



South Metro Airport Action Council

Transmitted electronically
January 23, 2012

Representative Keith Ellison
1122 Longworth Building
Washington, D.C. 20515-2305

Dear Keith,

A compromise has been reached, apparently, that will lead to budget implementations at FAA. It is timely to request a review of the high rates and air and ground traffic control procedures and communications at MSP. This review is all the more needed because of increased ground traffic and excessive overflight noise. A reduction in runway use rates would well serve Minnesota travelers, airport neighbors, and businesses.

Follow-on Congressional contact with FAA regarding the rates issue at MSP is urgently needed.

The air traffic control system is strained nationally:

- Recruiting, training, supervising, and monitoring work-hours for controllers has been and is limited;
- System improvements at airports have been slowed for a decade, in particular, development of ground safety systems and procedures has been neglected (at MSP ground congestion continues at peak hours and was worsened in 2011);
- Contract operators now fly over 40% of MSP departures and arrivals¹;
- MSP operations are increasingly directed by inexperienced less well trained airline, airport, and FAA personnel.
- Flight operations are increasingly more congested on the ground and in the MSP airspace.

The FAA Tower continued to strive for "efficiency" -- use of the runways at MSP at high rates and minimum separations -- in spite of the above limitations. However, MSP Tower Manager Carl Rydeen just found that the changes FAA made in response to the September 2010 near-mid-air-collision *substantially increased noise exposure and led to increased congestion on the ground*. As you know, this finding was anticipated by SMAAC, but the Metropolitan Airports Commission has not quantified the noise and ground safety impacts in the MSP Long-Term Comprehensive Plan or the MSP 2020 Expansion Environmental Assessment (EA).

More low-altitude turns and transits over neighborhoods near the airport increase noise exposure and pose additional ground safety issues. The new patterns also reduce flights over safety zones, over airport property and over properties previously rated over 70 DNL as a percent of all operations. By design, the procedure *minimizes aircraft-in-flight separations to support high rates*.

The airports commission is preparing the Environmental Assessment for FAA/EPA approval based on three options: No Action, Expansion without re-locating non-hub airlines to the smaller terminal, and Expansion re-locating non-hub airlines to the smaller terminal.

None of these include the current operations and flight tracks as the baseline or the consequences if air service increases as projected. In particular, ground traffic congestion if the larger terminal is dedicated to the hub and essentially all regional airline operations are concentrated but departure runways are selected by flight destination.

¹ Contract operator crews are not yet certified as to training norms pending implementation of new regulations related to captaincy flight hours and air crew rest minimums

The long-term plan to relocate airlines and add gates would complicate ground traffic and increase the areas exposed to excessive noise and pollution. The plan acknowledges that ground traffic facilities are insufficient, but postpones improvements for 15 years, during which, presumably hub peaks will intensify, noise and pollution will be spread, and the risk of a serious accident is manifestly higher.

Make no mistake, FAA is pressured by airlines to maintain high rates, and Mr. Rydeen did not consider lower rates when reacting to the near-mid-air collision. The NTSB investigation noted that a previous rate-increasing exception ("independent" use of the parallel runways) led to the September 2010 situation: during *simultaneous* take-offs, the controller directing the cargo plane on the left-hand runway did not order a turn.

We are trying to address the situation locally without much success, but we hope FAA would consider a lower peak rate ceiling at least as an EA comparison option. The current EA may -- for lack of believable airline demand -- result in a "no action" plan, but the current operational baseline still does not include the noise and pollution increase experienced during 2011.

Thank you, and your staff, for your ongoing concern for neighborhoods, air travelers, aviation employees, and economic recovery. SMAAC will provide information and support whenever needed.

Cordially,

FOR THE BOARD OF DIRECTORS

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