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MEMBER**

July 25, 2023

Ms. Colleen D'Alessandro  
New England Regional Administrator  
Federal Aviation Administration  
1200 District Avenue  
Burlington, MA 01803-5299

Dear Ms. D'Alessandro:

This letter provides the Town of Milton, Massachusetts's request to implement MIT's Recommendations regarding arrivals to Boston Logan International Airport's ("Logan") Runway 4R, and follows the Town's July 10, 2019, November 20, 2020, and November 30, 2021 letters.

As you are aware, from the onset of the FAA's implementation of the runway 4R concentrated RNAV arrival path over the Town of Milton, our residents, the Select Board, Congressman Stephen Lynch, and our State Legislators have been pleading with the FAA to provide relief to Milton residents who have been uniquely overburdened by the concentrated 4R arrival track.

In response to complaints and concerns from residents of multiple communities—including but not limited to the Town of Milton—regarding the increased noise and pollution emanating from airplane arrival traffic through the use of RNAV, the Massachusetts Institute of Technology's International Center for Air Transportation ("MIT"), led by Prof. R. John Hansman, engaged in an extensive, comprehensive, and years-long study to "to identify potential modifications to departure and arrival procedures at [Logan] which would reduce community noise impact in areas which experience flight track concentration." This study, which MIT conducted in two phases—"Block 1" and "Block 2"—culminated in a June 2021 report that included not only a detailed technical analysis but also series of recommendations regarding procedures for some of Logan's flight paths, including Runway 4R (the "MIT Block 2 Report").

The Town of Milton has been repeatedly led to believe that the RNAV Study commissioned by FAA and Massport would find and implement ways to supplement the 4R procedure and address the negative impacts of this RNAV's concentration through

dispersion. Yet now, in the middle of 2023, no relief is in sight. This is so despite the growing, well-documented detrimental health effects that consistent airplane noise has over residents in communities that must endure it. *See, e.g.,* Soumya Karlamangla, "How Noise Can Take Years Off Your Life," *New York Times*, June 14, 2023, available at <https://www.nytimes.com/2023/06/14/us/noise-san-diego-health-effects.html>

The pre-RNAV 4R procedures and operation shared overflight burdens with other municipalities' neighborhoods, Quincy and Braintree in particular, in ways and to a degree that were far more equitable than the 4R RNAV. Air traffic controllers pre-RNAV directed flights in a way that no single community (in this case, Milton) was subject to such disproportional impacts as the RNAV imposes.

The MIT Block 2 alternatives identified three potentially flyable RNP paths, but all were identified as requiring analysis of merger with the extant RNAV path. See MIT Block 2 Report, pages 23-31. Furthermore, MIT/Massport provided Milton with noise exposure data indicating that MIT's illustrated 24 degree, 3nm intercept RNP path would actually increase noise impacts over neighborhoods in the north section of East Milton. Because of this, Milton has repeatedly voiced its objection to that RNP path and continues to do so.

The FAA has repeatedly failed to engage with Milton in any meaningful way. We demand, once again, that FAA address Milton's unique concentrated overflight burdens, and engage directly with our community to do so.

Dispersion via rotation of arrival path procedures that restore equitable burden sharing across the pre-RNAV region is our goal. We demand that the FAA engage in such an effort, and also apply its flight design and NextGen expertise to develop feasible alternatives, including through the use of ATC control and advanced navigation cockpit-to-cockpit technology and training to enable feasible dispersion alternatives. Those alternatives must focus on decreasing the negative impacts of flight path concentration through greater path variability, rotation of paths and/or dispersion.

Milton residents want a solution to this problem. We request that the FAA implement three of MIT's recommendations for flyable alternative RNP paths for Runway 4R.

Sincerely,

Michael F. Zullas, Chair on behalf of the Milton Select Board

Erin G. Bradley, Vice Chair  
Roxanne Musto, Secretary  
Richard G. Wells, Member  
Benjamin Zoll, Member