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November 9, 2015

VIA EMAIL AND U.S. MAIL

Ms. Amy Lind Corbett
Regional Administrator
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12 New England Executive Park
Burlington, MA 01803-5299

Mr. Thomas P. Glynn
Chief Executive Officer
Massport Executive Offices
1 Harborside Drive
East Boston, MA 02128

Mr. Darryl Pomieter
President
Logan Airport Community Advisory Committee, Inc.
136 Myrtle Street
Boston, MA 02114-4447

Re: Boston Logan Airport Noise Study

Dear Ms. Corbett, Mr. Glynn and Mr. Pomieter:

Last year, we wrote to the FAA and Massport to advise you of the negative effects that increased air traffic over the Town of Milton, and the noise and air pollution associated with it, has had upon the people we represent. We asked the FAA to distribute air traffic equitably by redistributing arrivals on runways 4R and 4L and departures on runways 27 and 33L. We also requested that the new runway use plan to be developed by the Logan Airport Community Advisory Committee ("CAC") take five specific actions, including the implementation of steeper glide paths and controlled descents and the redirection of arriving flights and all nighttime flights over the ocean. A copy of our April 2, 2014 letter is attached hereto as Exhibit A. By letter

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dated April 11, 2014, Massport referred our letter to the CAC and “ask[ed] [the CAC] to take up these issues at their next meeting.” A copy of Massport’s letter is attached hereto as Exhibit B.

During the past year, the situation has worsened considerably. Residents of Milton continue to complain to us, their elected representatives, about interrupted sleep, anxiety, and a reduced quality of life because of the marked increase in air traffic. Too often, it is difficult for many of our residents to have a conversation outdoors because airplanes are flying at very low altitudes and with great frequency. The number of complaints we receive has only continued to grow.¹ As you know, there is medical evidence that airplane noise is associated with health issues such as an increased risk of cardiovascular disease, coronary heart disease and stroke.² Additionally, many Milton residents are concerned about the impact that the increased volume of airplane noise and pollution has on property values. Copies of a few representative samples of the many letters and emails that we have received from Milton residents in recent times are attached hereto as Exhibit C.

Four runways (arrivals on 4R and 4L and southbound departures on 27 and 33L) place air traffic over Milton. Currently, three (3) RNAVs (for runways 4R, 27 and 33L) fly over Milton. Earlier this year, the FAA proposed to add two (2) more RNAVs, each for runway 4L, to the sky over Milton. If implemented, the FAA’s proposal would result in five (5) RNAVs over Milton.³ The existing situation, let alone the proposed two additional RNAVs, is inequitable.

It appears that neither Massport nor the FAA has taken any action to address the concerns we raised last year. Our representative to the CAC, Cindy L. Christiansen, Ph.D., a professional researcher and statistician, recently brought to our attention several issues that she believes are flaws in the Boston Logan Airport Noise Study (“BLANS”) that are outlined below, after first

¹ Milton had the highest number of total calls from any town by far in 2014, with 2,669 recorded complaints, and has had the highest number of noise complaints for each of the last three calendar years. Complaints on the Massport complaint line have increased for Milton from an average of 9 per month in 2012, to an average of 160 per month in 2013, to an average of 222 per month in 2014. That represents a 25-fold increase in noise complaints. Noise complaints for 2015 have only been tabulated through September, and average 220 monthly.

² Residential exposure to aircraft noise and hospital admissions for cardiovascular diseases: multi-airport retrospective study *BMJ* 2013;347:f5561 doi: 10.1136/bmj.f5561 (Published 8 October 2013); Aircraft noise and cardiovascular disease near Heathrow airport in London: small area study *BMJ* 2013;347:f5432 doi: 10.1136/bmj.f5432 (Published 8 October 2013); Airport noise and cardiovascular disease *BMJ* 2013;347:f5752 doi: 10.1136/bmj.f5752 (Published 8 October 2013).

³ On June 29, 2015, we submitted comments to the FAA objecting to the implementation of the two proposed 4L RNAVs and seeking relief from the overuse of runway 4R. We understand that the 4L RNAV proposals and the many written comments submitted to the FAA are still under review.

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trying to discuss and resolve these problems through the CAC and its consultant. Because of the timing of the current work on Phase III of the BLANS study, we believe it is important that Massport and the FAA work with Milton and the CAC to address these concerns now, before it becomes too late.

In addition, Dr. Christiansen also reports that the CAC has not received important information that it requested from the FAA and Massport on January 15, 2015. The purpose of this letter is to request that (A) Massport and the FAA take the necessary steps to work with the CAC to correct the BLANS flaws, (B) Massport and the FAA provide the requested information to the CAC and (C) the FAA address Milton's concerns about the significant overuse of the 4R/L runways and the virtually constant noise created by the three (3) RNAVs (particularly the 4R RNAV) when they are in use. Specifically, the Town of Milton respectfully requests that the BLANS III testing, as presently designed, be stopped and redesigned so that a new runway usage plan that will distribute air traffic across the Greater Boston metropolitan area in an equitable manner can be achieved.⁴

BLANS III Design and Analyses Flaws

Dr. Christiansen has reported to us that despite being two (2) years into the BLANS III study, with the Test #1 period completed and the Test #2 period ending soon, the CAC does not have all of the data it needs to achieve its goals. Despite promising statements made by the Project Management Team near the start of the BLANS III process about the goals to be achieved,⁵ to date the CAC has been unable to make a determination of a valid metric that constitutes a "more equitable distribution of noise" or any determination as to what the annual runway goals are. Moreover, we understand that the CAC (1) has not been able to correlate complaints and noise with testing and configuration changes; (2) does not have flight path maps; (3) does not have flight track maps; (4) does not know which runway use affects which communities; (5) does not

⁴ See "Overview of Boston Logan Operations and Noise from Overflights" presentation to Massport's Board of Directors dated March 19, 2015: "Phase III, Runway Use: Goal is to balance use of runways when possible (e.g., wind and weather permitting)."

⁵ The minutes of the Project Management Team's November 14, 2013 meeting record the following statements: "...She [Terry English, FAA, BLANS Program Manager] also referenced the BLANS Phase 3 scope of work that includes a dual CAC goal of 'reducing noise' and providing a more equitable distribution of noise."

"(Brian Brunelle FAA, Boston Logan Airport Traffic Control Tower) ... It is also critical that the CAC state what their annual runway use goals are. Otherwise there is nothing to achieve."

See Minutes from Phase 3 Boston Logan Airport Noise Study (BLANS) Management Meeting Date: November 14, 2013 Time: 10:00 a.m. – 1:00 p.m.

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have the noise exposure and impacts by runway end and by community from runway end; (6) does not have the information about all aircraft (i.e., not only jets); and (7) does not have complete information on runway use restrictions.

Dr. Christiansen has reported to us that her review of the BLANS III testing design, which has focused so far only on problems of “dwell and persistence”, shows that it is flawed because it (a) omits some configurations, (b) includes some configurations that are seldom used, (c) fails to include other configurations as choices, (d) fails to account for the fact that some communities are affected by multiple configurations, (e) does not focus on the communities with the biggest problems, and (f) fails to reflect seasonal effects on configuration changes, given that the testing period is only 6 months and the weather patterns at Logan Airport change significantly from winter to summer.

Specifically, Dr. Christiansen has reported to us the following problems:

1. The most frequently used 4/9 configuration (configuration #1; runways 4R/L were used for 35% of all jet arrivals in 2014 and runway 9 was used for 30.7% of departures) is given as a first choice for a switch in 4 of the 5 remaining configurations in Test #1. The only place that 4/9 shows up as third choice is in configuration #6 (15/9), which is used only about 1% of the time. This does not result in a fair distribution.
2. In 50% of the configurations for Test #1, the 22R/L runways, which are seldom used alone during high demand periods, are the alternate first choice. This means that to be compliant with the Test #1 decision matrix when demand is high, the FAA will always use the other first choice, which is 4/9. This is a serious flaw in the BLANS design.
3. Runway 27 departures also include runway 33L departures as documented in the description of the configurations for Test #1 and Test #2. Because of the south turn for 27 departures that was designed to avoid flying over parts of Jamaica Plain, Brookline and beyond, the same communities to the south (Milton, Roslindale, Hyde Park and others) that receive the 27 southbound departures also receive the 33L southbound departures. This does not result in a fair distribution.
4. Configuration #2, Test #1 (33/27) has a first choice switch to the 4/9 configuration. This makes no sense if the goal of the design is not to burden the same people with both the sound of departing aircraft when they try to fall asleep at night and the sound of arriving aircraft waking them up the next morning. The design ignores the fact that some communities, like Milton, receive both the Runway 27 departures and the 4R/L arrivals.

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Configuration #2, with its first choice in the decision matrix to be an acceptable switch to the 4/9 configuration, leads to this inequitable result, and it must be revisited and revised.

5. The number of configurations has changed from Test #1 to Test #2. One technical committee document proposed five runway configurations. Test #1 has six. Test #2 has seven, but only six are used as “prior” runway configurations. It is not clear who chose the runway configurations in the decision matrices for the two tests.⁶ These inconsistencies are unexplained and result in decision matrices that would never be approved by a scientific peer-review process.
6. Test #1 allowed two runway configurations as first choices, one as a second choice and another as a third choice. Test #2 now gives several first choice configurations with 4/9 included in each. This design gives the FAA approval for switching from one configuration to the 4/9 and offers no guidance toward the BLANS goal to balance runway use.
7. The decision matrix for configuration changes is designed to allow a change in the departure runway to trump a change in the arrival runway, protecting communities under departure paths over communities under arrival paths if a change cannot be made to protect both. However, a runway 9 departure is considered an “over the water” procedure according to Massport’s Noise Abatement Office; the design does not account for the fact that there is no departure-overflown community to protect when runway 9 departures persist. When runway 9 has been used for departures, paired for about 35% of the arrivals to 4R/L, the first priority should be to relieve those communities under the arrival path. A well-thought out design should take this into account if the intent is to fairly distribute the burden of Logan Airport’s air traffic.
8. The denominator for rates of configuration change should not be the total number of days but, rather, the number of days when a change is possible because of wind direction and speed. To do otherwise presents an inaccurate picture of an increased rate of success and produces a statistic that is meaningless for assessing good-faith efforts by the FAA and Massport to distribute planes fairly across the metroplex. Timing, concentration and

⁶ At the July 6, 2015 CAC meeting, Dr. Christiansen asked the FAA’s consultant, Mr. Adams, who chose the runway configurations in the decision matrix. Mr. Adams advised Dr. Christiansen that the FAA chose the configurations. However, at the September 10, 2015 meeting, CAC President Darryl Pomicter told Dr. Christiansen that the prior CAC President, Sandra Kunz, had determined the configurations. A third alternative is offered in the FAA’s press release about Test #1, in which the FAA stated that Massport determined the configurations for Test #1.

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number of operations from runway use when weather conditions force configuration choice should be considered in the decision matrix for times when configuration choice is not affected by nature, but not in the denominator of the proportion representing successful decisions with respect to fairness.

9. During the Test # 2 period, the FAA is being encouraged to switch configurations in the morning and afternoon. However, Mr. Gene Brown, a former Milton CAC Representative, gathered the following statistics for the 40-day period from September 1, 2015 through October 10, 2015, which show that the FAA did not switch configurations on many days even when wind speed and direction allowed it. These statistics are of particular concern to us. During this period of time, we heard from many residents who complained about constant and brutally loud noise:

- Of the 960 available hours (40 days x 24 hours per day) for landing aircraft from September 1, 2015 through October 10, 2015, 466 hours had landings on runway 4R/L. This means that runways 4R/L were used 48.5% of the time during this 40-day period.
- East/Northeast wind use of 4R/L occurred for 296 hours; Southeast to South wind use of 4R/L occurred for 94 hours; Northwest wind use of 4R/L was 57 hours; West, southwest and calm or variable use of 4R/L was 19 hours. If runways 4R/L were only used for east and northeast wind conditions during this time period, usage would have been 30.1%, not 48.5%.
- Runways 4R/L were used for landings on 33 days, or 82.5%, of these 40 days.
- Nocturnal hours use of runway 4R/L (10 PM - 6 AM) was 85 hours or 26.6% of the 320 nocturnal hours in the time period.
- Even though the goal for Test #2 of BLANS III is to switch runway configurations twice per day when weather conditions allow, of the 144 hours during the October 1 through October 6 time frame, 4R/L was used for 129 hours, leaving only 15 hours without arrivals being flown over Milton during these six days. On some of these days, the choice to use 4R/L for arrivals was weather-related. However, on the sixth day (October 6, 2015), after five consecutive days of 19 to 24 hour use of 4R/L, Massport closed runways 33L and 15R for maintenance, resulting in yet another 19 hours of 4R/L use when the winds were northwest and calm and when another configuration could have been used.

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- Data on runway use for many of these 40 days shows a gross overuse of 4R/L for arrivals. Here are just a few examples:
 - On September 1, Milton had 10 hours of arrivals even though the winds were 120-10 to 200-5 (SE to SW) during this time period.
 - On September 3, Milton had 15 hours of arrivals with winds 110-4, 120-6 and 140-7 (SE).
 - On each of September 10 and September 11, Milton had 24 hours of arrivals even though the wind was northwest or at 6 knots for hours of these days.
 - After these two days of 24 hours of arrivals, on September 12, the FAA sent more arrivals over Milton between 5:00 a.m. and 8:00 a.m. when winds were 220-4 (SW), and again between 10:00 a.m. to 10:00 p.m. when winds were 090-7 to 160-7 (E and SE), for a total of 15 hours.
 - As if September 10 through September 12 were not enough to demonstrate the unfair distribution of arrivals, on September 13, Milton had 19 hours of arrivals, from 5:00 a.m. until midnight, when winds were out of the southeast and east, 110-10, 100-5 and 070-4.
- 10. The Project Management Team's statement in its July 17, 2015 meeting minutes that "at least one of CAC's preferences was achieved over 70 percent of the time"⁷ is misleading. Using the identical time period and the identical assessment algorithm, the FAA reported, in Table 2 of the draft report, that at least one of the configuration changes was made on 63% (not over 70%) of the 178 days in the test period. Furthermore, the inconsistencies in Tables 1 and 2, where Massport and the FAA, respectively, report their results of Test #1 are very significant. Here are two of many examples of such inconsistencies in the reported statistics:

⁷ The Project Management Team's notes of its July 17, 2015 meeting (dated August 7, 2015) states that:

"T English (TE) asked if R Adams (RA) had attended the CAC meeting on July 6, 2015 and whether he had everything needed to assess Runway Use Test #1. ... RA said that overall he believes that Test #1 was successful noting that at least one of CAC's preferences was achieved over 70 percent of the time. He also said that there was no major disagreement from CAC members about Test #1 and that most CAC representatives were encouraged that FAA is undertaking the tests."

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- Change from both the previous night's arrival and departure runways; 178 day period
 - Massport 51%; FAA 31%
- Change from the previous night's arrival runway but not departure; 178 day period
 - Massport 8%; FAA 26%

The foregoing statistics demonstrate that runways 4R/L have been, and continue to be, greatly overused and that the goals of the BLANS III study are not being met.

Milton has not been alone in finding flaws in the BLANS testing. See email from John Stewart, CAC representative from Boston's South End, to CAC President Darryl Pomicter and CAC representatives dated September 9, 2015 ("Test 1 was an unmitigated disaster for the RW 27 communities. ... This Test was a failure and the South End would vehemently oppose its implementation."), attached hereto as Exhibit D.

To Date, the CAC's Development of a Runway Use Plan Has Not Resulted in an Equitable Distribution of Air Traffic

According to its Articles of Organization, the CAC's purpose is to:

1. "... represent the communities in the Greater Boston area which are impacted by the operations and expansion of Logan International Airport in the evaluation of present and proposed ... aircraft operations related to the airport and ways to reduce noise and mitigate the adverse impacts of the airport and its operations. . . .
2. In furtherance of these purposes, the corporation will seek to protect the communities from adverse effects, including noise and air pollution and ground traffic impacts, which would be caused by Logan International Airport, including, but not limited to, expansion of Logan International Airport runways, taxiways, terminal gates, parking facilities, flightpath procedures and other airside, landside and operational capacity improvements.
3. In furtherance of these purposes, the corporation may engage in litigation before any local, state or Federal court or agency."

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See Articles of Organization of Logan Airport Community Advisory Committee, Inc. filed with the Massachusetts Secretary of State on January 21, 2003.⁸

We believe the CAC is being hampered in fulfilling its purpose by the lack of responsiveness to its requests for data and information from Massport and the FAA. Without this important information, and without well-designed studies, the CAC is not able to protect the communities that have been impacted the most by air traffic arriving at and departing from Logan Airport, including Milton.

The Volpe presentation at the FAA's May 18, 2015 hearing on the proposed 4L RNAV indicates that the FAA estimated DNL assuming that Logan will be in a northeast wind flow approximately 40% of the time, which are times when the 4R and 4L runways will be used. Note that 40% is in contrast to the reported annual northeast wind 18% of the time (reference: <https://www.massport.com/environment/environmental-reporting/noise-abatement-how-logan-operates/>). We are concerned that, if Volpe made this determination last May while the Phase III process was still in the early stages, then what influence will the CAC have in ultimately redistributing air traffic to eliminate the unfair and unsafe practice of using the 4R/L runways for 40% of the Logan arrivals? Volpe's determination as to the use and distribution of arrivals on the 4R/L runways seriously undercuts the CAC's purpose and authority and makes the CAC process illusory. Full and fair evaluation of an appropriate and equitable runway distribution by the CAC in accordance with its purpose and intent is not possible where the end result is pre-determined.

There is still time during the BLANS III process for Massport and the FAA to support the CAC so that it may live up to its mission of adequately representing and protecting affected communities from the adverse impacts of noise and pollution. We believe Massport, the FAA and the CAC must act, and act soon.

⁸ According to a letter dated October 23, 2015 from Thomas P. Glynn, Chief Executive Officer of Massport, to Senator Brian A. Joyce, "Massport believes that noise from aircraft is a regional issue that must be addressed through regional dialogue with all communities at the table, with the FAA which determines flight paths and Massport participating. Such regional community dialogue is the mission of the statutory Community Advisory Committee."

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The FAA Has Not Provided Information that the CAC Needs to Perform its Function

At the January 15, 2015 CAC meeting, the CAC voted to request updated radar flight track analyses and various noise abatement information.⁹ Ten months later, the CAC is still waiting for this information from the FAA.

⁹ An email from CAC President Darryl Pomicter to Mr. Jose Masso of Massport dated August 24, 2015, which was copied to all CAC member and is attached hereto as Exhibit E, states the following:

"In addition to completing the Boston Logan Airport Noise Study, Phase 3 for a new Runway Use Program, please consider the four Logan CAC Motions agreed to January 15, 2015 and emailed to Massport and FAA January 22 to be highest priorities for the Logan CAC:

MOTION: Moved and seconded that the FAA (with technical assistance from Massport) update the radar flight track analysis of the runway 27 departures for 2014 with respect to RNAV way points and gates. Include analysis of standard deviation of the radar tracks and compliance with the Runway 27 ROD.

MOTION AGREED TO UNANIMOUSLY.

MOTION: Moved and seconded that:

The Logan CAC requests Massport provide basic Logan Airport noise abatement information:

1. Runway Use (Arrivals and Departures Operations) by Runway End.
2. Noise (Exposure and Impacts) by Runway End.
3. Noise (Exposure and Impacts) by Community from Runway End.
4. All aircraft (not just jets).

MOTION AGREED TO UNANIMOUSLY.

MOTION: Moved and seconded that Massport and FAA representatives attend the next CAC meeting to discuss availability of real time data, queryable data, graphical data and/or reporting standards regarding aircraft arrivals and departures that includes multiple variables including runway use, wind direction, altitudes, flight track locations, numbers of planes etc.

MOTION AGREED TO UNANIMOUSLY.

MOTION: Moved and seconded that the communities of Arlington, Belmont and Watertown request through the CAC that the FAA re-examine Runway 33L RNAV SID, implemented in June of 2013, in light of the significant increase in noise complaints and negative feedback from communities since implementation and that alternatives or modifications be considered.

MOTION AGREED TO, ONE VOTE IN THE NEGATIVE."

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We understand that, during the Project Management Team's November 2, 2015 conference call, CAC President Pomicter, referring to Test #1 and Test #2, stated "[t]hese two ended up with nothing." We also understand that there was a discussion about a lack of funding to do all of the work that the CAC wants to do, pay for the data and information requested by the CAC, analyze data from Test #1 and Test #2, and conduct Test #3 and possibly a new Test #4.

Conclusion

Based on all of the foregoing, we believe that BLANS III, as currently designed and being tested, may encourage the overuse of runways 4L and 4R and may fail to incorporate protection when switching runway configurations for communities like Milton that are affected by more than one configuration. Such overuse has already had a severe adverse impact upon the Town of Milton from which we seek permanent relief.

We respectfully request a fair and objective determination of runway usage configurations and a fair and equitable distribution of air traffic over the Greater Boston metropolitan area.

Preferably, more arrivals would be routed over the ocean to minimize the impact on all communities surrounding Logan Airport. It is inequitable for the FAA to concentrate flight paths and overburden any community.¹⁰ As noted above, we respectfully request that the BLANS III testing, as presently designed, be stopped and redesigned so that a new runway usage plan that will distribute air traffic across the Greater Boston metropolitan area in an equitable manner can be achieved. We also request that the FAA, Massport and the President of the CAC meet with us to discuss BLANS III. Milton's Town Administrator, Annemarie Fagan, will contact each of you to arrange such a meeting.

¹⁰ As you know, communities in other parts of the country are experiencing the same problem that Milton is as a result of the FAA's implementation of the Next Gen/RNAV system. The City of Phoenix, Arizona and residents of the Georgetown neighborhood of Washington, D.C. have filed suits against the FAA because of the extreme toll that noise from increased air traffic has taken on their residents.

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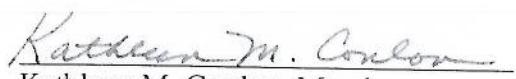
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Thank you for your consideration of this letter and the relief we request. We look forward to your response and to achieving a permanent solution to the current inequitable conditions.

Sincerely,


J. Thomas Hurley, Chairman


David T. Burnes, Secretary


Kathleen M. Conlon, Member

cc: U.S. Senator Edward J. Markey (without exhibits)
U.S. Senator Elizabeth Warren (without exhibits)
Congressman Stephen F. Lynch (without exhibits)
Congressman Michael E. Capuano (without exhibits)
State Senator Brian A. Joyce (without exhibits)
State Representative Walter F. Timilty (without exhibits)
State Representative Daniel R. Cullinane (without exhibits)
Cindy L. Christiansen, Ph.D., Logan CAC Representative
Mr. David Godine, Logan CAC Representative (Alternate) (without exhibits)
Ms. Caroline Kinsella, Massport CAC Representative
Milton Airplane Noise Advisory Committee (without exhibits)
Milton Board of Health (without exhibits)
Milton Board of Park Commissioners (without exhibits)
Milton Council on Aging (without exhibits)
Milton Planning Board (without exhibits)
Milton School Committee (without exhibits)
John P. Flynn, Esq., Milton Town Counsel
Karis L. North, Esq., Milton Town Counsel