

TO: Terry English, FAA Project manager
Sandra Kunz, Chair and Jerry Falbo, vice-Chair, CAC

Re: Will Lyman's response to discussion.
April 14, 2009
PMT "mini-summit" meeting on BLANS

I strongly object to any measure that has been rejected by majority vote of the CAC being moved into Level 2 Screening process even with the accompanying notation, as suggested by Flavio Leo and Betty Desrossiers of MPA, of "strong CAC reservations." Such a notation would, in my opinion, prove to be essentially meaningless. It is clear that both the FAA and Massport strongly support fanning, and that support is to be expected, given their own statement, "[fanning] will always improve operational efficiency." (FAA TRACON Response to CAC Questions on Fanning, December 4, 2007.) It is unreasonable, however to expect that attaching "notes of CAC reservation" to measures that are anathema to the CAC would be regarded by CAC as anything but contempt by FAA and MPA for CAC's participation. It is contrary to the supposed cooperative working relationship all three entities are assumed to have in the process.

The FAA placed fanning measures into this study at the initial BOS/TAC "brainstorming session" to improve operational efficiency. Because this court-ordered BLANS/EIS process is solely a noise mitigation study and not a capacity enhancement study, I must once again re-state my assertion that the placement of fanning into this study is inappropriate.

Furthermore, in the same document quoted above, it was also stated, "FAA is prepared to discuss further details related to 'fanning' *if and when* (italics mine) the CAC proposes this concept as a potential alternative under Phase 2." The CAC clearly voted not to have R33 and R27 fanning measures moved into the first, much less the second, level of screening in this Phase 2 BLANS process.

Why are we still talking about this? The MPA and the FAA continue to state "these measures (fanning) need to move forward." They said they needed the reason for our decision, and we sent it to them on June 26, 2008. (Attachment 1 is a copy of that document, and attachment 2 is a more specific analysis of Ricondo's report on fanning at Detroit, Minneapolis, Cleveland, Newark and Philadelphia.) They now express the concern that, should fanning be dropped, the BLANS EIS conclusions could be legally challenged based on NEPA regulations regardless of the CAC's informed vote against the procedure. In this meeting, those two agencies offered the advice that the CAC's Goals and Objectives statement should include language stating "no new noise should be introduced into close-in, densely populated areas (inside the 50DNL?)." The question for the CAC would be whether any other alternative measures, aside from the FAA's fanning measures, have the clear potential of introducing new noise into any close-in densely populated communities. If not, it would appear that we can satisfy FAA and MPA concerns about those NEPA-requirements by immediately incorporating such language

into the CAC's Goals and Objectives statement, to wit: No new noise shall be introduced into close-in, densely populated areas and that maximum use instead be made of water, industrial and open areas for overflights.

Presumably, if the CAC includes such suggested NEPA language in its Goals and Objectives statement, the fears voiced by MPA's Flavio Leo of lawsuits resulting from the failure of fanning measures to move past the first screening would thus be eliminated. If the CAC's goals state that no new, dense residential areas should receive significant departure noise increases from measures in this Study, fanning can be safely eliminated from consideration, because it runs counter to that goal.

I will formally request that the CAC craft its Goals and Objectives statement to include this FAA suggested NEPA-supported language so that we can move on with the rest of the noise abatement measures that have CAC support and whose purpose is not to "enhance airport efficiency" for the FAA.

Respectfully,
Will Lyman
JP CAC

Disclaimer:

The listening-in or participation by observation of BLANS PMT or 'mini-summit' meetings does not indicate my support or acceptance of any BLANS decisions made during those meetings by the three parties' spokespersons. Only after the CAC has had informed discussions on critical measures within the BLANS and has taken a majority vote on an item, will I support such a measure.

Will Lyman, Jamaica Plain CAC Rep

Attachments follow.

Attachment 1

June 26, 2008

My understanding of the position of the CAC supporting the rejection of fanning measures in the BLANS:

The CAC believes that the procedure known as “fanning” holds little long term benefit as noise mitigation. Any positive effects are likely to be short term due to the accompanying benefits fanning provides as an FAA ATC efficiency enhancer. It is our opinion that any minimal noise reduction would be more than offset by the noise impact created by the increased airtraffic engendered by a reduced concern over in-trail separation. We believe that within a few short years, the net effect in noise mitigation would be negative.

In examining noise study reports from several similar-size airports, the CAC saw no hard evidence of long term noise mitigation stemming from the implementation of a fanning procedure, and what short term benefits were cited came from airports with distinctly wider, less populated areas in which to implement the fanning. Those reports, especially the NY/NJ Airspace Redesign EIS, clearly indicated that fanning was regarded primarily as an enhancer of airport efficiency. This committee felt that a procedure whose primary benefit was efficiency enhancement was not appropriate for a noise mitigation study.

It was therefore concluded that fanning could in no way be an effective noise mitigator at Logan Airport and was subsequently rejected by a super-majority vote of the CAC. It is requested that the FAA immediately incorporate proper NEPA language into the BLANS EIS Purpose and Needs statement reflecting this position.

Will Lyman
CAC Jamaica Plain Rep

Attachment 2

Dear R27 CAC reps,

My observations on Ricondo's December 5, 2007 analysis of fanning at Detroit, Minneapolis, Cleveland, Newark and Philadelphia as they relate to R27:

Ricondo clearly states that fanning "maximizes runway capacity, thus . . . increasing efficiency." The further statement that, "while the procedure is used at many airports to increase efficiency, it may be considered for noise abatement," is a good indication of how favorably the FAA would view a fanning proposal. As this is a noise abatement study performed as mitigation for 14/32, its sole purpose is to reduce noise impact. Considerations of efficiency enhancement can be thrown out as irrelevant here. The only question is, "Does fanning provide noise relief?"

Ricondo's analysis suffers from a chronic lack of data making it difficult to draw any positive conclusions about fanning as a noise abatement measure.

As the report states up front, the population impact reduction numbers in this report are caused by All Noise Abatement Measures Implemented at those airports (hereinafter shortened to "ANAMI") and not just the fanning measures. With the exception of Detroit:

*Detroit (DTW) Detroit's parallel runways have airspaces of 60° Northward and 40° Southward in which to fan. Runway 27's airspace is only 35 degrees wide, so fanning would be more compact than Detroit's, thereby increasing the worst effects close in and diminishing the mitigating effects farther out. Even considering the population impact figures provided for Detroit, the relief for 2400 people is far less than the figure of 6300 people that have significantly reduced impact since the current R27 departure procedure was instituted in 1997[1] <see footnote>.

*Minneapolis St. Paul (MSP) – MSP can't be compared with Logan or anywhere else because, once again, the DNL (Day/Night Noise Level) contours developed were based on ANAMI, not just fanning. There is no population count for the decrease or increase of noise for the fanning procedure. But the analysis goes on to say, that because MSP accepted the recommendation to fan departures, it "indicates that it works as a noise

abatement procedure.” Without data, that conclusion must be seen as speculative, and, given what we know about its success in maximizing runway capacity, one might just as reasonably speculate that MSP’s acceptance of fanning may have had more to do with airport efficiency than with noise abatement.

*Cleveland Airport (CLE) - Again the reduction in numbers of people within the DNL contours is based on ANAMI and not just the fanning procedure. Additionally, the airspace available for fanning off CLE’s Runway 5L/R is a whopping 95 degrees and 90° at the other end (23L/23R) – compared, once again, to R27’s 35°. There are no DNL contour population counts given for CLE in the report.

*Newark Airport (EWR) It is clearly stated that the fanning procedure recommended at EWR was for increased operational efficiency and “would potentially cause noise impacts.” Again the DNL population counts include ANAMI, but in the “DNL Noise Exposure” figures that are provided, it is clear that anyone outside Newark’s 65 DNL has suffered significant increases in new noise (5.0 DNL). Since, according to Logan’s Airside 14/32 EIS, Runway 27’s 65DNL ends about 16 houses in from the harbor’s edge in South Boston, about 99% of R27 communities exist outside the 65 DNL. So EWR’s fanning procedure would result in a contour increase of 3 – 5 DNL in almost all R27 communities. That’s two to three times the impact (1.5 DNL) that would trigger an EIS.

*Philadelphia Airport (PHL) – Here again, fanning was recommended to increase operational efficiency. But note this: Because noise analysis determined that these fanned headings “would potentially cause noise impacts,” they tried to find headings that “locate over-flights over more compatible areas.” The only “compatible areas” off Runway 27 are exactly what the current noise abatement departure procedure is intended to overfly: Fort Point Channel, SE Expressway, Franklin Park and Forest Hills Cemetery.

Boston does not have the “over the river” and industrial land areas that Philly has around its airport. Applying this report to Logan demonstrates, as with Newark, that the “Noise Increase” from 60DNL and out would be a 5 DNL increase in the contour over such R27 neighborhoods as South End, Roxbury, Mission Hill, Jamaica Plain, Roslindale, West Roxbury, Hyde Park, Brookline and Dedham.

In the end, this report as written can support fanning only as an efficiency enhancement, and, when the topography and density under R27's airspace is considered, suggests that fanning will be counterproductive for purposes of noise abatement. I would recommend that at the earliest opportunity we formally ask that any fanning measures for R27 be voted out of the Study by the whole CAC. CAC reps affected by other runways should decide if fanning measures make sense for their areas.

Will Lyman,
Jamaica Plain CAC alternate

[1] Data from the Logan R27 EIS is available to show wide-dispersion fanning off R27 would impact the greatest number of people and noise sensitive sites inside R27's airspace.