



City of Phoenix
AVIATION DEPARTMENT

April 24, 2015

Glen A. Martin, Regional Administrator
U.S. Department of Transportation, Federal Aviation Administration
Western Pacific Region
Office of the Regional Administrator
P.O. Box 92007
Los Angeles, CA 90009

Dear Mr. Martin:

As referenced in Phoenix City Manager Ed Zuercher's letter dated April 24, 2015, please refer to the accompanying detailed response to the Federal Aviation Administration's Phoenix West Flow RNAV SID Post-Implementation Report and to your letter to Mr. Zuercher dated April 14, 2015. We remain prepared to work with the FAA to identify real solutions that will provide meaningful relief to our community.

Sincerely,

Chad R. Makovsky, C.M.
Assistant Aviation Director
City of Phoenix Aviation Department

DETAILED RESPONSE TO THE FEDERAL AVIATION ADMINISTRATION'S PHOENIX WEST FLOW RNAV SID POST-IMPLEMENTATION ASSESSMENT REPORT, GLEN MARTIN LETTER OF APRIL 14, 2015, AND PBN WORKING GROUP PROCESS

APRIL 24, 2015

The City of Phoenix ("City") has established that the PBN Working Group process, the *Phoenix West Flow RNAV SID Post-Implementation Assessment Report* ("Report", see Exhibit 1) and Letter from Glen Martin to Ed Zuercher on April 14, 2015 ("Exhibit 2"), have been inconsistent with the commitments that Administrator Michael Huerta made to Mayor Greg Stanton, Representative Ruben Gallego, Councilmembers Laura Pastor and Kate Gallego, Representative Ed Pastor, City Manager Ed Zuercher, and Assistant Aviation Director Chad Makovsky.

The City has concluded that FAA never intended to consider and did not, in fact, actually consider effective measures to reduce noise impacts from the RNAV routes it implemented without community notice on September 18, 2014. FAA rejected the City's preferred alternative before the process even began, even though it would retain 80 percent of the fuel savings from FAA's September 18, 2014, procedures, while reducing noise exposure to residents, historic resources and parks.

FAA Has Not Involved the City in a Meaningful Way

On January 21 and 22, 2015, Administrator Huerta committed both orally and in writing to the City's representatives that FAA would reconvene the PBN Working Group to explore changes to the RNAV routes and procedures to address the serious noise concerns in the City.

We are committed to partnering with the airport and airlines to explore other potential adjustments to the procedures to better manage noise issues. We will reconvene our Performance Based Navigation Working Group in February. As I told Mayor Stanton and Congressman Gallego when I met with them on Wednesday, January 21, the City of Phoenix is an important player in this process and we want city representatives to be part of this process.

Administrator Huerta's letter followed a series of promises that FAA made starting in October 2014 to work with the City to consider possible modifications to the RNAV routes that have increased Phoenix Sky Harbor International Airport ("PHX") noise complaints from only 221 in 2013 to more than 7,000 in just the last seven months.

City leadership believed Mr. Huerta's commitments. The City thought that engaging in the FAA's process would result in meaningful changes in flight tracks. However, the City has now learned that FAA structured the PBN Working Group process deliberately to avoid making any changes to the RNAV routes that would have a substantial effect on noise. On February 12 and 19, 2015, Regional Administrator Glen Martin and other members of the PBN Working Group met with City elected officials, Representative Pastor and Assistant Aviation Director Chad Makovsky. The City made clear

how the RNAV routes were having extensive negative impacts on the City, especially when PHX was in West Flow. The City also identified specific alternatives it wanted to see analyzed, including use of the RNAV procedures on the pre-September 18 North and South Turn flight tracks, or the use of the Salt River corridor heading for longer before initiating the South Turn to the DAVZZ waypoint. The City also made clear that it needed the additional airspace and safety information it had already requested, including TARGETS data, to provide further recommendations.¹ **The assertion in the April 14, 2015, letter from Regional Administrator Martin that the City did not “offer its own ideas or suggestions for the FAA consider” is not true.**

To be clear, the position of the City Council has been clear: the City has requested – and still requests – that the FAA return the North and South Turns to their original routes, but using the RNAV technology and procedures, and asserts doing so will serve to meet FAA program objectives, purpose, and need.

Despite considerable discussion about process during the February 12 and 19 meetings, FAA staff withheld from the City the fact that it had **already executed** a Scoping Document days before (on February 9) that limited the scope of the Working Group to effectively preclude the group from making any changes to the routes that would improve noise conditions in a noticeable manner.

If FAA truly intended to involve the City as a partner, it would have discussed the scope of the Working Group with the City **before** deciding on the scope of its task and would have defined a scope that explicitly required addressing the City’s legitimate concerns. Instead, FAA staff did not disclose the critical limitation that the Working Group could only “propose modifications that will maintain or enhance safety, improve operational efficiency, and ensure procedural conformance with the intended flight paths.” Scoping Document at 2 (included in Exhibit 1). FAA did not mention the scoping document and its limitations even when FAA said on February 19, 2015, that it would review the City’s proposed alternatives for the North and South Turns, despite knowing that they would fall outside of the scoping document criteria.

FAA staff told Representative Pastor and Mr. Makovsky on April 13, 2015, that FAA applied the scope requirement to “improve operational efficiency” to reject any possible modifications that would move the RNAV routes by more than 0.3 miles so as to avoid triggering a “new federal action.” This meant that FAA ruled out any movement of the flight tracks that would make any significant noise improvement even before it began its analysis and before soliciting the views of the City.² This is the very definition of an opaque, pre-determined process that is nothing more than a symbolic exercise.

¹ The City still has not received TARGETS and other data for the originally implemented procedures and other alternatives considered prior to implementation, despite having asked for these materials four months ago.

² The City views FAA’s proposed alternatives NW2 and SW2, which impose certain altitude and speed requirements, as better than the September 18 procedures they would replace. They should be used as an immediate, interim measure. However, because they affect less than 15 percent of flights on the North and South Turn procedures and maintain the current flight paths, it is anticipated, based on comments made during the PBN Working Group coordination, that they would not provide significant noise mitigation. The PBN Working Group report does not provide any quantification of potential noise reduction with these measures.

In fact, even though the Working Group was supposed to address concerns about noise, there is **nothing** in the Scoping Document charge to the Working Group about noise. If FAA intended to address noise concerns – as the City has been led to believe – that should have been the charge to the group. It was not included in the scope that FAA staff withheld from Representative Pastor and Mr. Makovsky until April 7th. FAA staff calculated and presented no information regarding the extent to which any of the alternatives would affect noise. FAA staff did not even model and present the noise effects of its two proposed alternatives. Neither of FAA’s preferred alternatives – which would include minimum altitudes and speed provisions – is likely to make any significant, noticeable difference in noise exposure.³

The Report and the April 13, 2015, meeting also make clear that the FAA deliberately intended the City to have no chance to influence the analysis or Report, and did not include the City as a true member of the Working Group:

- Despite the claimed intention of FAA to partner with the City in the Working Group process, neither the Report nor the scoping document mentions Mr. Makovsky or Representative Pastor even once.
- The City is not listed in the scoping document as a member of the Working Group.
- Outside of the February 19th meeting of the Working Group, the FAA staff did not include the City in any of the discussions identifying or analyzing the alternatives included in FAA’s report.
- Regional Administrator Glen Martin told Representative Pastor and Mr. Makovsky on April 13 that the airlines’ Working Group representative was not included in the April 13 meeting, because of FAA staff concerns about interaction between the airlines and City. It is inconsistent with the definition of a partnership and the convening of the Working Group to suggest that the designated airport representative and a former United States Congressman could not be relied upon to work collaboratively with other Working Group members in the Working Group process.
- Despite delivering the draft Report on April 7, FAA staff still did not provide the underlying TARGETS data necessary to analyze it until Friday April 10, only one business day before the Working Group meeting. Further, the City is still missing some of the data provided to other members of the Working Group. The City has been regularly denied timely access to the information needed to effectively engage in the Working Group. It is unacceptable and contradicts FAA Administrator Huerta’s commitments for FAA staff to deny the City access to data and then to assert that the City has not provided substantive input.

³ Neither of FAA’s preferred alternatives (NW2 and SW2) would move the flight tracks at all. While the proposed altitude and speed provisions would make the alternatives marginally better than the procedures FAA is currently implementing, they would not provide any significant noise relief. Because FAA acknowledges that 93 percent of North Turn aircraft and 85 percent of South Turn aircraft already meet the proposed altitude minimums, there would be little change in noise exposure.

- FAA staff only modeled its two preferred alternatives with TARGETS prior to releasing the draft report to the City on April 7. FAA staff undertook modeling for the other alternatives only after the City requested the additional analysis on April 8. Clearly, FAA staff did not seriously consider other alternatives if it did not take the time to model them and study their feasibility and benefits.
- FAA's position that it had to avoid any alternative that would create a new federal action that may involve environmental review is unfounded and not consistent with any FAA Order or other guidance. FAA undertook a federal action when implementing the changes to the flight paths on September 18, 2014. This was accomplished under a Categorical Exclusion and no public notice. But now FAA is unwilling to mitigate the impacts of their federal action because it would require environmental review and public notice. This decision erodes any remaining credibility the FAA has with the public and City Council.
- The FAA has never addressed the specific concerns and noise information the City provided in its Protest and Supplemental Protest filed on February 18, 2015, and April 7, 2015, respectively.
- FAA has never responded to the City's February 18 and April 7 notice that it expects the FAA to reinstate consultation under Section 106 of the National Historic Preservation Act, based on new information regarding impacts and proof that FAA's assertions to the State Historic Preservation Officer were incorrect. The FAA continues to ignore its legal obligations under Section 106 of the NHPA.
- Furthermore, because historic properties are also considered Department of Transportation Section 4(f) resources, the Administrator of the Department of Transportation cannot approve the taking or constructive use of land from public and private historical sites unless the following conditions apply:
 - There is no feasible and prudent avoidance alternative to the use of land; and

The action includes all possible planning to minimize harm to the property resulting from such use.

As shown below, there are feasible and prudent alternatives to the impacts occurring to the historic districts now being overflowed and the FAA has refused to consider any plan that would minimize harm to these resources.

Because FAA staff structured the Working Group process to foreclose significant changes to the routes and to not involve the City in the same way as any of the other participants of the process, the City does not see how the PBN Working Group as currently configured would serve any productive purpose without a fundamental change to the process and a commitment to consider alternatives that will have a significant noise reduction.

FAA Has Not Provided Sufficient Reasons to Reject the City's Proposed Alternatives

The City has made specific requests for analysis of the effect of using RNAV procedures on the pre-September 18 flight tracks. FAA's Report and Regional Administrator Martin's April 14, 2015, letter prematurely rejected the alternatives offered by the City: replacing the new LALUZ, YOTES, SNOBL,

MAYSA, BNYRD, FTHLS, JUDTH and KATMN RNAV routes with new RNAV routes on the original tracks used for the North Turn and South Turn. FAA rejected these alternatives based on criteria it designed to rule out any changes that moved routes by more than 0.3 miles and to avoid any new federal action for environmental review purposes.⁴ FAA did not even formally consider the alternative of returning to the original South Turn flight track with RNAV technology and procedures. Inexplicably, FAA did review a return to the original flight track, but with non-RNAV procedures. FAA's scoping criteria make it clear that non-RNAV procedures were not acceptable, therefore it predetermined that it would not accept the alternative. In essence, FAA made a determination **before** the Working Group started that there could be no significant changes to its routes and no tradeoff between the noise impacts of its routes and efficiency. This approach inappropriately precluded the opportunity to balance noise, efficiency and fuel issues.

As discussed below, the City's proposed alternatives greatly reduce exposure to noise among all residents, minority residents, low-income residents and historic districts, while maintaining 80 percent of the fuel savings of FAA's RNAV changes, the same throughput, and safety that complies with FAA standards. The tradeoff between fuel savings and community relief is precisely the reason that we have been demanding meaningful environmental review so that these tradeoffs can be objectively analyzed. A solution that provides relief to long-suffering communities and still achieves 80 percent of the projected fuel savings is an example of a reasonable alternative deserving of serious consideration.

- Noise: FAA did not present any modeling for the potential changes in noise exposure for the City's alternatives or its September 18 RNAV routes. However, the City has used the partial TARGETS modeling information provided by FAA on April 10 to develop single event sound equivalent level noise contours (SEL) for the City's preferred alternatives and FAA's alternatives. As it did in its Protest Supplement filed on April 7, 2015, the City used SEL 75 dB noise contours from 737-700 aircraft to reflect the areas in which aircraft noise affects outdoor speech and has been shown to be a reliable way to measure noise on a per flight basis. The noise contours are attached in Exhibit 3 to this letter.

The noise modeling shows clearly that the FAA's September 18, 2014, North and South Turns create much higher noise impacts than the pre-September 18 routes or the alternative RNAV routes that the City has proposed. FAA's September 18 flight tracks extend the SEL 75 dB contours over areas with higher population density than the original routes that followed the agricultural and industrial zones along the Salt River corridor. Under the original routes, aircraft would gain altitude before turning over populated areas to the north and the south, minimizing the noise levels in the process.

FAA's September 18 North Turn RNAV route exposes 68% more people to noise on a per flight basis than the City's proposed RNAV route over the pre-September 18 flight track. Similarly, FAA's South Turn RNAV route exposes 70% more people to SEL 75 dB noise levels than the pre-

⁴ As noted before, City staff cannot explain to Council or the public how the FAA could believe it could implement the new RNAV procedures through a categorical exclusion from NEPA but that it believes that any restoration of flight tracks would require more extensive NEPA documentation. The agency cannot have it both ways.

September 18 track. Table 1 compares the total numbers of persons exposed. The Protest Supplement filed by the City with FAA on April 7, 2015, also shows that FAA’s new North and South Turn routes expose substantially more minority and low income persons to SEL 75 dB than the original routes.

These modeled noise contours are supported by and coincide with the locations and types of noise complaints received by the City and reported in City’s February 18 Protest. The vast majority of noise complaints are located in these SEL 75 dB contours: in areas of South Phoenix and Laveen affected by the South Turn and areas to the east of Grand Avenue affected by the North Turn. See Protest at Figure 1.⁵

The noise contours also show that the City’s proposed alternative would avoid the vast majority of historic districts that are exposed to SEL 75 dB and higher under the September 18 RNAV routes. See Exhibit 3. This is precisely the sort of mitigation that FAA is obligated to consider under the Section 106 NHPA regulations, DOT Section 4(f), and in the City’s request to re-initiate consultation that the FAA has illegally ignored.

Table 1: Population Exposed to SEL 75 dB for FAA and City Alternatives

	September 18 Route (NW1 and SW1)	City Alternative (NW4* and SW3**)	Difference
North Turn	35,700	21,200	FAA route exposes 68% more people
South Turn	37,800	22,200	FAA route exposes 70% more people
TOTAL	73,500	43,400	FAA routes expose 69% more people

*Note that while the city requested alternative NW4, the FAA incorrectly modeled the alternative. Therefore the city is relying on alternative W1 as having the most similar characteristics to our requested alternative.

**Note that SW3 uses the non-RNAV flight procedures for the original South Turn track, while the City has recommended use of the RNAV procedures.

- **Fuel Usage and Efficiency:** FAA calculated the fuel use changes for the various alternatives, even though it did not estimate the noise impacts. FAA reported that the airlines have estimated that all of the RNAV procedures together save the airlines approximately \$3.6 million per year and 15,000 metric tons of carbon dioxide (CO₂) for all of the operations from PHX. FAA reports that the NW4 alternative (the City’s preferred North Turn alternative) would add 1,850 tons of CO₂, while the SW3 alternative (closest to the City’s preferred South Turn alternative) would add

⁵ Reliance on noise complaint data is important. The FAA has recognized, and the federal courts have endorsed, the importance of complaint data when analyzing impacts for areas outside the traditional DNL 65 dB contour. The fact that the FAA has promulgated regulations based largely on complaint data as the basis for changes in flight patterns should be evidence enough that the agency should have analyzed the City’s noise complaint data here to determine whether particular flight patterns would provide meaningful noise relief.

1,200 tons of CO₂. The combination of NW4 and SW3 (which most closely tracks the City's proposed alternatives), would still allow FAA's RNAV route package to save 11,950 tons per year of CO₂. Because fuel use is directly related to fuel burn, fuel savings would be proportionately the same.

Restoring the South and North flight paths is expected to reduce emissions savings by approximately 3,050 metric tons of CO₂ to regional airspace.⁶ This represents 6/100 of one percent of total emissions in the regional airshed west of Central Avenue from all emission sources. While we appreciate the FAA's interest in reducing CO₂ emissions, it is clear that the reduction in air emission benefits associated with restoring the flight paths are quite small relative to the benefits of addressing community concerns about noise.

Under the City's proposal, the airlines would still retain 80 percent of the fuel savings (and CO₂ savings) of the FAA's September 18 route package, while drastically reducing the exposure of residents to noise from the South and North Turns. Airline fuel savings would drop slightly from \$3.6 million per year to about \$2.9 million per year, a difference of only \$700,000 per year. This is a fair and reasonable tradeoff. Had the FAA done appropriate environmental review in the first instance, it would have disclosed this tradeoff and would have given decision makers the reasonable basis upon which to conclude that the tradeoff is reasonable in these circumstances.

- **Throughput:** In Section 3.1, the Report mentions that there is increased departure throughput during peak traffic periods due to a third departure path to the west. The City's alternatives and the similar alternative were assessed as having or potential for having lower departure throughput. However, analysis of the FAA's ASPM data for west flow conditions at the Airport shows that there is no significant difference between the post-September 18 procedures and the pre-September 18 procedures, using a comparison of October-January 2013/14 and 2014/15 data. The ASPM data also show very little change in monthly operations between 2013 and 2014, so a reduction in overall demand is not a factor in lack of a significant difference. Thus, there is no material improvement in throughput with the new North and South Turn and there would be no expected loss in moving to the City's proposed alternatives.
- **Safety:** In Section 3.1, the Report states that safety was improved with immediate course divergence to the west due to repeatable, predictable flight paths. The report lists safety issues as one of the concerns for Alternatives NW3, NW4, NW6, SW3, SW4, and SW5. However, the pre-implementation routes (and the City's proposed alternatives) provided more than the required 15 degrees of divergence between the North Turn route and the South Turn route. Therefore, the pre-implementation routes and City-proposed RNAV routes for the North and South Turns provide an appropriate level of safety for divergent headings to permit

⁶ Note that the difference may actually be lower if the South Turn were modeled with the use of RNAV procedures rather than the original non-RNAV procedures.

simultaneous independent operations on the runways for the pre-September 2014 North and South turns. The FAA acknowledged this fact during the April 13 meeting. No additional safety issues have been identified.

FAA has provided no satisfactory reasons why the City's proposed alternatives cannot work and should not be implemented. The City's proposed alternatives serve the program's purpose and need as they are safe, reduce noise, continue to provide significant air emission reductions, and only slightly affect fuel savings.

FAA's Proposed New Strategies for the City

While the City appreciates FAA's offer of additional suggested strategies it believes the City itself should undertake, such as voluntary noise abatement paths and community involvement (*see* page 3 of your April 14 letter), they cannot distract from or substitute for FAA addressing the problems created by its own RNAV flight path decision. The City agrees that measures like these should be combined with "adjustments to the routes." But, we need to start with adjustments to the routes to understand what types of voluntary airline measures, new land use measures, and other efforts make sense.

The April 14, 2015, letter states that "airport proprietors are primarily responsible for planning and implementing actions designed to reduce the effect of noise on residents of the surrounding area." The City has done just that for more than 40 years and has been one of the most successful major airports in reducing noise concerns prior to FAA's implementation of the September 18, 2014, RNAV routes. The City has worked for decades and spent hundreds of millions of dollars to promote compatible land uses, purchase the most noise affected properties and insulate homes to reduce noise impacts. These efforts were extremely successful, as seen through the steady reduction of homes within the noise contours of the Airport and the very low levels of complaints (down to 221 in 2013). City staff are not aware of any other major metropolitan airport that had complaint levels as low as PHX in 2013.

But it is important to recognize that these decades of success were based on stable flight paths into and out of PHX. To the west, aircraft departing PHX followed runway headings or the Salt River corridor over areas the City has planned for industrial and agricultural uses to maximize land use compatibility.

The City's years of efforts – and hundreds of millions of dollars spent on studies and implementation – were summarily undone by FAA's unilateral decision to fundamentally shift the flight tracks from the tracks around which the City planned to new residential, historic and park areas that did not have regular previous overflights. This was FAA's decision. As an airport operator, the City has worked assiduously to ensure land use compatibility, efforts which were defeated by the FAA's flight track changes. It is, therefore, disturbing for the FAA even to suggest that the City should now engage in land use compatibility planning. It has done so. It continues to do so. FAA needs to take responsibility for the effects of its actions and FAA's decision to undermine decades of City noise planning and land use compatibility efforts.

The following is the City's response to FAA's proposed "strategies" included in the April 14 letter:

- Voluntary Noise Abatement. The City agrees that voluntary noise abatement measures agreed to with the airlines can be useful and have varying degrees of success elsewhere in the country. However, before developing voluntary measures, it is important to know where flight paths are going to be located so there is a baseline to begin working. This suggestion is disingenuous because FAA knows full well that the City could never reach voluntary agreement on noise abatement tracks without the complete engagement of **both** the airlines and the FAA. However, FAA structured the Working Group process to make such engagement impossible, even though it was the logical forum for such discussions.
- Community Involvement. The City agrees that community involvement is critical. In fact, Acting Aviation Director Tamie Fisher invited the FAA to participate in the January 2015 Community Outreach meetings to hear from the community and better explain what it had done. The City was, however, disappointed that the FAA elected not to attend. The City is considering more formal measures such as community roundtables. The City has worked hard to organize more than 17 community meetings and hearings regarding the noise and impacts created by FAA's new RNAV procedures. FAA has not held one public meeting regarding the effects of its decision, even though in November 2014 the FAA committed in writing to do so. How can the agency now suggest that the City – and not the FAA – engage in a community engagement process? The City respectfully recommends that the FAA should start following its own advice (and legal obligations) regarding community involvement.
- FAA's Offer to Assist Airport Noise Office. While the City appreciates the FAA's offer to help with its noise office, it does not believe that the FAA would be helpful in addressing the unprecedented level and types of complaints from the community. As FAA should know, the overwhelming level of complaints is the direct product of FAA's action that the agency has shown it does not want to change in any significant way. In specific, clear statements made by Regional Administrator Martin to Representative Pastor and Mr. Makovsky, FAA does not believe that there is a real noise problem and that the community reaction is just a problem with resident perception and misunderstanding. The FAA's suggested communication strategy and diagnosis of the problem underestimates the real impacts to people and their genuine concerns. Bringing this stated position to the noise office would only inflame public concern and further grow the lack of trust in FAA rather than solve problems.
- Other Recommendations for Route Adjustments. The City has already offered recommendations that FAA has either not considered or rejected as out of the scope of possible change. FAA has also still not provided the information the City has requested for months in order to provide the best input. FAA has still also not addressed the noise, historic, and other information the City has provided. FAA needs to provide the information that the City has requested and fair consideration of the City's preferred alternative.

The City is working on many of the measures the FAA suggested on April 13 and 14. However, only FAA can correct the noise impacts it created through its unilateral implementation of the RNAV routes.

CONCLUSION

FAA did not follow through on its promise to the City and its residents to conduct a fair and thorough evaluation of flight path alternatives and noise mitigation through the PBN Working Group process. The City engaged the FAA in good faith, expecting that FAA would follow through on Administrator Huerta's and Regional Administrator Martin's commitments to provide solutions to the noise problems associated with the FAA September 18, 2014 RNAV routes. Instead, FAA structured its Working Group process to avoid opportunities for significant change and meaningful involvement by the City. Accordingly, the City believes the current PBN Working Group process should end and be replaced immediately with a meaningful process to develop solutions. Accordingly, the City calls for the following corrective steps to actually follow through on the Administrator's commitments and provide a meaningful process that

- 1) The FAA commits, by the end of April, to begin preparation of an Environmental Assessment in which the one alternative is the return of the LALUZ, YOTES, SNOBL, MAYSA, BNYRD, FTHLS, JUDTH and KATMN routes to their original routes with the new RNAV procedures.
- 2) The FAA agrees to provide, by the end of April, full TARGETS, noise modeling, flyability and other information regarding the procedures implemented on September 18, 2014, as well as all alternatives that FAA considered and the City proposed as part of the PBN Working Group process.
- 3) The FAA provides a new scoping charter by April 30, 2015, that ensures that the routes identified in (1) above are within the scope of the Working Group and provides the City with the same procedural access and voice within the Working Group as other members.
- 4) The FAA must commit to a scope for the Metroplex Environmental Assessment that includes reasonable alternatives proposed by the City including, but not limited to, an alternative which uses pre-September 2014 flight tracks for PBN procedures for North and South Turn. FAA must also commit to community outreach and public meetings both for the scoping of the Environmental Assessment and throughout the rest of the Metroplex process.
- 5) The FAA must include City representatives in any working group or other oversight entity for the Metroplex Environmental Assessment and provide information, documents and data to the City as they become available to FAA staff.

- 6) The FAA must establish a single-point-of-contact with the FAA who has the authority to make decisions, to provide documents, and to communicate all FAA tentative decisions with the City. That person must be responsible for ensuring that the City is a true partner going forward in all matters concerning NextGen implementation in the airspace over the City.

While the City appreciates the goals of NextGen and the FAA's desire to reduce fuel burn and CO₂ emissions, in this implementation, the slight benefits demonstrated in this letter associated with this implementation do not outweigh the significant costs to the City and the community.