737-800 60dB  $L_{A,max}$  Noise Exposure



**B737-800  
Population Exposure ( $L_{A,max}$ )**

	60dB
Straight In	32,232
RNP	25,106
Difference (Straight In – RNP)	7,126

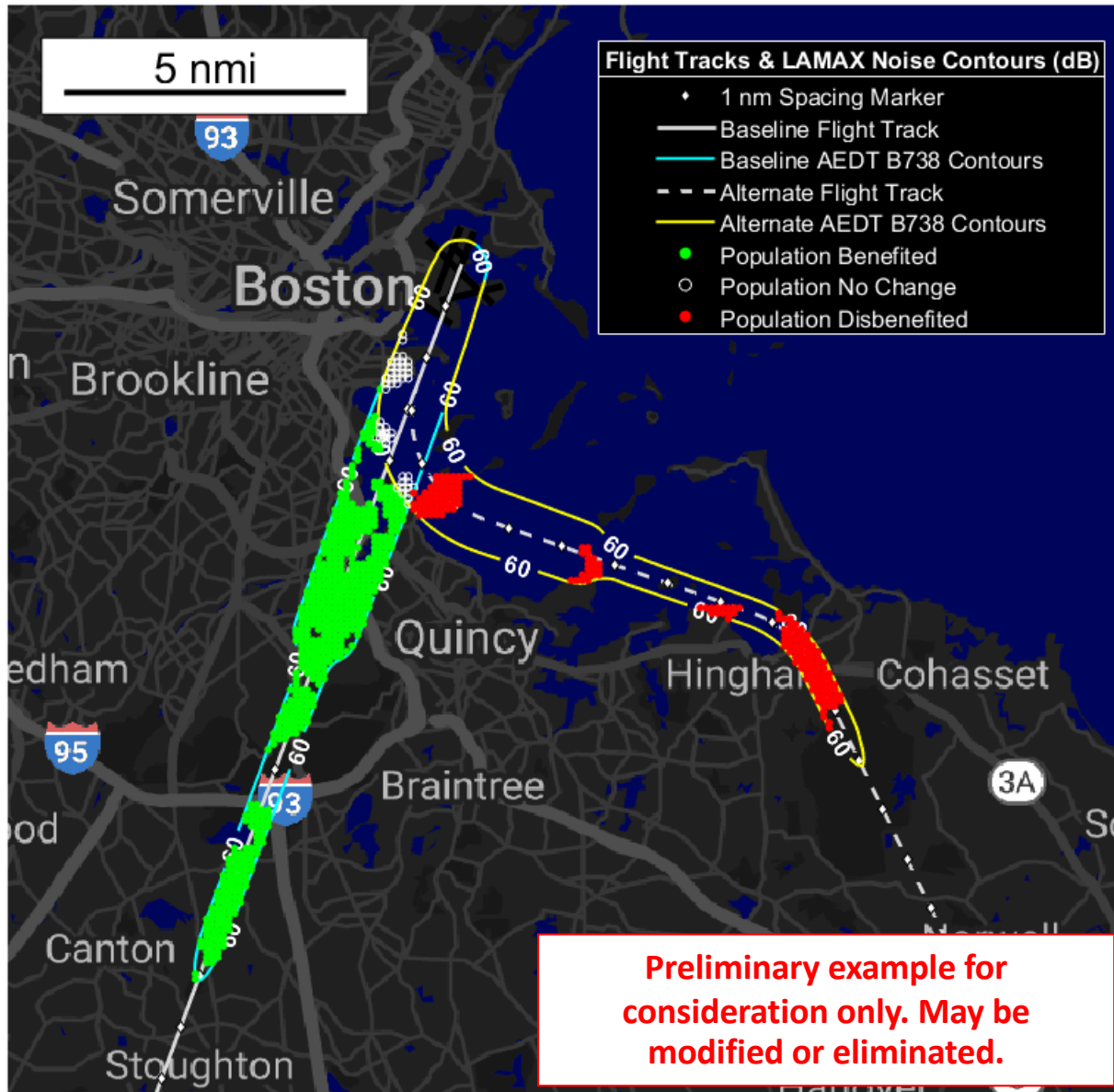
1.5nmi final segment  
 90° 2nmi radius-to-fix turn  
 90° 2nmi radius-to-fix turn

- Procedure within RNP criteria.
- Community support unclear.



# 4R RNP Approach – Min Population Exposure from South

B737-800 60dB  $L_{A,max}$  Noise Exposure



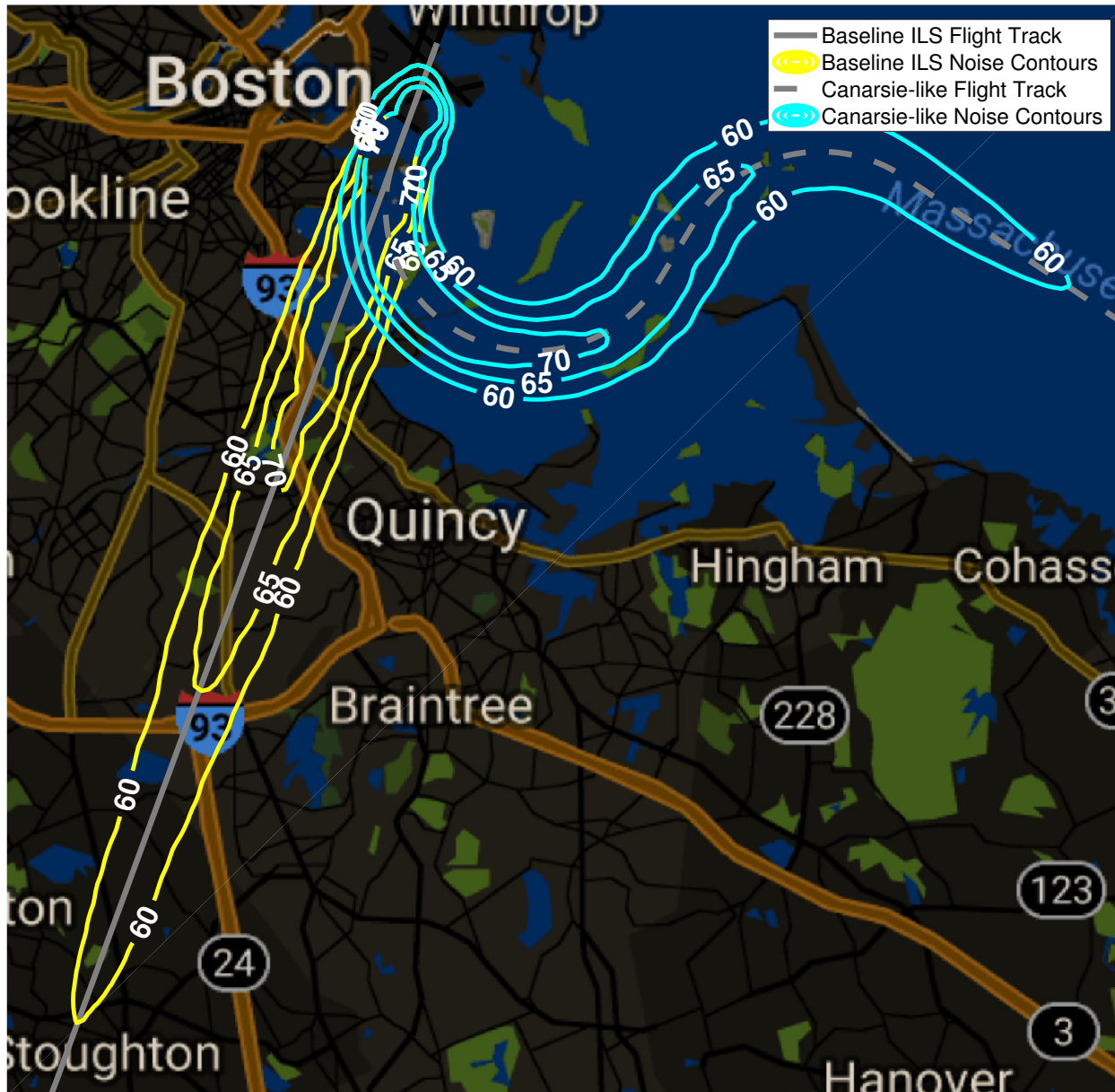
**B737-800  
Population Exposure ( $L_{A,MAX}$ )**

	60dB
Straight In	32,232
RNP	11,682
Difference (Straight In – RNP)	20,550

1.5nmi final segment  
 90° 2nmi radius-to-fix turn  
 5nmi straight segment  
 45° 2nmi radius-to-fix turn

- Procedure within RNP criteria.
- Community support unclear.
- Possible flyability issues need to be tested.
- Air traffic merging concern with straight-in traffic.

# 4R RNP Approach – Canarsie-like



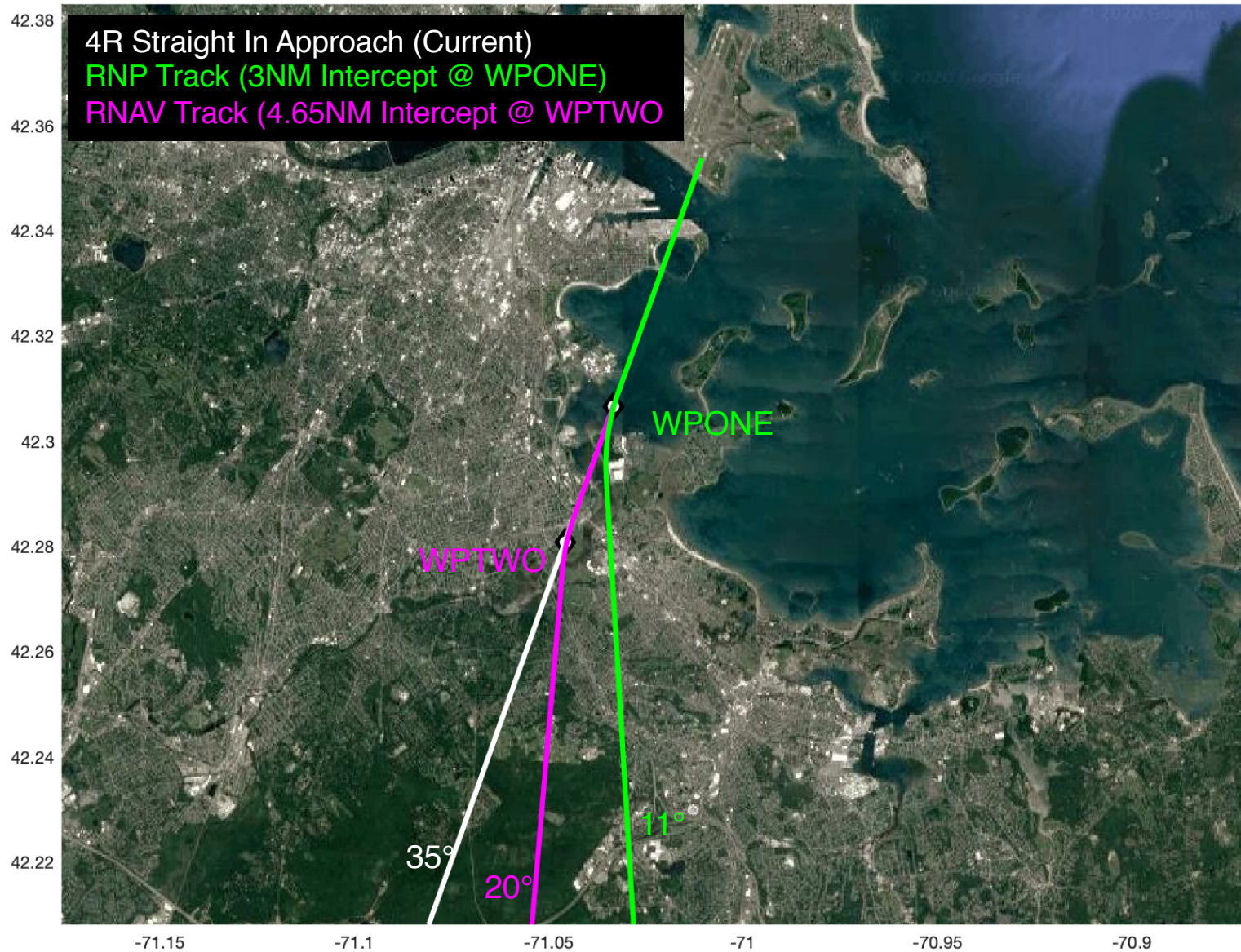
## B737-800 Population Exposure ( $L_{A,MAX}$ )

	60dB
Straight In	46,039
RNP	7,137
Difference (Straight In – RNP)	38,902

- Rejected by Communities
- Additional Path Length and Final Merge Issues

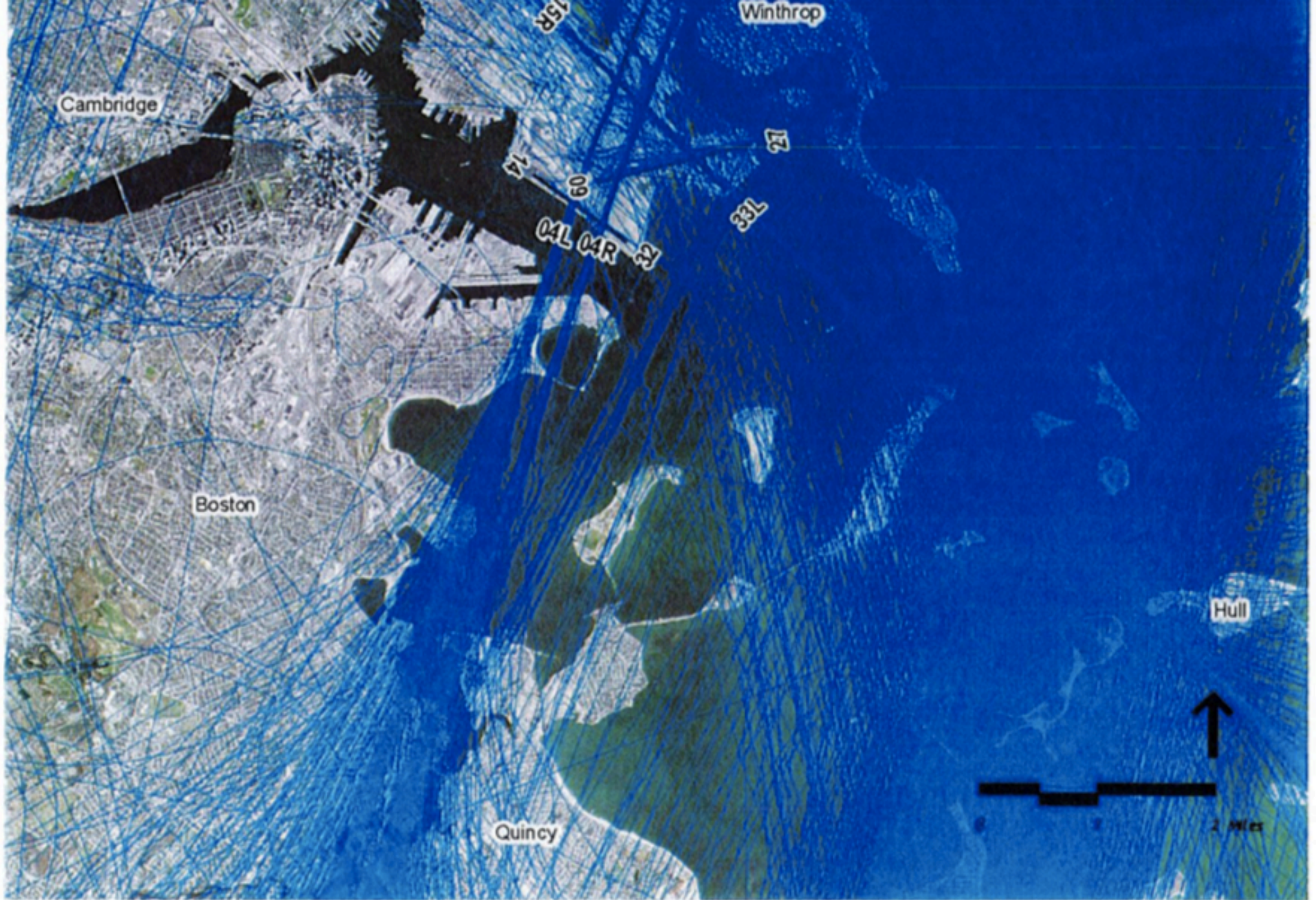


# Feasible 4R Tracks based on Milton Request



The RNP track (green) is the route requested for analysis by Milton and mirrors the JetBlue Visual RNAV. It does not meet criteria for RNAV procedures, and could only be implemented as an RNP procedure. An alternative track that does meet RNAV criteria is shown in magenta.





Source: Massport NOMSERA Multi-Lat, Office of Geographic and Environmental Information (MassGIS), Commonwealth of Massachusetts Executive Office of Energy and Environmental Affairs

**RealContours™ Air Carrier Arrival Tracks (October 2009)**

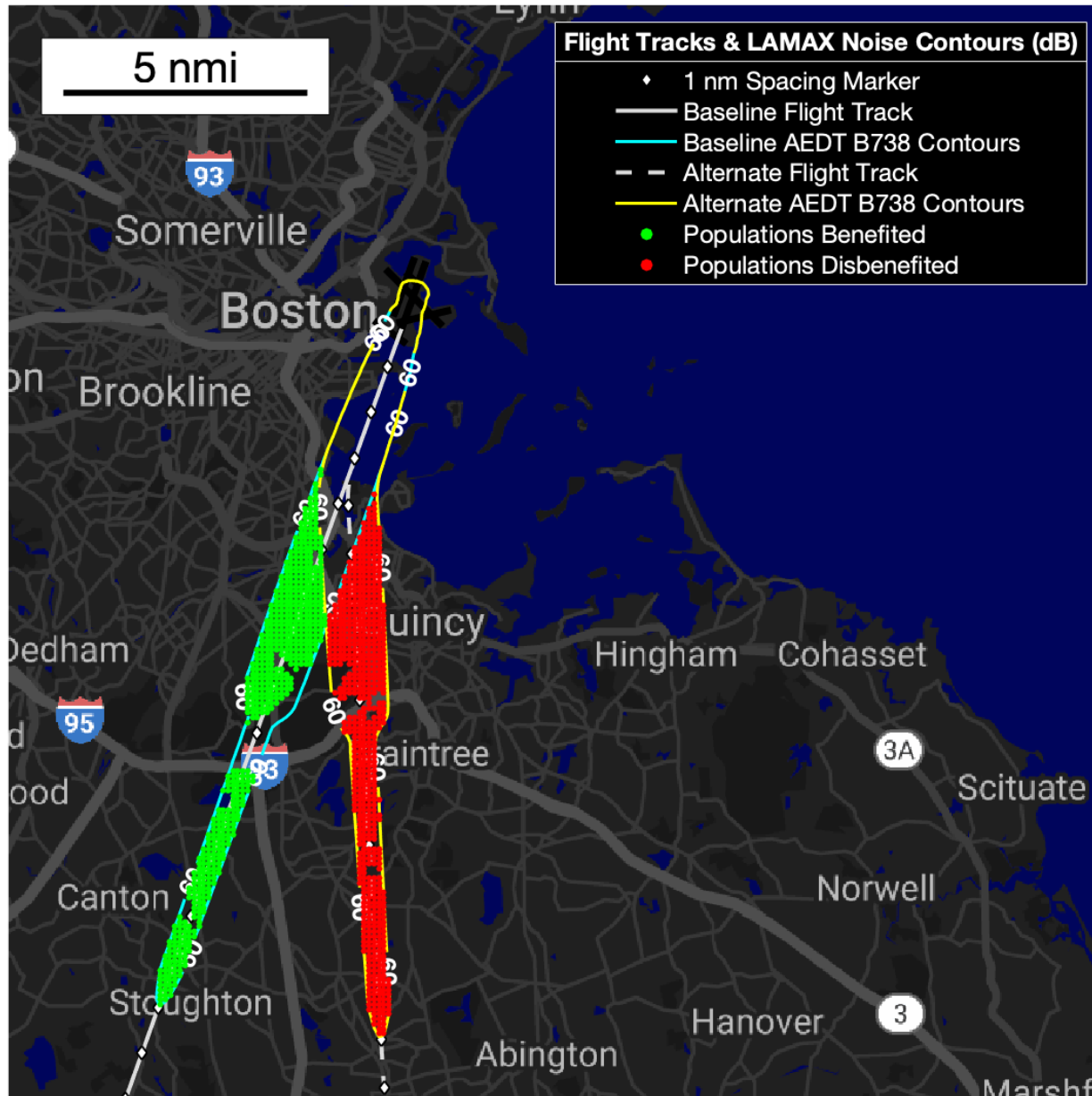
Figure 6-8

— Arrival Flight Tracks



# 4R RNP Approach – Milton Request

## B737-800 60dB $L_{A,max}$ Noise Exposure



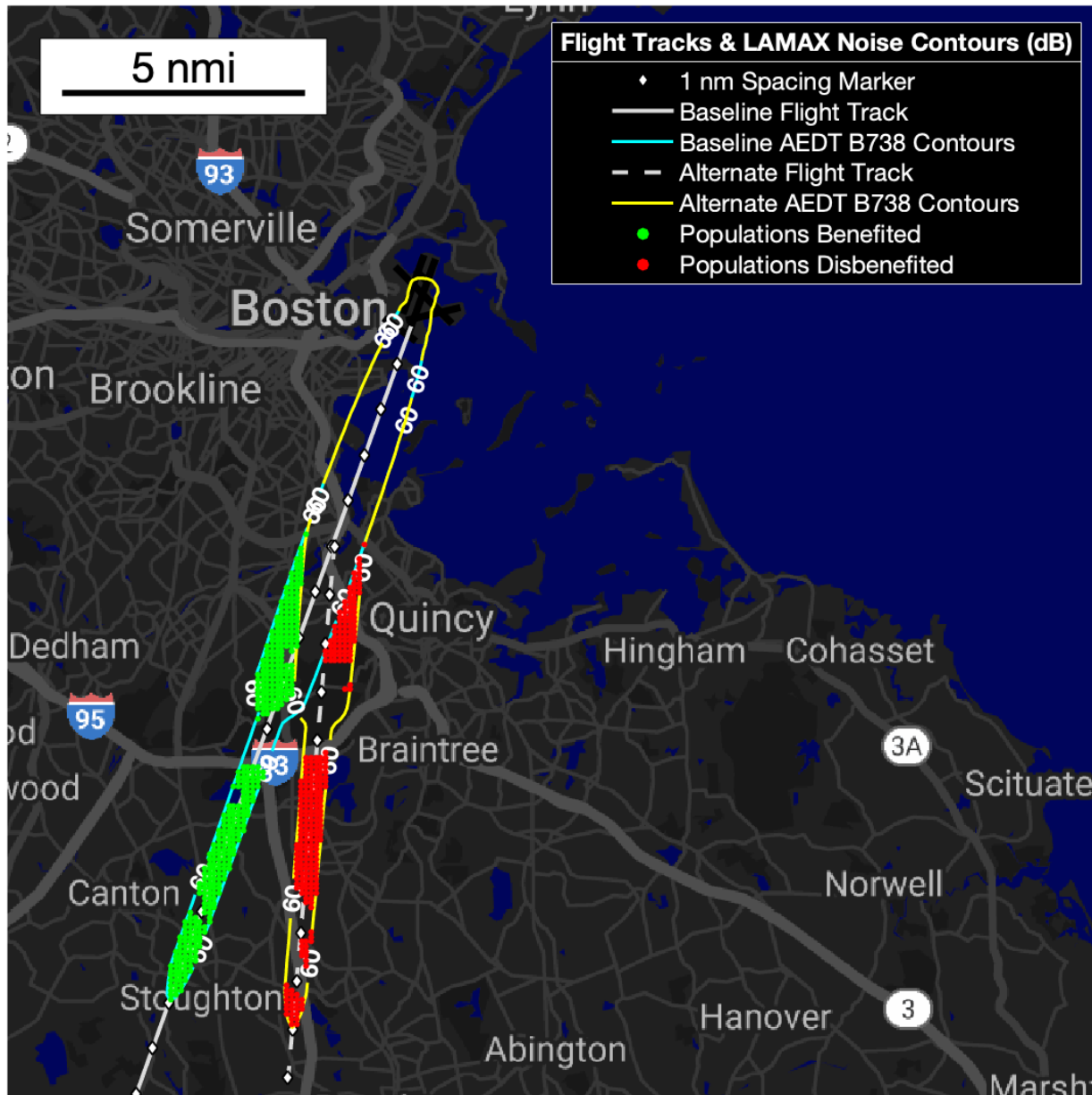
### B737-800 Population Exposure ( $L_{A,MAX}$ )

	60dB
Straight In	34,567
RNP	53,271
Difference (Straight In – RNP)	-18,704

3nmi final segment  
24° turn to final

- Procedure within RNP criteria.
- Concerns with merging tracks

# 4R RNAV Approach – Milton Request



## B737-800 Population Exposure ( $L_{A,MAX}$ )

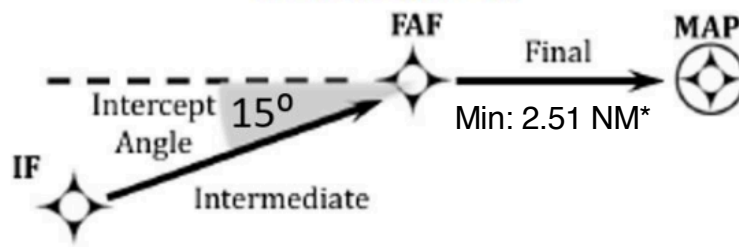
	60dB
Straight In	34,567
RNP	40,459
Difference (Straight In – RNP)	-5,892

4.6 nmi final segment  
15° turn to final

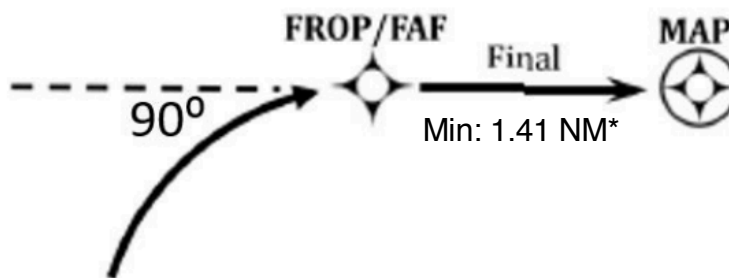
- Procedure within RNAV criteria. Concerns with merging tracks.



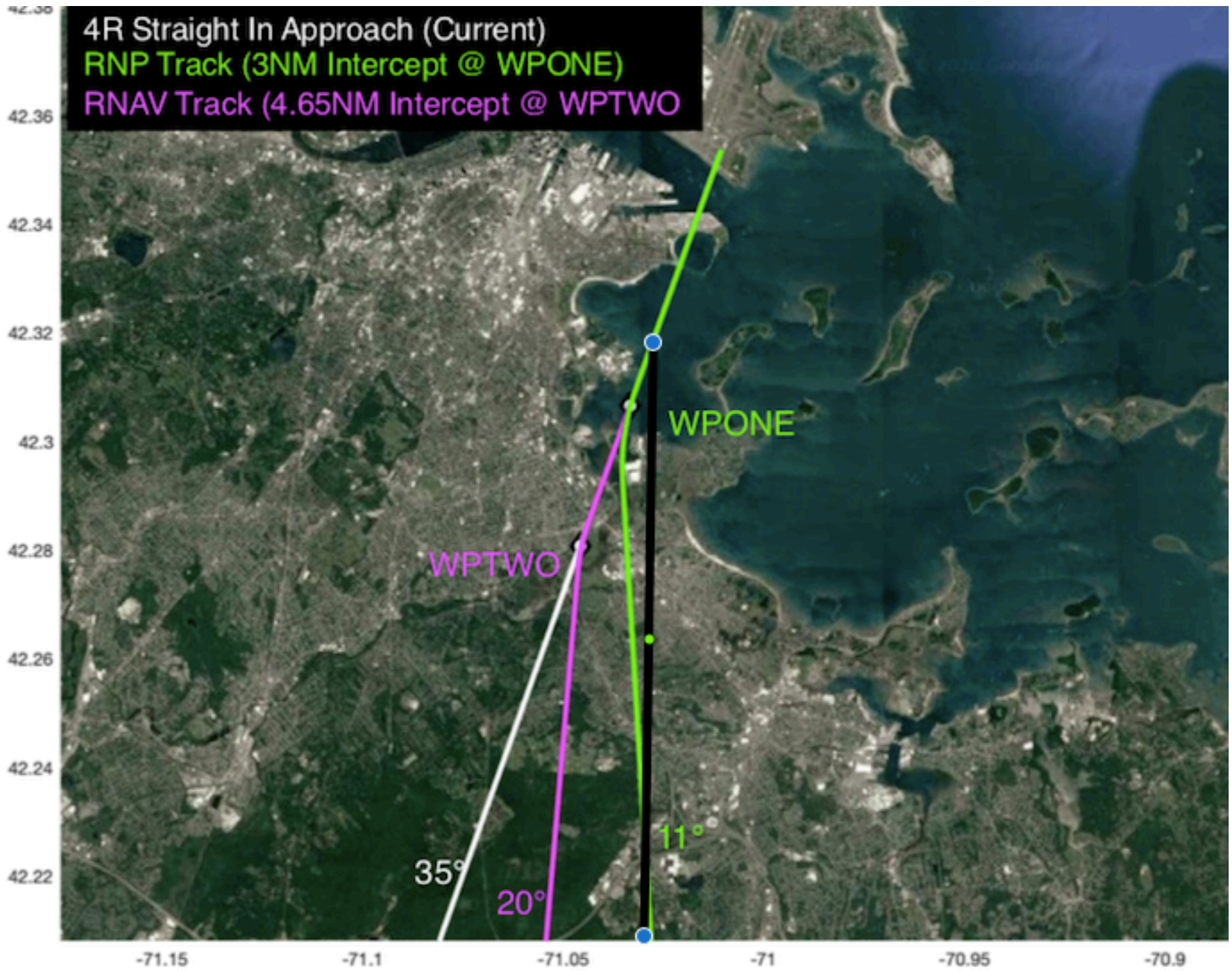
## RNAV (GPS)



## RNAV (RNP)



$$5.1\text{nm} - 2.51\text{nm} = 2.59\text{nm} > \tan(15^\circ)$$
$$.2679 \Rightarrow .67\text{nm} = 4071'$$



## **REQUESTS AND RECOMMENDATIONS FOR BLOCK 2**

### **DISPERSED RUNWAY 4L AND 4R ARRIVAL PATH TESTS**

#### **CONTENTS**

##### **1.0 PREFACE**

##### **2.0 KEY CONSIDERATIONS**

##### **3.0 PRIOR REQUESTS AND FAA RESPONSES**

##### **4.0 DISPERSION REQUEST AND TEST ELEMENTS**

###### **4.1 AUTOMATE DISPERSION**

###### **4.2 USE MULTIPLE FLIGHT PATHS**

###### **4.3 USE CHARTED VISUAL FLIGHT PROCEDURES**

###### **4.4 RECOGNIZE WESTWARD SHIFT OF CSPR SKYRAILS**

###### **4.5 CHMNY VERSUS MILTT REALITIES**

###### **4.6 DISPERSION CHART SHOWING ONE TEST AREA**

###### **4.7 4R RNP APPROACH—MIN POPULATION FROM SOUTH**

###### **4.8 4R RNP APPROACH — OFFSET INITIAL**

###### **4.9 4R LOW-NOISE OVERWATER RNAV APPROACH + RNP**

##### **5.0 22L-TYPE LOW-NOISE OFFSET RNAV APPROACH +RNP**

##### **6.0 27 DEPARTURES WAYPOINT RELOCATION**

##### **7.0 FIELDWORK TO CONFIRM REALITIES/POSSIBILITIES**

##### **8.0 DWELL AND PERSISTENCE REQUIRE SIMILAR ACTION**

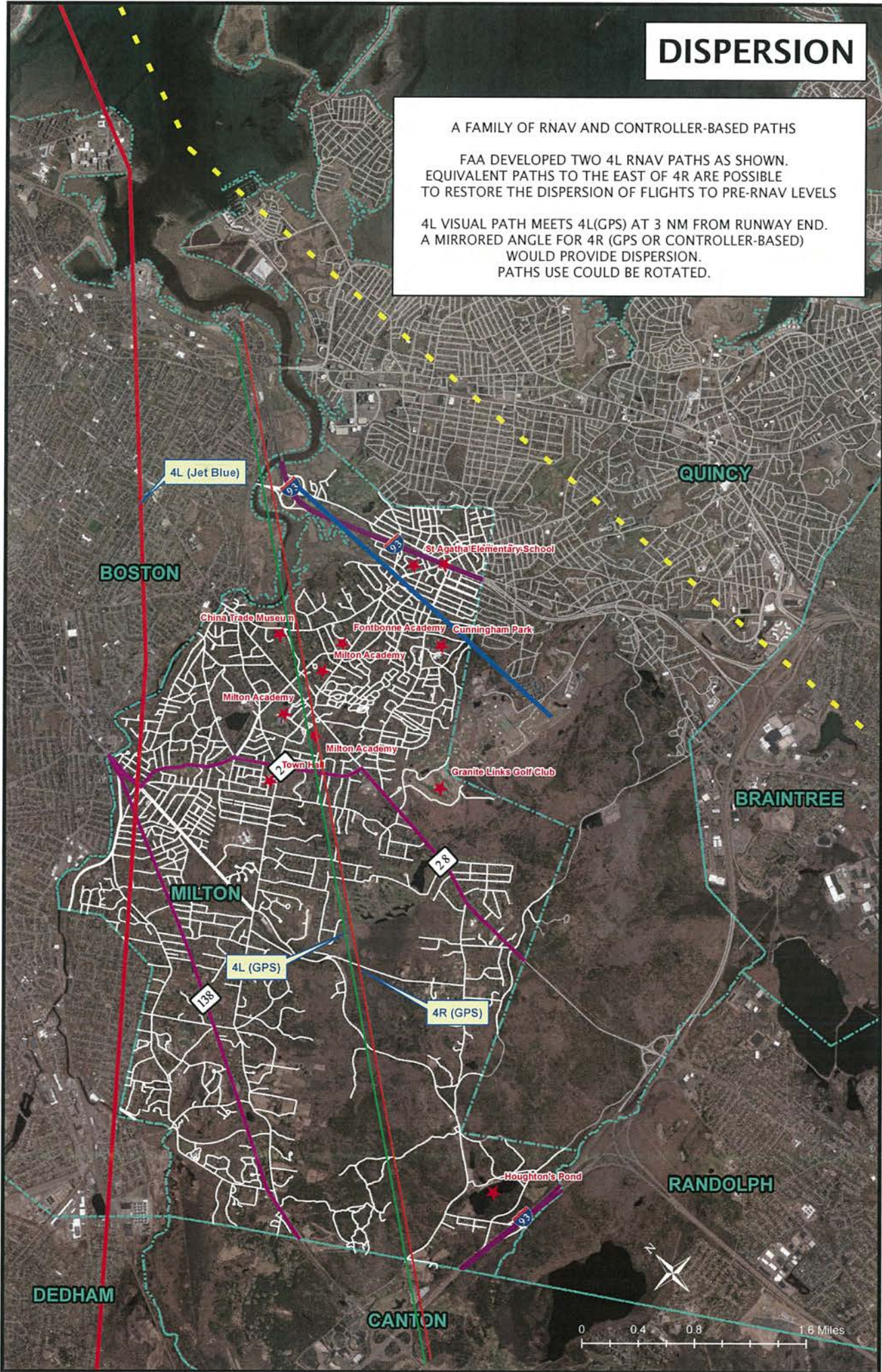


# DISPERSION

A FAMILY OF RNAV AND CONTROLLER-BASED PATHS

FAA DEVELOPED TWO 4L RNAV PATHS AS SHOWN. EQUIVALENT PATHS TO THE EAST OF 4R ARE POSSIBLE TO RESTORE THE DISPERSION OF FLIGHTS TO PRE-RNAV LEVELS

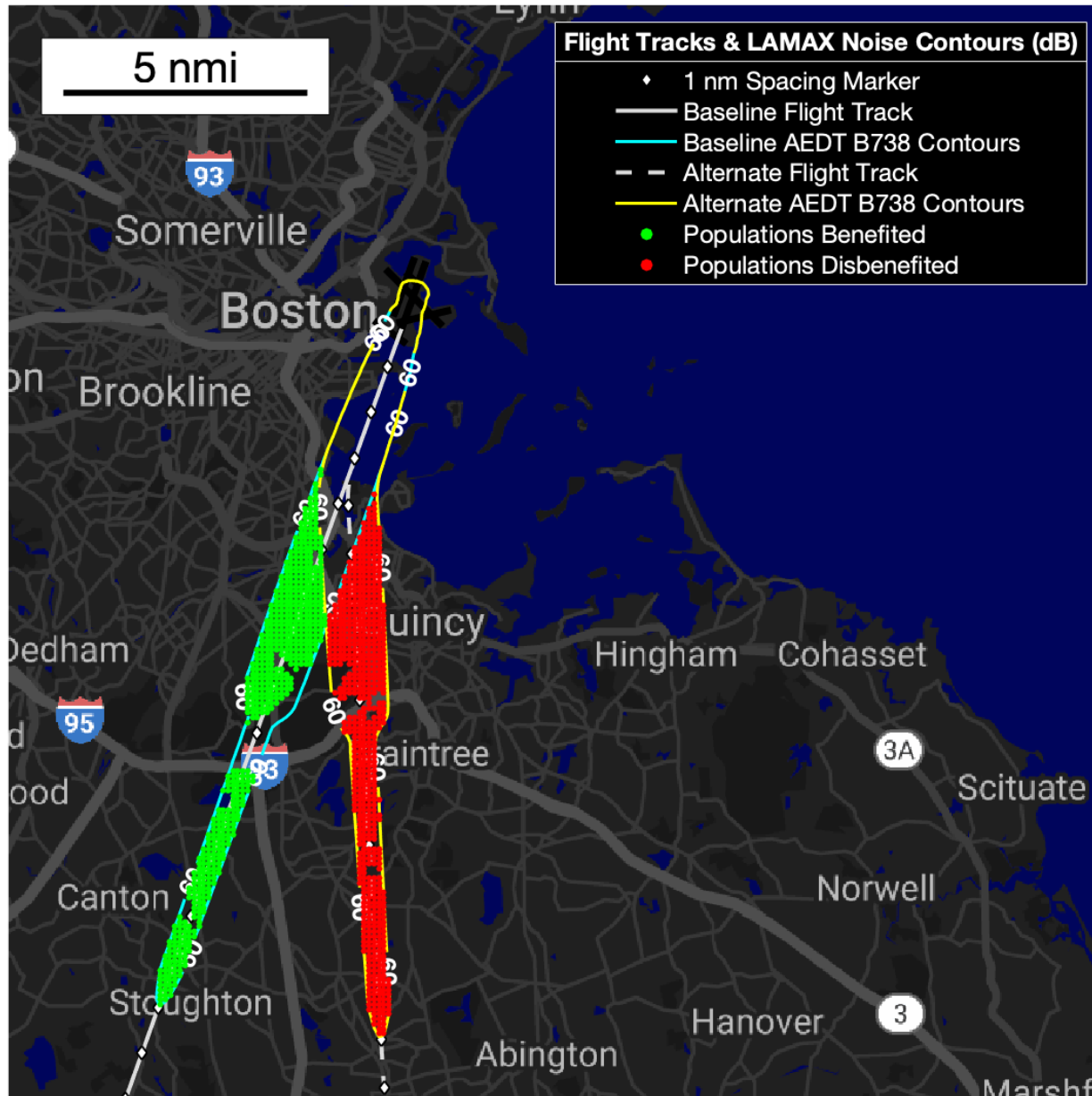
4L VISUAL PATH MEETS 4L(GPS) AT 3 NM FROM RUNWAY END. A MIRRORRED ANGLE FOR 4R (GPS OR CONTROLLER-BASED) WOULD PROVIDE DISPERSION. PATHS USE COULD BE ROTATED.





# 4R RNP Approach – Milton Request

B737-800 60dB  $L_{A,max}$  Noise Exposure



**B737-800**  
Population Exposure ( $L_{A,MAX}$ )

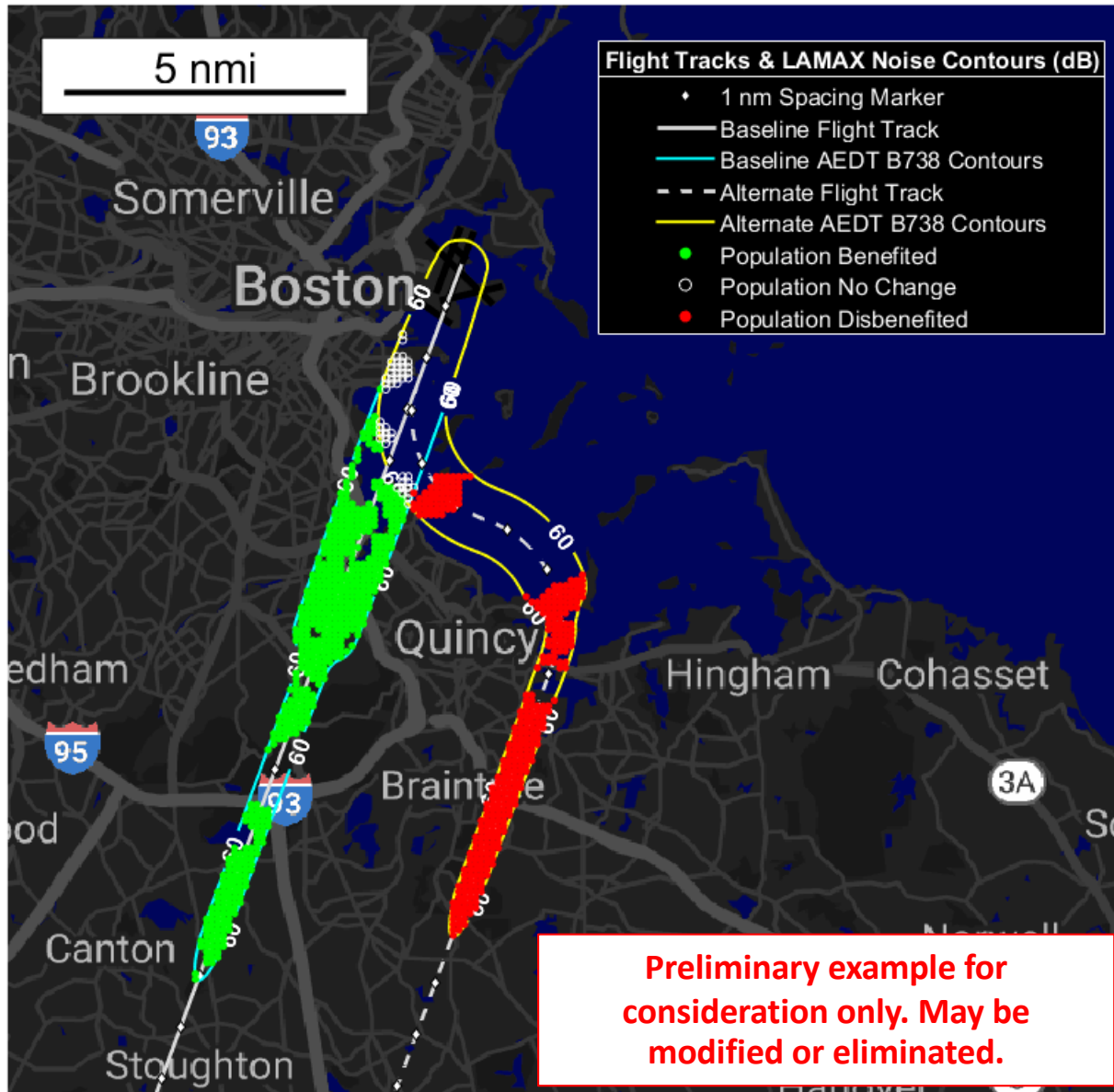
	60dB
Straight In	34,567
RNP	53,271
Difference (Straight In – RNP)	-18,704

3nmi final segment  
24° turn to final

- Procedure within RNP criteria.
- Concerns with merging tracks

# 4R RNP Approach – 4 Mile Offset Initial

B737-800 60dB  $L_{A,max}$  Noise Exposure



**B737-800  
Population Exposure ( $L_{A,max}$ )**

	60dB
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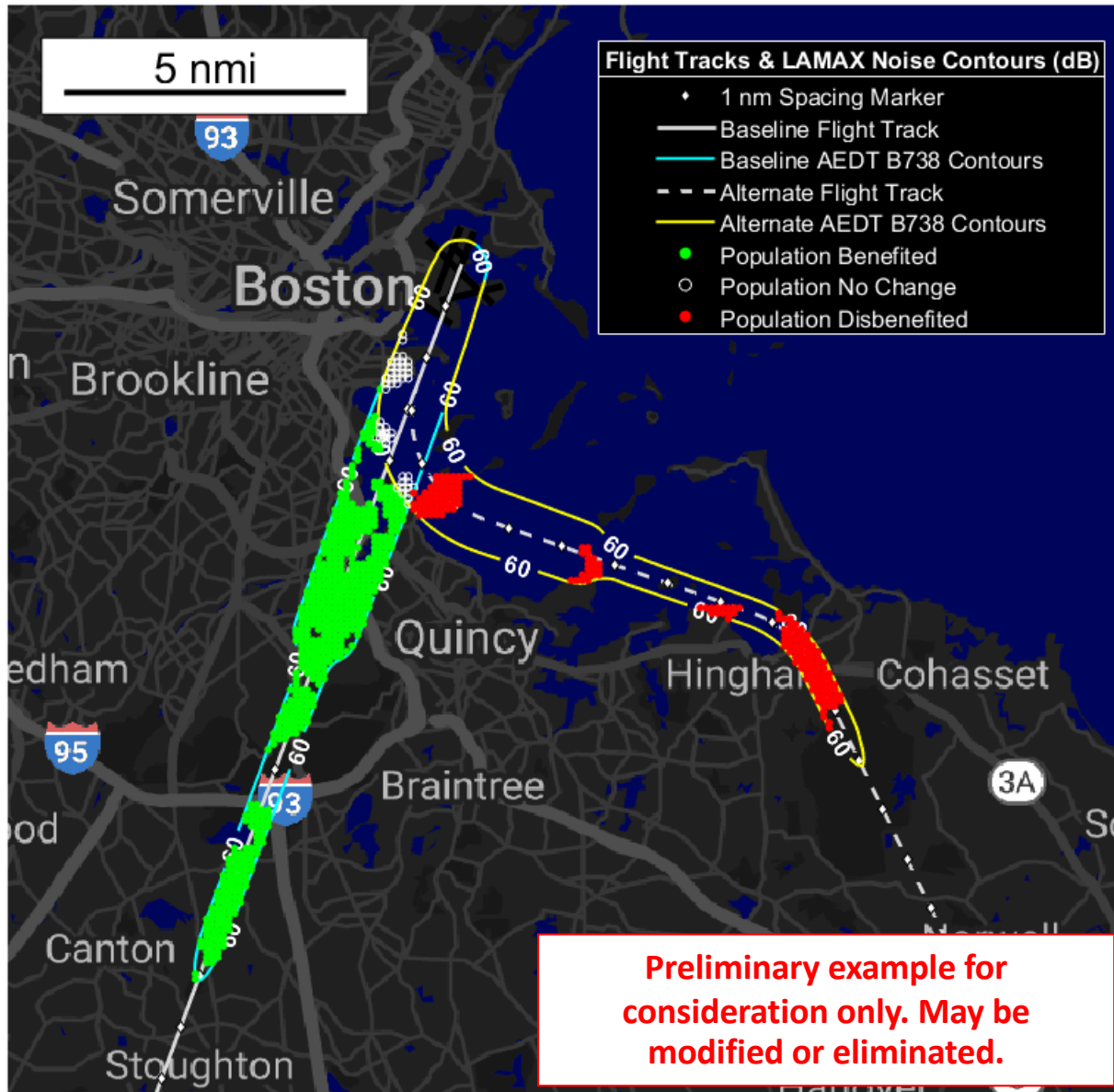
1.5nmi final segment  
 90° 2nmi radius-to-fix turn  
 90° 2nmi radius-to-fix turn

- Procedure within RNP criteria.
- Community support unclear.



# 4R RNP Approach – Min Population Exposure from South

B737-800 60dB  $L_{A,max}$  Noise Exposure

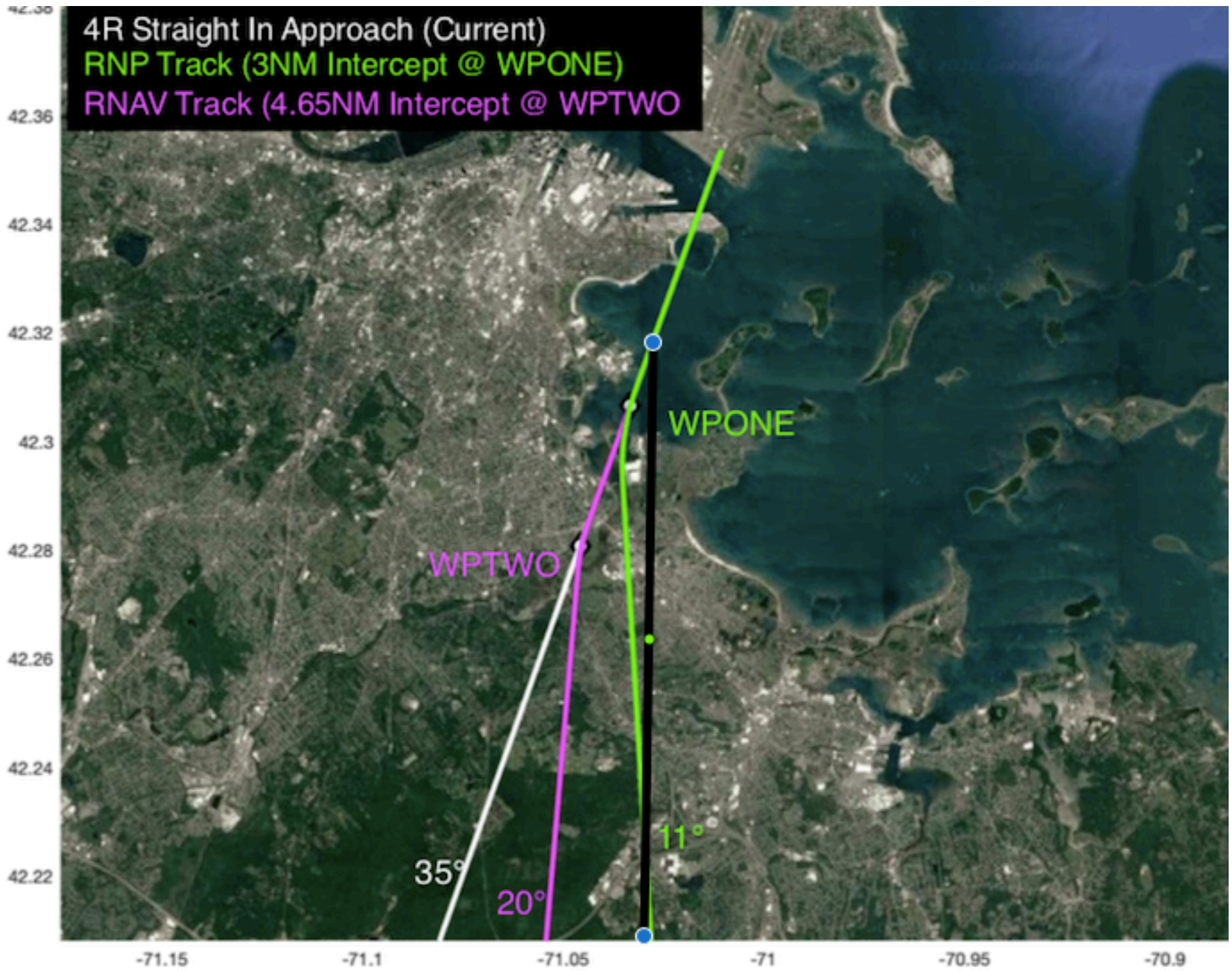


**B737-800  
Population Exposure ( $L_{A,MAX}$ )**

	60dB
Straight In	32,232
RNP	11,682
Difference (Straight In – RNP)	20,550

1.5nmi final segment  
 $90^\circ$  2nmi radius-to-fix turn  
 5nmi straight segment  
 $45^\circ$  2nmi radius-to-fix turn

- Procedure within RNP criteria.
- Community support unclear.
- Possible flyability issues need to be tested.
- Air traffic merging concern with straight-in traffic.



## **22L/R SID**

- VI-CF Rev 3.

## **33L SID**

- Controller-based dispersion (LOGAN TWO) during low-traffic periods.

## **27 SID**

- Waypoint relocation (KIRAA to WYLYY for northbound and westbound departures).

## **22L Approach**

- Overwater RNAV with RNP overlay.

## **4R Approach**

- Multiple RNAV/RNP options.
  - Noise redistribution requires community consensus.
  - TARGETS analysis has not been performed.
- Encourage Continuous Descent Approach use.



## NEXT STEPS

### 4R MILTON ACTION ITEMS

#### MIT ADVISED THAT THREE ALTERNATIVE RNP PATHS ARE FLYABLE

\*At end of 2017 **62%** of all US air carrier aircraft (including freight) in service were equipped for **RNP** operation (MIT report)

\* **All** of these are **RNP** equipped: **JetBlue, American, Delta, Cathay Pacific, Frontier, Southwest, United, Alaska**

\***JetBlue** alone has **125 arrivals per day** from 54 cities and plans to go to **200 arrivals per day** (Jet Blue Annual Report)

#### FOLLOW-UP ON RNAV ALTERNATIVE

#### ADVOCATE FOR DISPERSION VIA ONE OR MORE ALTERNATIVES FROM AMONG MIT FLYABLE PATHS

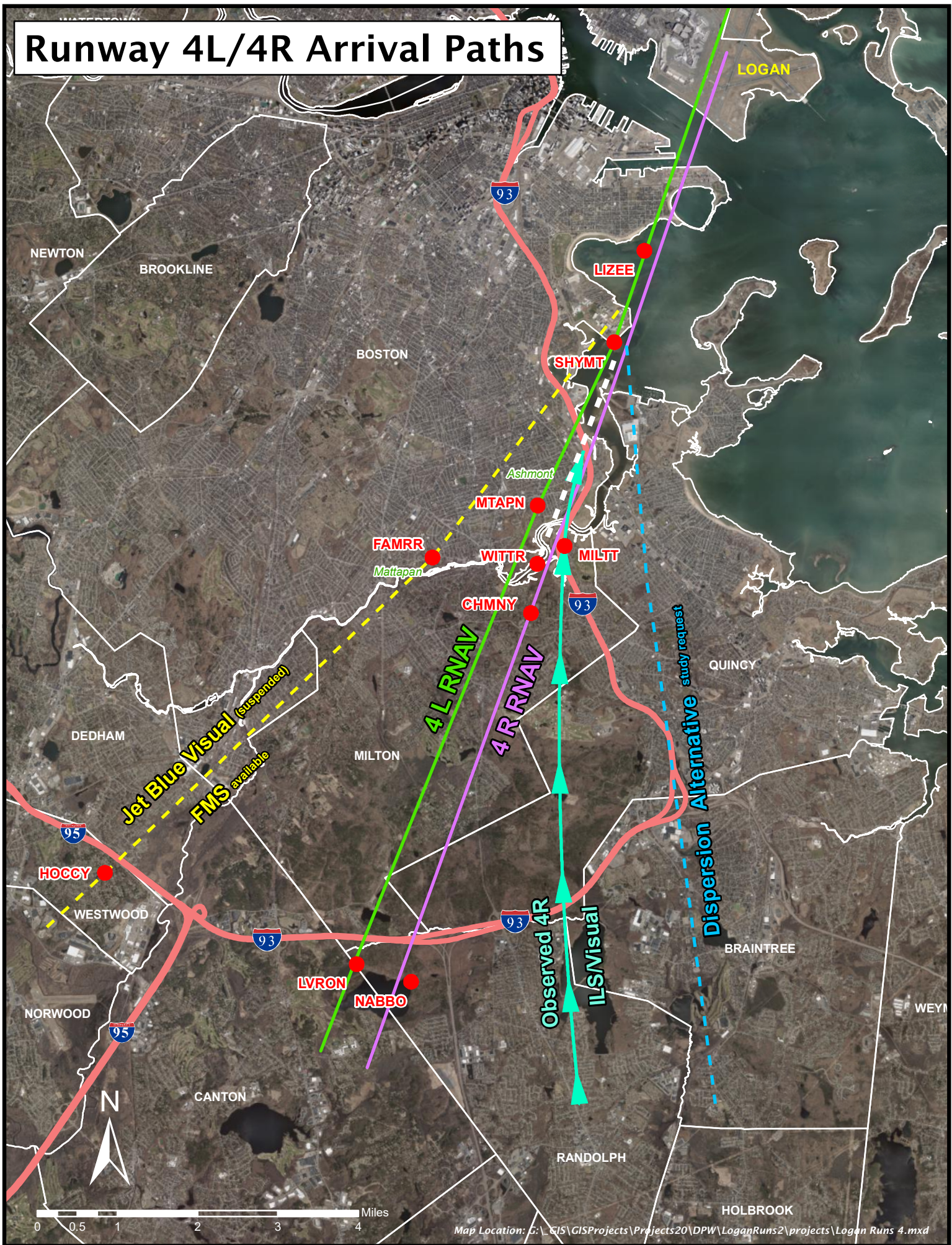
**Enlist Political Support: State Sen./Rep., US Rep./Senators**

**Engage other cities/towns/Massport and MIT: "TARGETS"**

**[Federal Legislation if new US Senate majority: to mandate FAA equal protection of communities via required dispersion of flight paths across available space (HR-4 example: mandate change sponsored in 2018)]**



# Runway 4L/4R Arrival Paths







**Massport Community Advisory Committee**  
One Broadway, 14<sup>th</sup> Floor  
Cambridge, MA 02142

May 18, 2020

(VIA ELECTRONIC MAIL)

Colleen D'Alessandro, ANE-1, FAA New England Regional Administrator  
[Colleen.Dalessandro@faa.gov](mailto:Colleen.Dalessandro@faa.gov)

**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.





**Massport Community Advisory Committee**

One Broadway, 14<sup>th</sup> Floor  
Cambridge, MA 02142

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



U.S. Department  
of Transportation

**Federal Aviation  
Administration**

Office of the Regional Administrator  
New England Region

1200 District Avenue  
Burlington, MA 01803-5299

June 11, 2020

Mr. Matthew A. Romero, Executive Director  
Massport Community Advisory Committee  
One Broadway, 14th Floor  
Cambridge, MA 02142

Dear Mr. Romero:

Thank you for your May 18, 2020, correspondence on behalf of the Massport Community Advisory Committee (MCAC). This letter is in response to MCAC's request to delay the environmental review process for the proposed General Edward Lawrence Logan International (BOS) Area Navigation (RNAV) Global Positioning System (GPS) Runway (RWY) 4 Left (4L) [RNAV (GPS) RWY 4L] approach procedure. The proposed action will establish an instrument approach procedure to Runway 4L, where no instrument approach procedure is currently published, that will enhance both safety and efficiency at BOS and in the National Airspace System (NAS). As a result of the expected benefits and with recent proven success conducting virtual public workshops for other initiatives, the FAA intends to proceed with the project as currently scheduled.

The implementation of the RNAV (GPS) RWY 4L will enhance safety specifically by:

- 1) Allowing air traffic control to more precisely monitor each aircraft both vertically and laterally along the arrival track;
- 2) Enable air traffic control and operators to conduct instrument approaches to Runway 4L when Runway 4 Right (R) is not available and;
- 3) Significantly reduce the need to use the Instrument Landing System (ILS) approach to Runway 15R with a transition to a Visual Approach (VA) to Runway 4L (ILS 15R VA 4L) procedure.

The implementation of the RNAV (GPS) RWY 4L will enhance efficiency by improving aircraft arrival rates and will reduce pushing delays incurred during the daytime into the nighttime, particularly during inclement weather.

The FAA first notified the community of its intent to conduct an Environmental Assessment (EA) in 2015 as a result of input from community members and elected officials regarding the level of environmental review planned for the project. After securing funding and procuring contract support, the FAA notified MCAC that the EA process had begun in October 2019. Continuing the EA for the proposed RNAV (GPS) RWY 4L during this time is important to increasing flight safety, and the FAA has determined that realizing the procedure's benefits are an operational necessity for BOS and the NAS. The FAA will follow its normal process to

analyze the impacts of the proposed procedure by using historical radar track data to model the baseline conditions and compare them to the expected changes from the proposed action. Since historical data will be used, the reduced operations caused by COVID-19 will not inhibit the FAA's ability to assess the environmental impacts of the procedure. Furthermore, BOS operations have increased the first week of June to a total of 2,215 operations from a total of 1,709 during the first week of May, representing an increase of nearly 30 percent; a trend we expect to continue further justifying the need for the procedure.

The FAA's environmental analysis will first be shared with the public in the form of a Draft EA, at which time the public can submit any comments or concerns they might have about the FAA's analysis. Ensuring the appropriate level of public notification about a Draft EA through interactive virtual public workshops has proven successful in achieving the desired outreach with the communities potentially affected by proposed changes to instrument flight procedures. Recently, as part of the EA process for the South Florida Metroplex project, virtual public workshops, attended by tens of thousands, were held via Zoom, Facebook, Twitter and YouTube to notify the public of the Draft EA. During the live virtual public workshops, participants could submit their questions through any one of the platforms, using a mobile device or PC, or submit inquiries through the dedicated website created for the virtual events. Community members have access to the site as a source for more information related to the Draft EA, access to recorded live question and answer sessions, and may submit comments through the site during the open comment period. Establishing this new technology-enabled environment and offering multiple opportunities for community members to attend events increased the quality and rigor of our communications and allowed the FAA to reach a much broader audience. In addition, copies of the Draft EA will be available at local libraries, which are expected to be open prior to the release of the Draft EA. These libraries allow public access to the Internet, where the public can view the website for the project and submit comments. If libraries do not open by the time the Draft EA is released, then physical copies can be mailed to residents upon request.

We appreciate MCAC sharing potential accessibility concerns with the FAA. We look forward to working with MCAC members and local community leaders to identify other accommodations that may help address specific community challenges. While the FAA understands that the COVID-19 pandemic has caused massive disruptions within communities across the world, we must continue our mission to improve safety and enhance efficiency in the National Airspace System. As a result, we intend to proceed with the project as scheduled with virtual public workshops conducted in early fall 2020.

Sincerely,

**COLLEEN M  
D'ALESSANDRO**

Colleen D'Alessandro

Regional Administrator, New England Region

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D'ALESSANDRO  
Date: 2020.06.11 11:09:02 -04'00'



247 Adams Street Milton MA 02186

July 14, 2020

(VIA ELECTRONIC MAIL)

Colleen D'Alessandro, ANE-1, FAA New England Regional Administrator  
Colleen.Dalessandro@faa.gov

**RE: Proposed Runway 4L Environmental Assessment Follow Up Response**

Dear Ms. D'Alessandro:

I am writing on behalf of residents of Milton, Mattapan and Dorchester, with the support of the Milton Select Board and Boston City Councilor Ms Andrea Campbell, to respond to your letter of June 11, 2020 to the MCAC. The MCAC is submitting a letter to you also.

The FAA's June 11, 2020 reply, rejecting the MCAC's request that the Logan runway 4L EA be deferred, should be reversed because it is prejudicial to the residents of Milton, Mattapan, Dorchester and other neighborhoods overflowed by the referenced RNAV flight path for these reasons:

1. The FAA bases its decision in part on the statement that BOS operations increased in the first week of June by 30% over May's operations. The FAA reply does not acknowledge that due to the CDC's Covid-19 advisory that air travel should be limited, there actually were only **5** landings on runway 4L during the entire month of May 2020. (In 2019, there were 907 arrivals in May.) Then yesterday, July 13, Massport reported that there were only **3** landings on runway 4L during the entire month of June 2020. Meanwhile, airlines have announced reductions in planned August service given the continuing Covid-19 contagion. There is no runway-utilization-related reason to resume the EA now.

2. Given the paucity of 4L arrivals due to the CDC's Covid-19 advisory, there is also no safety reason to proceed with the runway 4L arrival path EA now as contrasted with the **7 prior years** since 2013 during which FAA

announced that it would proceed with the EA but did not do so. Nor does the FAA's June 11, 2020 reply reference any recent 15R or 4L incursion or other safety instances at all.

3. The FAA's letter ignores the important predicate need for residents to have their own meetings to discuss the proposed 4L arrivals RNAV path prior to and during the EA public comment period. A large group of residents cannot readily meet in person due to Covid-19 restrictions, and many residents have no access to internet/virtual meeting capability. FAA's reply ignores residents' need for their own gatherings. Furthermore, libraries are closed. Residents without internet access cannot attend virtual-meetings among their own neighbors, nor attend a FAA virtual workshop. The FAA had no response to this very question at its recent Tampa virtual-meeting, nor did its reply to the MCAC letter address how such residents could participate meaningfully now.

4. The recent FAA virtual meetings regarding an EA for the South Central Florida Metroplex Airports confirmed added concerns that virtual meetings are no substitute for in person meetings by residents with the FAA.

There are 2.877 million residents of the Tampa metro area. The FAA's attendance record for the two days of virtual meetings indicated that 31 registered residents attended, not including Matthew Romero and myself, whom you allowed to attend as observers.

The virtual-meetings for the Tampa Airport residents provided no means for residents to engage other than by submitting a written question--without the ability to follow-up or ask for further explanation or detail, and provided no ability for participants to drill-down on summary explanations of FAA policy. In a word, it is not a fully interactive dynamic, as in-person meetings can be.

Our further concerns about the virtual-meeting modality include the following issues: FAA's voluminous EA and Appendices were not explained by slide run-through or other means during the Tampa virtual-meeting. Instead, FAA participants' terminology often equated FAA "measurements" with modeling outputs, suggesting to residents that noise data from more than a hundred thousand locations had been gathered rather than modeled. The means of measurement versus modeling and the methods of noise calculation were not clarified for residents. The FAA puts a lot of resources and effort into its virtual meetings. However, the lack of interactive dialog renders the



FAA's virtual-meeting modality not a "workshop" but rather a friendly, recital equivalent to the FAA's required flight attendant advisory content, given to minimally-participatory passengers on aircraft, or here a small number of registered live-attendee residents.

5. The FAA's Draft EA's importance, length, embedded terminologies, and assumptions render it complex. Residents will need time to read, absorb and discuss it among themselves before the public comment period begins to run. For that reason, the Draft EA should be made publicly available at least 30 days before any EA public comment period. Furthermore, any online resources like those presented at the South Central Florida Metroplex virtual meetings (e.g. interactive maps, video representations flight paths, etc.) should be made available less than 30 days prior to the commencement of the public comment period. Additionally, given economic justice concerns, please include in the information provided 30 days prior to the public comment period current census block data for the neighborhoods within the proposed 4L RNAV path's IF-to-touchdown sound contours, including race and ethnicity data as well as mean, median and modal incomes. For inclusiveness and comparison, please include separately such data for the neighborhoods overflowed by all 4L visual and FMS paths as well as neighborhoods overflowed by the parallel 4R path.

As the MCAC's May 18, 2020 letter requested, 30 days prior to commencement of the public comment period should be at least 30 days before the later of 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. We hereby reiterate that request and timing.

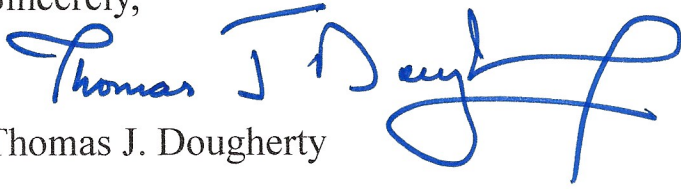
We also request that when the public comment period occurs, it be extended to 90 days to permit added opportunity for resident questions, input and interaction among themselves and with the FAA.

6. Lastly, without the frequency of flights that occur absent the Covid-19 restrictions, it is impossible for residents to do the field work regarding 4L arrivals that they plan to do. The FAA's reply ignored this factor. It is a sine qua non for residents.

Thank you for your attention to this matter.



Sincerely,

A handwritten signature in blue ink that reads "Thomas J. Dougherty". The signature is fluid and cursive, with the first name "Thomas" written in a slightly larger, more prominent script than the last name "Dougherty".

Thomas J. Dougherty

cc Town of Milton Select Board  
and Boston City Councilor Ms Andrea Campbell



**Massport Community Advisory Committee**  
One Broadway, 14<sup>th</sup> Floor  
Cambridge, MA 02142

July 14, 2020

(VIA ELECTRONIC MAIL)

Colleen D'Alessandro, ANE-1, FAA New England Regional Administrator  
[Colleen.Dalessandro@faa.gov](mailto:Colleen.Dalessandro@faa.gov)

**RE: Proposed Runway 4L Environmental Assessment Follow Up Procedural Request**

Dear Ms. D'Alessandro:

Thank you for your response to my letter dated May 18, 2020 regarding the Environmental Assessment (EA) process and timeline for the proposed Boston Logan International (Logan) Airport Runway 4 Left (4L) Approach Procedure. I would also like to thank you and FAA staff for attending our virtual Massport Community Advisory Committee (MCAC) meeting on June 11, 2020 to discuss this matter further. We were disappointed that FAA denied our request to delay the timing of the 4L EA process considering the ongoing COVID-19 pandemic and the effect upon the communities, neighborhoods, and residents that would be impacted by this process. We urge FAA to reconsider our request for the delay as stated in my initial letter. Barring that, however, I would put forward some follow up requests for the Proposed 4L EA process.

As discussed at our virtual meeting, the current FAA process would release the draft EA upon the commencement of the public comment period, during which the public workshops would be conducted. We request that the Draft Proposed 4L EA be provided to members of the public no less than 30 days prior to the commencement of the public comment period. Furthermore, any online resources like those presented at the Southern Florida Metroplex virtual workshop (e.g. interactive maps, video representations of flight paths, etc.) should also be made available no less than 30 days prior to the commencement of the public comment period. This would ensure adequate time to review the Draft EA and supporting materials prior to both the workshops and the public comment period.

Your letter indicated that the FAA plans to conduct the 4L EA public workshops virtually using a format and platforms like the recent South Florida Metroplex project virtual workshops. Having attended these virtual workshops, we maintain our belief that the virtual workshop format is not an adequate substitute for in person meetings. In particular, we remain concerned for impacted communities and neighborhoods with higher proportions of residents lacking sufficient resources and availability to attend virtual meetings in a meaningful way. Adequate access to information and the ability for impacted residents to participate is critical for any environmental review process. To address these concerns, we request that the comment period be extended from the currently planned 30 days to 90 days to allow for greater participation and engagement by the impacted communities and their residents given the anticipated use of the virtual workshops format.



**Massport Community Advisory Committee**

One Broadway, 14<sup>th</sup> Floor  
Cambridge, MA 02142

We appreciate the FAA's participation with the MCAC on matters relating to Boston Logan International Airport, and especially for your further consideration of our requests as it relates to the 4L EA. Ensuring the impacted communities, neighborhoods, and residents are fully briefed and aware of the proposed procedure and can participate and comment in a meaningful way is our primary concern on this issue.

We are also aware that some of the communities and neighborhoods plan to commit both time and monetary resources to further evaluate and study this matter and its effect on their residents. We expect they will submit follow up questions directly to FAA as well as specific recommendations or requests regarding the 4L EA process. We respectfully request that these questions and requests be fully considered and responded to by FAA as needed.

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





U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Office of the Regional Administrator  
New England Region

1200 District Avenue  
Burlington, MA 01803-5299

August 7, 2020

Mr. Matthew A. Romero, Executive Director  
Massport Community Advisory Committee  
One Broadway, 14th Floor  
Cambridge, MA 02142

Dear Mr. Romero:

Thank you for your July 14, 2020 correspondence regarding the proposed Runway (RWY) 4 Left (L) environmental assessment (EA) follow-up procedural request on behalf of the Massport Community Advisory Committee (MCAC).

In your letter, you requested the Federal Aviation Administration (FAA) delay the environmental review process for the proposed General Edward Lawrence Logan International Airport (BOS) Area Navigation (RNAV) Global Positioning System (GPS) RWY 4L [RNAV (GPS) RWY 4L] approach procedure. However, the FAA intends to proceed with the project as scheduled, with virtual public workshops to be conducted in the fall 2020 for the reasons cited in our June 11, 2020 letter.

You also requested to extend the comment period from 30 days to 90 days. After careful consideration, we have determined that we are able to extend the comment period for an additional 30 days for a total of 60 days. The draft proposed 4L EA will be provided to members of the public no less than 30 days prior to the commencement of the virtual public workshop. The draft EA and supporting information will be made available in the fall 2020. The public and stakeholders may begin to provide comments at that time for 60 days.


Finally, you requested that the FAA provide adequate access to information and the ability for impacted residents to participate in the environmental review process. The FAA plans to host two virtual workshops in the fall 2020, which will be recorded and available on YouTube and the FAA website. The proposed format for these workshops will be similar to the Southern Florida Metroplex. The FAA will consider all comments and respond to them in the final decision document. The final decision is expected to be made in the spring 2021.

We appreciate the continuing dialog with MCAC on this subject and look forward to working with MCAC members and local community leaders to identify other accommodations that may help address specific community challenges. While the FAA understands that the COVID-19 public health emergency has caused massive disruptions within communities across the world, we must continue our mission to improve safety and enhance efficiency in the National Airspace System.

Sincerely,

**COLLEEN M  
D'ALESSANDRO**

Colleen M. D'Alessandro  
Regional Administrator, New England Region

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D'ALESSANDRO  
Date: 2020.08.10 09:55:55 -04'00'

CC: Thomas Dougherty



# Runway 4L/4R Arrival Paths

