



South Metro Airport Action Council

Senator Al Franken
Senator Amy Klobuchar
Representative Keith Ellison
Representative Betty McCollum
Representative Tim Walz
Representative-Elect Rick Nolan

November 26, 2012

Dear Friends,

We thank you for your attention to the changing economic and environmental situation at Minneapolis-St. Paul International airport (MSP), and at many other big hub airports. Representative Ellison's staff checked with the Federal Aviation Administration (FAA) about the MSP Air Traffic Control Tower (ATCT) actions intimately related to three controversies over overflight changes, safety, and noise exposure.

The local airport authorities say, and most cities surrounding MSP accept, that Federal law and FAA rules limit what the Metropolitan Airports Commission (MAC), or any airport manager, can do to reduce noise and pollution. Federal policies and practices that are passed down:

- favor after-the-fact noise *mitigation*, rather than *abatement*;
- require that most revenue from airport operations be used to provide airline services and facilities; and
- deny State and local authorities a meaningful role in scheduling commercial operations.

The FAA's "efficiency" policy for ATCT and airport operations redefines safe capacity of airports and applies whether or not there is increased environmental impact or actual economic need. **The concentration of flights at the busiest hubs in the last decade is a unequally shared burden, exacerbated at MSP by its small site and urban setting.** Today, a much higher percentage of all U.S. flight operations use fewer hub airports. Interpretations and budget priorities within FAA's policy-making authority created the inequities and should be reviewed and changed.

Compared to before MSP was expanded by adding a new runway (R17-35), daily operations at peak hours increased on the old parallel runways (R12-30L/R) from approximately 425 (33% of 1,280) daily operations) to 690 (52% of daily operations) in 2011. This change in concentration was accompanied by changes in flight paths, principally dispersed departures and significantly more departures to the west than to the east and more arrivals from the east. Due to prevailing winds, the new runway is used for *either* easterly departures or westerly arrivals to maintain high hourly rates overall.

What economic value is gained from more airport operations if fewer passengers are transported per flight? What fuel consumption and harmful emissions are lessened *since the distance traveled and landings and take-offs are increased per trip* nationally? Can the government afford the massive costs and years of development to automate air traffic control systems *capable of safely guiding 90% of all airport operations in five or six hours per day at MSP and a dozen or so other big hub airports?*

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Currently, three MSP actions¹ are being formalized within the FAA, although the issues are aspects of the same problem. We seriously doubt that the processes will result in just or timely noise solutions, safer operations, or more affordable air transportation service in Minnesota.

Knowledgeable individuals and organizations have been less able to get current and complete information directly or to share knowledge and insight since the MAC created the Noise Oversight Committee (in 2002). This change was at first not considered appropriate and questioned during the FAA's much-delayed review of the *Part 150 Noise Compatibility Plan Update* submitted in 2002. Citizens' complaints about any flight operations are now received by the "environmental" staff as "noise" complaints and hardly ever *discussed* in public by either FAA or airport commissioners.

More operations per hour and more often at minimum separations are less safe and more expensive to control or both. The several FAA programs addressing this vary by airport, and little schedule information has been released about the status of FAA programs at MSP.

The FAA programs, to assure regional carrier personnel are properly trained, experienced and well rested and regional jet aircraft are properly inspected, has not been considered in the implementation of PBN routes. Concentrating more flights along fewer routes will re-distribute overflights and noise in a way that INM/DNL modeling has not – and perhaps cannot – keep current and accurate. If more noise exposure over 65 DNL results from PBN routes as modeled, there is no funding in place for sound-insulation.

SMAAC proposed lower rates (fewer operations per hour) to decrease the environmental impact of operations at least until economic need reaches the 620,000 annual operations stipulated in the MSP Expansion ROD (1998); the FAA, airline and airport systems are upgraded and synchronized; and the regional carriers serving MSP have completed the safety training and audits specifically required by Congress in the FAA re-authorization.

Your constituents need you to follow up with the FAA, questioning national policy applications and budget allocations applied to Minneapolis-St. Paul International Airport.

Sincerely,
FOR THE BOARD OF DIRECTORS

James R. Spensley

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Attached: MSP 2020 Capital Improvements EA Note
September 2010 Near-Mid-Air-Collision Note
RNAV/PBN Note

¹ See attached topic Notes.