



City of Phoenix
OFFICE OF THE CITY MANAGER

July 10, 2015

Mr. Glen Martin
U.S. Department of Transportation, Federal Aviation Administration
Western Pacific Region
Office of the Regional Administrator
P.O. Box 92007
Los Angeles, CA 90009

Dear Mr. Martin:

Thank you for your letter dated June 24, 2015 regarding the Federal Aviation Administration's (FAA) interest in moving forward with short-term options to reduce some noise impacts caused by FAA's Implementation of new RNAV routes in the Phoenix airspace. Let me be clear that nothing in this letter diminishes Phoenix's repeated request for the FAA to return the first segments of the flightpaths immediately to the historic routing that used the river bottom/planned southwest freeway corridor flying south as well as flying farther west, before turning North.

Based on the conversations we have had with you in the past and with community input as we study the options, the City of Phoenix is willing to move forward with the FAA to further evaluate the viability and benefit of several of the measures you have identified in your letter.

However, the City does not have interest in pursuing, and affirmatively objects to, the second option in your letter: minor speed and climb adjustments to "westbound departures to the north and south, which the FAA outlined in its post-implementation report dated March 2015." We assume the adjustments you reference are the FAA-preferred NW2 and SW2 procedures from the FAA's post-implementation report (released in April 2015).

FAA developed these procedures with no engagement with the Airport, no involvement by the community and no noise modeling analysis. Implementing this change without these steps would be revisiting the FAA's previous approach to changes as evidenced on September 18, 2014. Insufficient analysis and a lack of appropriate community involvement has a demonstrated track record of bad outcomes. The City's preliminary independent noise analysis reveals these proposed procedures would make noise exposures slightly worse for some residents and be neutral for others. At the same time, pursuing these changes would consume time and effort that would be better spent working on a more permanent and sustainable solution for the long term.

However, it is important to step back for a moment and consider that none of these measures provides a long-term solution to the underlying noise problem the FAA created in September 2014 by flying planes over new incompatible land uses. Working on these short term options you propose should not distract us from our stated goal to find permanent relief.

The repeated commitments from FAA that it would explore changes that would provide community relief remain unfulfilled. FAA's post-implementation report issued in April (and the City/FAA discussions afterwards) showed that the FAA has ruled out any changes that would meaningfully reduce the noise impacts of these procedures.

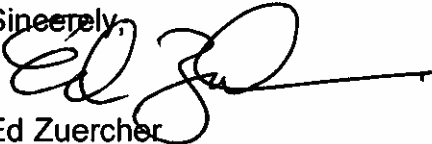
Even while the FAA declined our request to formally study mitigation proposals from Phoenix, the FAA was in the process of developing a recent report accepting RTCA's recommendation that FAA needs to better engage airports and the public during RNAV implementation (*Federal Aviation Administration Response to RTCA, Inc. "Blueprint for Success to Implementing Performance Based Navigation" Recommendations* (June 5, 2015)).

This study recommends - and your agency has said it accepts and will implement - a much improved public process associated with RNAV implementation: "[N]oise and/or community impacts associated with proposed PBN implementations—should be evaluated from the outset of implementation planning efforts. A proactive approach to community engagement is recommended to ensure project success."

It appears very clear to us that the FAA has determined that Phoenix citizens will have to live with the consequences of FAA decisions, even while it implements lessons learned in other cities. The City will continue to aggressively pursue its petition for review to address FAA's actions and inactions that threaten community well-being and the long-term future of aviation in Arizona.

Still, the City remains ready to engage with the FAA to address these concerns if FAA is willing to undertake a serious and good-faith effort to fix its RNAV routes and broken process for implementing airspace changes in Phoenix. The lead for the dialogue on the three remaining short term mitigation items you have suggested is Chad Makovsky. Please work with him to move forward.

Sincerely,



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