



6040 28th Avenue South, Minneapolis, MN 55450 • 612-467-0741

November 29, 2023

Mr. Erik Amend
Regional Administrator, Great Lakes Region
Federal Aviation Administration
2300 Devon Avenue
Des Plaines, IL 60018

Re: MSP NOC RNAV Recommendations

Dear Mr. Amend:

Thank you for inviting feedback from the Minneapolis-St. Paul International Airport (MSP) Noise Oversight Committee (NOC) regarding the proposed Area Navigation (RNAV) departure procedures at MSP.

On November 29, 2023, the MSP NOC took action to approve these recommendations and forward them to the FAA. The motion passed by unanimous vote.

On behalf of the entire NOC, we respectfully submit these recommendations,

A handwritten signature in black ink, appearing to read "Cheryl Jacobson".

Cheryl Jacobson
MSP NOC Community Member
City of Mendota Heights

A handwritten signature in black ink, appearing to read "Paul Buckley".

Paul Buckley
MSP NOC Airport User Member
Delta Air Lines



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NOC RNAV Sub-Committee Recommendations

The Noise Oversight Committee (NOC) understands and appreciates that the Federal Aviation Administration (FAA) is committed to complete, open, and effective participation in agency action, and that the agency regards community involvement as an essential element in the development of its actions, programs, and decisions.

Effective community involvement broadens FAA's information base and improves decisions. FAA collaboration with the public and airport stakeholders is critical during the planning and design of proposed Area Navigation (RNAV) procedures. The first step in meeting the needs of the public is to understand the public's needs.

The NOC wishes to be strategic partners in community involvement regarding the proposed RNAV procedures at MSP, particularly in an effort to assist FAA in better understanding the public's concerns and needs. The NOC therefore puts forward the following recommendations.

Provide opportunities for meaningful public engagement

- Conduct engagement that seeks community input and does not simply inform the public. The FAA *Community Involvement Manual* emphasizes the importance of establishing ongoing, two-way communications that gives the public an opportunity to understand the proposed project and to ask questions and raise concerns before decisions are made. Therefore, the FAA should:
 - Allow sufficient time for public input to shape the outcome of the project.
 - Thoughtfully consider all input received from the NOC and the public and incorporate into procedure design as feasible (i.e., where safety and efficiency would not be negatively impacted).
 - Clarify why any input received is not feasible to be incorporated into procedure design by explaining how it would negatively impact safety and efficiency.

Provide additional opportunities to engage with the public

- Community involvement should start in the design phase. The FAA has stated, and the NOC agrees, that community concerns should be identified as early as practicable and considered in the planning process. FAA's *Community Involvement Performance Based Navigation Desk Guide* recommends sharing preliminary designs with the community to solicit feedback to inform decision making and project refinements. The FAA's *Community Involvement Manual* acknowledges that meeting with specialized groups (such as NOC or MAC) may not entirely capture views of the community. FAA should provide the following additional opportunities to engage the public regarding procedure design:

- Conduct broader public engagement efforts by presenting the proposed procedures at a workshop/meeting with NOC open to the public on or before January 3, 2024. This will afford the FAA the opportunity to provide necessary context about the design as leaders of the project. Additionally, it will allow the FAA to understand if the proposed procedures would be highly controversial on environmental grounds prior to making a determination of the appropriate level of environmental review. This would not take the place of the public workshops the FAA plans to conduct in the Summer 2024.
- A combination of techniques is usually needed to reach all the relevant communities. Therefore, the FAA should conduct one virtual and two in-person public workshops. A combination of virtual and in-person workshop options offers the most inclusivity by being accessible both to those who cannot travel to an in-person meeting and to those less familiar with technology or who lack reliable internet access.

Increase transparency and communicate effectively

- Recognize and develop a communication approach that considers community sensitivity to RNAV design and information gaps based on previous projects. This communication approach should include:
 - Explanation of the project benefits and efforts made to consider noise and incorporate community concerns into the proposed design.
 - Presentation of the proposed procedures in a manner that is accessible to non-technical audiences while providing sufficient detail and technical information to communicate procedure design and how aircraft will operate.
 - Use of creative tools to increase community understanding (i.e. online illustrative and interactive tools).
 - Accessible information to communities across the Minneapolis/St. Paul Twin Cities area with translation services available as needed (Spanish, Hmong, Somali, and ASL interpretation).
- During the public workshops, communicate the impact of the procedures to residents, anticipated changes in noise exposure and what it means for them and their experience of aircraft over their homes today.
- Advertise the public workshops to communities across the Minneapolis/St. Paul Twin Cities area and have translation services available as needed (Spanish, Hmong, Somali, and ASL interpretation).
- Increase public awareness and clarify opportunities for public participation by:
 - Sharing details with the NOC about the timelines, technical design steps, and engagement required to implement the procedures to decommission the MSP VOR on schedule.
 - Providing NOC members with information that can be shared with their stakeholders.

Identify additional opportunities for proposed procedures to replicate existing flight paths

- The proposed West SID ultimately separates into three routes; however, areas near the airport when aircraft are at their lowest altitude, are more concentrated and located in areas that receive arrival overflights to Runways 12L and 12R. Include more dispersion of these straight-out departures on Runways 30L and 30R in consideration of the areas currently impacted by arriving aircraft.
- The aircraft modeled on the 360-degree COULT, and 340-degree North and Northeast SIDs departing Runways 30L and 30R indicates aircraft will turn tighter and earlier, changing the area where aircraft are turning southeast-bound (COULT SID) and northeast-bound (North and Northeast SIDs). If this is an accurate representation of day-to-day departure operations to the north, it will put aircraft operations over areas that currently do not receive these types of overflights. Operations on these departures should fly further on the 360- and 340-degree headings prior to making their next right turn, similar to how they fly these departure procedures today with the goal of spreading out tracks and preventing concentration. This may also require adjustments to arrival routes to accommodate this request.
- The aircraft modeled on the West and KBREW SIDs, departing Runways 12L and 12R indicates a change in the area where aircraft are turning west-bound (West SID) and north-bound (KBREW SID). If this is an accurate representation of day-to-day departure operations to the south, it will put aircraft operations over areas that currently do not receive these types of overflights. Operations on these departures should fly further to the north prior to making their next left turn, similar to how they fly these departure procedures today with the goal of spreading out tracks and preventing concentration. This may require adjustments to arrival routes to accommodate this request.