



ANNEMARIE FAGAN  
TOWN ADMINISTRATOR

COMMONWEALTH OF MASSACHUSETTS  
**TOWN OF MILTON**  
OFFICE OF SELECTMEN

525 CANTON AVENUE, MILTON, MA 02186

TEL 617-898-4843

FAX 617-698-6741

SELECTMEN

KATHLEEN M. CONLON  
CHAIRMAN

DAVID T. BURNES  
SECRETARY

J. THOMAS HURLEY  
MEMBER

July 19, 2016

**VIA EMAIL AND U.S. MAIL**

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

Mr. Todd Friedenbergl  
Deputy Regional Administrator  
New England Region  
Federal Aviation Administration  
12 New England Executive Park  
Burlington, MA 01803-5299

Dear Ms. Corbett and Mr. Friedenbergl

Thank you for meeting with Town Administrator Annemarie Fagan, Logan Community Advisory Committee ("CAC") Representative Cindy Christiansen, Airplane Noise Advisory Committee Chair Andy Schmidt, and me on Friday, June 17, 2016, to discuss the ongoing burdens that the FAA's NextGen program have placed upon the Town of Milton. We appreciate your time and your willingness to listen to our concerns about the volume, frequency and altitude of aircraft flying over the Town of Milton.

Milton seeks real solutions and permanent relief from the RNAVs that have overburdened our community and saturated our skies with aircraft in concentrated flight paths, often for more than 19 hours a day and for multiple consecutive days. To sum up the problem succinctly, there are too many airplanes flying over Milton. I write to summarize the issues we discussed as well as some measures that Milton representatives proposed during our meeting for your consideration.

(1) **Reduce Volume of Arrivals to Runways 4R and 4L**

During the month of May 2016, 6,596 airplanes flew over Milton to land on Runway 4R. This number represents 44.4% of all arrivals to Logan. During the past twelve (12) months, 33% of arriving jets flew over Milton to land on Runway 4R and an additional 5% landed on Runway 4L. The current situation is unacceptable to Milton, as is the projection used in the May 18, 2015 presentation and analysis prepared by Volpe showing that the baseline (current) percentage

Ms. Amy Lind Corbett  
Mr. Todd Friedenberg  
July 19, 2016  
Page 2

of arrivals flying over Milton to land on Runways 4R and 4L is 40%. Over the last seven years 36% of jet arrivals have landed on Runways 4R and 4L (31% and 5%, respectively). The PRAS goal is 21.1% effective runway use. Forty percent (40%) of arrivals flying over Milton cannot be part of the FAA's plan for managing and equitably distributing the burden of flight operations at Logan Airport. Forty percent (40%) of arrivals is not acceptable to the Town of Milton.

The FAA must reduce the volume of air traffic over Milton substantially, to at least the PRAS goal of 21.1% effective runway use. It is unjust and inequitable that some communities that are as close to Logan Airport as Milton is have virtually no arrival or departure flight paths over them while Milton bears the burden of a high percentage of arrivals. Moving arriving aircraft from the Runway 4R RNAV to the proposed Runway 4L RNAV, which would also fly over Milton, will not solve the problem that our Town is experiencing as a result of the FAA's NextGen system. Air traffic must be dispersed equitably among all of the communities in Greater Boston, all of which benefit from Logan Airport's proximity to them. That is the only sustainable solution to the problem that the FAA's NextGen program has created for Milton.

While the FAA's NextGen program may have achieved efficiencies for airlines, it has failed to protect the health and safety of people on the ground below the RNAV flight paths. As the Board of Selectmen has informed the FAA and Massport previously, the NextGen system has adversely impacted the quality of life and health of many Milton residents.

Reducing the percentage of arrivals over Milton is Milton's primary request and one that we believe can be accomplished quickly by making runway use choices that spread flights across all runway configurations more equitably. Such a reduction would occur, for example, by removing the designation of the Runway 4/9 configuration as the calm wind arrival/departure runways; by using Runway 15R for arrivals when demand is low and the winds are from the southeast; and by ending the increasing practice of using Runway 4R for arrivals in northwest winds. Additionally, we recommend that, each day, the Logan tower be provided with information about the previous day's and week's runway use to inform the tower's decision-making for runway configuration choices. We look forward to hearing additional, concrete ideas that the FAA may have for reducing the use of Runways 4R and 4L that will promote fairness and a more equitable shared burden across communities.

## (2) Other Relief

As we discussed, we believe there are several other measures that the FAA can implement quickly if not immediately to provide some relief to Milton, to neighboring communities and, in the case of (d) and (e) below, to the nation. We summarize them here for your convenience, in no particular order of priority:

Ms. Amy Lind Corbett  
Mr. Todd Friedenberg  
July 19, 2016  
Page 3

(a) **NABBO Waypoint**

During our meeting, we asked the FAA to assess potential noise reduction by requiring arrivals to Runway 4R to turn south of the NABBO waypoint at an altitude of 3,000 feet or higher and then follow a continuous descent approach to the airport. Similarly, arrivals to Runway 4L should turn south of a waypoint that is equivalent to NABBO (i.e., at or above 3,100 feet) and follow a continuous descent approach to the airport. If your assessment of the noise impact of these requirements is consistent with our expectations (i.e., that it would reduce the noise burden), we would ask the FAA to implement such turning requirements immediately. Currently, the NABBO waypoint is not being observed uniformly by pilots. Approximately one-third of aircraft arriving on Runway 4R is turning north of the NABBO waypoint, which inflicts additional and unnecessary noise on Milton residents.

(b) **Departures from Runway 27**

Departures from Runway 27 are required to make a quick southbound turn to fly over the Roxbury neighborhood of Boston and avoid flying over the more affluent communities to the west of Boston. These southbound departures then fly over Milton and other communities southwest of the airport before looping toward their final destination. Residents of the avoided communities west of Boston benefit greatly from having an airport approximately six miles from their homes and yet do not share the burden of noise and pollution associated with the airport. This is an inequitable result that must be re-examined by the FAA.

(c) **Departures from Runway 33L**

Many flights departing Logan Airport from Runway 33L do not follow the prescribed RNAV flight path and instead turn southeast around the KIRAA waypoint (a waypoint for the departure flight path from Runway 27). Their failure to follow the 33L RNAV flight path puts more planes over Milton at a low altitude. We ask the FAA to ensure that departures from Runway 33L follow the RNAV flight path and not turn before the RNAV procedures dictate that they should.

(d) **Vortex Generators**

The FAA should require all airline operators to install vortex generators on the wings of the A320 series aircraft in order to reduce noise. At our meeting, Mr. Schmidt gave you 3-D copies of a vortex generator. They are lightweight and inexpensive and are already

Ms. Amy Lind Corbett  
Mr. Todd Friedenberg  
July 19, 2016  
Page 4

in use in Europe. Vortex generators are standard equipment on all new A320 series aircraft. The FAA should mandate their use on all A320 aircraft flying in U.S. air space.

(e) **Continuous Descent**

Since the implementation of the NextGen system, airplanes arriving on Runways 4R and 4L at Logan Airport have been flying over Milton at altitudes (under 2,000 feet) that are too low. Historically, airplanes flying over Milton were at higher altitudes. The noise created by low-flying, frequent (i.e., often at 30-second intervals and sometimes at the same time on parallel paths) aircraft over our Town is intolerable. We understand that a continuous descent reduces the noise from arriving aircraft while also saving fuel. We ask the FAA to require a continuous descent approach for arrivals to Logan in order to keep the planes higher in the sky for a longer period of time and reduce the significant noise burden that has been placed on Milton.

(f) **Runway Restrictions**

At our meeting, we discussed the possibility, first suggested by FAA Tower personnel during a recent CAC conference call, of removing the wind restriction on Runway 14/32. This would open up Runway 14/32 for more arrivals, allow for another 2-runway arrival configuration using Runways 32 and 27 in northwest winds, and help to avoid the overuse of Runways 4R and 4L for arrivals. Because Mr. Friedenberg indicated that it will take time and work to remove the wind restriction, we ask the FAA to coordinate with Massport and to commence the process of reviewing the restriction and implementing a change as soon as possible.

We look forward to a continued dialogue with you and the implementation of the foregoing measures in an expeditious manner. We welcome your ideas for additional solutions that will achieve a reduction in the amount of air traffic over Milton.

Thank you again for taking the time to come to Milton to meet with us.

Sincerely,



Kathleen M. Conlon  
Chair, Milton Board of Selectmen

Ms. Amy Lind Corbett  
Mr. Todd Friedenberg  
July 19, 2016  
Page 5

cc: Governor Charlie Baker  
U.S. Senator Edward J. Markey  
U.S. Senator Elizabeth Warren  
Congressman Stephen F. Lynch  
Congressman Michael E. Capuano  
State Senator Brian A. Joyce  
State Representative Walter F. Timilty  
State Representative Daniel R. Cullinane  
Town Administrator Annemarie Fagan  
Cindy L. Christiansen, Ph.D., Massport and Logan CAC Representative  
Mr. Andrew Schmidt  
Milton Airplane Noise Advisory Committee  
Milton Board of Health  
John P. Flynn, Esq., Milton Town Counsel  
Karis L. North, Esq.