

April 6, 2007

NY/NJ/PHL Airspace Redesign

The following provides official comments from Greenwich, CT and New Canaan, CT on the NY/NJ/PHL Airspace Redesign and your Noise Mitigation Report dated April 6, 2007. Details are based largely on a study done by Williams Aviation Consultants at our request.

General

For decades, residents living in Greenwich and New Canaan have been suffering from severe noise pollution from low flying aircraft over their homes. This worsening problem is having a serious impact on quality of life and raising the potential for a major public safety issue. We have registered our concerns on numerous occasions with little result.

More specifically, Greenwich and New Canaan are two of the most severely impacted communities in the entire country by air traffic. There is an average of at least 340 low altitude flights per day – an astonishing number – principally from Westchester and LaGuardia. In addition, there are continual violations of the “voluntary curfew” at Westchester Airport.

The FAA does not make effective use of unpopulated or less populated tracts of land, industrial and commercial zones, major highway systems or large bodies of waters as “natural troughs” for mitigating noise impact. Alternative routes exist that meet all FAA standards while simultaneously and substantially reducing the effects on population.

Draft EIS

Williams has identified numerous deficiencies in the DEIS on which the alternatives were based. To the extent the conclusions in the DEIS are wrong, the proposed alternatives would be wrong.

Specifically, the ICC option only shows a benefit because the FAA's Consultant manipulated the fleet mix by substituting some of the large aircraft for regional jets. The FAA also did not consider the impacts of air traffic from 80% of the airports in the study area and did not consider the impacts of general aviation, military traffic, over flights and VFR traffic, etc. If actual conditions were modeled for noise and capacity, none of the alternatives would meet the purpose and need, and the true adverse impacts to areas surrounding the region's airports would be revealed.

Further deficiencies identified by Williams are shown in Attachment 1.

Noise Mitigation Report

The Integrated Airspace Alternative selected by the FAA promises to reduce congestion and delays but, in doing so, adds new flight paths and fans aircraft on departure, severely impacting our two residential communities. Given that the FAA initially excluded aircraft noise mitigation from the project's “purpose and need,” we do not believe that the FAA adequately reviewed the four alternatives and that the preferred alternative is not in the public's best interest. To pick just one example, airplanes bound for New York City's La Guardia Airport would begin their descent over the heart of Fairfield County and hug the coastline near Stamford and Greenwich before crossing over Long Island Sound to land. Safety and quality of life, not efficiency, should have been the

most important considerations in the FAA's evaluation. Despite the many predicted impacts to Fairfield County communities, no mitigation strategy is even attempted for LGA arrivals over Connecticut.

It is difficult to provide specific comments since the data on which it was designed are badly flawed. Nevertheless, Attachment 2 provides the Executive Summary from Williams, Attachment 3 provides remarks delivered to the FAA in Washington by Judy Neville on April 16 and Attachment 4 gives a statement from Congressman Christopher Shays read at the FAA hearing in Stamford on April 24. We support the views in these attachments.

In particular, we agree with our Congressman's view that "the FAA and Congress need to consider alternative methods of reducing air travel delays, including market-based solutions such as....auctioning slots at airports." The economic cost of air traffic should be borne by the airlines and their customers, not by those living under flight paths.

We look forward to hearing from you.

Respectfully,

James A. Lash, First Selectman, Town of Greenwich

Judy Neville, First Selectman, Town of New Canaan

Attachment 1: Williams Aviation Consultants-- Additional deficiencies in the DEIS

Modeling baseline for noise and capacity was manipulated to show efficiency gains.

The capacity analysis did not consider the impacts on adjacent Air Route Traffic Control Centers.

The capacity analysis did not model ground operations.

The capacity analysis did not model the transition of aircraft to the en route ATC system.

The capacity analysis assumed that the en route controller would accept "stacks" of aircraft in one chapter and then admitted that "stacks" would not be the norm.

The LGA over the water route (055 degree heading) is being eliminated.

LGA over the water departures will now over-fly the land areas west of the Sound.

The FAA's Consultant states that there are no adverse impacts on residents or on land use but later states that there will be adverse impacts. Impact on land use is not evaluated.

ICC is not an option that can be completed within the DEIS timeframe.

ICC did not consider impacts of building and construction of a facility to house the combined ATC facilities.

The ICC alternative only shows a benefit based on the manipulated data base.

The alternatives without ICC do not meet the stated need.

No noise mitigation measures are proposed although the FAA's Consultant admits that the project will result in adverse impacts.

The alternatives in the DEIS are capacity enhancing, but the FAA's Consultant did not identify airports where the additional operations would occur or the impacts on the underlying land areas.

Attachment 2: Williams Aviation Consultants-- Executive Summary

FAA Noise Mitigation Report dated April 6, 2007

This Executive Summary is a compilation of the comments contained in each section during our review of the Operational Analysis of Mitigation of the NY/NJ/PHL Airspace Redesign as it pertains to Greenwich and New Canaan, CT and the Westchester County Airport.

Williams Aviation Consultants Inc. (WAC) analysis of the MITRE Report concerning the "Evaluation of Arrivals to LGA via the Localizer Directional Aid to Runway 22" elicited several comments.

An LDA (Localizer-Type Directional Aid) approach is a non precision approach that uses a ground based localizer in conjunction with altitude crossing restrictions along the final approach course for navigation to an airport. As with the ILS approach, each arriving aircraft will fly the same ground track. The LGA LDA Runway 22 Approach to LGA can effectively be used when the ceiling is at or above the Circling Minimums as published on the approach plate.

The FAA contends that the LDA Approach to Runway 22 at LGA and the ILS Runway 22 Approach to JFK are not compatible being "a safety requirement due to lack of maneuvering room in the airspace".

WAC findings reveal that procedurally, there is no problem using these two instrument approaches simultaneously even though their final approach courses are not parallel. The two final approach courses would cross at some point but that point would be so far east as to make the safety contention ridiculous.

LGA Runway 13 departures referred to as the "Whitestone Climb" takes departures down the middle of the LGA ILS/LDA Runway 22 and JFK ILS Runways 22L/R final approach courses. These departure aircraft normally are well above the LGA/JFK arrivals prior to turning northeast. If this departure procedure had not historically taken aircraft safely above the arrival flows to LGA/JFK Runways 22, it would have been discontinued years ago.

The FAA claims safety issues regarding the use of the LDA Runway 22 Approach at LGA in that the descent gradient is too high for large aircraft. The LDA at LGA contains no written restrictions on the approach plate for any category of aircraft therefore any contention that the approach cannot be used by Large or Heavy aircraft is untrue.

It is unclear where the consultant found data that supports their claim that the approach to Runway 22 is designed with a 3.6 degree angle of descent. Our research reveals a descent angle on the final segment of the approach within legal limits. The descent gradient does not exceed the maximum descent gradient for large or heavy Category C and D aircraft. There is no specific Glide Path Angle published for this approach. The contention that flight crews may not be qualified to fly the LDA approach is like saying that some licensed automobile drivers can't drive on roundabouts. They may not want to drive on one, but there is no law that prohibits it.

Analysis of LaGuardia Runway 31 Departures over Rikers Island compares the original Preferred Alternative (Integrated Airspace with Integrated Control Complex) with the mitigated Preferred

Alternative. Neither the DEIS nor the Noise Mitigation Report assign LGA Runway 31 departure aircraft definitive ground tracks and climb profiles making it impossible to analyze actual noise impacts for any location.

The FAA's consultant's analysis concluded that LGA would actually need three simultaneous headings during the morning departure push from 6 am to 7 am. By their own admission, "noise modeling in the Draft EIS showed that a three-heading scenario would potentially cause noise impacts."

The three headings are "initial" departure headings assigned by the tower. Once the aircraft passes the Minimum Vectoring Altitude (MVA) the departure controller may assign new headings with subsequent altitude restrictions based upon other traffic and/or the departure gate the aircraft is being vectored to.

Once the three headings option is available as a delay reducing tool, its use will expand outside the morning time frame and will ultimately be available at the discretion of Air Traffic Control (ATC).

Aircraft that fly unpublished ground tracks without climb profiles will have protracted impacts on satellite air traffic such as Westchester County (HPN) departures/arrivals. HPN departures/arrivals will have their routes/altitudes moved/restricted to accommodate LGA RWY 31 departure traffic or vice versa. These protracted impacts will move aircraft noise to communities that have had no noise impact prior to the airspace redesign.

In the Assessment of Departure Flight Paths for Westchester County the FAA Consultant is attempting to make the point that under the Preferred Alternative of the DEIS, Westchester County Airport (HPN) departures are constrained by Newark (EWR) and La Guardia (LGA) air traffic, airspace and procedures. This being the case, there is no evidence that any type of operational or procedural analysis was performed for HPN Preferred Alternative and part of the DEIS. Because air traffic flows to and from HPN, EWR and LGA are highly interrelated, a procedural analysis should have been performed on HPN in the original DEIS.

The FAA has not determined whether or not an ICC that combines the Center and TRACON into one facility is feasible by the end of the DEIS out year 2011 date. The ICC Alternative is well above the current technical abilities of the FAA in terms of technology, personnel and feasibility that it should not even be considered.

The FAA Consultant draws attention to increased controller workload required under current HPN departure procedures. However, the current Westchester Departure is a Radar Vector procedure which by definition requires greater controller workload than would be the case with other types of departure procedures that could be designed for HPN. The FAA Consultant also attempts to add increased pilot workload to the controller. In so doing, the consultant erroneously describes pilot considerations during departure at HPN.

The Consultant does, however, correctly state that an FMS/RNAV departure procedure, if designed and implemented at HPN, would reduce workload. Not stated however is that it is true that any charted "Pilot Navigation" departure procedure confines a departing aircraft to specific ground tracks and altitudes. The associated routes and climb profiles can be specifically adapted to circumnavigate both adjacent airspace boundaries and conflicting departure procedures from

nearby airports. Assigning charted departure procedures reduces controller workload, but has no effect on pilot workload.

In one chart the FAA Consultant states that “the dispersal of the departure tracks from Runway 34 at Westchester County Airport results in a borderline change in noise for a single point located on the charts. However, the reason for the dispersal of departure flight tracks is that the only departure procedure available at Westchester is a Radar Vector procedure. If the existing Radar Vector procedure was replaced by RNAV and Pilot Navigation procedures, ground tracks would not disperse and could possibly be designed to over-fly less populated areas.

The lack of detail presented throughout the DEIS is remarkable. Because aircraft headings are utilized rather than specifically designed courses, it is not possible to determine where a route will actually track and at what altitudes departing aircraft will over-fly populations. It is not clear how the FAA Consultant arrived at their conclusions regarding noise changes when literally every departing aircraft could theoretically fly a different departure track. This is true for both the current procedure and the recommendations for the Preferred Alternative.

The FAA Consultant states “In the Preferred Alternative, the simplest departure path was chosen for HPN 34 departures. A path that runs parallel to the EWR airspace boundary, after the heading off the Runway contained in current noise abatement guidelines, keeps aircraft clear of EWR airspace. However, this brings aircraft further north of where they fly today. The “simplest departure path” may not be the best or most effective path.

It appears that no thought was given to the effect departing aircraft flight tracks have on populations, but rather to conforming to new approach control airspace boundaries. There is no evidence that Westchester departures were taken into consideration in the design location of the proposed EWR boundary. It is within the realm of possibility that a study of the proposed EWR approach control boundary in conjunction with HPN departure issues might allow a slight change to better accommodate HPN departures.

The FAA Consultant further states that “It may be possible to mitigate this noise change by developing an RNAV procedure for the departures.” However, RNAV and Pilot Navigation departure procedures confine aircraft to repeated, uniform and specific ground tracks and climb profiles, and serve well to circumnavigate populations in certain cases. The statement “It may be possible” is not a solution but only a wish. Mitigation measures should correctly include definitive mitigation measures rather than statements to the effect of “this might work.” The FAA Consultant draws attention to the fact that “departures must stay 1.5 miles away from the boundary with EWR arrival airspace until they are high enough to pass over the top. If this is not possible, then the departures must be coordinated with the EWR arrival controllers. The requirement to “stay 1.5 miles away from the boundary with EWR” as well as controller coordination issues is solely an air traffic control issue and does not relate in the least to community interest in mitigation measures. The fact that HPN departures must be merged with LGA departures again confirms that a procedural analysis of HPN should have been included in the DEIS.

The FAA Consultant concludes by stating that “The application of an RNAV departure procedure for westbound flights departing Runway 34 at Westchester County Airport would ensure that flight tracks were focused and followed a predictable, predetermined path. Such a change would have no

operational impact, since the extra mileage flown is negligible.” However, RNAV and Pilot Navigation departure procedures would have a positive operational impact on air traffic control issues and community noise mitigation issues.

Continuous Descent Arrivals (CDA) is a concept that would work very well under ideal conditions. In the current and near future the broad use of CDA is impractical for the simple reason that allowing an aircraft to continue this type of profile descent to the airport unaffected by other arrival and departure traffic is just not possible.

When arrival traffic increases, sequencing on the final approach course becomes necessary. Aircraft that are high and fast are difficult to fit into the sequence to the runways. If additional vectors and speed control are required to sequence CDA traffic, any benefit gleaned from the descent thus far will be lost.

CDA's however can be expected to have some impact on departure traffic which may be required to tunnel beneath arrivals potentially causing additional noise for some communities.

Attachment 3: Congressman Christopher Shays—Statement on the New York/New Jersey/Philadelphia Airspace Redesign

I appreciate the FAA's willingness to come to Stamford tonight to discuss its proposed New York/New Jersey/Philadelphia Northeast Airspace Redesign. I also appreciate so many concerned residents coming out to see the FAA's presentation and to share their legitimate concerns about the plan's impact on their quality of life.

Over the past few months, the FAA has zeroed in on the Integrated Airspace Alternative as its preferred alternative. Throughout this time, I have shared my concerns and many of your concerns with the FAA, particularly the fact that the plan brings more planes into the region at the expense of the region's quality of life.

I strongly oppose the FAA's integrated airspace alternative that would route more air traffic over residential neighborhoods. I am particularly disappointed that the FAA has not developed any noise mitigation strategies, despite the wide swath of land over the Fourth Congressional District that will be adversely impacted by planes at altitudes that appear to go as low as 4,000 feet in the southern portion of the district.

Even though they have no mandate to consider quality of life issues, we cannot simply ignore the hugely negative impacts of air noise in this process.

I believe that if the FAA had to consider the true impacts of the Integrated Airspace Alternative on the communities below the air traffic, they would never have concluded that airspace redesign was the appropriate first attempt at relieving air traffic congestion. The FAA and Congress need to consider alternative methods of reducing air travel delays, including market-based solutions such as de-peeking strategies and incentives, auctioning slots at airports or implementing quotas, especially in light of the fact that no noise mitigation strategies appear to be available for our area. It seems to me these common-sense solutions should not just be studied but tried before implementing such a radical alternative that negatively affects many thousands of residents throughout the Northeast.

I also am concerned many residents don't know precisely how many planes and at what altitude these planes will be passing over them. I am hopeful we can clear at least that up tonight.

Unless the FAA demonstrates that strategies other than airspace redesign are not sufficient, or until a workable noise mitigation is implemented, I will continue to work with other Members of Congress whose regions are affected to oppose this plan.