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November 30, 2021

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

Dear Ms. D'Alessandro,

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 Lynch and our State Legislators have been asking the FAA to provide relief to Milton residents who have been uniquely overburdened by the concentrated 4R arrival track. The RNAV Study commissioned by Massport, after five years' effort, has led to no solution for Milton residents.

We were led to believe that the goal of the Study was to find and implement ways to supplement the 4R procedure and thereby address the negative impacts of this RNAV's concentration through dispersion.

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 (Milton) was subject to such disproportional impacts as the RNAV imposes. The MIT Block 2 alternatives identified three potentially flyable RNP paths, but each was objected to by Quincy, Braintree, and/or Hingham, and all were identified as requiring analysis of merger with the extant RNAV path. Furthermore, MIT/Massport recently 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, we do not support that illustrated RNP path. We have asked MIT to remodel that RNP path such that its noise contour does not affect Milton so that when this Study concludes, we do have such a third RNP path to discuss with neighboring municipal, state and federal elected officials as a supplemental path to help relieve Milton's RNAV burdens.

Although the current RNAV Study may be concluding, we demand that FAA address Milton's unique concentrated overflight burdens in ways it has not done. FAA's proposed Runway 4L arrival RNAV procedure would further uniquely burden Milton with concentrated overflight


noise. Missing from the MOU process is engagement of FAA itself and ATC and airline representatives with the communities. MIT has reported its interactions with those entities, but that process over five years has led to push-back not progress.

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. We will ask Congressman Lynch, Congresswoman Pressley, Senator Markey, Senator Warren, Governor Baker and our State Legislators to support this request because Milton residents want a solution to this problem.


Sincerely,


Kathleen M. Conlon, Chair


Arthur J. Doyle, Vice Chair


Michael F. Zullas, Secretary


Melinda A. Collins


Richard G. Wells, Jr.

CC:

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