



South Metro Airport Action Council

Transmitted electronically
February 14, 2013

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

Regarding our letter dated 23 January 2012 and the partial text of
An FAA message recently sent by your office.

Dear Keith,

Since October 2010, your office had intermittent contact with FAA **regarding rates and safety at MSP**. MSP Tower Manager Carl Rydeen revised departure procedure changes in response to the September 2010 near-mid-air-collision. Subsequently, thousands of new noise complaints were made because of more flights over South Minneapolis, most from residents living East of Bloomington Avenue.

The Metropolitan Airports Commission (MAC) submitted the MSP 2020 Capital Improvements EA/EAW and SMAAC's comments to FAA/EPA for review. The review may be continuing and MSP Tower Manager Carl Rydeen needs to clarify the explanation given you on November 2012.

*“... in response to your constituent's concerns regarding **high traffic rates during peak (operations, highest rates) at MSP in direct relation to the ongoing ATC procedure changes after the 16 September 2010 incident at MSP,**” the Air Traffic Control Management at MSP revealed the following:*

“The incident the constituent described was an event that occurred as a result of a controller error. The error didn't result from high traffic rates at MSP. The controller made a mistake.

“After the incident, ATC Management at MSP reviewed the circumstances and subsequently implemented operational procedures that systemically eliminate the likelihood of that mistake reoccurring. After reviewing the operational changes, the FAA concluded they did not result in the increase in noise complaints. The increase of noise complaints was because of the change in the overall fleet mix of the operators at MSP.

“The rates of traffic at MSP change throughout the course of the day. The constituent and all users of MSP Airport can be assured that the arrival and departure rates allowed by ATC are safe, and comply with national standards for airport operations.

“I trust this adequately addresses your constituent's concerns. If you need further assistance, please don't hesitate to contact me.”

This is an entirely unacceptable answer especially considering it was given months after literally hundreds of your constituents complained about the overflights. The FAA conclusion that the operational procedures were not a proximate cause of complaints cannot be sustained; Mr. Rydeen himself agreed to further change the procedures, adding more Runway 30R departure headings, to reduce complaints. FAA erred in initially reporting that departures were not lower and the MAC staff used annual data inappropriately to analyze a 3 to 4 month period.

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We agree with Mr. Rydeen that “fleet mix” played a large part in more noise complaints: flights turning over the newly impacted areas north of MSP more often track further east now than was possible before the fleet majority became regional jets. The procedure change allows more of these turning departures, most of them are lower passing over homes near the airport. Shortly after the procedural changes were implemented, the overflights increased as airlines choose departure runways by flight destination. FAA may not have foreseen the complaints as a result of the operational changes, but the proof of more and lower flights can be found in FAA radar tracking data histories.

The procedural change is at least *related* to rates, and to the *FAA efficiency policy* as has been explained in detail.

In local appearances and by adopting a 4-heading departure plan for Runway 30R departures, Mr. Rydeen recognized the need for overflight relief in South Minneapolis. Mr. Rydeen said he did not consider lower rates when reacting to the near-mid-air collision, and apparently did not acknowledge the implementation cost or schedule of the operational changes as a practical matter.

Hearings, and a decision as to requiring a Environmental Impact Statement (EIS) and Record of Decision (ROD) were postponed. The postponement delays dealing with the SMAAC comment that the FAA rules require adoption of less expensive or more effective alternatives to reduce noise and other environmental impacts from airport operations. While many constituents and air travelers have well-reasoned doubts concerning Mr. Rydeen’s safety assurances, the Rule applies to the environmental impacts and relative costs of the lower rates alternative.

Following another FAA policy, Mr. Rydeen proposed a system of more precise flight paths at MSP based on *required navigation performance*, by airlines and commercial airliners. The requirement is for avionics and flight-planning computers and position sensors, “performance-based navigation (PBN),” to keep courses over the ground related to safety. That is, separation distance and interval kept within “safe” limits but near minimums for efficiency.

Neither the current operations nor the proposed PBN flight tracks were included in the environmental or cost-of-systems and operations analysis in the EA/EAW. 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. The MAC anticipates the need for very expensive ground traffic facilities (taxi way bridges to avoid intersections with runways and other taxiways). SMAAC notes that ground congestion is less related to operations per year, more related to peak-hour operations.

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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Link to our EA/EAW Comments:
<http://www.quiettheskies.org/LTCP/2012/EA1Oct12Comments.pdf>
CC: Senators and Representatives

