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January 31, 2024 Noise Oversight Committee Draft Recommendations to the FAA

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

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

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

Provide opportunities for meaningful public engagement

- Provide a public comment period of up to 60 days related to FAA's proposed procedures and resultant environmental review to allow members of the public sufficient time to be informed and equipped to participate in the FAA's comment process.
- In order to have broad and effective outreach, the NOC would like the FAA to avoid scheduling its public workshops during major holidays.
- As noted in the FAA's January 5, 2024, response to the NOC's recommendations submitted on November 29, 2023, the FAA plans to hold virtual open houses due to the FAA's perspective that they are convenient, provide greater reach and flexibility and are more cost effective. The NOC recommends the FAA provide in-person FAA personnel for at least one hybrid public workshop, as this would honor the points raised by the FAA and offers the most inclusivity by being accessible

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

Increase transparency and communicate effectively

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

Effectively communicate environmental impacts

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

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

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

Identify additional opportunities to enhance use of existing noise abatement practices

- During South Flow operations, aircraft departing with a 120-degree heading from Runway 12L utilize the established noise abatement procedure, Crossing-in-the-Corridor. This benefits surrounding communities by directing aircraft over more compatible land in the center of the Egan-Mendota Heights Corridor. Since RNAV provides more precise and predictable routes and the FAA has stated that during South Flow operations Runway 12R is only used for departures when operationally necessary, the NOC recommends the FAA assign a 120-degree heading to additional Runway 12L RNAV departures to route aircraft over the center of the corridor.
- Aircraft departing over the Minnesota River reduces the instances of aircraft overflying residential areas. The NOC recognizes the FAA's high use of the existing Runway 17 turn point noise abatement procedure to keep westbound turns over the Minnesota River today. The NOC recommends the FAA take this opportunity to design new RNAV procedures to keep Runway 17 westbound departures over the Minnesota River for as long as possible before flying over homes and other noise sensitive areas.
- The NOC recommends the FAA's procedures minimize shifts in flight patterns that may be due, in part, to planes staying on runway heading longer than they do today. Staying on runway heading may lead to shifts in areas of overflights and conflicts with a noise abatement principal of the MAC and NOC, which is to reduce straight out departures over communities already impacted by arrival noise. Using a 500-foot per nautical mile (NM) climb gradient may allow an aircraft to initiate a turn on course closer to the departure end of the runway. The NOC recommends the FAA evaluate a 500-foot per NM climb gradient.

Identify additional opportunities for proposed procedures to replicate existing flight paths

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

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