



June 24, 2026

TO: PHX-MODERNIZATION-comment@faa.gov

SUBJECT: Opposition to Phoenix Area FAA Modernization Project; Request to Revise and Re-Publish the Draft Environmental Assessment and Delay IFP Scheduled Publication

To Whom It May Concern,

On behalf of the City of Phoenix Aviation Department and the City's Airport System (PHX, DVT and GYR), thank you for the opportunity to provide comments on the proposed Phoenix Area Modernization Project ("Project") and Draft Environmental Assessment ("DEA"). The City commends the FAA for its commitment to improving our air transportation system through the development of safer and more efficient airspace management strategies. The City further recognizes the positive steps FAA has taken over the last 10 years to enhance public participation in airspace design initiatives and the overall process inclusiveness and transparency the FAA now strives for.

The DEA purpose and need summary communicates that a combination of outdated existing RNAV procedures and the absence of other RNAV procedures (particularly for jet aircraft using satellite airports) results in traffic management sector overload and increased (and otherwise avoidable) controller workload; the City supports this as a notional goal that should be explored in depth with, importantly, adequate time and deliberation to ensure tradeoffs between no action and any improvement are fully understood. **However, the City opposes the Project and DEA as published for several significant reasons.**

The list below introduces the substantive reasons for the City's opposition. In addition to these reasons, the City would encourage FAA to view geometric airspace changes (ie, lateral and vertical changes to procedures) as a last resort for improving airspace efficiency as these changes are invariably at odds with local land use planning and therefore the general public's presumptions related to real estate investment and decision-making around where to reside. The FAA should always pursue additional investment in staffing and technology prior to recommending geometric airspace changes to a community. When the FAA does seek geometric changes, the project should provide a comprehensive discussion of how these alternatives have been exhausted and that no additional efficiency can be gained without geometric changes. With that recognition of an important precursor to the Project, the City's opposition is due to the following overarching concerns (Parts 1 through 6):

1. In general, new RNAV procedures need to be implemented with route dispersion/ rotation/ diffusion programs otherwise the community noise impacts are substantial; the Project does not propose noise dispersion/ rotation/ diffusion programs.
2. The reported noise impacts from the Project are substantial; with the Project the population of the region exposed to noise in the 45 dB to 60dB range will increase by 10%, which is untenable.
3. The DEA does not codify existing noise abatement gates for PHX or confirm these gates are not changed with the Project; this exclusion meant the Project would be met with public controversy.
4. The Project's proposed Group B SIDs for PHX laterally shift and lower (the altitude) over residential areas in both west and east flow; the affected neighborhoods are either characterized or designated as Historic or Environmental Justice communities. The DEA does not provide detailed or specialized analysis of these important areas within the community.
5. The Project and DEA do not present any alternatives to the proposed action, including conceptual dispersion programs, route rotation and vectoring windows to mitigate community noise impacts.
6. The DEA and supporting documents on the Project website are unnecessarily confusing and, in some cases, misleading; the result of this situation is that the public were unable to fully understand the Project and its impact. The DEA has multiple substantive technical deficiencies and readability issues.

Parts 1 through 6 of this letter (below) provide the rationale and details for the City's opposition to the Project and DEA as published. These sections outline various technical and qualitative improvements that should be made to the DEA so a revised DEA can be published and reviewed with the community for additional input. The letter concludes with:

- A. Formal requests for data sharing, modifications to the DEA and ultimately, delay of the Project IFP publication scheduled for 2027.
- B. Suggestions for immediate next steps and opportunities for collaboration to ensure procedural success moving forward.
- C. Concluding remarks and the City's gratitude for addressing this letter's concerns and requests before moving forward with a Final EA.



PART 1. NEW RNAV PROCEDURES NEED TO INCLUDE DISPERSION/ ROTATION/ DIFFUSION PROGRAMS.

In general, RNAV projects require alternative routing with multiple headings, noise diffusion programs, and track rotation systems to address the central community concern (and documented impacts) with NextGen aviation technology. Traditional ground-based navigation resulted in natural path dispersion because aircraft systems drifted, spreading flights over a wide geographical area. PBN creates highly precise flight paths as it concentrates aircraft noise into "geographic highways" for aircraft in the air, and geographic highways of intense noise on the ground. To alleviate the resulting noise on communities, procedure design needs to utilize track dispersion, alternating headings, and schedule-based track rotation.

To counteract RNAV's hyper-concentration, three primary noise-abatement design programs must be included in the DEA with alternatives for each particular route proposal and accompanying strategy. First, multiple divergent headings that, instead of forcing all departing or arriving flights onto a single RNAV track, provides for procedures to be mapped with multiple initial "fan-out" headings. Aircraft are alternated across a series of lateral segments or radial fixes immediately after takeoff. The goal being that the total volume of traffic is divided among several geographic corridors, ensuring that no single community shoulders the entire noise load. Second, because RNAV inherently decreases flight path diffusion, procedures must account for and intentionally imbed noise diffusion tactics by blending RNAV precision with radar vectoring segments; this programming involves aircraft following an RNAV route initially, but Controllers use a vector area to artificially spread the traffic before the aircraft re-join the primary RNAV track. Third, rotational/alternating tracks provides for an operational scheduling framework designed to provide predictable periods of silence to neighborhoods surrounding high-traffic airspace areas. Multiple RNAV entry/exit corridors that Controllers can use to rotate and select which track is "active" based on a strict timetable (e.g., alternating tracks by day of the week, or switching paths between morning and afternoon shifts) and guaranteeing communities long stretches of predictable "quiet hours" or full rest days.

The concepts above are no longer theory; they've been developed or are being developed at multiple Metroplex Airports systems like the FAA's Phoenix-Area Modernization Project. Examples include Advanced Operational Procedure Design Concepts for Noise Abatement at BOS ([Advanced Operational Procedure Design Concepts for Noise Abatement – Ascent](#)), Equivalent Lateral Spacing Operations at SAN ([Noise Mitigation Proposals — Quiet Skies La Jolla](#)), Terminal Arrival Area Concepts at DCA ([DCA-Baseline-Report-Final-20201210.pdf](#)) and most recently, FAA's current initiative at MSP ([Community Engagement - Minneapolis-St. Paul | Federal Aviation Administration](#)) that utilizes upgraded RNAV departure routing programs designed to use multiple headings in the initial segments of SIDs.

Specific to the Phoenix-Area, we can see in noise complaint data that RNAV procedures (without diffusion/rotation mitigation) have long-lasting devastating impacts on neighborhoods. In 2013, before FAA implemented widespread RNAV procedures at PHX, the total number of noise complaints was 220. Immediately following RNAV implementation (as FAA is aware vis-à-vis



Phoenix v. Huerta 2015) and for years afterwards, the City received approximately 220 complaints a day, instead of a year. Even 10 years after the pre-RNAV condition, expectations by FAA and industry that communities over time will adapt to and be less annoyed by the RNAV noise, and the FAA's implementation of the 43rd Avenue Gate following the 2017 US Court of Appeals ruling and subsequent settlement agreement, the City still received 28,515 complaints in 2023. This data tells us that the impact of RNAV without mitigation programs like those discussed above is permanent and disastrous to the quality of life of individuals and neighborhoods that find themselves under RNAV routes. And to put a fine point on it, the Project's noise consequences and community impacts are not theory, the Project proposes more concentration of already concentrated routes and more adverse impacts for the same community that is still submitting thousands of noise complaints all these years later.

Ultimately, the DEA needs to include dispersion/rotation/diffusion programs that ensure that no one particular household or neighborhood experiences a 5+ dB impact and that noise increases associated with air transportation growth in general is managed through airspace efficiency improvements that seek to ensure no one household or neighborhood experiences more than 3 dB increase (ie, the level of noise increase that is noticeable). To revise the DEA with these programs will require significant time and investment, including new PBN working group meetings, extensive public outreach and publishing of a revised DEA for formal public input. The City is prepared to support the FAA's efforts in this regard with supplemental technical consulting (for airspace design and environmental impact modeling) and continued supplemental public outreach and engagement.

PART 2. THE PROJECT EFFECTS UNTENABLE COMMUNITY NOISE IMPACTS.

The Project results in a reportable noise increase (above 45 dB) for 86,384 people in the North Phoenix area, Scottsdale and Chandler; and expands the total population impacted by overflight noise by 10% compared to no action. Moreover, the proposed action results in 65,475 people exposed to a $\geq +5$ dB increase; most of these people live in the North Phoenix area. The North Phoenix area is well known for its reputation for outdoor recreation, excellent schools and overall quality of life. Numerous public health studies have shown the detrimental impacts of increased aircraft noise on student-learning and individual health. The DEA's assertion that the large swaths of Phoenix Mountain Preserve through North Phoenix are not managed for quiet is inaccurate; the Preserve is managed for quiet (for example, motor vehicles are prohibited and fireworks are banned within 1 mile of the Preserve) and the residents in these areas purchased their homes with reasonable expectation of continued quietude. Similarly, the DEA, in the context of proposed RNAV Turboprop Routes over Phoenix Historic Districts and 4(f) resources (like public parks) also does not recognize these areas are "managed for quiet".

The DEA does not appear to comply with FAA's NEPA Order in several substantive areas. Of particular concern is that the DEA excludes VFR operations from noise modeling, and the noise model appears to be based on a single, and seemingly unrealistic, operational environment where almost no vectoring occurs. The latter concerns FAA admitted to throughout the public workshops, claiming this was good for the community as it results in a more conservative estimate of noise



impacts; this statement is misleading for anyone living under the areas where aircraft will be vectored with the proposed action.

In comparing the proposed action to similar FAA initiatives in other regions, the average change in population exposed to reportable noise is a **reduction** of 6,717 people (see table below). This comparison, among other takeaways, suggests the Project is less responsive to our community's needs than FAA projects for other communities. This comparison also supports conclusions like above and those discussed later that the DEA (intentionally or not), misleads our residents.

45db to 60db Population Change	
San Antonio 2022	8,068
Florida 2020	0
Charlotte 2015	0
North Texas 2014	0
DC 2013	20,239
Houston 2013	405
Boston 2013	-68,504
Chicago 2013	-100,431
Denver 2012	79,766
Avg. Change	-6,717

The DEA noise modeling does not account for specialized impacts on Environmental Justice communities or include cumulative impacts (such as noise from VFR operations). The DEA explains that because the DEA was initiated before 2025, it follows the previous guidance outlined in FAA Order 1050.1F; this Order sets forth requirements for Environmental Justice and Cumulative Impacts analysis. The DEA further explains that due to Executive policies and new case law (culminating in the new FAA Order 1050.1G) the DEA does not include Environmental Justice and Cumulative Impacts analysis. It is not clear how the FAA has chosen to follow some rules from one Order and other rules from a different Order, but the result is clear, critical analysis of the Project's impacts on the community were excluded from the DEA. This exclusion is particularly concerning since the primary goal of the Project is to solve for inefficient interaction (and additional Controller workload from) of VFR and IFR operations; yet somehow, the FAA contends VFR operations have no bearing on the DEA and therefore their noise impacts do not need to be accounted for. In summary, these issues strongly suggest the community noise impacts could be more severe than reported in the DEA.

As noted earlier, RNAV achieves a tight route centerline precision, funneling flights over the exact same homes. This shifts the noise profile from a broad, lower-frequency annoyance to highly repetitive, severe noise spikes. The standard NEPA noise metric DNL hides individual spikes as a single thunderous jet and a constant low hum can yield identical DNL values; this defies human perception as humans do not experience noise as a 24-hour mathematical average; and provides misleading low averages as quiet background periods mathematically dilute intense, highly disruptive bursts of traffic. FAA's NEPA Order identifies supplemental metrics that can be

developed and presented in the DEA to make up for the DNL metric's shortcomings (specifically in the context of new RNAV routing) and help residents better understand issues like peak impacts, single events and duration at specific noise levels or provide heavier nighttime model weighting.

The DEA should have explained how each proposed route effecting this noise increase relates specifically to the purpose and need and why routes with this level of noise increase as a tradeoff to alternative routes that also meet the purpose and need with less noise impact is the DEA's recommendation. Given how the Project's population levels exposed to new noise compares to similar recent FAA proposals in other regions, the DEA should have provided a thorough explanation as to how other methods of addressing the purpose and need, such as investment in technology and staffing had been exhausted, as discussed earlier. Regardless of how the DEA could have better dealt with the noise impacts from the Project, ultimately the Project as is, cannot be supported by the City and the FAA must "go back to the drawing board" and develop a project that has far less noise impacts. Ideally a revised DEA would demonstrate to the Phoenix-Area the FAA has afforded us the same community deference and benefits its similar airspace projects in other regions apparently resulted in.

PART 3. DEA DOES NOT CODIFY ADHERENCE TO 43RD AVENUE AND TEMPE 4DME GATES.

As a result of Phoenix v. Huerta 2015, the US Court of Appeals decision (2017) and subsequent Settlement Agreement, a noise abatement procedure was established for western standard instrument departures from PHX. Previously, in 1994, a similar Agreement was entered into by FAA and the cities of Phoenix and Tempe, that established the 4DME gate for eastern standard instrument departures from PHX.

Based on comments during the public workshops, continued adherence appears to be FAA's intent. For example, during the Sky Harbor focused Workshop on May 13, 2026, at minute 1:03:54 the FAA stated: *"Okay, the next one. "Some procedures, including procedures going over historic communities in downtown Phoenix, list that the procedure is for turboprops and turbojets. Does that mean commercial jet aircraft will be allowed to fly the procedures over these historic neighborhoods?" I'm gonna turn it over to you, Nick, 'cause I know you know the answer to that question. - Okay. I'd like to use another slide here. Let me figure out which one it is. It's a West Flow Sky Harbor departures, say P8 I think, or P9. Either one of those. So I kind of referenced the turboprop and turbojet difference earlier in the Group B conversation. But the westbound departures off of Sky Harbor will fly relatively the same pattern or same departures for turbojets straight out to 43rd Avenue or just past 43rd Avenue. And then they turn north and fly north as they continue to climb and get higher, which again reduces noise. There will be those turns depending on traffic and safety, whatever other aircraft are out there in the area. So to specifically answer the question, the 43rd Avenue and Tempe 4 DME will still be used. So there aren't many changes for the turbojet departures off of Sky Harbor. The turboprops will fly that other SID that I showed in those*



boards earlier. - Yeah. And again, I think just to reiterate, right, commercial jet aircraft, they're gonna follow these procedures that we're showing on the screen right. Correct. - Yeah. So hopefully that answers that question."

The DEA should have communicated in both narrative and mapping that the 43rd Avenue and 4DME Gates (noise abatement procedures) will continue to be adhered to with the proposed procedures.

PART 4. GROUP B (TURBO PROP) DEPARTURES FROM PHX RESULT IN NEGATIVE IMPACTS ON HISTORIC PROPERTIES AND MAY IMPACT ENVIRONMENTAL JUSTICE COMMUNITIES.

The proposed action includes new standard instrument departures for Group B aircraft from PHX. These procedures are not required to adhere to the noise abatement gates mentioned above. The proposed procedures for NW, SW, NE and SE flows are significantly different from existing lateral locations; in most instances the proposed procedure appears to create a corridor over an area that is less compatible (more noise sensitive) as compared to the general location of the VFR procedures under existing conditions. Moreover, the proposed procedures appear to be held at or below 3000' AFE for several miles beyond where these aircraft climb above 3000' AFE under existing conditions.

To be clear, these procedures in NW flow directly impact Phoenix Historic Districts and in SW flow may directly impact Environmental Justice Communities. Similar impacts are expected in NE and SE flow to neighborhoods in Scottsdale and Tempe east of PHX. The Project process must be paused so PBN working group stakeholders can look at dispersion/diffusion/rotational routing for these corridors, study alternative environmental impacts and review those new alternative actions with the Community prior to publication of the Final EA.

PART 5. THE PROJECT AND DEA FAIL TO PRESENT ANY ALTERNATIVES TO THE PROPOSED ACTION.

According to FAA Order 1050.1F "Alternatives are to be considered to the degree commensurate with the nature of the proposed action and agency experience with the environmental issues involved. Generally, the greater the degree of impacts, the wider the range of alternatives that should be considered.... For alternatives considered but eliminated from further study, the EA should briefly explain why these were eliminated." The DEA should have provided alternative procedures, including alternatives with lateral locations similar to the proposed action only with higher minimum altitudes at initial waypoints as well as alternative procedures with different lateral locations that could be used within a program for noise dispersion/diffusion/rotational basis in conjunction with the proposed procedures. These alternatives are particularly critical for the North Phoenix area where incredibly large populations will be impacted by reportable noise increases.



PART 6. THE DEA AND SUPPORTING DOCUMENTS ON THE PROJECT WEBSITE ARE UNNECESSARILY CONFUSING AND, IN SOME CASES, MISLEADING; THE RESULT OF THIS SITUATION IS THAT THE PUBLIC WERE UNABLE TO UNDERSTAND THE PROJECT AND ITS IMPACT. THE DEA HAS MULTIPLE SUBSTANTIVE TECHNICAL DEFICIENCIES AND READABILITY ISSUES.

Underpinning the Project was several years of “start and stop” PBN working group efforts amidst funding delays, government shutdowns, changes in FAA leadership responsible for the Project and other policy situations beyond the control of FAA or the context of the Project. These points alone may explain why the working group meetings (critical for assuring FAA and airlines are reviewing conceptual ideas early on with airport representatives familiar with local noise issues) didn’t include the minimum required mapping for airport stakeholders to provide oversight of the process, for example: satellite airport procedures were shown without composite mapping of aials, existing tracks or calculated average tracks; no mapping of proposed PHX Group B procedures were produced; in general, no alternatives were developed or analyzed; and the JO covering PBN working group requirements for primary airport staff concurrence never occurred. After the PBN working group meetings ended and leading up to the DEA publication another useful example of this context occurred when the FAA’s Project Notice of Intent in 2025 failed to mention that PHX was one of the airports being studied (when it is the primary airport being studied). In short, and most importantly, this context shows the rush-nature over of this Project, particularly as it was formalized and the DEA was published with some many errors and missing (required) elements.

A good portion of the balance of this letter goes into detail of various elements of the DEA and related project website content that would benefit from revisions and modifications to move the effort closer to something that the public could understand and provide useful input towards. To FAA’s credit, throughout the process immediately leading up to the DEA publication and immediately following the DEA publication, the FAA did well to fix many substantive deficiencies and errors. Specifically, the day after the DEA was published (4/29/26) the City contacted the FAA and identified concerns it felt would ensure the community’s inability to understand the Project and its impacts. The FAA recognized these concerns and in a somewhat rare action, took down the DEA for several days while the public comment period was open to make hundreds of textual and mapping changes as noted in the DEA Change Sheet published with the revised DEA. Most of these changes were needed in the Alternatives Chapter (which oddly includes no alternatives) and Appendix H and I, the most critical elements of the DEA as they show the no-action and proposed action maps (for which no less than 460 separate map exhibits needed to be modified). The number of changes needed to simply go forward with the public review of the DEA again provides the context for the overall slapdash and confusing nature of the information provided to the public for this Project.

Another example of what can only be characterized as unintentionally misleading is the Proposed Procedure Boards ([Proposed Procedure Boards](#)) for PHX. The procedure boards are important to the public’s engagement and understanding as the FAA contends the requirements of the DEA don’t allow for more useful mapping, but those requirements (or limitations) can be overcome with the more “public-friendly” workshop procedure boards (particularly as these boards are the only FAA materials that actually overlay an existing condition – actual tracks – with the proposed routes on a



single map). Yet, these boards severely misinform the public as they refer to the proposed procedures as the “Published Procedure” (page 2), the “Proposed Published SIDs” (page 3), the “Existing Published SIDs” (page 8), and the “Published STARs” (page 10) when none of these procedures are published or existing. Furthermore, a major change included in the Project is the changes to Group B routes for PHX, yet the Boards include no maps of the proposed arrival procedures (which the DEA Appendix H and I clearly show are subject to proposed changes). Finally, as discussed in depth later in this letter, the cartographic choices made by the FAA for these maps (specifically, using the same color to show both a proposed route and existing tracks overlay means there is no possible way to tell if a route aligns with existing tracks) results in significant readability problems for the public.

The following list identifies elements of the Project, DEA or related documents that contain errors, appear to deviate from requirements or should be improved to ensure the community’s understanding of the Project and its impact:

1. The DEA no action (Appendix H) and proposed action (Appendix I) provide map scales that make it difficult for people in the impacted areas to see the changes; the organization of the maps as two different documents instead of overlaying the proposed procedures on top of the existing (no action) procedure makes it difficult to see the changes; the description of Turbofans as Turbojets makes it difficult for people to understand what the change is impacting; the depiction of lower altitude changes in AFE (which is not readily defined and conflicts with the more commonly used MSL measure and term for higher altitudes) does not allow for public understanding of potential height changes (and the use of two different measurement types for the same map seemingly makes no sense); and the lack of differentiation between aircraft types and line delineations (several maps include procedures affecting both Jet and Turboprop routes but the linework for both route types are identical) on these maps results in public confusion and misunderstanding.
2. DEA Appendix J describes the Basics of Noise, but the text references it as describing the modeling inputs (eg, "More detailed information about the AEDT 3g input for Existing Conditions can be found in Appendix J", DEA Chapter 4, p. 45).
3. The DEA identifies three different total number of IFR operations that occurred in 2024: 605,011 (Ch. 1, Table 1-3, p. 6), 581,857 (Ch. 4, p. 45) and 618,232 (Appendix K, Section 4.3, Table 3, p. K-37).
4. The DEA notes that FAA did not include VFR operations in the noise modeling analysis. To exclude a category of aircraft operations that operate in the study area means that results may not accurately account for the full aircraft noise environment and misstate the community's exposure to aircraft noise described in the No Action and Proposed Action alternatives. "DNL and CNEL account for the noise levels of all individual aircraft events, the number of times those events occur, and the period of day/night in which they occur." (FAA Order 1050.1F Desk Reference (v2, 2020. Section 11, p.11-2). Particularly at DVT and SDL,



high VFR and Local activity may be a key factor in accurately characterizing noise impacts. (Ch. 1, Table 1-2, p. 6).

5. The DEA does not clearly quantify the extent tactical vectoring will persist under real-world, high-demand conditions, nor how that variability may affect the geographic distribution of noise. The procedure comparison graphics (Appendix H and I) make it difficult to interpret vectoring density in specific areas. As a result, there is uncertainty as to whether the modeled tracks fully represent actual operations during peak periods.
6. It's not clear how the FAA determined the proposed action would not be highly controversial.
7. The DEA does not identify the number of flights assigned to the no-action and proposed action flight tracks.
8. The DEA does not appear to comply with FAA's NEPA Order in several substantive areas. Of particular concern, the DEA doesn't identify alternatives for any proposed procedure, it excludes VFR operations from noise modeling, and the noise model appears to be based on a single, and seemingly unrealistic, operational environment where almost no vectoring occurs. The latter concerns FAA admitted to throughout the public workshops, claiming this was good for the community as it results in a more conservative estimate of noise impacts; this statement is absurd to anyone living under the areas where aircraft will be vectored with the proposed action.
9. While the DEA has no alternatives, it misleads the public by referencing alternatives in Section 3.1 to appendix E, which does not show any alternatives. The DEA does not include a summary table in the Alternatives Chapter showing the alternatives evaluated or why they weren't selected. According to FAA Order 1050.1F "Alternatives are to be considered to the degree commensurate with the nature of the proposed action and agency experience with the environmental issues involved. Generally, the greater the degree of impacts, the wider the range of alternatives that should be considered.... For alternatives considered but eliminated from further study, the EA should briefly explain why these were eliminated."
10. Several proposed routes state there is nothing to compare to; the DEA should have included mapping (no action) of an average track for existing IFR operations (or VFR operations likely to become IFR) as a comparison reference.
11. Concerns with future RNP arrivals – DEA should have provided a 20-year forecast with built-in presumptions about RNP usage as the environmental approval for these procedures at a time that most aircraft do not use the technology means FAA is potentially approving future procedures that will have significant noise impacts to the community without having to review those impacts with the community. Only ~6.9% of arrivals in 2027 and ~17.9% in 2032 are estimated to use RNP tracks (Appendix K, File 2 of 6, pp. K-63–K-64). This begs the question for example, what is the environmental impact to the community if 50% of IFR arrivals use RNP in 2042?

12. The DEA does not appear to give any special consideration of impacts on Historic Districts. FAA's Section 106 consultation with the State and Tribal Historic Preservation Offices was not completed or shared with the Community during the public comment period. The absence of this key agency input during the public review makes the community's involvement in this entire process less meaningful and transparent.
13. The DEA page count exceeds the FRA requirement; appendices should provide context and technical information, with the main body written for conciseness and in plain language.
14. Page 1; Footnote 2, typographical error, reads as FAAA Order 1050.1F. Page 6; Tables 1-2 and 1-3 present large amounts of operational data but provide little interpretation.
15. Chapter 1 does not provide explanations of some terminology that the public may not be familiar with. Examples include: "Runway thresholds include displaced thresholds and instrument approach procedure (IAP)-based threshold crossing heights for both arrival directions." There is no explanation of displaced thresholds or crossing heights; National Plan of Integrated Airport Systems (NPIAS) classifications to describe airports such as "national reliever" and "regional reliever" but does not provide explanations of what those classifications mean.
16. Page 11, Exhibit 1; would benefit from a clearer and more comprehensive depiction of regional aviation context. Incorporating these external airports would strengthen the analytical transparency and help reviewers understand the broader airspace environment. Additionally, incorporating some form of altitude screening on the map would clarify how terrain elevation influences the study boundary.
17. Page 13, Exhibit 1; the supplemental study area map similarly omits the previously mentioned regional airports, even though several of them fall within the bounds of the supplemental study area itself. Ensuring that all airports located within the supplemental boundary are shown (using a clear, differentiated symbol) would strengthen both transparency and methodological defensibility.
18. Pages 24, 25; greater emphasis is needed on how the operational objective benefits communities, the public, and airports.
19. Page 31, 36; the color choices on these maps are suboptimal, and the bright blue used for the SID procedures creates unnecessary visual conflict with the STAR procedures. This significantly reduces clarity and makes the chart more difficult to interpret.
20. Page 32, 33; narrative heavily focused on vectoring and controller workload but does not explicitly explain the amount and what that translates to (fuel emissions, noise, safety, predictability, etc.) and technical definitions are used without practical examples.

21. Page 45, Noise and Compatible Land Use: the DEA should acknowledge early that public perception of noise often differs from technical metrics.
22. Page 49, Exhibit 4-1; exhibit contains a significant amount of information, however, distinguishing meaningful patterns is difficult due to color palette and geographic scale.
23. Page 51, Exhibit 4-2: exhibit provides useful land cover information but the connection to the Proposed Action is not immediately clear. Map contains multiple land cover categories that are difficult to distinguish at this scale.
24. Page 54 -57 – Exhibits 4-3 through 4-6; combination of the study area boundaries, resource symbols, geographical labels, color choices, and jurisdictional boundaries creates a visually dense presentation. Resources do not visually stand out from background information. Map scale dissection choices should be reconsidered, as individual tribal land should be presented within their entirety.
25. Page 60, Exhibit 4-7; color choices make it difficult to decipher between the study areas. Airport symbols have low visibility.
26. Page 69, methodology section could benefit from a plain-language summary.
27. Page 73-75, Table 5-3 and 5-4; consider adding visual summaries, key findings callouts, or simplified graphics.
28. Pages 76-81, Exhibits 5-1 through 5-4: Difficult for a non-technical audience to interpret. Readers may struggle to understand whether colors indicate increases or decrease, what magnitude of change is meaningful, whether changes are considered significant.
29. Pages 85, Exhibit 5-5; Airport symbols have low visibility, making it difficult to determine location/affect to depicted resources. Reportable noise changes are difficult to decipher at this scale.

* * *

The preceding sections of this letter explain the City's rationale for opposing the Project and identify numerous changes to the DEA that should be incorporated into a revised DEA for publication and reviewed with the community for their input. Many of the changes will require additional PBN working group meetings, including updated flyability and environmental modeling. Ultimately, these necessary actions will delay the scheduled IFP publication for the Project. These final sections of the City's letter deal with the following issues: A) specific requests, B) next steps and collaboration, and C) concluding remarks.



A. FORMAL REQUESTS FOR DATA SHARING, MODIFICATIONS TO THE DEA AND ULTIMATELY, DELAY OF THE PROJECT IFP PUBLICATION SCHEDULED FOR 2027.

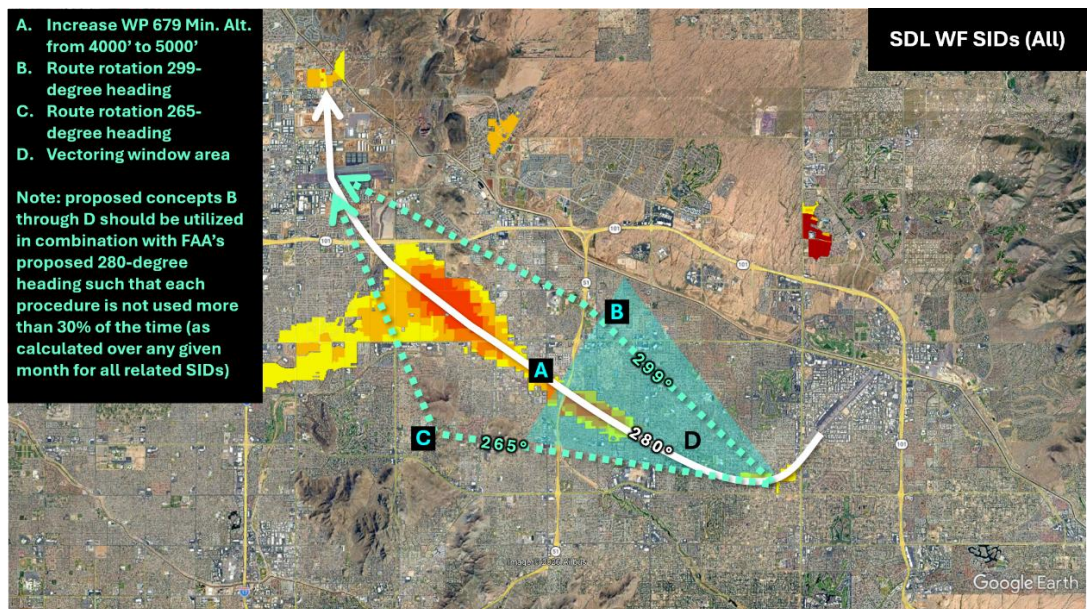
The City has the following formal requests (note, several of these requests, for clarity and economy, request-by-reference issues and concerns identified in Parts 1 through 6 of the letter):

1. Delay the scheduled IFP publication date (2/28/27) for the Project procedures until such time as a revised DEA can be developed and published for public review and comment.
2. Develop a revised DEA that incorporates the changes (#1 through #29) and related introductory narrative from this letter's section titled *"The DEA and Supporting Documents on the Project Website are Unnecessarily Confusing and, in Some Cases, Misleading; the Result of this Situation is that the Public were Unable to Understand the Project and its Impact. The DEA has Multiple Substantive Technical Deficiencies and Readability Issues."*
3. Include in the revised DEA the following supplemental analyses (again, please refer to Part 6 of this letter for additional context and clarification):
 - a. Environmental Justice and Cumulative Impacts analysis required under FAA Order 1050.1F.
 - b. VFR Traffic in the Noise Analysis of the revised DEA.
 - c. Supplemental noise modeling including Sound Exposure Level (SEL), Time Above a Specified Level (TA) and Community Noise Equivalent Level (CNEL) for proposed PHX west flow Turboprop IFR departures.
 - d. Analysis that recognizes Historic and 4(f) resources (like public parks) within the Phoenix Historic Districts are "managed for quiet" as well as the residential areas near the Phoenix Mountain Preserve in North Phoenix, and the Preserve itself.
4. Include in the revised DEA, maps showing PHX abatement procedures and narrative explaining how the 43rd Ave Gate and 4DME were established and their importance going forward with the Project actions.
5. Provide the City the following electronic files:
 - a. GIS files for all Section 106 and 4(f) resources and boundaries (eg, APE) considered in the Project study.
 - b. TARGETS file for all proposed procedures for all airports included in the project.
 - c. AEDT model (and related inputs) for the Project, including all airports and proposed routes.

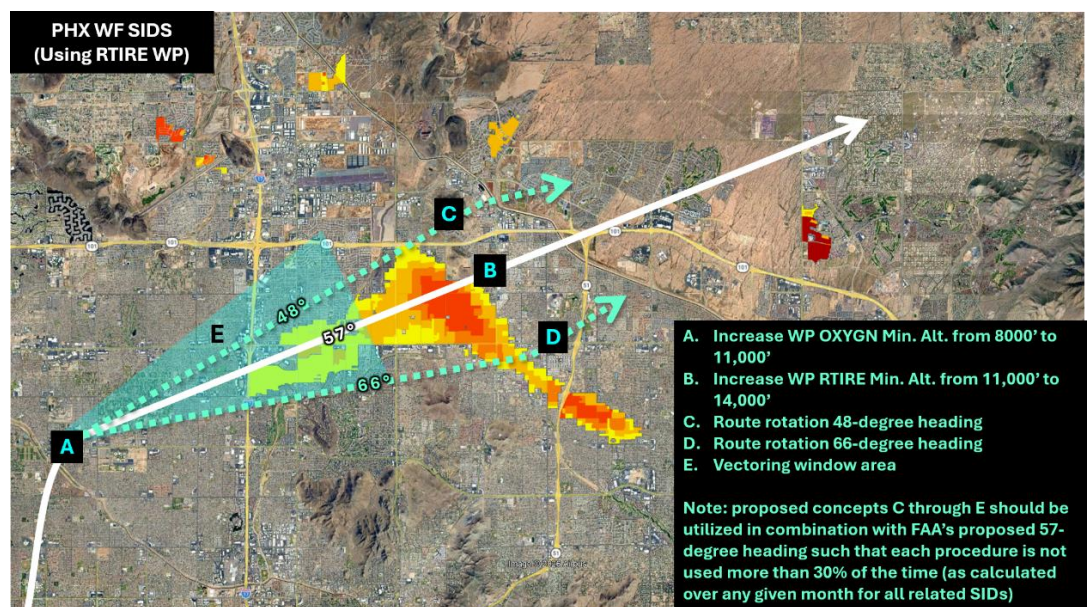


6. Produce a revised DEA that includes route alternatives and noise diffusion/dispersion programs by holding formal PBN working group meetings to analyze for flyability, environmental impact and consistency with the DEA purpose and need (ie, net benefit for reducing controller workload) the following proposed route modifications (ie, waypoint altitude minimum level increase), conceptual routes for noise dispersion/diffusion through route rotation programs and noise dispersion/diffusion through vectoring window programs:

a. SDL WF SIDS (All)



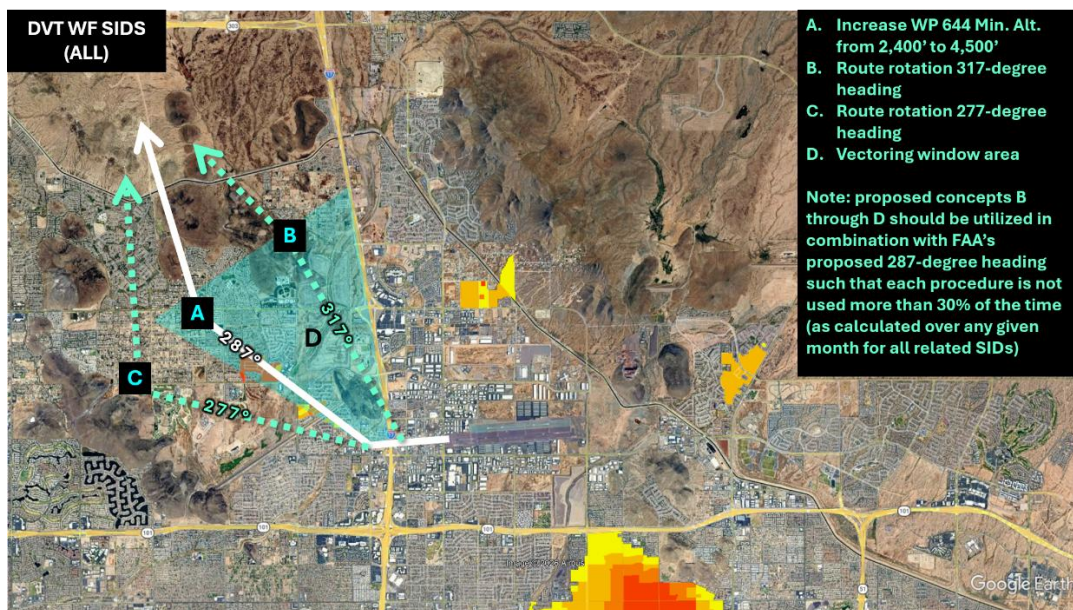
b. PHX WF SIDS (Using RTIRE WP)



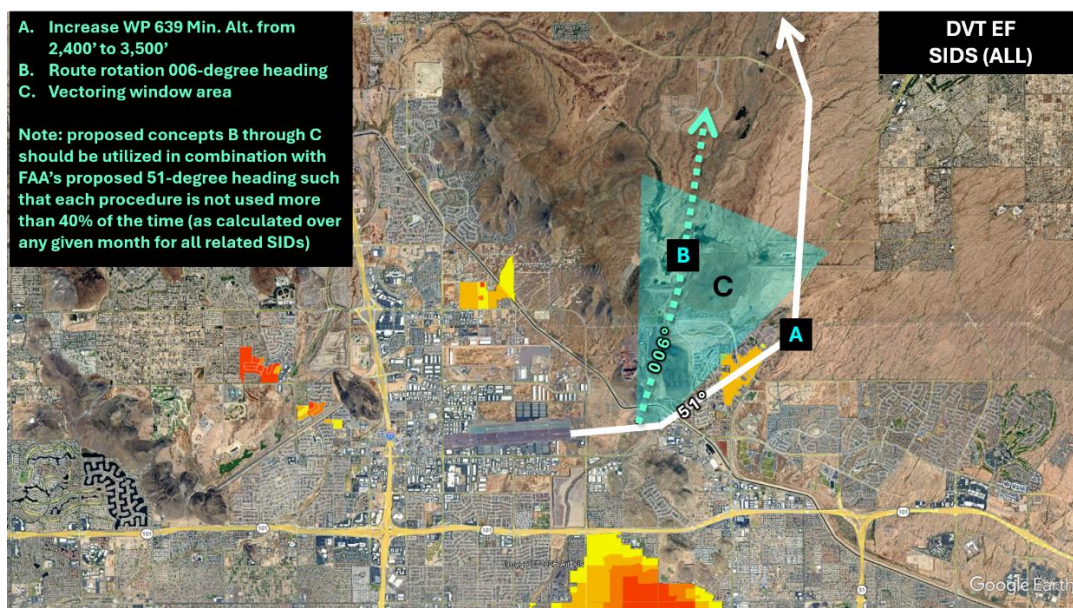
PHX DVT BYR

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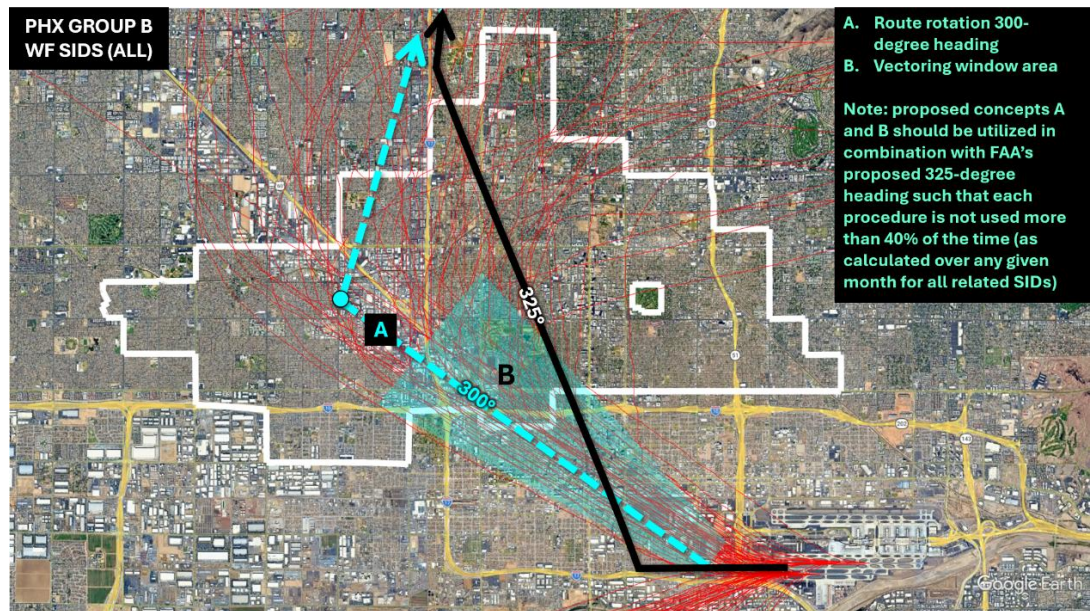
c. DVT WF SIDS (ALL)



d. DVT EF SIDS (ALL)



e. PHX GROUP B WF SIDS (ALL)



B. SUGGESTIONS FOR IMMEDIATE NEXT STEPS AND OPPORTUNITIES FOR COLLABORATION TO ENSURE PROCEDURAL SUCCESS MOVING FORWARD.

As discussed throughout this letter, the City opposes the Project and DEA for several critical reasons; these reasons explain the community's negative reaction and similar opposition to the Project and DEA. The FAA's purpose and need, however, remains an important, shared goal by seemingly all stakeholders. As this letter primarily asks for a delay in the process so that a revised DEA can be developed and reviewed with the public for their input in the future, the City recommends several important next steps:

1. Immediately, the City (Aviation Department) will facilitate a virtual meeting with the Regional Administrator and FAA technical representatives to review the letter, provide additional context and address key agency concerns.
2. The City requests the technical electronic files requests noted above be completed by FAA shortly after the initial meeting with the FAA RA and technical leads.
3. The City will make available its technical staff and consultants (as necessary) to update TARGETS and AEDT models with the proposed alternative and diffusion/dispersion routing programs for an initial check of flyability and environmental benefits.
4. The City would encourage FAA to quickly follow on the technical modeling above with a series of full PBN working group meetings to allow technical stakeholders (including

satellite airports, industry and airline representatives) full input into the revised routes and programs.

5. With the GIS electronic files request for 106/4(f) related analysis, the City will work with consultation stakeholders (State and Local) to better understand potential impacts and help facilitate their regulatory reviews for FAA.
6. FAA is encouraged to provide regular Project website updates on this process, in addition to their review of all public comments, analysis and posting of “bucketed” comments and technical responses.
7. Following a full PBN working group design process, the City would like to partner with the FAA on the variety of readability concerns addressed in this letter to help ensure procedural success (ie, the public’s full understanding of the revised Project and revised DEA) going forward.
8. The City would like to collaborate with the FAA on potential outreach augmentation strategies (eg, direct mailers to households where noise could increase by 3 dB) for the revised DEA.
9. The City will provide FAA with examples of mapping analysis (such as overlays of average track lines with existing/proposed procedure linework) to help facilitate public review of the revised DEA.

C. CONCLUDING REMARKS; THE CITY’S GRATITUDE FOR ADDRESSING THIS LETTER’S CONCERNS AND REQUESTS BEFORE MOVING FORWARD WITH A FINAL EA.

In closing, I want to express my sincere gratitude for your willingness to consider feedback and forgo any hastily derived “band-aid” solutions for this critical initiative that impacts so many industry and agency stakeholders, the flying public and otherwise. As it takes time to do something right, the City stands ready to help the FAA through the deliberate process of improving upon the DEA, developing meaningful noise mitigation strategies and communicating with the general public on those revisions and concepts discussed in this letter.

As we learned with the implementation of the 2017 Settlement Agreement, a new process often uncovers key issues that were unknown during the original process. I suspect as we go through a new round of PBN working group meetings that even greater efficiencies and improvements for the airspace will become evident and that in time, this delay will be viewed as a great step in the long journey to modernize our air transportation system. The City of Phoenix, like FAA, prides itself on being future-oriented and state-of-the-art, “*We promote an environment of inventive thinking and imaginative solutions to community needs. We encourage a spirit of continuous improvement in all our activities to exceed community expectations*” [City of Phoenix Mission, Vision and Values | City of Phoenix](#). Let us continue to partner on what is right, not what is expedient, so that we may truly



strike the balance for the whole community's needs while also enabling aviation's continued success and sustainability in our region.

Respectfully,

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