

### F.2.5.3 Neighborhood Associations

#### Grossman

 Outlook

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**Re: Early Coordination for the Phoenix Area FAA Modernization Project**

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From Joyce Grossman <joycecgrossman@gmail.com>

Date Thu 11/27/2025 7:42 PM

To 9-AVS-ASW-PHX-Modernization-Comment (FAA) <PHX-Modernization-Comment@faa.gov>

**CAUTION:** This email originated from outside of the Federal Aviation Administration (FAA). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Sorry, I read this as additional information. This looks like the same email that we worked with before. Better safe than sorry to send it. Enjoying a rainy drizzly couple days up here in Portland. I'll be glad to come home to some sunshine.

Sent from my iPhone

On Nov 20, 2025, at 6:41 AM, 9-AVS-ASW-PHX-Modernization-Comment (FAA) <PHX-Modernization-Comment@faa.gov> wrote:

**Grossman cont.**

Dear Stakeholder,

The Federal Aviation Administration (FAA) is initiating an Environmental Assessment (EA) for the Phoenix Area FAA Modernization Project. This effort will evaluate potential environmental impacts associated with changes to aircraft flight paths and altitudes in the region.

Please see the attached letter for additional details, including information on the study areas, process, and opportunities to provide timely feedback.

Thank you for your attention and participation.

Sincerely,  
Federal Aviation Administration

**Grossman cont.**

<PHX EA - Scoping - Letter NeighborhoodAssoc.pdf>

## Dreiseszun

 Outlook

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### Re: Early Coordination for the Phoenix Area FAA Modernization Project

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From Steve Dreiseszun <steve@viewpointphoto.com>

Date Fri 12/19/2025 4:47 PM

To 9-AVS-ASW-PHX-Modernization-Comment (FAA) <PHX-Modernization-Comment@faa.gov>

Cc Helana Ruter <helana.ruter@phoenix.gov>; Jordan D Feld <jordan.feld@phoenix.gov>; Kathryn Leonard <kleonard@azstateparks.gov>

 3 attachments (3 MB)

FAA Submission - Historic Neighborhood Petitioners Feedback. 12-19-25.pdf; SD Historic Neighborhoods Consultation Ltr [FAA - 2018 Appendix-C].pdf; PHX EA - Scoping - Letter NeighborhoodAssoc.pdf;

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**CAUTION:** This email originated from outside of the Federal Aviation Administration (FAA). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

To Whom It May Concern,

Thank you for providing information to our neighborhoods regarding the FAA's proposal for the Phoenix Area Modernization Project. As requested, our feedback is **attached**.

Additionally, please add my email address to your distribution list for neighborhood association contacts.

Please confirm receipt of this submission and attachments.

Sincerely,

Steve Dreiseszun  
Point of Contact, Historic Neighborhood Petitioners  
1125 W. Culver St.  
Phoenix, AZ 85007  
c: 602.510.6552

On behalf of:  
STORY PRESERVATION ASSOCIATION, INC.  
WILLO NEIGHBORHOOD ASSOCIATION  
ENCANTO-PALMCROFT HISTORIC PRESERVATION ASSOCIATION, INC.  
ROOSEVELT ACTION ASSOCIATION, INC.

**Dreiseszun cont.**

----- Forwarded message -----

From: 9-AVS-ASW-PHX-Modernization-Comment (FAA) <[PHX-Modernization-Comment@faa.gov](mailto:PHX-Modernization-Comment@faa.gov)>

Date: Thu, Nov 20, 2025 at 8:24 AM

Subject: Early Coordination for the Phoenix Area FAA Modernization Project

Dear Stakeholder, The Federal Aviation Administration (FAA) is initiating an Environmental Assessment (EA) for the Phoenix Area FAA Modernization Project. This effort will evaluate potential environmental impacts associated with changes to aircraft flight paths and altitudes in the region. Please see the attached letter for additional details, including information on the study areas, process, and opportunities to provide timely feedback. Thank you for your attention and participation.

Sincerely,  
Federal Aviation Administration

Dreiseszun cont.



THE ROOSEVELT  
NEIGHBORHOOD

December 19, 2025

Phoenix Area FAA Modernization  
Operations Support Group  
FAA-ATO Central Service Center AJV C-250  
10101 Hillwood Pkwy  
Fort Worth, TX 76177

Submitted via Email: [PHX-MODERNIZATION-comment@faa.gov](mailto:PHX-MODERNIZATION-comment@faa.gov)

To Whom it May Concern:

I want to thank the FAA for the opportunity for public input and feedback on the proposed Environmental Assessment for the Phoenix Area FAA Modernization Project in alignment with NEPA and Section 106 of the National Historic Preservation Act.

As Petitioners in the action,

STORY PRESERVATION ASSOCIATION, INC.; WILLO NEIGHBORHOOD ASSOCIATION; ENCANTO-PALMCROFT HISTORIC PRESERVATION ASSOCIATION, INC.; ROOSEVELT ACTION ASSOCIATION, INC.

v.

FEDERAL AVIATION ADMINISTRATION  
MICHAEL HUERTA, Administrator,  
Federal Aviation Administration

D.C. Cir. No. 15-1247  
(Consolidated with 15-1158)

who suffered harm under the 2014 PHX flight path changes, I formally request Consulting Party Status in this matter on behalf of the following historic neighborhoods: FQ Story Historic District; Willo Historic District; Encanto-Palmcroft Historic District; Roosevelt Historic District and Woodland Historic District.

As you are no doubt aware, the 2014 flight paths over Central Phoenix caused real, lasting harm to our historic neighborhoods, our parks, and the people who live here during the 3 1/2 years they were in effect. When these flight paths were first implemented, the FAA rerouted decades of stable, predictable air traffic directly over some of the most historically significant and park-rich areas of our city—without talking to the City of Phoenix, without consulting historic-preservation experts and without analyzing the impact on the neighborhoods beneath. The results were immediate and devastating.

With no warning to residents, the FAA shifted westerly departures to new satellite-guided paths that funneled concentrated airplane noise over neighborhoods that had always been quiet. Overnight, parts of Central Phoenix went from a handful of aircraft per day to an almost nonstop stream of low, loud overflights. Noise complaints didn't just increase, they exploded by more than 2,900%.

These weren't minor inconveniences. The noise disrupted daily life, rattled homes, shook windows, interrupted sleep and changed the character of historic districts that depend on peace and quiet to preserve their sense of place. It also damaged the serenity of beloved public parks—spaces meant to be calm, restorative, and welcoming.

**Dreiseszun cont.**

The areas affected in 2014 are among the most distinctive in Phoenix: tree-lined historic districts, century-old homes, parks where families gather, joggers run, and children play. These are not generic neighborhoods. They are protected historic assets, recognized for their unique architecture, cultural heritage, and community value.

Federal law specifically requires the FAA to protect these kinds of places before making changes that could harm them. But in 2014, the FAA skipped the required consultations with the City's Historic Preservation Office, skipped meaningful engagement with local officials and skipped the analysis needed to understand the consequences of shifting flight traffic over these neighborhoods. When the impacts became undeniable, the Arizona State Historic Preservation Office took the unusual step of withdrawing its previous approval and demanding that the FAA restart the legally required review process.

After the backlash from Phoenix residents, the FAA acknowledged that it had not anticipated how harmful the new routes would be. For months, the FAA promised the City it would take a serious look at alternatives, restore community involvement and review the environmental impacts properly. The City supplied extensive data, noise analysis and concrete solutions.

But instead of correcting course, the FAA closed the door. It refused to return flights to their long-standing paths, refused to update its flawed environmental review, and refused to re-engage with the historic-preservation process it had skipped the first time.

In 2016, the City Historic Preservation Office requested the FAA reinstate consultation with SHPO, the City and other consulting parties regarding the impacts of the changed RNAV procedures. They stated:

- There was significant adverse impact on contributing attributes of historic properties in these neighborhoods creating ongoing and disruptive noise by the changed flight paths.
- The 2014 flight paths and procedures diminished the integrity of setting in these historic districts by affecting the use of some of the important character-defining features that historically promoted outdoor living and neighborhood walkability.
- The historic architecture and context in the relevant Phoenix historic districts revolves around the use of outdoor space and the integration of the indoor and outdoor realms. Quiet and undisturbed use of the outdoors is a critical attribute of the historic status of the City's NHPA properties.

We cannot return to those flight paths. Putting planes back over these Historic Neighborhoods would:

- Re-concentrate intense aircraft noise over areas that were never meant to handle it.
- Damage historic districts and parks, undermining their character, tranquility, and appeal.
- Ignore the voices of thousands of residents who experienced the disruption firsthand.
- Repeat a process that violated core federal protections for historic places and public parks.

Phoenix's historic neighborhoods and parks are irreplaceable. They are the heart of our city, and once their character is lost, it cannot be rebuilt. Federal law recognizes that. Our community knows that. The FAA should continue to respect that.

The Bottom Line:

The 2014 routes were implemented without proper analysis, without proper consultation and without regard for the people and places below them. The impacts were severe, well-documented and legally significant. Returning to those same flight paths would recreate the very harms that our community fought so hard to correct.

**Dreiseszun cont.**

Page 3

The Settlement Agreement subsequent to the US District Court of Appeals, DC Circuit ruling, reached between the City of Phoenix, Historic Neighborhood Petitioners and the FAA returned the westerly flight departures using RNAV to approximate the pre-September 2014 flight tracks.

The Historic Neighborhood Petitioners support these current procedures and urge that they remain in place under the Phoenix Area FAA Modernization Project.

Sincerely,



Steve Dreiseszun, on behalf of:

Story Preservation Association, Inc.  
Willo Neighborhood Association  
Encanto-Palmcroft Historic Preservation Association, Inc.  
Roosevelt Action Association, Inc.

*Attachments: SD Historic Neighborhoods Consultation Ltr [FAA - 2018 Appendix-C].pdf  
PHX EA - Scoping - Letter NeighborhoodAssoc.pdf*

Cc: Helana Ruter, Historic Preservation Officer  
City of Phoenix Historic Preservation Office

Jordan Feld, Deputy Aviation Director  
PHX Sky Harbor International Airport

Kathryn Leonard, State Historic Preservation Officer  
Arizona State Historic Preservation Office

**Dreiseszun cont.**



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

**Office of the Air Traffic Organization**  
Western Service Area

1601 Lind Avenue Southwest  
Renton, Washington 98057

February 23, 2018

Mr. Steve Dreiseszun  
Historic Neighborhood Petitioners  
1125 W. Culver St.  
Phoenix, AZ 85007

RE: Section 106 Consultation Initiation for the Proposed Air Traffic Procedure Amendments for the West Flow Area Navigation Standard Instrument Departures at Phoenix Sky Harbor International Airport, Phoenix, Arizona

Dear Mr. Dreiseszun,

Thank you again for agreeing to represent the Historic Neighborhood Petitioners in order to meet the terms of the agreement.<sup>1</sup> As you are aware, pursuant to the agreement entered into by the City of Phoenix, the Historic Neighborhood Petitioners and the Federal Aviation Administration (FAA), the FAA is proposing to amend nine west flow Area Navigation (RNAV) Standard Instrument Departure (SID) procedures at Phoenix Sky Harbor International Airport (PHX). The Proposed Action has been determined to be an 'undertaking' subject to Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations at 36 CFR part 800 (as amended).

The purpose of this letter is to initiate consultation under Section 106 of the NHPA. Under Section 10 of the agreement, the Historic Neighborhood Petitioners (along with the City of Phoenix) agreed to be consulting parties with the FAA in fulfilling the Section 106 requirements.

The Proposed Action and its associated activities are also subject to the National Environmental Policy Act (NEPA) and the FAA is preparing an appropriate NEPA document to meet its regulatory obligations. The FAA intends to complete Section 106 in conjunction with the NEPA process.

**Proposed Action**

The Proposed Action involves air traffic procedure amendments to the west flow RNAV SID procedures from runways 25L, 25R and 26. The RNAV SIDs include the MAYSA, LALUZ, SNOBL, YOTES, BNYRD, FTHLS, JUDTH, KATMN, and IZZZO as per the stipulated agreement. Specifically, aircraft on the northwest departure procedures MAYSA, LALUZ,

<sup>1</sup> See Memorandum Regarding Implementation of Court Order per *City of Phoenix, Arizona v. Huerta*, 869 F.3d 963 (D.C. Cir. 2017).

**Dreiseszun cont.**

2

SNOBL, and YOTES will follow along the extended runway centerline and thence join the RNAV route at a later waypoint. Aircraft on the southwest departure procedures BNYRD, FTHLS, JUDTH, and KATMN will follow a 240-degree course and thence join the RNAV route at a later waypoint. Aircraft on the west departure procedure IZZZO will follow a 240-degree course and thence join the RNAV route at a later waypoint.

**Identification of Interested Parties**

The FAA has invited the City of Phoenix Historic Preservation Officer, the Arizona State Historic Preservation Officer, and the Gila River Indian Community Tribal Historic Preservation Officer to participate in consultation. The FAA also contacted other Federally-recognized Tribes that might attach religious or cultural significance to historic properties in the area, including the Salt River Pima-Maricopa Indian Community, the Ak-Chin Indian Community of the Maricopa, and the Fort McDowell Yavapai Nation.

The views of the public are essential to inform Federal decision making in the Section 106 process. The FAA shall seek and consider the views of the public in a manner that reflects the nature and complexity of the undertaking and its effects on historic properties.

We also appreciate your participation at the three public workshops held in the Phoenix area in early February. We look forward to continuing to work with the Historic Neighborhood Petitioners. If you have any initial comments or question on this undertaking, please contact Marina Landis at (425) 203-4561, or [marina.landis@faa.gov](mailto:marina.landis@faa.gov).

Sincerely,



Shawn M. Kozica, Manager  
Operations Support Group  
Western Service Center

Cc:

Brent Kleinman, President, Encanto-Palmcroft Historic Preservation Association  
Andie Abkarian, President, Roosevelt Action Association  
Marilyn Rendon, President, Willo Neighborhood Association  
Will Denney, President, Story Preservation Association  
Matthew G. Adams, Counsel for the Historic Neighborhood Petitioners

Dreiseszun cont.



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

November 20, 2025

**Subject:** Early Coordination for the Phoenix Area FAA Modernization Project

Dear Valued Neighborhood Association:

The purpose of this letter is to inform you of a proposal under consideration by the Federal Aviation Administration (FAA) and to solicit your feedback. In accordance with the National Environmental Policy Act (NEPA), the FAA is undertaking the preparation of an Environmental Assessment (EA) to consider the potential environmental impacts associated with changes to air traffic procedures as part of the Phoenix Area FAA Modernization Project. The EA is being developed in accordance with established laws, regulations, FAA Orders, and guidance. The FAA welcomes your input and is offering you the opportunity to provide any background information that you may have regarding the study areas established for this undertaking, including identification of sensitive environmental resources, and to advise the FAA of any issues, concerns, policies, or regulations you may have regarding the environmental analysis to be conducted as part of this EA.

The Phoenix Area FAA Modernization Project would involve changes to aircraft flight paths and altitudes in certain areas. The FAA has established a General Study Area to evaluate potential impacts of changes in aircraft routing, including those that would occur below 10,000 feet (ft.) above ground level (AGL). Additionally, since the General Study Area includes national parks, wildlife refuges, and various cultural properties where other noise is very low and a quiet setting is a generally recognized purpose and attribute, a Supplemental Study Area extending up to 18,000 ft. AGL has been identified. (Please see the attached Exhibit 1, Project Study Areas, and Exhibit 2, Project Study Areas and Proposed Flight Procedures.)

Ten airports within the General Study Area and Supplemental Study Area will be studied, including the primary airport Phoenix Sky Harbor International Airport (PHX). The nine additional satellite airports are:

- DVT – Phoenix Deer Valley Airport
- FFZ – Falcon Field Airport
- IWA – Mesa Gateway Airport
- CHD – Chandler Municipal Airport
- GYR – Phoenix Goodyear Airport
- GEU – Glendale Regional Airport
- SDL – Scottsdale Airport
- B XK – Buckeye Municipal Airport
- P19 – Stellar Airpark

Additionally, public input is essential to inform Federal decision-making as part of the Section 106 process. The FAA also requests your assistance in identifying community groups and associations that may have an interest in this project and its effects on historic properties. The FAA will seek and consider the views of the public in a manner reflecting the nature and complexity of this undertaking and its effects on historic properties.

**Dreiseszun cont.**

2

We look forward to your response. If you have any initial comments on this undertaking, please contact:

**Attn:** Phoenix Area FAA Modernization  
Operations Support Group  
FAA-ATO Central Service Center AJV C-250  
10101 Hillwood Pkwy  
Fort Worth, TX 76177

**Email:** [PHX-MODERNIZATION-comment@faa.gov](mailto:PHX-MODERNIZATION-comment@faa.gov)

For additional information and the most recent developments on this project, please visit the PHX Area FAA Modernization Project community engagement website [https://www.faa.gov/air\\_traffic/community\\_engagement/phx](https://www.faa.gov/air_traffic/community_engagement/phx).

Your timely response will assist us in incorporating your concerns into the project planning. To facilitate this coordination, we would appreciate a response no later than December 21, 2025.

Sincerely,



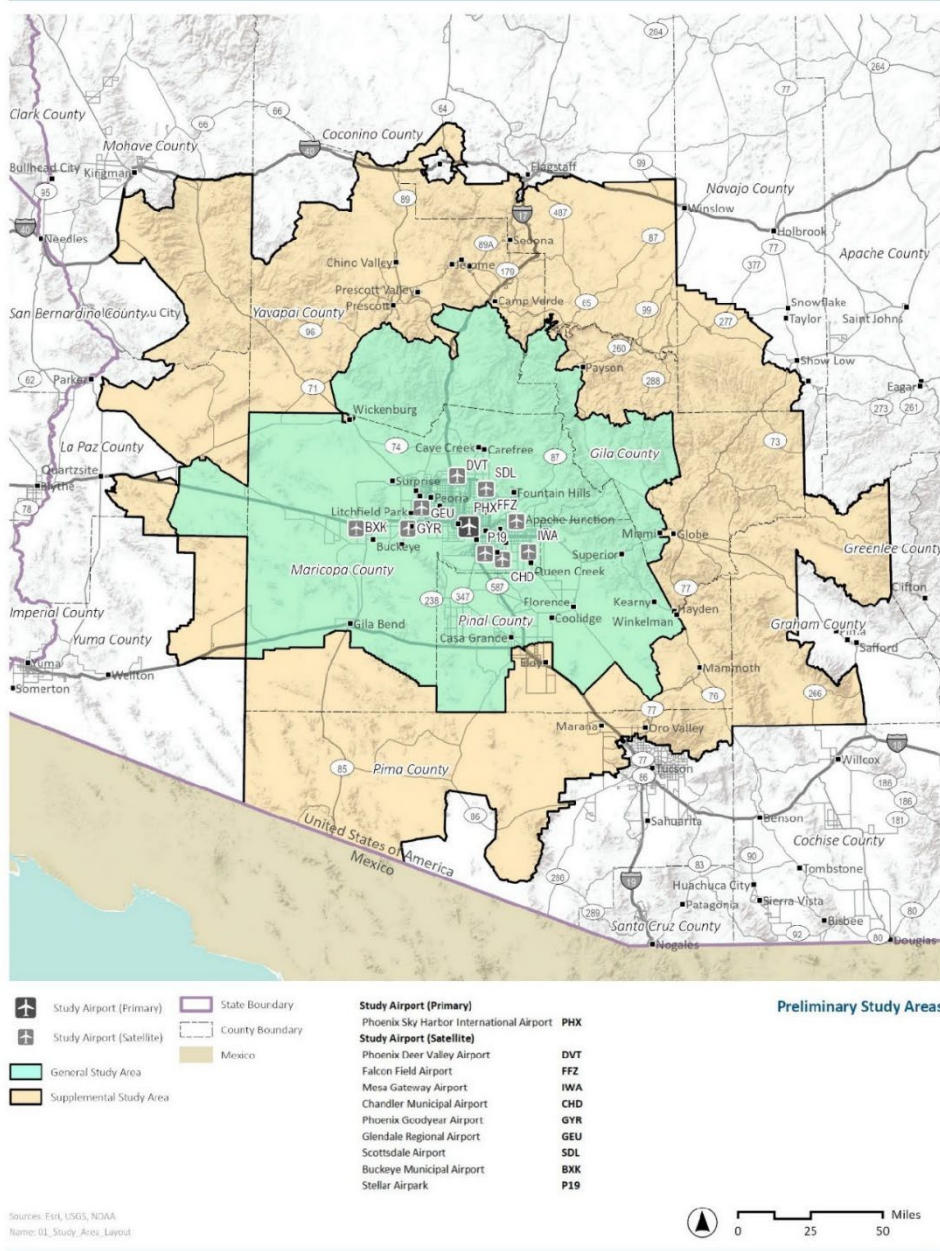
Christopher L. Southerland  
Acting Director, Central Service Center  
Air Traffic Organization

**Attachments:**

- Exhibit 1. Project Study Area
- Exhibit 2. Project Study Area and Proposed Flight Procedures

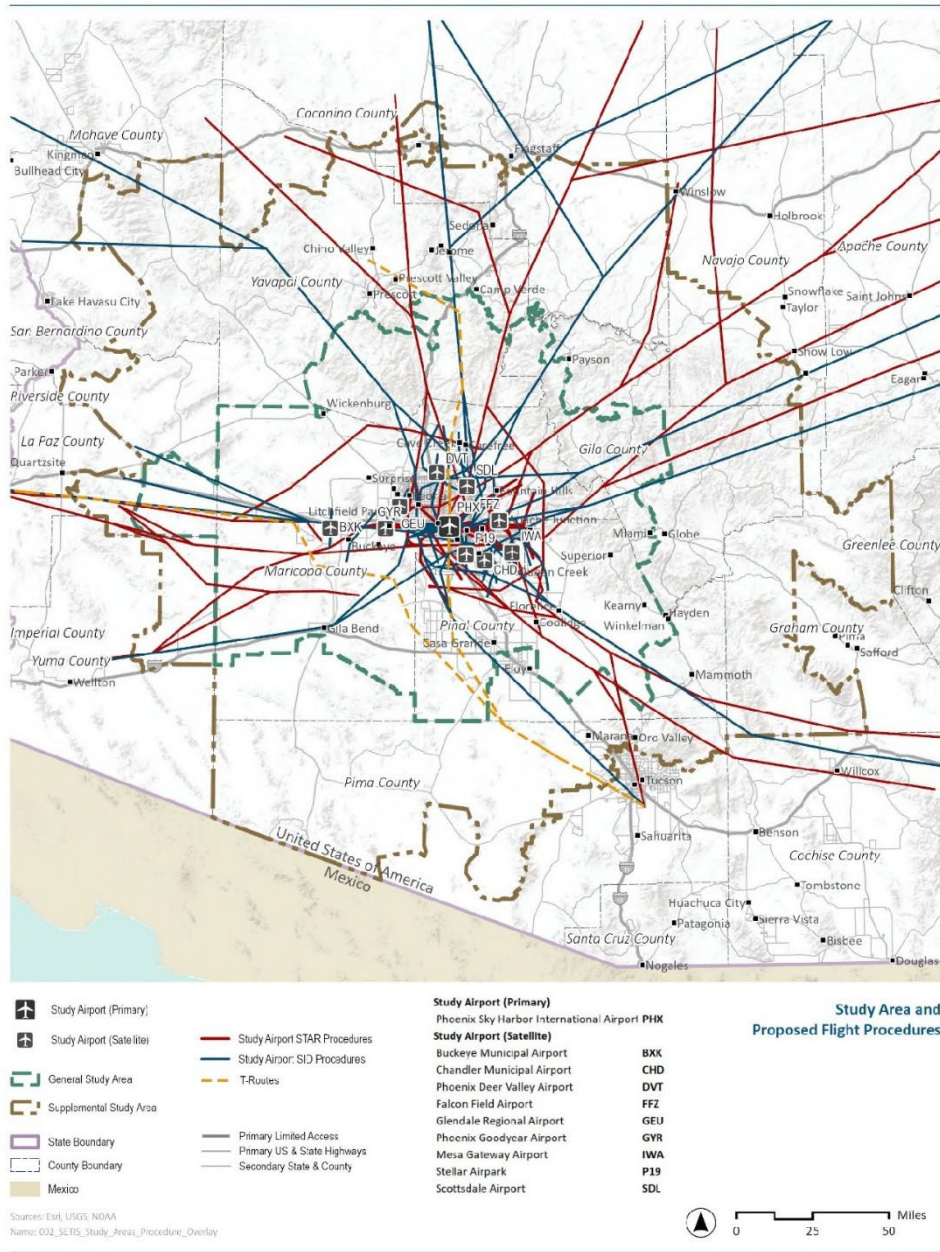
Dreiseszun cont.

Exhibit 1: Project Study Areas



Dreiseszun cont.

Exhibit 2. Project Study Areas and Proposed Flight Procedures



## Brevoort

 Outlook

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### Preserve PHX Letter > Phoenix Area FAA Modernization Project – Environmental Assessment

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**From** info azpreservation.org <info@azpreservation.org>

**Date** Sun 12/21/2025 8:18 PM

**To** 9-AVS-ASW-PHX-Modernization-Comment (FAA) <PHX-Modernization-Comment@faa.gov>

 1 attachment (190 KB)

Preserve PHX FAA Letter 12-21-25.pdf;

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Please see attached letter on behalf of Preserve Phoenix with regards to the Phoenix Area FAA Modernization Project – Environmental Assessment. Thank you.

**Brevoort cont.**



December 21, 2025

Phoenix Area FAA Modernization  
Operations Support Group  
FAA-ATO Central Service Center AJV C-250  
10101 Hillwood Parkway  
Fort Worth, TX 76177

Submitted via email: [PHX-MODERNIZATION-comment@faa.gov](mailto:PHX-MODERNIZATION-comment@faa.gov)

Re: Phoenix Area FAA Modernization Project – Environmental Assessment

To Whom It May Concern:

On behalf of the Board of Directors of Preserve Phoenix, the citywide historic preservation advocacy organization for Phoenix, I wish to submit the following comments on the Environmental Assessment for the Phoenix Area FAA Modernization Project.

Preserve Phoenix is a 501(c)(3) nonprofit organization dedicated to preserving and protecting Phoenix's historic buildings, neighborhoods, and districts. As the historic preservation advocacy organization serving the fifth-largest city in the United States, our work focuses on participating in citywide conversations, educating decision-makers, and elevating the importance of historic places as essential components of Phoenix's identity and livability. While we do not speak for individual historic districts, the health and long-term viability of Phoenix's historic neighborhoods are a central concern of our organization.

Phoenix's historic districts are living neighborhoods. Their significance is tied not only to architecture, but to daily use – outdoor space, walkable streets, neighborhood parks, and a level of residential stability that supports long-term stewardship. Changes to flight paths that introduce sustained, concentrated aircraft noise can disrupt these patterns in ways that are both immediate and lasting.

Following the 2014 flight path changes, Preserve Phoenix heard from residents across several historic neighborhoods who experienced dramatic increases in aircraft noise. Residents reported impacts to daily life indoors and outdoors, including sleep disruption, diminished use of yards and parks, and an overall change in neighborhood character. In some cases,

734 W. Polk St, Phoenix, AZ 85007 • [hello@preservephx.org](mailto:hello@preservephx.org) • [preservephx.org](http://preservephx.org) • EIN: 86-0559779

**Brevoort cont.**

homeowners felt compelled to replace historic windows to reduce interior noise – an understandable response that nonetheless resulted in the loss of historic materials and character-defining features. These experiences demonstrate how aviation decisions can have cascading effects on historic resources beyond what is typically captured in noise contours alone.

For a city the size of Phoenix, process matters. Meaningful coordination with the City of Phoenix, the State Historic Preservation Office, and affected communities is essential to ensuring that modernization efforts do not inadvertently place disproportionate burdens on established historic neighborhoods. The Environmental Assessment process should not only evaluate technical efficiency, but also reflect lessons learned from prior actions and their real-world impacts.

**Preserve Phoenix supports the current westerly departure flight paths and urges that they remain in place as part of the Phoenix Area FAA Modernization Project.** These procedures avoid reintroducing previously documented harms to historic neighborhoods and parks and better reflect the balance Phoenix residents expect between regional infrastructure and neighborhood livability.

Phoenix’s historic buildings and neighborhoods are finite resources. Once their character is compromised, it cannot be fully restored. Thoughtful planning, transparency, and respect for community experience are essential to ensuring that modernization does not come at the expense of the very places that make Phoenix unique.

Thank you for the opportunity to comment.

Yours truly,



Roger Brevoort  
Chair, Advocacy Committee  
Preserve Phoenix

cc: Steve Dreiseszun, Story Preservation Association  
G.G. George, Phoenix Historic Neighborhoods Coalition  
Helana Ruter, City of Phoenix Historic Preservation Office  
Jon Brodsky, Phoenix Sky Harbor International Airport  
Jim McPherson, Arizona Preservation Foundation  
Kathryn Leonard, Arizona State Historic Preservation Officer

## McPherson

 Outlook

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### AZ Preservation Foundation letter >> Fwd: Early Coordination for the Phoenix Area FAA Modernization Project

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From Jim McPherson <jmcpersoniii@gmail.com>

Date Sun 12/21/2025 11:31 AM

To 9-AVS-ASW-PHX-Modernization-Comment (FAA) <PHX-Modernization-Comment@faa.gov>

Cc Steve Dreiseszun <steve@viewpointphoto.com>; G.G. George <gggfabgal@outlook.com>; Erin Lindsey <erin@phoenixartdeco.org>; Helana Ruter <helana.ruter@phoenix.gov>; Kathryn Leonard <kleonard@azstateparks.gov>; jon.brodsky@phoenix.gov <jon.brodsky@phoenix.gov>

 1 attachment (165 KB)

APF FAA PHX Flight Paths 12-20-25.pdf

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**CAUTION:** This email originated from outside of the Federal Aviation Administration (FAA). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hello, Please see attached letter from the Arizona Preservation Foundation about the Phoenix Area FAA Modernization Project. Thank you. Happy Holidays.

Jim McPherson  
President, Board of Directors  
Arizona Preservation Foundation

----- Forwarded message -----

From: 9-AVS-ASW-PHX-Modernization-Comment (FAA) <[PHX-Modernization-Comment@faa.gov](mailto:PHX-Modernization-Comment@faa.gov)>

Date: Thu, Nov 20, 2025 at 8:24 AM

Subject: Early Coordination for the Phoenix Area FAA Modernization Project

Dear Stakeholder, The Federal Aviation Administration (FAA) is initiating an Environmental Assessment (EA) for the Phoenix Area FAA Modernization Project. This effort will evaluate potential environmental impacts associated with changes to aircraft flight paths and altitudes in the region. Please see the attached letter for additional details, including information on the study areas, process, and opportunities to provide timely feedback. Thank you for your attention and participation.

**McPherson cont.**

Sincerely,  
Federal Aviation Administration

**McPherson cont.**



December 20, 2025

Phoenix Area FAA Modernization  
Operations Support Group FAA-ATO  
Central Service Center AJV C-250  
10101 Hillwood Parkway  
Fort Worth, TX 76177

Submitted via email: [PHX-MODERNIZATION-comment@faa.gov](mailto:PHX-MODERNIZATION-comment@faa.gov)

Re: Phoenix Area FAA Modernization Project – Environmental Assessment

To Whom It May Concern:

On behalf of the Board of Directors of the Arizona Preservation Foundation (APF), Arizona's statewide historic preservation advocacy organization, I appreciate the opportunity to comment on the proposed Environmental Assessment for the Phoenix Area FAA Modernization Project pursuant to the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (NHPA).

Founded in 1979, APF is a nonprofit organization dedicated to protecting and promoting Arizona's historic and cultural resources. We work statewide with local governments, state and federal agencies, preservation professionals, property owners, and community organizations to advance sound preservation policy, monitor threatened historic places, provide technical resources and small grants, and educate the public on the economic, environmental, and community benefits of preservation. Our role here is not neighborhood-specific advocacy, but rather to provide a broader policy perspective informed by recurring issues across Arizona.

From that statewide vantage point, APF offers the following observations.

**Historic resources warrant heightened consideration under federal review.**

Historic districts and cultural landscapes throughout Arizona derive their significance from attributes such as setting, use of outdoor space, walkability, and neighborhood cohesion – qualities that are particularly sensitive to concentrated and persistent aircraft noise. Substantial changes to flight paths can adversely affect both indoor and outdoor use of historic properties, directly implicating the integrity of historic districts recognized under federal, state, and local programs. Following the 2014 flight path changes in Phoenix, APF heard from residents that the resulting increase in aircraft noise materially affected quality of life both indoors and outdoors. In some cases, residents reported replacing historic windows to mitigate interior noise impacts. While understandable from a livability standpoint, such alterations affect historic fabric and character-defining features, underscoring how aviation decisions can have secondary preservation impacts that extend beyond immediate noise exposure.

*P.O. Box 13492, Phoenix, AZ 85002 • [azpreservation.org](http://azpreservation.org) • [info@azpreservation.org](mailto:info@azpreservation.org) • EIN 86-0371336*

## McPherson cont.

### **Process and precedent matter.**

APF's experience monitoring endangered historic places and assisting communities facing infrastructure pressures demonstrates that early, meaningful consultation under NEPA and Section 106 is essential. Coordination with State Historic Preservation Offices, local governments, and consulting parties is not simply procedural compliance; it is a practical safeguard that helps agencies identify reasonable alternatives, avoid unintended harm, and reduce conflict. Where consultation is delayed or limited, impacts to historic resources – and the need for corrective action – are far more likely.

### **The Phoenix Area FAA Modernization Project has statewide implications.**

As a statewide organization, APF regularly hears from communities near both major and regional airports who are concerned about the cumulative effects of flight path changes on established neighborhoods and historic resources. The approach taken in Phoenix will inform expectations and agency practice elsewhere in Arizona and nationally. Respecting documented impacts, honoring prior agreements, and avoiding the re-creation of known adverse effects will strengthen confidence in the federal environmental and preservation review process.

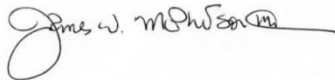
### **Support for the current westerly departure flight paths.**

Most importantly, APF – along with the affected Phoenix historic neighborhoods – fully supports the current flight paths for westerly departures and urges that they remain in place as part of the Phoenix Area FAA Modernization Project. These procedures reflect lessons learned from prior actions, reduce adverse effects to historic neighborhoods and parks, and represent a workable balance between operational needs and community protection.

In closing, Arizona's historic places are finite public assets that contribute measurably to community identity, economic vitality, and quality of life. Protecting these resources while meeting transportation needs is not a zero-sum proposition; it depends on transparent analysis, adherence to established legal frameworks, and sustained intergovernmental collaboration. The Arizona Preservation Foundation stands ready to support constructive dialogue that advances both aviation objectives and long-term stewardship of historic resources.

Thank you for the opportunity to submit these comments.


Sincerely yours,



Jim McPherson  
President, Board of Directors  
Arizona Preservation Foundation  
[info@azpreservation.org](mailto:info@azpreservation.org)

cc: Steve Dreiseszun, Story Preservation Association, Inc.  
G.G. George, Phoenix Historic Neighborhoods Coalition  
Erin Lindsey, Preserve Phoenix  
Helana Ruter, City of Phoenix Historic Preservation Office  
Jon Brodsky, Phoenix Sky Harbor International Airport  
Kathryn Leonard, Arizona State Historic Preservation Office

## George

 Outlook

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**Re: AZ Preservation Foundation letter >> Fwd: Early Coordination for the Phoenix Area FAA Modernization Project**

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**From** G.G. George <gggfabgal@outlook.com>

**Date** Sun 12/21/2025 1:19 PM

**To** Jim McPherson <jmcpersoniii@gmail.com>; 9-AVS-ASW-PHX-Modernization-Comment (FAA) <PHX-Modernization-Comment@faa.gov>

**Cc** Steve Dreiseszun <steve@viewpointphoto.com>; Erin Lindsey <erin@phoenixartdeco.org>; Helana Ruter <helana.ruter@phoenix.gov>; Kathryn Leonard <kleonard@azstateparks.gov>; jon.brodsky@phoenix.gov <jon.brodsky@phoenix.gov>

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Thanks for sharing.

GGG

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**From:** Jim McPherson <jmcpersoniii@gmail.com>

**Sent:** Sunday, December 21, 2025 9:31 AM

**To:** PHX-MODERNIZATION-comment@faa.gov <PHX-MODERNIZATION-comment@faa.gov>

**Cc:** Steve Dreiseszun <steve@viewpointphoto.com>; G.G. George <gggfabgal@outlook.com>; Erin Lindsey <erin@phoenixartdeco.org>; Helana Ruter <helana.ruter@phoenix.gov>; Kathryn Leonard <kleonard@azstateparks.gov>; jon.brodsky@phoenix.gov <jon.brodsky@phoenix.gov>

**Subject:** AZ Preservation Foundation letter >> Fwd: Early Coordination for the Phoenix Area FAA Modernization Project

Hello, Please see attached letter from the Arizona Preservation Foundation about the Phoenix Area FAA Modernization Project. Thank you. Happy Holidays.

Jim McPherson  
President, Board of Directors  
Arizona Preservation Foundation

----- Forwarded message -----

**From:** 9-AVS-ASW-PHX-Modernization-Comment (FAA) <[PHX-Modernization-Comment@faa.gov](mailto:PHX-Modernization-Comment@faa.gov)>

**Date:** Thu, Nov 20, 2025 at 8:24 AM

**Subject:** Early Coordination for the Phoenix Area FAA Modernization Project

Dear Stakeholder, The Federal Aviation Administration (FAA) is initiating an Environmental Assessment (EA) for the Phoenix Area FAA Modernization Project. This


**George cont.**

effort will evaluate potential environmental impacts associated with changes to aircraft flight paths and altitudes in the region. Please see the attached letter for additional details, including information on the study areas, process, and opportunities to provide timely feedback. Thank you for your attention and participation.

Sincerely,  
Federal Aviation Administration

**F.2.5.4 Public Officials and Others**

**Crane**

 Outlook

---

**FW: Early Coordination for the Phoenix Area FAA Modernization Project**

---

From Mayor <mayor@carefree.org>

Date Thu 12/11/2025 9:57 AM

To 9-AVS-ASW-PHX-Modernization-Comment (FAA) <PHX-Modernization-Comment@faa.gov>

Cc SkyRanch Airport Manager <18az@skyranchcarefree.com>

 1 attachment (935 KB)

2025-11-20\_PHX\_EA\_Dignitaries-Scoping\_Crane\_J.pdf;

**CAUTION:** This email originated from outside of the Federal Aviation Administration (FAA). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

## Crane cont.

Dear Mr. Southerland:

Thank you for bringing the Phoenix Area FAA Modernization Project to my attention. As a community, the Town of Carefree has an interest in this project and potential impacts aircraft flight paths and altitudes may have to our environment from a noise and environmental perspective. We are also concerned with any impacts that may occur to SkyRanch Airport, a private airport which located within Carefree.

As this project proceeds and proposals are clear, please keep the Town of Carefree posted.

Best Regards,  
Mayor John Crane  
Town of Carefree, Arizona  
Town Hall: (480) 488-3686  
Cell: (602) 363-1978

E-mails that board members or staff generate pertaining to the business of the public body are public records. Therefore, the e-mails must be preserved according to a records retention program and generally be made available for public inspection. The recipient of this message is hereby notified that participation in email discussions with this sender can and will result in all information contained therein being reviewed by any interested parties, including media outlets and reporters. To ensure compliance with the Open Meeting Law, Town Council recipients of this message should not forward it to other members of the Council. Members of the Council may reply to this message, but they should not send a copy of the reply to other members. Any questions may be directed to the Town of Carefree 's Town Clerk (480) 488-3686.

---

**From:** 9-AVS-ASW-PHX-Modernization-Comment (FAA) <[PHX-Modernization-Comment@faa.gov](mailto:PHX-Modernization-Comment@faa.gov)>

**Sent:** Thursday, November 20, 2025 09:12

**To:** [mayor@carefree.org](mailto:mayor@carefree.org)

**Subject:** Early Coordination for the Phoenix Area FAA Modernization Project

Dear Stakeholder,

The Federal Aviation Administration (FAA) is initiating an Environmental Assessment (EA) for the Phoenix Area FAA Modernization Project. This effort will evaluate potential environmental impacts associated with changes to aircraft flight paths and altitudes in the region.

Please see the attached letter for additional details, including information on the study areas, process, and opportunities to provide timely feedback.

Thank you for your attention and participation.

Sincerely,  
Federal Aviation Administration

Crane cont.



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

November 20, 2025

Mayor John Crane  
Town of Carefree  
8 Sundial Circle P.O Box 740  
Carefree, AZ 85377

**Subject:** Early Coordination for the Phoenix Area FAA Modernization Project

Dear Mayor Crane:

The purpose of this letter is to inform you of a proposal under consideration by the Federal Aviation Administration (FAA) and to solicit your feedback. In accordance with the National Environmental Policy Act (NEPA), the FAA is undertaking the preparation of an Environmental Assessment (EA) to consider the potential environmental impacts associated with changes to air traffic procedures as part of the Phoenix Area FAA Modernization Project. The EA is being developed in accordance with established laws, regulations, FAA Orders, and guidance. The FAA welcomes your input and is offering you the opportunity to provide any background information that you may have regarding the study areas established for this undertaking, including identification of sensitive environmental resources, and to advise the FAA of any issues, concerns, policies, or regulations you may have regarding the environmental analysis to be conducted as part of this EA.

The Phoenix Area FAA Modernization Project would involve changes to aircraft flight paths and altitudes in certain areas. The FAA has established a General Study Area to evaluate potential impacts of changes in aircraft routing, including those that would occur below 10,000 feet (ft.) above ground level (AGL). Additionally, since the General Study Area includes national parks, wildlife refuges, and various cultural properties where other noise is very low and a quiet setting is a generally recognized purpose and attribute, a Supplemental Study Area extending up to 18,000 ft. AGL has been identified. (Please see the attached Exhibit 1, Project Study Areas, and Exhibit 2, Project Study Areas and Proposed Flight Procedures.)

Ten airports within the General Study Area and Supplemental Study Area will be studied, including the primary airport Phoenix Sky Harbor International Airport (PHX). The nine additional satellite airports are:

- DVT – Phoenix Deer Valley Airport
- FFZ – Falcon Field Airport
- IWA – Mesa Gateway Airport
- CHD – Chandler Municipal Airport
- GYR – Phoenix Goodyear Airport
- GEU – Glendale Regional Airport
- SDL – Scottsdale Airport
- BXX – Buckeye Municipal Airport
- P19 – Stellar Airpark

Additionally, public input is essential to inform Federal decision-making as part of the Section 106 process. The FAA also requests your assistance in identifying community groups and associations that may have an interest in this project and its effects on historic properties. The

**Crane cont.**

2

FAA will seek and consider the views of the public in a manner reflecting the nature and complexity of this undertaking and its effects on historic properties.

We look forward to your response. If you have any initial comments on this undertaking, please contact:

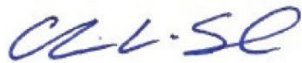
**Attn:** Phoenix Area FAA Modernization  
Operations Support Group  
FAA-ATO Central Service Center AJV C-250  
10101 Hillwood Pkwy  
Fort Worth, TX 76177

**Email:** [PHX-MODERNIZATION-comment@faa.gov](mailto:PHX-MODERNIZATION-comment@faa.gov)

For additional information and the most recent developments on this project, please visit the PHX Area FAA Modernization Project community engagement website [https://www.faa.gov/air\\_traffic/community\\_engagement/phx](https://www.faa.gov/air_traffic/community_engagement/phx).

Your timely response will assist us in incorporating your concerns into the project planning. To facilitate this coordination, we would appreciate a response no later than December 21, 2025.

Sincerely,



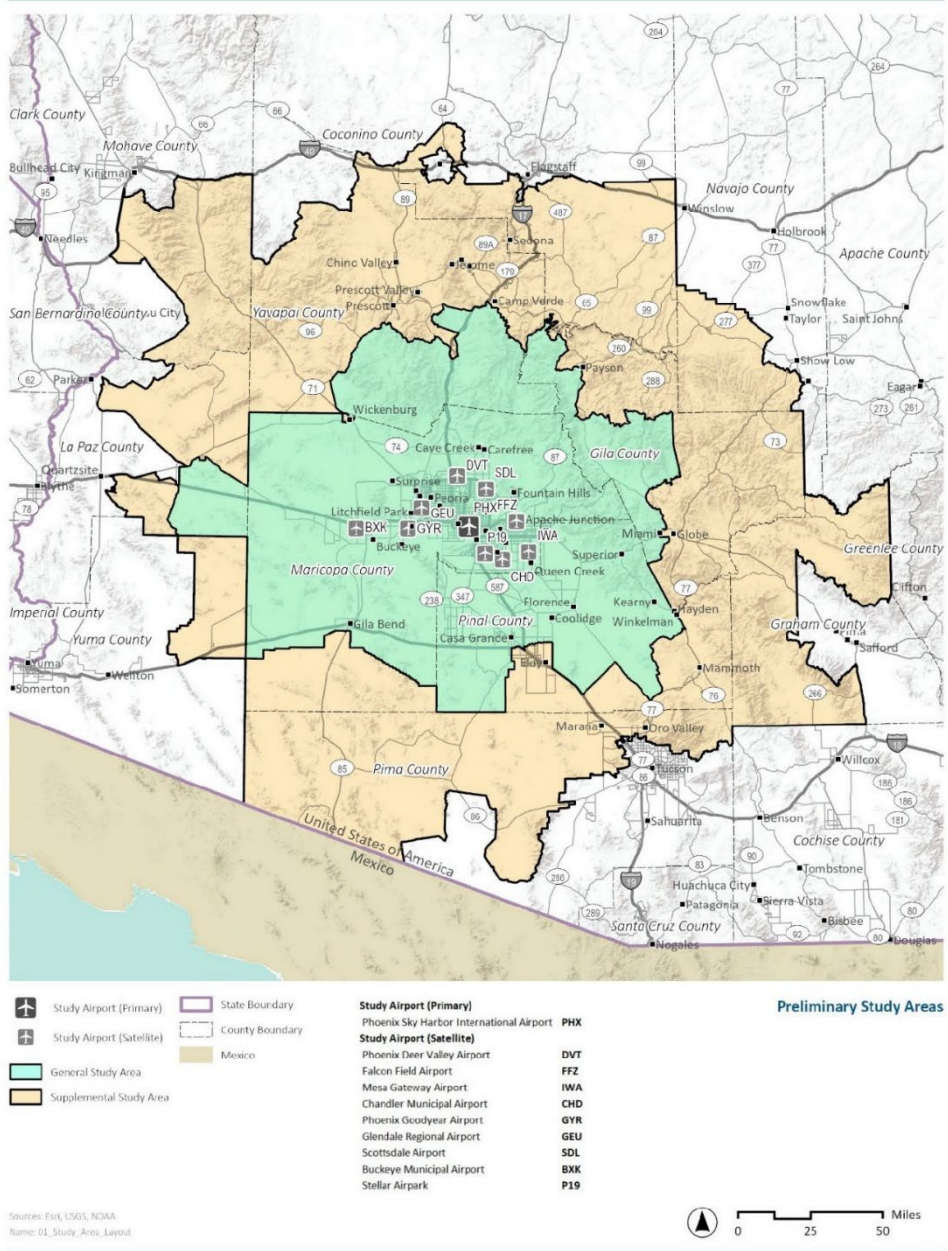
Christopher L. Southerland  
Acting Director, Central Service Center  
Air Traffic Organization

**Attachments:**

- Exhibit 1. Project Study Area
- Exhibit 2. Project Study Area and Proposed Flight Procedures

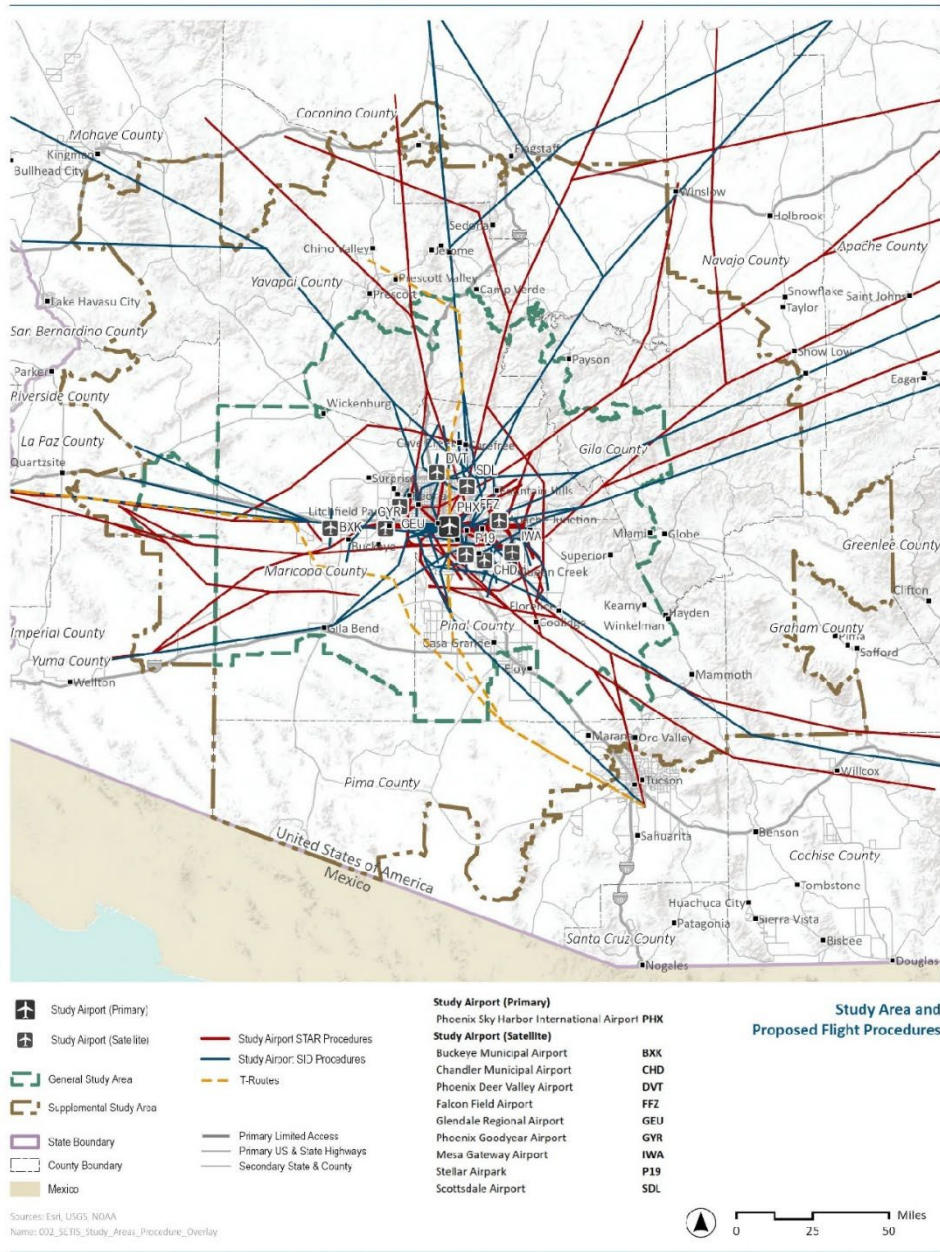
Crane cont.

Exhibit 1: Project Study Areas




Crane cont.

Exhibit 2. Project Study Areas and Proposed Flight Procedures



## Carroll

 Outlook

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**RE: Early Coordination for the Phoenix Area FAA Modernization Project**

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From Frank Carroll <FCarroll@azleg.gov>

Date Fri 11/28/2025 12:51 PM

To 9-AVS-ASW-PHX-Modernization-Comment (FAA) <PHX-Modernization-Comment@faa.gov>

**CAUTION:** This email originated from outside of the Federal Aviation Administration (FAA). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

**Carroll cont.**

I would be happy to participate.



**Senator Frank P Carroll, Majority Whip**

57<sup>th</sup> Legislature  
Vice Chairman – Regulatory Affairs &  
Government Efficiency  
Federalism  
Natural Resources  
Rules  
Legislative District 28 – Sun City West,  
Sun City, Peoria, Phoenix, New River  
1700 W. Washington Street Phoenix, AZ 85007  
Office: (602) 926-3249  
Cell: (520) 428-4851

---

**From:** 9-AVS-ASW-PHX-Modernization-Comment (FAA) <PHX-Modernization-Comment@faa.gov>

**Sent:** Thursday, November 20, 2025 8:47 AM

**To:** Frank Carroll <FCarroll@azleg.gov>

**Subject:** Early Coordination for the Phoenix Area FAA Modernization Project

Dear Stakeholder,

The Federal Aviation Administration (FAA) is initiating an Environmental Assessment (EA) for the Phoenix Area FAA Modernization Project. This effort will evaluate potential environmental impacts associated with changes to aircraft flight paths and altitudes in the region.

Please see the attached letter for additional details, including information on the study areas, process, and opportunities to provide timely feedback.

Thank you for your attention and participation.

Sincerely,  
Federal Aviation Administration

## Connolly

 Outlook

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### RE: Early Coordination for the Phoenix Area FAA Modernization Project

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From Janeen Connolly <JConnolly@azleg.gov>

Date Fri 11/28/2025 5:24 PM

To 9-AVS-ASW-PHX-Modernization-Comment (FAA) <PHX-Modernization-Comment@faa.gov>

You don't often get email from jconnolly@azleg.gov. [Learn why this is important](#)

**CAUTION:** This email originated from outside of the Federal Aviation Administration (FAA). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon,

Thank you for including me on the email notification below regarding early coordination for the Phoenix Area FAA Modernization Project.

I am a seasoned "siting" professional. I have sited countless projects to permit electric power plants, EHV transmission lines, wind energy, solar energy, large regional freeway projects, to establish wetlands, to raise dams just to name a few. These projects require environmental assessments, many of them require NEPA. In addition, a number of the projects required FAA coordination to insure they were not impacting flight patterns, so I understand the cone.

I might be helpful identifying stakeholders. I am mostly interested in following your process as I serve on the Science and Technology Committee in the Arizona House of Representatives. Feel free to reach out to me.

Thank you,

*Janeen Connolly*

Representative LD8 - Arizona House of Representatives

E. [jconnolly@azleg.gov](mailto:jconnolly@azleg.gov) / O. 602-926-3300



**Connolly cont.**

---

**From:** 9-AVS-ASW-PHX-Modernization-Comment (FAA) <PHX-Modernization-Comment@faa.gov>  
**Sent:** Thursday, November 20, 2025 8:55 AM  
**To:** Janeen Connolly <JConnolly@azleg.gov>  
**Subject:** Early Coordination for the Phoenix Area FAA Modernization Project

Dear Stakeholder,


The Federal Aviation Administration (FAA) is initiating an Environmental Assessment (EA) for the Phoenix Area FAA Modernization Project. This effort will evaluate potential environmental impacts associated with changes to aircraft flight paths and altitudes in the region.

Please see the attached letter for additional details, including information on the study areas, process, and opportunities to provide timely feedback.

Thank you for your attention and participation.

Sincerely,  
Federal Aviation Administration

## Roe

 Outlook

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### City of Peoria FAA Inquiry

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**From** Austin Roe <austin.roe@peoriaaz.gov>

**Date** Mon 12/8/2025 6:50 PM

**To** 9-AVS-ASW-PHX-Modernization-Comment (FAA) <PHX-Modernization-Comment@faa.gov>

 1 attachment (904 KB)

2025-11-20\_PHX\_EA\_Historic-Scoping\_Washburn.pdf

You don't often get email from austin.roe@peoriaaz.gov. [Learn why this is important](#)

**CAUTION:** This email originated from outside of the Federal Aviation Administration (FAA). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

**Roe cont.**

Hello,

The city of Peoria received the attached letter outlining potential changes to flights paths in our area. I wanted to see if I could set up a brief virtual meeting in an effort to better understand these changes prior to the December 21<sup>st</sup> deadline outlined in the letter.

Please let me know the easiest way to facilitate this conversation.

Thank you,

**Austin Roe** | Chief of Staff  
Office of Mayor & Intergovernmental Affairs  
8401 W. Monroe Street | Peoria, AZ 85345  
O: (623) 773-4614 | [www.peoriaaz.gov](http://www.peoriaaz.gov)  
[Austin.Roe@peoriaaz.gov](mailto:Austin.Roe@peoriaaz.gov)

**Roe cont.**



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

November 20, 2025

Nathaniel Washburn  
Library and Cultural Services Manager  
City of Peoria  
8401 West Monroe Street  
Peoria, AZ 85345

**Subject:** Early Coordination for the Phoenix Area FAA Modernization Project

Dear Nathaniel Washburn:

The purpose of this letter is to inform you of a proposal under consideration by the Federal Aviation Administration (FAA) and to solicit your feedback. In accordance with the National Environmental Policy Act (NEPA), the FAA is undertaking the preparation of an Environmental Assessment (EA) to consider the potential environmental impacts associated with changes to air traffic procedures as part of the Phoenix Area FAA Modernization Project. This project has been determined to be subject to Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations in 36 CFR Part 800. The FAA will initiate consultation under Section 106 once more information is available.

The Phoenix Area FAA Modernization Project would involve changes in aircraft flight paths and altitudes in certain areas. The FAA has established a General Study Area to evaluate potential impacts of changes in aircraft routing, including those that would occur below 10,000 feet (ft.) above ground level (AGL). Additionally, since the General Study Area includes national parks, wildlife refuges, and various cultural properties where other noise is very low and a quiet setting is a generally recognized purpose and attribute, a Supplemental Study Area extending up to 18,000 ft. AGL has been identified. (Please see the attached Exhibit 1, Project Study Areas, and Exhibit 2, Project Study Areas and Proposed Flight Procedures.)

Ten airports within the General Study Area and Supplemental Study Area will be studied, including the primary airport Phoenix Sky Harbor International Airport (PHX). The nine additional satellite airports are:

- DVT – Phoenix Deer Valley Airport
- FFZ – Falcon Field Airport
- IWA – Mesa Gateway Airport
- CHD – Chandler Municipal Airport
- GYR – Phoenix Goodyear Airport
- GEU – Glendale Regional Airport
- SDL – Scottsdale Airport
- BXK – Buckeye Municipal Airport
- P19 – Stellar Airpark

The FAA is inviting local agencies with jurisdiction over land within the General Study Area and Supplemental Study Area to provide early input on potential environmental concerns and historic resources. The FAA requests your assistance in identifying other interested parties that should be considered for participation in the Section 106 consultation process when it is initiated.

**Roe cont.**

2

Additionally, public input is essential to inform Federal decision-making as part of the Section 106 process. The FAA also requests your assistance in identifying community groups and associations that may have an interest in this project and its effects on historic properties. The FAA will seek and consider the views of the public in a manner reflecting the nature and complexity of this undertaking and its effects on historic properties.

We look forward to your response. If you have any initial comments or questions on this undertaking, please contact:

**Attn:** Phoenix Area FAA Modernization  
Operations Support Group  
FAA-ATO Central Service Center AJV C-250  
10101 Hillwood Pkwy  
Fort Worth, TX 76177

**Email:** [PHX-MODERNIZATION-comment@faa.gov](mailto:PHX-MODERNIZATION-comment@faa.gov)

For additional information and the most recent developments on this project, please visit the PHX Area FAA Modernization Project community engagement website [https://www.faa.gov/air\\_traffic/community\\_engagement/phx](https://www.faa.gov/air_traffic/community_engagement/phx).

Your timely response will assist us in incorporating your concerns into the project planning. To facilitate this coordination, we would appreciate a response no later than December 21, 2025.

Sincerely,

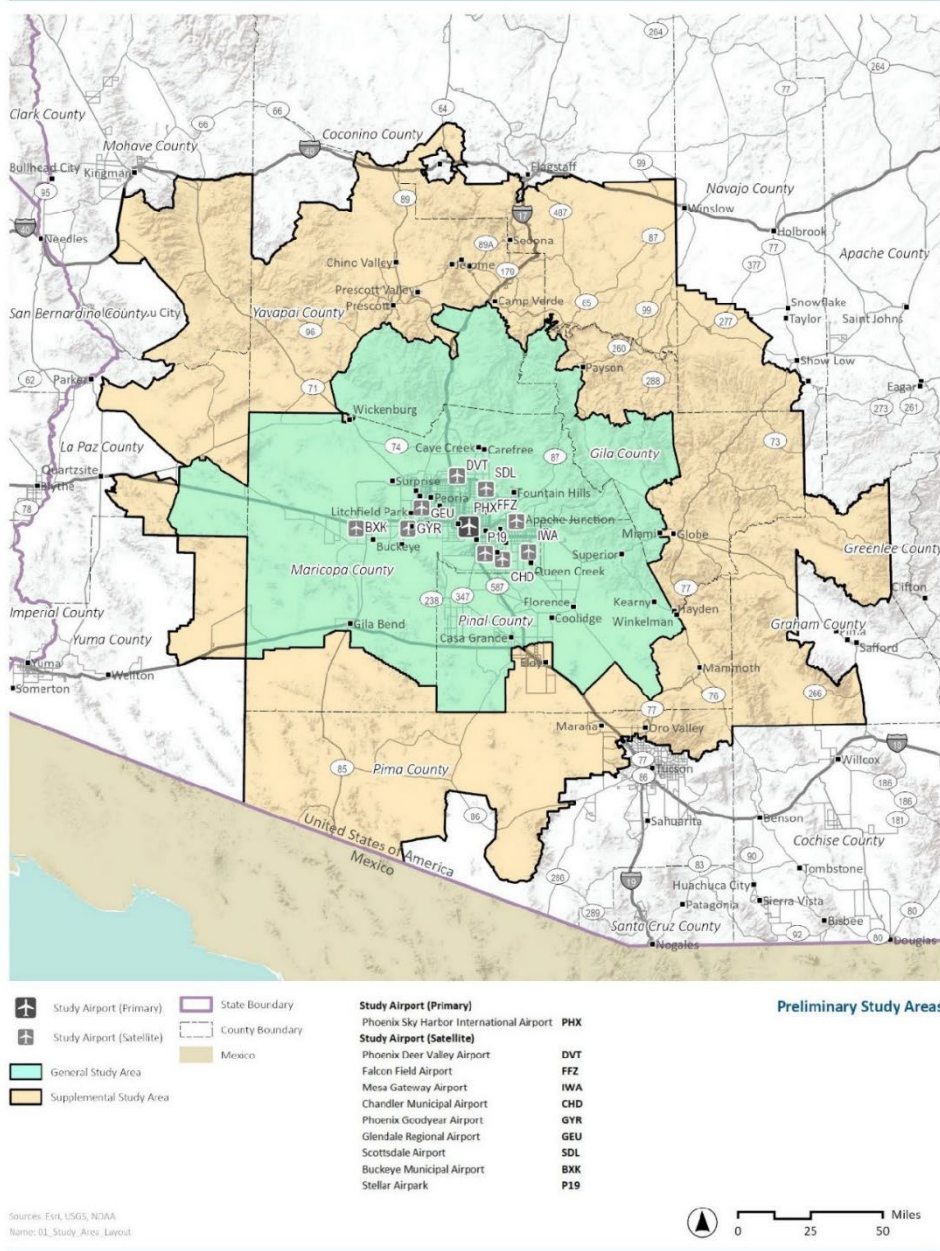


Christopher L. Southerland  
Acting Director, Central Service Center  
Air Traffic Organization

Attachments:  
Exhibit 1. Project Study Area  
Exhibit 2. Project Study Area and Proposed Flight Procedures

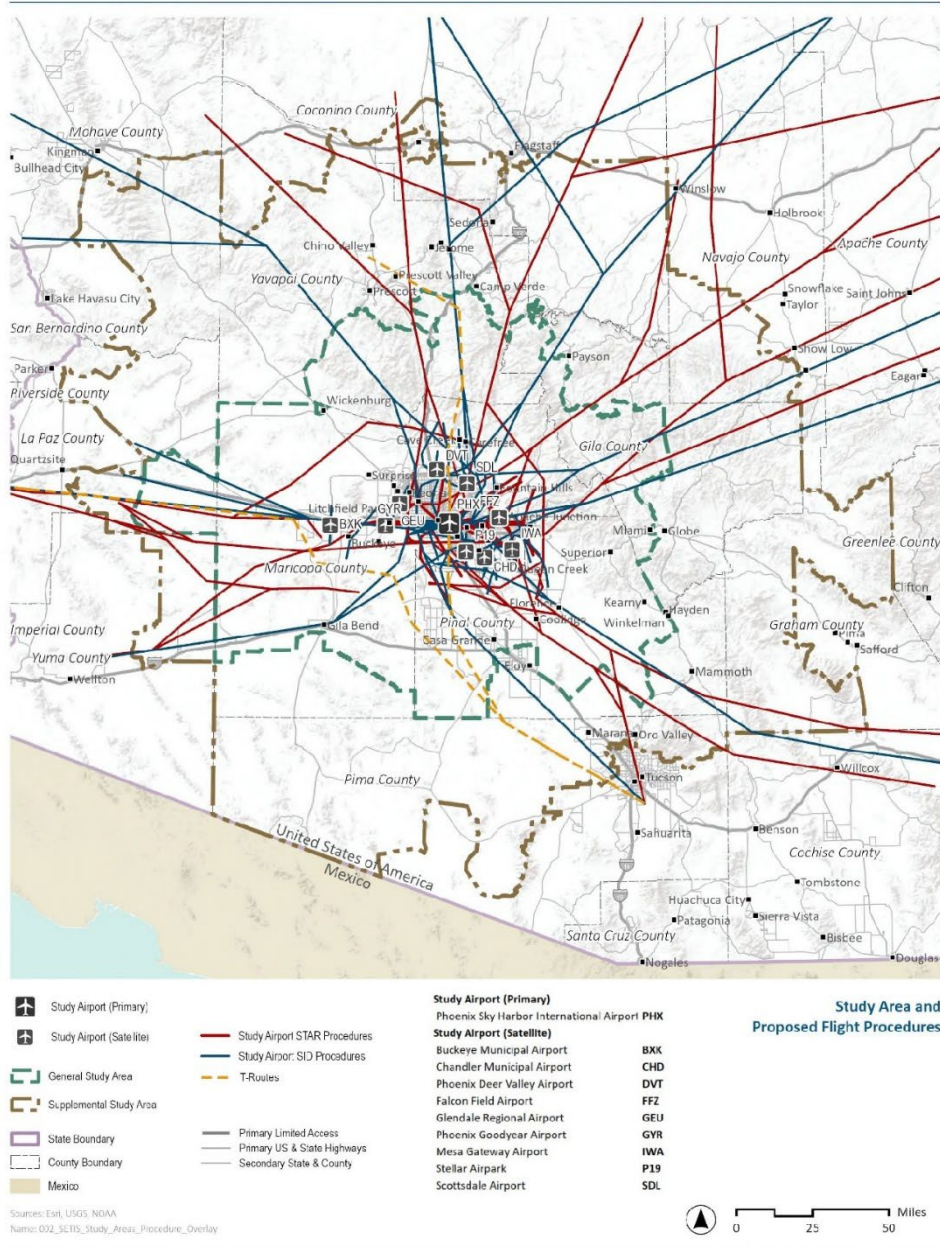
Roe cont.

Exhibit 1: Project Study Areas




Roe cont.

Exhibit 2. Project Study Areas and Proposed Flight Procedures



## Huggins

 Outlook

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### Early Coordination for the Phoenix Area FAA Modernization Project

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From Huggins Jr, Randy <RHuggins@GLENDALEAZ.com >

Date Thu 12/11/2025 6:28 PM

To 9-AVS-ASW-PHX-Modernization-Comment (FAA) <PHX-Modernization-Comment@faa.gov>

Cc Hoskins, Duane <DHoskins@GLENDALEAZ.com >; Kazmerski, Kevin <KKazmerski@GLENDALEAZ.com >

 1 attachment (904 KB)

2025-11-20\_PHX\_EA\_Historic-Scoping\_Washburn.pdf

**CAUTION:** This email originated from outside of the Federal Aviation Administration (FAA). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

**Huggins cont.**

To whom it may concern,

Please add the City of Glendale Historic Preservation Commission to the list of groups and associations that have an interest in this project and its effects on historic properties. Duane Hoskins and Kevin "John" Kazmerski will be the liaisons for the City, and are copied on this email.

Thank you,



**Randy Huggins**  
Development Services Director  
Development Services Department

rhuggins@glendaleaz.com  
P 623.930.2585 | C 602.570.4479  
5850 West Glendale Avenue  
Glendale, AZ 85301

**We improve the lives of the people we serve every day.**  
Community • Integrity • Excellence • Innovation • Learning

NOTE: The Development Services Department has been temporarily RELOCATED to the Bead Museum building located at 5754 West Glenn Dr.

Huggins cont.



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

November 20, 2025

Nathaniel Washburn  
Library and Cultural Services Manager  
City of Peoria  
8401 West Monroe Street  
Peoria, AZ 85345

**Subject:** Early Coordination for the Phoenix Area FAA Modernization Project

Dear Nathaniel Washburn:

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- GEU – Glendale Regional Airport
- SDL – Scottsdale Airport
- BXK – Buckeye Municipal Airport
- P19 – Stellar Airpark

The FAA is inviting local agencies with jurisdiction over land within the General Study Area and Supplemental Study Area to provide early input on potential environmental concerns and historic resources. The FAA requests your assistance in identifying other interested parties that should be considered for participation in the Section 106 consultation process when it is initiated.

**Huggins cont.**

2

Additionally, public input is essential to inform Federal decision-making as part of the Section 106 process. The FAA also requests your assistance in identifying community groups and associations that may have an interest in this project and its effects on historic properties. The FAA will seek and consider the views of the public in a manner reflecting the nature and complexity of this undertaking and its effects on historic properties.

We look forward to your response. If you have any initial comments or questions on this undertaking, please contact:

**Attn:** Phoenix Area FAA Modernization  
Operations Support Group  
FAA-ATO Central Service Center AJV C-250  
10101 Hillwood Pkwy  
Fort Worth, TX 76177

**Email:** [PHX-MODERNIZATION-comment@faa.gov](mailto:PHX-MODERNIZATION-comment@faa.gov)

For additional information and the most recent developments on this project, please visit the PHX Area FAA Modernization Project community engagement website [https://www.faa.gov/air\\_traffic/community\\_engagement/phx](https://www.faa.gov/air_traffic/community_engagement/phx).

Your timely response will assist us in incorporating your concerns into the project planning. To facilitate this coordination, we would appreciate a response no later than December 21, 2025.

Sincerely,

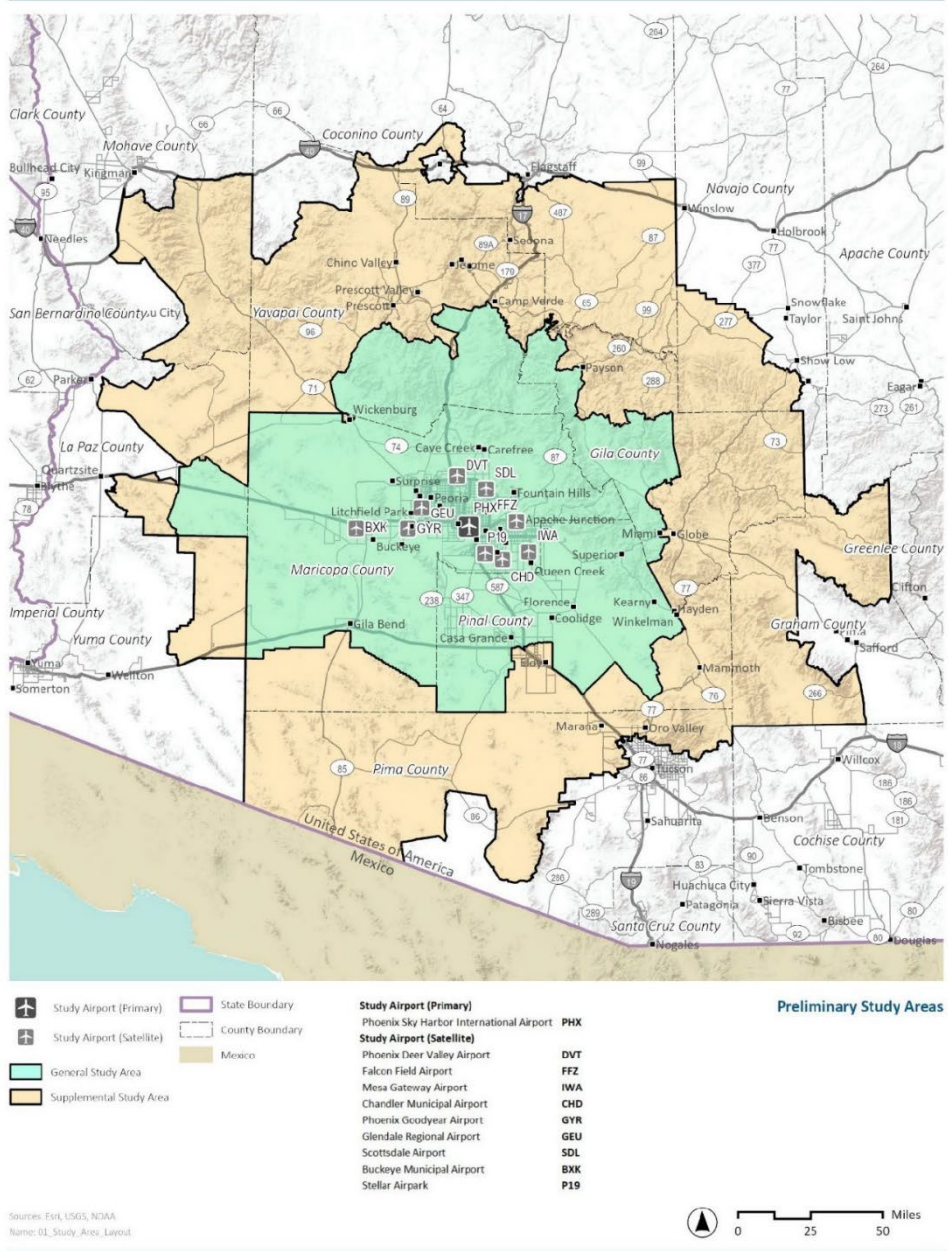


Christopher L. Southerland  
Acting Director, Central Service Center  
Air Traffic Organization

Attachments:  
Exhibit 1. Project Study Area  
Exhibit 2. Project Study Area and Proposed Flight Procedures

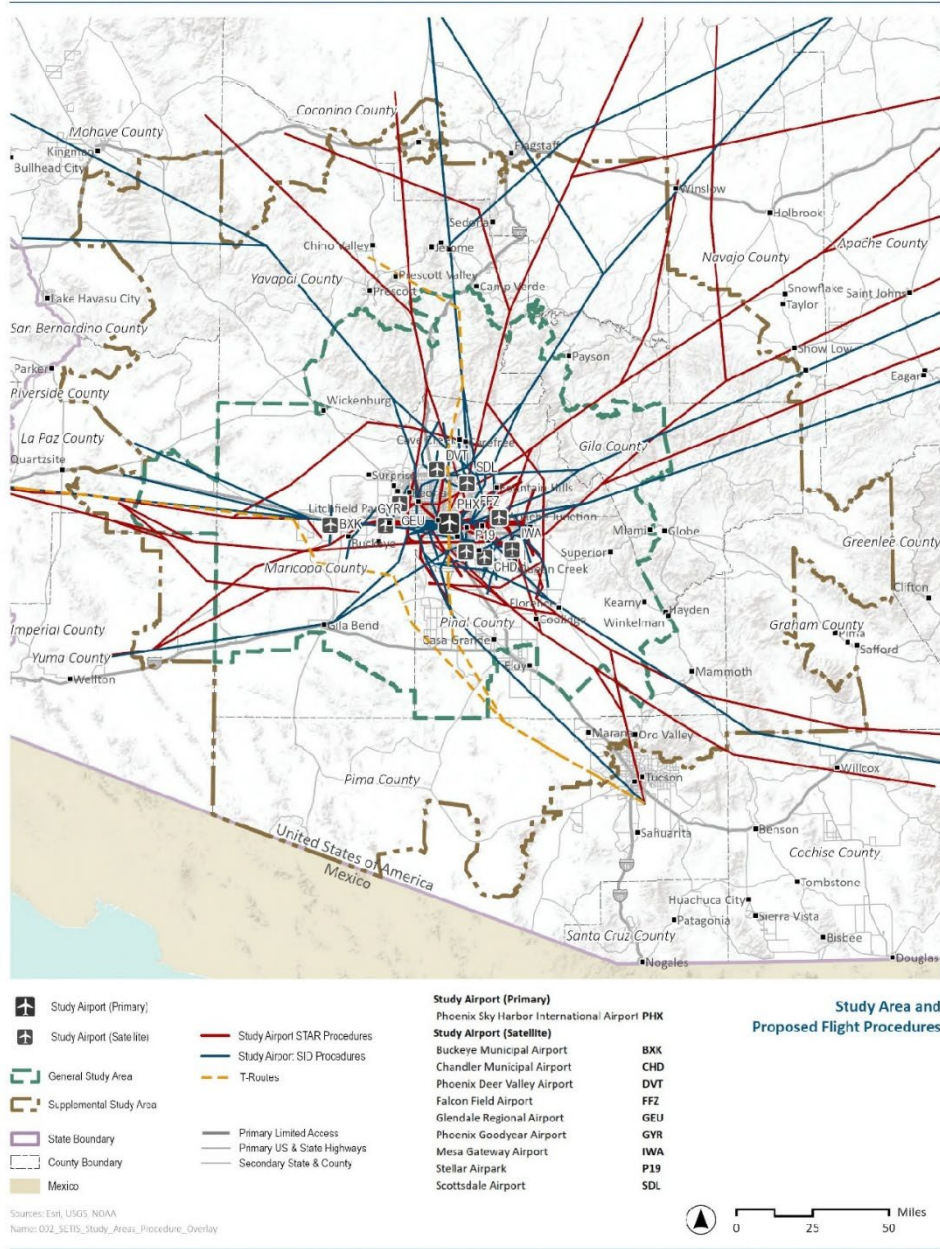
Huggins cont.

Exhibit 1: Project Study Areas



Huggins cont.

Exhibit 2. Project Study Areas and Proposed Flight Procedures



## Feld



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### Early Coordination for the Phoenix Area FAA Modernization Project - City of Phoenix Aviation Department Comment Letter

---

From Jordan D Feld <jordan.feld@phoenix.gov>

Date Tue 12/16/2025 12:58 PM

To Southerland, Christopher L (FAA) <Christopher.L.Southerland@faa.gov>; 9-AVS-ASW-PHX-Modernization-Comment (FAA) <PHX-Modernization-Comment@faa.gov>

Cc Chad Makovsky <chad.makovsky@phoenix.gov>; Helana Ruter <helana.ruter@phoenix.gov>

📎 1 attachment (590 KB)

Early Coordination Phoenix Area FAA Modernization Project - City of Phoenix Aviation Department Comment Letter\_jdf 121725.pdf;

Some people who received this message don't often get email from jordan.feld@phoenix.gov. [Learn why this is important](#)

**CAUTION:** This email originated from outside of the Federal Aviation Administration (FAA). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Please find the subject comment letter attached, thank you

### Jordan D. Feld, CM, AICP

Deputy Aviation Director

Planning & Environmental Division

Phoenix Sky Harbor International Airport

Phone: 602-273-4072

**PHX DVI BYR**

America's Friendliest Airport<sup>®</sup>

<https://skyharbor.com>

Feld cont.



December 17, 2025

Christopher L. Southerland  
Acting Director, Central Service Center  
FAA Air Traffic Organization  
via email: christopher.l.southerland@faa.gov

**Regarding: Early Coordination for the Phoenix Area FAA Modernization Project**

Mr. Southerland,

The City of Phoenix Aviation (City) has received your letter dated November 20, 2025, regarding the Early Coordination for the Phoenix Area FAA Modernization Project (Project). While the City generally opposes any changes to the airspace (as any change results in some level of community impact), we recognize the FAA must continue to seek opportunities for efficiency and safety improvements. We also commend FAA for the abundance of standing meetings set up for airport stakeholders leading up to the Spring 2026 outreach efforts and generally, we are appreciative of FAA's efforts to be transparent and inclusive of airport stakeholders in sharing proposed concepts before formal proposals are made official in early 2026. With that said, and in light of the troubling history of FAA airspace projects in our region, the City has several requests for the Project to go forward:

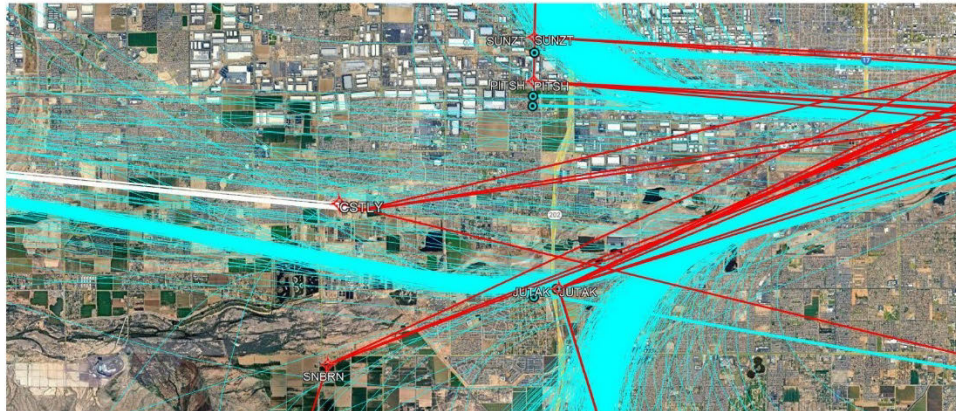
1. FAA should inform City prior to any public distribution, notice, letter or website posting of its intent and allow City to review the related draft content and recipient lists. The City commits to expedited review of these items so as to ensure the FAA's Project schedule. This additional step will help ensure communications are accurate and understandable to our community members as well as avoid unnecessary stress and confusion among stakeholders. As an example, the subject letter was distributed and posted online without the additional step described above which resulted in numerous community groups contacting the City in a state of panic; another example is the online posting failed to mention that PHX was one of the airports being studied when it is the primary airport being studied.
2. The FAA should provide the City the distribution lists for notices, letters and other intended outreach related to the project.
3. Section 106 consultation should include consultation with each historic district represented in the 2015 petition for review City of Phoenix vs Michael Huerta (FAA Administrator) and tribal communities impacted by the proposed airspace change (eg, Gila River Indian Community and Salt River Pima Maricopa Indian Community).
4. Has the FAA's 2016 Community Involvement Manual (CIM) been superseded by new guidance recommending outreach be limited to two virtual workshops? If not, can the FAA help the City understand why the FAA's Phoenix Area Project community engagement strategy seems to directly conflict with FAA policy: *"Public meetings enable the FAA to describe the proposed project directly to interested members of the community and allow participants to raise concerns that can be addressed through follow-up engagement efforts. While resources are required to*

Feld cont.

Page 2 of 3

*develop, set up, and travel to such events, in-person meetings can foster relationships. They can provide opportunities for informal discussions before and after the meeting and during breaks and allow participants to read body language and gauge emotions **more readily than in virtual meetings** or through written communications. Knowledge of and access to new technologies is not required.” (CIM 2.3.1 Public Meetings)*

5. Notwithstanding above, the City requests that FAA hold both in-person and virtual workshops, or a hybrid approach where the majority of technical FAA staff facilitate the meeting virtually, but FAA provides an in-person forum for each meeting (ie, a watch along). In-person workshops should be held in locations throughout the region and information at those meetings should be tailored to the proposed airspace changes in that area (for example, a meeting for the northern portion of the region would include mapping for PHX, DVT and SDL).
6. Virtual and in-person meetings must include materials translated in Spanish and technical representatives of the FAA should either be bi-lingual or accompanied by translators.
7. The City requests FAA’s understanding and commitment that the effect of any airspace change shall not change the 43<sup>rd</sup> Avenue initial western departure “gate” created by the Memorandum Regarding Implementation of Court Order (2017) nor shall it change the 4DME initial eastern departure gate created by the Tempe IGA (1994).
8. Related to above, the proposed ROBBE SID could be perceived to violate the Court Order as it assigns a new initial heading for a western SID. City requests FAA’s reconsideration of this route (shown below).



9. Also related to above, the City requests that the FAA chose names for new waypoints that are benign and would not result in additional public panic, such as the proposed waypoint “C[O]STLY” or “S[U]NB[U]RN”.
10. During the PBN Working Group Meetings held for the Project and discussions during Step 2 of the 2017 Court Order, FAA identified a Divergent Vectoring western SID for future consideration which would achieve a straight west departure (similar to that implemented in 2014). Is that routing still being considered?
11. City requests supplemental analysis as part of the NEPA Environmental Assessment; specifically, NEPA analysis should include modeling of proposed routes to show how aircraft will fly/vector-from these routes and should



2485 East Buckeye Road • Phoenix, Arizona 85034-4301 • Phone 602-273-3340 • TTY 7-1-1 Friendly

**Feld cont.**

Page 3 of 3

also include grid-point overflight analysis to determine which neighborhoods would experience a net increase of decrease of overflight (regardless of flight level or noise change).

In closing, thank you for the opportunity to provide early scoping comments on the Phoenix Area FAA Modernization Project. Please contact me at your convenience to discuss any details from this letter.

Respectfully,


Jordan D. Feld, CM, AICP  
Deputy Aviation Director, Planning & Environmental Division  
City of Phoenix Aviation Department  
jordan.feld@phoenix.gov  
602-273-4072

CC FAA Project, PHX-Modernization-Comment@faa.gov  
Helana Ruter, helana.ruter@phoenix.gov  
Chad Makovsky, chad.makovsky@phoenix.gov



2485 East Buckeye Road • Phoenix, Arizona 85034-4301 • Phone 602-273-3340 • TTY 7-1-1 Friendly

## Kuester

 Outlook

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### Phoenix Area FAA Modernization - City of Scottsdale Response

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**From** Kuester, Kelli <KKuester@Scottsdaleaz.gov>

**Date** Tue 12/16/2025 2:42 PM

**To** 9-AVS-ASW-PHX-Modernization-Comment (FAA) <PHX-Modernization-Comment@faa.gov>

**Cc** Wielebski, Rick <RWielebski@Scottsdaleaz.gov>; Perreault, Erin <EPERREULT@scottsdaleaz.gov>

 1 attachment (2 MB)

FAA Modernization Project - SDL.pdf;

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**Kuester cont.**

Good afternoon Christopher Southerland,

Please see the attachment in response to your letter dated November 20, 2025 regarding Early Coordination for the Phoenix Area FAA Modernization Project.

Thank you for the opportunity to provide input, please let us know if you have any questions.

**Kelli Kuester, C.M.**

Aviation Planning & Outreach Coordinator | City of Scottsdale

o 480-312-8482

Aviation Department  
15000 N. Airport Drive, Suite 100  
Scottsdale, AZ 85260

[www.scottsdaleaz.gov/airport](http://www.scottsdaleaz.gov/airport)

[Facebook](#) | [Twitter](#) | [Instagram](#)

**Kuester cont.**



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December 16, 2025

Phoenix Area FAA Modernization  
Operations Support Group  
FAA-ATO Central Service Center AJV C-250  
10101 Hillwood Pkwy  
Fort Worth, TX 76177

Subject: City of Scottsdale Response - Early Coordination for the Phoenix Area FAA Modernization Project

Dear Christopher Southerland,

Thank you for the opportunity to provide early input regarding the Phoenix Area FAA Modernization Project and the preparation of the Environmental Assessment (EA) under the National Environmental Policy Act (NEPA). The City of Scottsdale appreciates the FAA's request for feedback on potential environmental concerns, historic resources, and identification of parties to be included in the future Section 106 consultation process, as outlined in your letter dated November 20, 2025.

Based on the information provided, the city offers the following comments.

**1. Historic Properties and Culturally Sensitive Areas**

The City of Scottsdale maintains an official Historic Register, which includes designated historic districts, individual historic landmarks, and culturally significant resources that may warrant consideration in the Section 106 review. The FAA is encouraged to reference the full register, available through the [scottsdaleaz.gov](http://scottsdaleaz.gov) – keyword, "historic register" to ensure comprehensive identification of potentially affected resources.

In addition to designated resources, the City also manages non-designated properties with historic or archaeological sensitivity. These areas—particularly in southern Scottsdale and along key cultural corridors (i.e., Areas adjacent to the Indian Bend Wash) —should be evaluated as part of the Area of Potential Effects (APE), especially where changes in flight altitude or routing could alter noise conditions. Consequently, the city requests that these resources be included in the Area of Potential Effects (APE) when modeling potential acoustic or visual impacts.

**Kuester cont.**

**2. Noise and Community Impact Considerations**

Given the potential rerouting or altitude adjustments for aircraft below 10,000 ft AGL, the city recommends evaluating:

- Noise impacts on historic residential districts whose integrity relies on quiet residential character
- Impacts on Old Town Scottsdale's character area, including pedestrian-oriented environments sensitive to increased overhead activity
- Noise contour modeling should be provided in both existing and proposed conditions, including GIS files if available

**3. Environmental Sensitivity Areas**

Scottsdale requests that environmental modeling include:

- **McDowell Sonoran Preserve** - a large, protected desert preserve where quiet natural conditions are a defining attribute.
- **Parks and Greenbelts**- these locations support recreation and wildlife and may experience sensitivity to changes in low-altitude overflight.

**4. Identification of Community Groups and Stakeholders**

The following groups may have interest in the Section 106 process, public outreach, or potential noise impacts:

- Neighborhood Associations & Community Groups
- Scottsdale Historic Preservation Neighborhoods (Village Grove, Town and Country, Peaceful Valley, Villa Monterey, etc.)
- Old Town Scottsdale business associations
- McDowell Sonoran Conservancy
- SCANA (Scottsdale Coalition for Aircraft Noise Abatement)
- DC Ranch HOA
- McDowell Mountain Ranch HOA
- Stonebrook & Stonebrook II HOA
- Troon HOA

**Kuester cont.**

**5. Request for Continued Participation**

The City of Scottsdale requests to be included as an official consulting party for the Section 106 process and as a reviewing agency for the Environmental Assessment. Please continue to include:

- Planning & Development Department / Scottsdale Historic Preservation Office
- Scottsdale Airport / Aviation staff

The city also requests advance notice of public meetings, data releases, Draft Environmental Assessment availability, and any findings of effect.

**6. Additional Technical Information Requested**

To support future review, Scottsdale requests the following materials when available:  
GIS shapefiles for the proposed flight paths and altitudes  
Noise contour modeling (existing vs. proposed)  
Description of expected changes in flight frequency  
Clarification regarding nighttime operations or changes in area navigation procedures  
Any early findings related to impacts on quiet parks, preserves, or historic districts

The City of Scottsdale appreciates the opportunity to provide early coordination input.

Sincerely,



Rick Wielebski  
Aviation Director

CC:

Erin Perreault - Sr. Director/Zoning Administrator Planning & Development Services  
Kelli Kuester - Aviation Planning & Outreach Coordinator

## Daniel

 Outlook

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**RE: Early Coordination for the Phoenix Area FAA Modernization Project**

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**From** 9-CSA-AFREP (FAA) <9-csa-afrep@faa.gov>

**Date** Fri 12/19/2025 10:13 AM

**To** 9-AVS-ASW-PHX-Modernization-Comment (FAA) <PHX-Modernization-Comment@faa.gov>

**Cc** Rodolfo Cancino <rodolfo.cancino.2@us.af.mil>; AETC Airspace and Ranges <aetc.airspace.ranges@us.af.mil>;  
Jamie Flanders <jamie.flanders.2@us.af.mil>; ACC/A3AA Airspace Operations Team <acc.a3aa@us.af.mil>

**Daniel cont.**

Good morning,

As part of this study, the U.S. Air Force requests FAA develop route options that allow military access to the fully charted volume of the Outlaw and Jackal airspaces.

Please let me know if you have any questions or concerns regarding the USAF input.

v/r  
Lt Col Daniel

RACHEL S. DANIEL, Lt Col, USAF  
AFREP, Central Service Area  
Fort Worth, TX 76177  
Office: 817-222-5911  
Cell: 918-440-5296  
Org Email: [9-csa-afrep@faa.gov](mailto:9-csa-afrep@faa.gov)

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**From:** 9-AVS-ASW-PHX-Modernization-Comment (FAA) <PHX-Modernization-Comment@faa.gov>

**Sent:** Thursday, November 20, 2025 10:23 AM

**To:** 9-CSA-AFREP (FAA) <9-csa-afrep@faa.gov>

**Subject:** Early Coordination for the Phoenix Area FAA Modernization Project

Dear Stakeholder,

The Federal Aviation Administration (FAA) is initiating an Environmental Assessment (EA) for the Phoenix Area FAA Modernization Project. This effort will evaluate potential environmental impacts associated with changes to aircraft flight paths and altitudes in the region.

Please see the attached letter for additional details, including information on the study areas, process, and opportunities to provide timely feedback.


Thank you for your attention and participation.

Sincerely,  
Federal Aviation Administration

## Dunning

4/20/26, 3:41 PM

US EPA Region 9 contact for Phoenix Modernization Project - Scott Polzin - Outlook

 Outlook

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### US EPA Region 9 contact for Phoenix Modernization Project

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**From** Dunning, Connell <Dunning.Connell@epa.gov>

**Date** Fri 2/20/2026 4:29 PM

**To** 9-AVS-ASW-PHX-Modernization-Comment (FAA) <PHX-Modernization-Comment@faa.gov>

**Cc** Nguyen, Martin <Nguyen.Martin@epa.gov>

You don't often get email from dunning.connell@epa.gov. [Learn why this is important](#)

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We understand that there is currently a NEPA analysis underway for the Phoenix Area FAA Modernization.

Thank you for the hard copy mailing dated November 20<sup>th</sup>, 2025.

For future outreach regarding this project, the EPA requests correspondence via email.

Please update the EPA Region 9 Contact to be: Martin Nguyen, at [Nguyen.Martin@epa.gov](mailto:Nguyen.Martin@epa.gov).

If hard copy mailing is required:

**Martin Nguyen, NEPA Aviation Lead**  
U.S. Environmental Protection Agency, Region 9  
Environmental Review Section 2  
75 Hawthorne St, Mail Code CED-2  
San Francisco, California 94105

Thank you,  
Connell Dunning

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**Connell Dunning, NEPA Transportation Lead**  
U.S. Environmental Protection Agency, Region 9  
Environmental Review Section 2  
(415) 947-4161 | [dunning.connell@epa.gov](mailto:dunning.connell@epa.gov)  
75 Hawthorne St, Mail Code CED-2 | SF, California 94105

## F.2.5.5 *Members of the Public*

### **Brown**



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#### **Flight routes over Goodyear**

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From Dawn Brown <dbgb1980@icloud.com>

Date Wed 11/26/2025 11:49 AM

To 9-AVS-ASW-PHX-Modernization-Comment (FAA) <PHX-Modernization-Comment@faa.gov>

[You don't often get email from dbgb1980@icloud.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

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To whom it may concern:

Recently, the flight path ( Presumably from the Phx/Goodyear airport) has changed and my house is now under the new route! It is frustrating and causes a hardship on my family with the constant noise pollution. I'm requesting the flight path return to its former route. What can be done to alleviate this intrusion to entire neighborhoods?

Dawn

Sent from my iPad

## Jacobson

 Outlook

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### Do Not Change Phoenix Sky Harbor Airport flight path

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From PJF BLJ <deadlogclaim@gmail.com>

Date Mon 12/1/2025 12:03 AM

To 9-AVS-ASW-PHX-Modernization-Comment (FAA) <PHX-Modernization-Comment@faa.gov>

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**CAUTION:** This email originated from outside of the Federal Aviation Administration (FAA). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Do not change the flight path for either the western approach or take-off of Phoenix Sky Harbor airport. The west approach is over the riverbed of the Rio Salado. No one lives there and the banks of the riverbed are lined by warehouses, other commercial establishments, the occasional junk yards or vacant land owned by the City of Phoenix. The airport itself sits adjacent to the Rio Salado.

For as long as I can remember, and I have lived here almost 70 years, the airport has used the riverbed for take-offs and landings. As a result the area in the airport's flight path has development aware of the noise generated by the planes but due to the nature of the businesses, unaffected by the noise.

Only once do I recall the FAA implementing a deviation from the riverbed and it did not go well. Instead of taking off and landing over the dry riverbed, planes made violent turns away from the riverbed and flew low over the center of Phoenix and several historic neighborhoods. The results were awful. Noise from the planes was relentless making it difficult to be outside due to the noise. It was even difficult to sleep inside as the planes made noise late into the night. Mercifully, after months of annoyance, the flight path was restored to go over the Rio Salado.


The Rio Salado offers the perfect flight path for Sky Harbor airport and has been doing so for as long as I can remember. Please do not change the western approach to or from Phoenix Sky Harbor airport.

Bram Jacobson

2206 N. 11th Ave.

Phoenix, Arizona 85007

## Rhodes

 Outlook

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### Request to be added to list: consulting party status

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From Melissa <melissa.rhodes.az@gmail.com>

Date Fri 12/19/2025 6:02 PM

To 9-AVS-ASW-PHX-Modernization-Comment (FAA) <PHX-Modernization-Comment@faa.gov>

You don't often get email from melissa.rhodes.az@gmail.com. [Learn why this is important](#)

**CAUTION:** This email originated from outside of the Federal Aviation Administration (FAA). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hello, I was looking for information about why there are so many loud aircraft flying over my neighborhood now, and discovered that they may be changing flight patterns and adding flights over our neighborhood? My neighborhood already deals with noise from the SR-51 freeway, and now it seems we are being piled on with annoying low flying aircraft. There have been both helicopters and small planes flying over my home that I can hear INSIDE my house. Last night there was a plane flying over around 9-9:30pm. I need information on why this is happening, and if there is an advisory board of people who are impacted, I am requesting to be added to it. The freeway noise already impacts our neighborhood. Constant increased noise exposure (like low flying aircraft noise) has been documented to cause serious health problems. I intentionally did not buy a home in the range of airport noise. I am miles away from the airport, so I do not understand why my neighborhood is being impacted.

I would like some answers please.

Melissa Rhodes  
602-918-4441  
4121 N 18th St  
Phoenix, AZ 85016

### F.3 Draft EA Release and Public Review and Comment Period

On February 20, 2026, the FAA updated the Project Community Engagement website<sup>11</sup> notifying the public that in May 2026, they will be hosting a series of four virtual public workshops to present the Project, including existing regional airspace operations, proposed procedure updates, and findings from the Draft EA. A Zoom link will be available on the Project website in advance of the workshops. During these workshops, the public will also be provided with the opportunity to ask questions about the Project and receive answers.

On April 29, 2026, the FAA published a Notice of Availability (NOA) and Request for Comment on the Draft EA on the FAA's Project Community Engagement website<sup>12</sup> and in the following local newspapers: Arizona Capitol Times, La Voz, Casa Grande Dispatch, East Valley Tribune, and West Valley View. Copies of the NOA and proofs of publication of the newspaper notice announcing the availability of the Draft EA and opportunity for public comment will be provided in this appendix in the Final EA.

Public workshops will be held on the following dates and times:

PHX

May 13, 2026

Hours: 10:00 a.m. – 12:00 p.m.

West Valley Airports (GEU, GYR, BXK)

May 14, 2026

Hours: 5:00 p.m. – 7:00 p.m.

North Valley Airports (DVT, SDL)

May 19, 2026

Hours: 5:00 p.m. – 7:00 p.m.

East Valley Airports (FFZ, IWA, CHD, P19)

May 20, 2026

Hours: 5:00 p.m. – 7:00 p.m.

Community engagement is still ongoing and details related to the public workshops, including public comments received during the comment period and responses to those comments, will be provided in the Final EA. **Appendix G** is reserved for documenting the comments received on the Draft EA.

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<sup>11</sup> [https://www.faa.gov/air\\_traffic/community\\_engagement/phx](https://www.faa.gov/air_traffic/community_engagement/phx)

<sup>12</sup> Ibid.

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