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

Great Lakes Regional Office
2300 East Devon Avenue
Des Plaines, IL 60018-4696

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Cheryl Jacobson
MSP NOC Community Member
City of Mendota Heights

Paul Buckley
MSP NOC Airport User Member
Delta Air Lines

Dear Ms. Jacobson & Mr. Buckley,

Thank you for your January 31, 2024, letter sent on behalf of the Minneapolis – St. Paul Airport (MSP) Noise Oversight Committee (NOC). The FAA appreciates the NOC's recommendations provided on community outreach and procedure development for the area navigation (RNAV) departure procedures currently being developed at MSP. The FAA appreciates being able to have this dialogue early. What follows is part of that conversation but, unless specifically noted, no final decisions have been made that would be pre-decisional under the National Environmental Policy Act (NEPA) and other applicable laws and regulations.

The FAA has reviewed your January 31, 2024, letter and we appreciate the NOC's willingness to represent their member communities and the Twin Cities area in general, and to provide feedback on our initial draft procedures. The FAA is committed to community engagement, and based on this initial feedback, the FAA has incorporated changes to the initial project design in response to NOC's comments, which are noted below. These changes will be assessed for consideration for the final procedures under all applicable laws. The other non-procedural recommendations from the NOC and other stakeholders are very much appreciated by the FAA and are still being considered as part of this project.

The FAA developed the initial draft procedures for MSP based on three official design meetings and multiple discussions with aviation stakeholders including the MAC, airlines, local and regional air traffic control. These draft procedures were previously shared with the Metropolitan Airports Commission (MAC) officials on October 12 and 26, 2023 and members of the NOC Subcommittee on October 30, 2023. The FAA appreciates the initial feedback provided by the NOC in their November 29, 2023, and January 31, 2024, letters to the FAA.

In addition to the three official design meetings, the FAA's Air Traffic team recently reviewed the procedural recommendations submitted by the NOC in a workgroup meeting with aviation stakeholders on February 6, 2024. Any procedural suggestions that were feasible and did not negatively impact safety or efficiency, were assessed for consideration in the final procedures.

Recommendations received from the NOC, whether they were feasible or not, will be summarized and posted after the NEPA process is complete on the MSP community involvement website which will also feature updates, resources and other related documents throughout the full life cycle of the project. We will also post project updates on this website and the final outcome of the environmental process as required by NEPA.

Moving forward, the FAA remains committed to multi-faceted engagement for community engagement purposes. The FAA will work with the MAC and NOC to conduct public outreach sessions in 2024. The FAA appreciates the NOC's provided suggestions to the FAA on when to hold these sessions in their January 31, 2024, letter to the FAA.

The FAA is committed to making complete, open, and effective public participation an essential part of this process. These sessions will include materials showing the proposed new procedures, feature a question-and-answer session with air traffic controllers, and provide explanations of the changes being proposed. The FAA will ensure the dialogue with the general public is two-way and that suggestions received during these sessions are considered for final procedure designs. We look forward to continuing to partner with MAC, NOC, and other stakeholders to ensure that participation is successful.

Specific to the initial feedback contained in your January 31, 2024, letter, the FAA has provided the below responses:

Provide opportunities for meaningful public engagement

1. Provide a public comment period of up to 90 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.

FAA Response:
We will ensure our public engagement approach is in accordance with all applicable laws.

2. In order to have broad and effective outreach, the NOC would like the FAA to avoid scheduling its public workshops during major holidays.

FAA Response:
The FAA has committed to scheduling public engagement sessions on days other than major holidays.

3. 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.

FAA Response:
Thank you for your input on this important matter. The FAA will consider this recommendation as the level of environmental approach under NEPA has been determined.

Increase transparency and communicate effectively

4. 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.

FAA Response:
The FAA looks forward to serving as the lead for community engagement with the assistance of both public and private entities that assisted with the project design. While the replacement of outdated technology by the FAA is the primary driver for the updates to MSP procedures, and as such will be the lead for community engagement, the working group comprised of both public and private entities has developed many of the specific details to support implementation. In addition, the safety and efficiency benefits of the project impact multiple stakeholders including the FAA, industry, and the airport. As such, we would encourage all entities represented by the working group membership to actively support communication planning as well as community outreach and engagement activities.

5. 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.
6. 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.

FAA Response to the two above items:
The FAA is committed to ensuring that the public is able to obtain information about this project at this early stage and looks for ways for the public to do so from their personal computer, smartphone, library computer and other web-enabled device anywhere in the world. The FAA has recently updated our *Community Engagement – Minneapolis-St. Paul* webpage. In line with NOC's recommendation, the FAA added a video to that webpage that provides a comprehensive overview of the project. The FAA will update this webpage as details of the project are developed, including opportunities for community input.

7. 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).

FAA Response:
The FAA appreciates this feedback and will consider this for its public outreach sessions.

Effectively communicate environmental impacts

8. 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."

9. 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.

10. 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.

FAA Response to the above three items:
When complying with NEPA obligations, FAA follows the regulations issued by the Council of Environmental Quality (CEQ), which apply to all federal agencies, as well as the agency-specific instructions regarding NEPA implementation contained in FAA's Order 1050.1F: *Environmental Impacts: Policies and Procedures*. That Order identifies the potential environmental impacts that must be analyzed during the environmental review including noise, socioeconomics, and environmental justice that the NOC has highlighted for consideration. The FAA follows the process for determining the appropriate level of environmental review, based on the potential environmental impacts, identified in the Order. Regardless of the level of environmental review, FAA has committed to engaging the public during the environmental review process and public comment period. The FAA will provide information on noise impacts.

Identify additional opportunities for proposed procedures to reduce overflight concentration over Neighborhoods *(The FAA's below responses are part of an early dialogue with the NOC and community. Final decisions cannot be reached until the conclusion of the NEPA process.)*

11. 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.

February 6, 2024, Workgroup Response:
The current proposed procedures from runway 17 either turn to a 120, 135, 150, or a 220 heading. There are no proposed departures that continue straight out on a 170 heading. If changes to this design occur during development, due to safety criteria and other procedure development factors, we will advise the NOC.

12. The NOC appreciates the efforts by the FAA to use VI-CF legs to concentrate aircraft activity within the established boundary of the Eagan-Mendota Heights Corridor. The same departing aircraft overfly residential land uses within the corridor and 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.

February 6, 2024, Workgroup Response:
The workgroup agreed that the use of a VI-CF vs a VA-DF leg did not impact safety or efficiency for Air Traffic. The workgroup agreed to change the initial legs to VA-DF. We are striving to incorporate this change into the design.

Identify additional opportunities to enhance use of existing noise abatement practices

13. 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 Eagan-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 without increasing overflights over residential areas of Sunfish Lake.

February 6, 2024, Workgroup Response:
Moving additional departure procedures to an initial 120-degree heading will result in reduced efficiency at MSP. Using divergence, an aircraft can depart following another aircraft if their courses diverge and the preceding aircraft is 6000ft down the runway and airborne. If aircraft are flying the same path, the second aircraft cannot depart until the first aircraft is 3 NM away. The 120 initial heading is used for the busiest departure plus several others. Moving the second busiest departure, the COULT, to that heading would reduce overall airport efficiency.

14. 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 keep Runway 17 departures that are designed to fly over the Minnesota River, over the river for as long as possible before flying over homes and other noise sensitive areas.

February 6th, 2024, Workgroup Response:
The workgroup evaluated the currently designed procedure that is down the river and further adjustments would either not meet design criteria or create an issue with arrival aircraft on the downwind for runway 12R. Further changes would not allow departures to continue climbing due to the need to descend arrivals to get into the proper position to be established on a stabilized approach.

15. 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.

February 6, 2024, Workgroup Response:
All the departures that have a turn of more than 15 degrees from the end of the runway are designed with a 500 ft/NM climb gradient until Lateral Navigation Engagement (LNAV) by the Flight Management System (FMS) to initiate the turn within 1 NM of the runway end.

Identify additional opportunities for proposed procedures to replicate existing flight paths

16. 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.

February 6th, 2024, Workgroup Response:
The current procedures do not meet the full needs of air traffic and the crossing restrictions are currently needed. Air traffic needs to continually monitor these aircraft to make sure that they are clear of adjacent airspace. The restrictions will also require the aircraft to climb at a higher climb gradient and gain altitude faster. An aircraft without the restriction could climb at the minimum required climb gradient of 200 ft/NM. Also, having a few procedures that are different from the majority introduces risk into the National Airspace System.

17. 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.

18. 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.

19. 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.

February 6, 2024, Workgroup Response to the three above items:
According to FAA Job Order, 7110.65AA, the primary purposes of the ATC system is to prevent a collision involving aircraft operating in the system. In addition to its primary purpose, the ATC system also provides a safe, orderly, and expeditious flow of air traffic in and out of MSP. Air Traffic Control will continue to control aircraft, as close as possible as is done today, and as requested in procedure design workgroup meetings initially by the MAC. Air traffic wants to get aircraft on course and heading towards their destination as soon as safely possible. In addition, procedure design only allows for one runway transition per runway per departure procedure.

To meet the necessary air traffic charting deadlines, the FAA is working towards a goal of publishing the new procedures by August 2025. However, as part of our ongoing dialogue and workgroup meetings which included the MAC who has continuously expressed the goals of the NOC, we have discussed a common goal of ensuring existing dispersed pathways above MSP's surrounding communities remain consistent with what they are today - provided they meet FAA safety criteria and operational requirements.

Future Steps

We look forward to continuing our dialogue with the MAC, NOC, and other stakeholders. The MAC and the NOC will play a vital role with the FAA to develop and discuss timing of next steps as well as planning for public engagement sessions.

Sincerely,

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Regional Administrator
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