



**Federal Aviation Administration**

**Finding of No Significant Impact (FONSI)**

**and**

**Record of Decision (ROD)**

**and**

**Agency Concurrence Letters, Public Comment Letters and Responses  
to Comments, and Environmental Assessment Errata**

**For the North Texas Optimization of the Airspace and Procedures in  
the Metroplex (North Texas OAPM)**

**June 2014**



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**Attachment: Agency Concurrence Letters, Public Comment Letters and Responses to Comments, and Environmental Assessment Errata**

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## **Federal Aviation Administration**

### **Finding of No Significant Impact (FONSI) and Record of Decision (ROD)**

### **For the North Texas Optimization of the Airspace and Procedures in the Metroplex (North Texas OAPM)**

**June 2014**

#### **I. INTRODUCTION**

This document serves as the Federal Aviation Administration's (FAA) Finding of No Significant Impact and Record of Decision (FONSI/ROD) for *the North Texas Optimization of Airspace and Procedures in the Metroplex (North Texas OAPM) Project*. It is based on the information and analysis contained in the Environmental Assessment (EA) dated September 2013, Responses to Comments, and EA Errata dated February 2014; attached hereto and incorporated by reference. The FONSI/ROD has been prepared in compliance with the National Environmental Policy Act of 1969 (NEPA) (42 United States Code (U.S.C.) Section 4321 *et seq.*); implementing regulations issued by the Council on Environmental Quality (CEQ) (40 Code of Federal Regulations (CFR), parts 1500-1508); and FAA Order 1050.1E, *Environmental Impacts: Policies and Procedures*, effective March 20, 2006 ("FAA Order 1050.1E"). This FONSI/ROD is also used by the FAA to demonstrate and document its compliance with procedural and substantive requirements under aeronautical and environmental laws, as well as laws and regulations that apply to FAA decisions on proposed actions.

Furthermore, this FONSI/ROD:

- Documents the FAA's finding that the North Texas OAPM will not have significant environmental impacts and explains the basis for that finding; and,

- Approves certain Federal actions associated with the implementation of the Proposed Action. Implementation of the Proposed Action will result in no airport-related development, land acquisition, construction, or other ground disturbance activities.

In approving the North Texas OAPM, the FAA has considered 49 U.S.C. § 40101(d)(4), which gives the FAA various responsibilities and holds it accountable for controlling the use of navigable airspace and regulating civil and military operations in that airspace in the interest of safety and efficiency. Additionally, consideration has been given to 49 U.S.C. § 40103(b), which authorizes and directs the FAA Administrator to develop plans and policy for the use of the navigable airspace and assign by regulation or order the use of the airspace necessary to ensure the safety of aircraft and the efficient use of airspace. This statute further authorizes and directs the FAA Administrator to prescribe air traffic rules and regulations governing the flight of aircraft, for the navigation, protection, and identification of aircraft, and the protection of persons and property on the ground, and for the efficient utilization of the navigable airspace, including rules as to safe altitudes of flight and rules for the prevention of collisions between aircraft, between aircraft and land or water vehicles, and between aircraft and airborne objects.

Furthermore, the FAA has given careful consideration to the aviation safety and operational objectives of the North Texas OAPM in light of the various aeronautical factors and judgments presented; the need to enhance efficiency of the national air transportation system; and the potential environmental impacts of the project.

## **II. BACKGROUND**

The FAA is in the process of implementing the Next Generation Air Transportation System (NextGen), the FAA's plan to modernize the National Airspace System (NAS) through 2025. NextGen is intended to develop and implement new technologies, while integrating existing technologies and adapting the air traffic management system to a new way of operating. NextGen represents an evolution from an air traffic control system that is a primarily ground-based system to a system that is satellite-based and will allow the FAA to guide and track air traffic more precisely and efficiently. To achieve NextGen goals, the FAA is implementing new Area Navigation (RNAV) and Required Navigation Performance (RNP) air traffic routes and instrument procedures (RNAV Standard Instrument Departures (SIDs), Standard Terminal Arrival Routes (STARs), and Standard Instrument Approach Procedures (SIAPs) around the country that use emerging technologies and aircraft navigation capabilities. The implementation of RNAV and RNP procedures enables the use of other Performance Based Navigation (PBN) technology in the NAS, and facilitates more efficient procedures such as Optimized Profile Descents (OPD). The OAPM initiative is considered a midterm implementation step in the overall process of transitioning to the NextGen System. The FAA proposed the design and implementation of RNAV procedures that would take advantage of the technology readily available in the majority of aircraft to help improve the efficiency of the airspace in the North Texas Metroplex. Implementing RNAV procedures will also fulfill the requirements of the Modernization and Reform Act of 2012. The OAPM initiative specifically addresses airspace congestion, airports in close geographical proximity, and other limiting factors, such as Special

Use Airspace (SUA), that reduce efficiency in busy Metroplex airspace. Efficiency is improved by expanding the implementation of RNAV-based standard instrument procedures and connecting the routes defined by the standard instrument procedures to high and low altitude RNAV routes. Efficiency would also be increased by taking advantage of RNAV to maximize the use of the limited airspace in congested Metroplex environments.

The North Texas OAPM initiative is intended to address specific issues related to the efficient flow of traffic in and out of the North Texas Metroplex. A “Metroplex” is a geographic area covering several airports, serving major metropolitan areas, and a diversity of aviation stakeholders.

### **III. PROPOSED ACTION**

The Proposed Action is the implementation of optimized RNAV SID and STAR procedures and RNP-AR approaches that would reduce reliance on conventional procedures. The Proposed Action consists of development of standard air traffic procedures to enhance efficient handling and movement of air traffic, while maintaining safety, into and out of the North Texas Metroplex airspace. The Proposed Action includes:

- 32 RNAV STARs (32 new RNAV STARs)
- 29 RNAV SIDs (21 new RNAV SIDs and 8 modified RNAV SIDs)
- 13 Conventional STARs (1 new Conventional STAR, 7 modified Conventional STARs and 5 existing Conventional STARs)
- 16 Conventional SIDs (16 existing Conventional SIDs)
- 6 RNP Authorization Required (AR) approaches (6 new RNP-ARs approaches)

The Proposed Action includes 96 procedures: 60 new procedures, 15 modified procedures, and 21 existing procedures. Of the 60 new procedures, 21 procedures are RNAV SIDs, 32 are RNAV STARs, one is a conventional STAR, and 6 are RNP-ARs. Of the 15 modified procedures 8 were RNAV SIDs and 7 were conventional STARs. In total, the Proposed Action will provide 61 RNAV, 6 RNP-AR, and 29 conventional procedures for the North Texas Metroplex area.

The Proposed Action would improve operational efficiency through use of new or modified procedures which (1) improve the flexibility in transitioning traffic between en route and terminal area airspace and between terminal area airspace area and the runways; (2) improve the segregation of arrivals and departures in terminal area and en route airspace and reduce complex converging flight paths; and (3) provide RNAV arrival and departure en route transitional and terminal area airspace procedures for individual runways with the intent to provide a more predictable ground and vertical path. Chapter 3 of the EA provides details on the Proposed Action.

Implementation of the Proposed Action would not require any ground disturbance or development of facilities, such as additional runways or taxiways, nor would it require local or state action, such as permitting. Therefore, the implementation of the proposed changes to

procedures in the North Texas Metroplex would not require any physical alterations to environmental resources identified in FAA Order 1050.1E.

The Proposed Action consists only of procedural changes intended to more efficiently serve the Study Airports and to improve the flexibility and predictability of air traffic routes in transitioning traffic, improve the segregation of arrivals and departures, and provide RNAV arrival and departure en route transitional and terminal area airspace procedures to provide a more predictable ground and vertical path. Therefore, implementation of the Proposed Action would not increase the number of aircraft operations in the North Texas Metroplex airspace when compared to the No Action Alternative. The target date for implementation of the North Texas OAPM procedures is no later than September 29, 2014.

#### **IV. PURPOSE AND NEED FOR THE PROPOSED ACTION**

Chapter 2 of the EA documents the need (problem) and purpose (goal) for the airspace and procedure optimization in the North Texas Metroplex area. The North Texas OAPM project consisted of a Study Team phase, which analyzed the North Texas Metroplex operational challenges and explored opportunities to optimize air traffic procedures. The Study Team concluded that the existing published air traffic procedures in the North Texas Metroplex are inefficient, inflexible, and unnecessarily complex in consideration of recent advances in technology. Three key factors were identified by the North Texas Metroplex Study Team as causes for inefficiencies in the North Texas Metroplex air space:

- Lack of flexibility in the efficient transfer of traffic between the en route and terminal area airspace
- Complex converging interactions between arrival and departure flight paths
- Lack of predictable standard routes defined by procedures to/from airport runways to/from en route airspace

These three factors demonstrate the need for the Proposed Action.

The purpose of the Proposed Action is to take advantage of the benefits of performance based navigation (PBN) by implementing RNAV procedures that will help improve the efficiency of the airspace in the North Texas Metroplex. The Proposed Action would address the three key factors causing the inefficiencies in the airspace. Specifically, the objectives of the Proposed Action are as follows:

- Improve the flexibility in transitioning traffic between en route and terminal area airspace and between terminal area airspace area and the runways
- Improve the segregation of arrivals and departures in terminal area and en route airspace and reduce complex converging flight paths
- Provide RNAV arrival and departure en route transitional and terminal area airspace procedures to provide a more predictable ground and vertical path.

## V. ALTERNATIVES

The following provides a summary of the alternatives development process and alternatives considered. Further details are available in Chapter 3 of the EA.

***Identification and Evaluation of Potential Alternatives*** - In September 2010, the NTX OAPM Study Team (Study Team) began work to define operational problems in the North Texas Metroplex and to identify potential solutions. The Study Team included experts on the Air Traffic Control (ATC) system. The work completed was intended to provide a guide for later design efforts by the NTX OAPM Design and Implementation (D&I) Team. The Study Team met with and obtained input from local FAA facilities, airspace users (e.g., pilots), and aviation industry representatives to learn more about the challenges of operating in the North Texas Metroplex. These meetings helped identify operational challenges related to individual procedures and potential solutions that would increase efficiency. Initially, the Study Team identified over 105 issues related to existing procedures in the North Texas Metroplex. As the Study Team identified additional issues, they were grouped together into 17 generalized categories based on similarity. Next the Study Team identified potential designs for arrival and departure procedures that would address the identified issues. The modifications proposed were conceptual in nature, and did not include a detailed technical assessment, which was reserved for the D&I Team to conduct.

Following completion of the Study Team's Final Report in March 2011, the D&I Team began work on the procedure designs in July 2011. First, the Study Team proposals were prioritized based on complexity, interdependencies with other procedures, and degree of potential benefit to the Metroplex. Second, the D&I Team divided into workgroups to further develop and refine the Study Team proposals into preliminary designs. Finally, the preliminary designs were brought to the whole D&I Team for review and modification, if necessary. The D&I Team adopted, refined, rejected, and added to the proposal elements recommended by the Study Team. Airspace users and environmental specialists were regularly engaged for feedback throughout deliberations. In developing the proposed procedures, the D&I Team was responsible for following regulatory and technical guidance as well as meeting criteria and standards in three general categories: RNAV design criteria and Air Traffic Control regulatory requirements, operational criteria, and safety factors.

To ensure that procedures included in the Proposed Action were viable, the D&I team undertook validation exercises that further refined the procedures. To reach the milestones, the D&I Team relied on the use of design solution tools (e.g., design and testing software), and applied the criteria described above. The combined final procedure designs have been brought forward in this EA as the Proposed Action alternative.

***Alternatives Analyzed in the EA*** – In addition to the Proposed Action (described above), the EA also analyzed the No Action Alternative. Under the No Action Alternative, the procedures in use in the North Texas Metroplex as of 2011 (representing existing conditions) would generally remain the same. The only modification from today would be a change to the DUMPY FOUR arrival serving both DFW and DAL. This modification would correct ground tracks of arriving

aircraft to account for historical wind drift<sup>1</sup>. In addition, at a few airports, the location of landing thresholds on the runways will change as a result of independent projects due to capital improvements. These changes would have independent utility from the Proposed Action and would be implemented in the absence of the Proposed Action.

The 50 currently published SIDs and STARs in the North Texas Metroplex serving the North Texas OAPM Study Airports that comprise the No Action Alternative include:

- 16 RNAV SIDs
- 17 conventional (i.e., non-RNAV) SIDs
- 17 conventional (i.e., non-RNAV) STARs

The existing conventional arrival and departure procedures and existing RNAV departure procedures would remain as is, subject to minor, periodic reviews and revisions in response to changes in the operational environment (i.e., magnetic variation changes; obstruction surveys, and changes in FAA Air Traffic Control regulations). The No Action Alternative would not implement the specific procedures designed as part of the North Texas OAPM project.

The No Action Alternative would not meet the purpose and need for the project. It would not improve the efficiency of the airspace nor address any of the three key causal factors for airspace inefficiency. Furthermore, the No Action Alternative would not meet the congressional mandate to implement additional RNAV procedures.

## **VI. AFFECTED ENVIRONMENT**

To describe the conditions in the North Texas Metroplex, the FAA developed a General Study Area (GSA). The GSA for this project includes the geographic area in which natural resources and the human environment could be potentially affected by the Proposed Action and its reasonable alternative. Paragraph 14.5e of Appendix A to FAA Order 1050.1E, requires consideration of impacts of airspace actions from the surface to 10,000 feet AGL if the study area is larger than the immediate area around an airport or involves more than one airport. Furthermore, policy guidance issued by the FAA Program Director for Air Traffic Airspace Management states that for air traffic project environmental analyses noise impacts should be evaluated for proposed changes in arrival procedures between 3,000 and 7,000 feet AGL and departure procedures between 3,000 and 10,000 feet AGL for large civil jet aircraft weighing over 75,000 pounds.

In developing the GSA, the FAA collected radar data from flight paths in the North Texas Metroplex. The size of the GSA is based on aircraft arrivals and departures at the Study Airports identified in Table 4-1 of the EA. The Study Airports include two major airports:

- Dallas Fort Worth International Airport (DFW)
- Dallas Love Field Airport (DAL)

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<sup>1</sup> Impacts associated with modifications to DUMPY FOUR are considered in the cumulative impacts section.

The Study Airports also include the following nine airports:

- Addison Airport (ADS)
- Arlington Municipal Airport (GKY)
- Collin County Regional Airport at McKinney (TKI)
- Dallas Executive (RBD)
- Denton Municipal Airport (DTO)
- Fort Worth Alliance Airport (AFW)
- Fort Worth Meacham International Airport (FTW)
- Fort Worth Naval Air Station Joint Reserve Base / Carswell Field (NFW)
- Fort Worth Spinks Airport (FWS)

The GSA was designed to capture all flight paths identified for the No Action Alternative using 2011 radar data (the latest year of complete data available at the time the EA process began) and the flight paths designed as part of the Proposed Action up to the point at which 95 percent of departing aircraft are above 10,000 ft. AGL and 95 percent of arriving aircraft are above 7,000 ft. AGL.

The resulting GSA consists of the area within a 60 nautical mile (NM) radius of DFW for evaluating potential impacts of proposed changes in aircraft routings below 10,000 ft. AGL. The GSA includes all or part of 29 counties in Texas and Oklahoma (26 in Texas and 3 in Oklahoma). Exhibit 4-1 of the EA depicts the GSA and Table 4-2 of the EA lists the individual counties.

As discussed in Section 4.1.1 of the EA, aircraft flight altitudes were identified for both the Proposed Action and No Action Alternative using the 2011 radar data. The analysis of radar data included an assessment of existing flight tracks and profiles (altitudes) as well as consideration of proposed flight tracks and profiles (altitudes). The radar data obtained to determine existing noise conditions is further discussed in Section 4.3.1 of the EA.

Detailed information regarding the affected environment with respect to each relevant impact category is presented in Chapter 4 of the EA.

## **VII. ENVIRONMENTAL CONSEQUENCES**

The FAA analyzed the potential environmental impacts that could result from implementation of the Proposed Action as well as the impacts associated with the No Action Alternative on all relevant environmental impact categories specified in FAA Order 1050.1E. The FAA evaluated both alternatives for conditions in 2014, the first year of implementation of the optimized air traffic procedures under the Proposed Action, and 2019, five years after expected implementation of the Proposed Action.

The Proposed Action would not involve land acquisition, physical disturbance, or construction activities and, therefore, would not affect certain environmental impact categories. The following environmental resource categories would remain unaffected because either the resource does not exist within the General Study Area or it would not be affected by the

activities associated with the Proposed Action. The unaffected resource categories or sub-categories include:

- Coastal Resources
- Construction Impacts
- Farmlands
- Fish, Wildlife and Plants (Fish and Plants sub-categories only)
- Floodplains
- Hazardous Materials
- Pollution Prevention, and Solid Waste
- Light Emissions and Visual Impacts (Light Emissions sub-category only)
- Natural Resources and Energy Supply (Natural Resources sub-category only)
- Socioeconomic Impacts, Environmental Justice, and Children's Environmental Health and Safety Risks (Socioeconomic Impacts and Children's Environmental Health and Safety Risks sub-categories only)
- Water Quality
- Wetlands
- Wild and Scenic Rivers

The Proposed Action would not cause changes in patterns of population movement or growth, public service demands, or business and economic activity. In addition, the Proposed Action does not involve construction or other ground disturbing activities that would involve the relocation of people or businesses. Furthermore, the Proposed Action does not include the construction of airport facilities that would result in or induce an increase in operational capacity. Thus, the Proposed Action would not result in Secondary or Induced impacts.

Those environmental impact categories that could potentially be affected by the Proposed Action are discussed further below.

### **Noise**

As required by FAA Order 1050.1E, the Noise Integrated Routing System (NIRS) was used to model the noise impacts for the North Texas OAPM project because the project involves a study area larger than the immediate vicinity of an airport, incorporates more than one airport, and includes actions above 3,000 AGL. As stated in Section 4.3.1, of the EA, in order to comply with NEPA, the FAA followed the requirements for aircraft noise assessment specified in FAA Order 1050.1E, which requires that aircraft noise be analyzed in terms of the yearly Day-Night Average Sound Level (DNL) metric<sup>2</sup>. In practice, this requirement means that DNL is computed for an average annual day (AAD) of operations for the year of interest.

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<sup>2</sup> DNL is the Day Night Average Sound Level. It is a single value representing the aircraft sound level over a 24-hour period. To represent the greater annoyance caused by a noise at night, the DNL metric includes a 10-decibel penalty weighting for noise occurring between 10:00 pm and 6:59 am.

As discussed in Section 4.3.1 of the EA, a total of 649,792 IFR-filed flights from/to the Study Airports were identified through an examination of radar data obtained from the FAA's Performance Data Analysis and Reporting System (PDARS). This data was used to develop the AAD fleet mix, time of day (day and night) and runway use input for NIRS for the Existing Conditions.

The AAD flight schedules were prepared to support the aircraft noise analysis for the OAPM project EA. The AAD flight schedules continue to remain available for review on the North Texas OAPM EA website: [http://www.oapmenvironmental.com/ntx\\_metroplex/ntx\\_introduction.html](http://www.oapmenvironmental.com/ntx_metroplex/ntx_introduction.html). The AAD flight schedules were developed to represent activity for the study years 2014 and 2019 and were used to model future noise exposure (see Section 5.1 of the EA). The AAD flight schedules for the 2014 and 2019 study years were developed based on the 2011 FAA Terminal Area Forecast (TAF), released in January 2012. The TAF is the official forecast of aviation activity at FAA facilities and is updated annually. As stated in the AAD flight schedules, the TAF forecast for DAL includes the expiration of the Wright Amendment in 2014.

Noise was analyzed for both the Proposed Action and the No Action Alternative during the year in which implementation of the Proposed Action would be initiated (2014) and a five-year look-ahead (2019). The NIRS model computed DNL exposure values at three sets of data points throughout the General Study Area:

1. 2010 United States Census Bureau population census block centroids (center point of a census block; 98,297 census block centroids representing 6,745,544 people)
2. Unique points representing certain specific cultural resources and areas potentially protected under Section 4(f) of the Department of Transportation Act (DOT Act) (49 U.S.C. § 303(c)), and historic properties protected under Section 106 of the National Historic Preservation Act (NHPA) (16 U.S.C. § 470 et seq.) (1218 grid points representing sites of interest)
3. A uniform grid covering the General Study Area (using 0.5 and 1.0 nautical mile spacing) to document aircraft DNL exposure levels at potential noise sensitive locations that were not otherwise identified (42,998 uniform grid points, including 28,490 grid points at 0.5 NM intervals and 14,508 grid points at 1.0 NM covering the study area)

The results calculated the differences in DNL noise exposure between the two alternatives (Proposed Action compared to No Action Alternative) to determine if implementing the Proposed Action would result in significant noise impacts. FAA applied its criteria of significance, an increase of 1.5 dB DNL or more on any noise sensitive area within areas exposed to 65 dB DNL or higher, to determine whether the project would result in a significant noise impact. In addition, as stated in the Noise Technical Report, for air traffic actions where the study area is larger than the immediate vicinity of the airport, incorporates more than one airport, or includes actions above 3000 ft. AGL, FAA Order 1050.1E also states that NIRS will be used to produce change-of-exposure tables and maps at population centroids using the following screening criteria: changes of 5.0 dB or greater for DNL 45-60 and changes of 3.0 dB or greater for DNL 60-65. These changes are referred to as reportable noise increases. Therefore, the analysis also identified any DNL increase of 3 dB or higher in areas exposed to noise between DNL

60 dB and 65 dB and any DNL increase of 5 dB or higher in areas exposed to noise between DNL 45 dB and 60 dB. While the EA refers to such increases as a “reportable noise increase,” they are not significant. The results of the NIRS modeling indicated that:

1. The Proposed Action would not result in a DNL 1.5 dB or higher increase in noise-sensitive areas exposed to aircraft noise at or above DNL 65 dB
2. The Proposed Action would not result in DNL increases of 3 dB or higher in areas exposed to noise between DNL 60 dB and 65 dB
3. The Proposed Action would not result in a DNL increase of 5 dB or higher in areas exposed to noise between DNL 45 dB and 60 dB

As depicted in Exhibits 5-1 and 5-2 of the EA, no population would experience increases in aircraft noise exposure that would be considered significant (DNL 1.5 dB or higher increase in noise-sensitive areas exposed to aircraft noise at or above DNL 65 dB) in 2014 or 2019 as a result of the Proposed Action. Thus, the Proposed Action would not result in significant noise impacts. Accordingly, no mitigation is required per FAA Order 1050.1E, Appendix A, paragraph 14.4c.

### **Compatible Land Use**

The compatibility of existing and planned land uses in the vicinity of an airport is usually associated with the extent of the airport’s noise impacts. If the noise analysis concludes that there is no significant impact, a similar conclusion usually may be drawn with respect to compatible land use. Because the Proposed Action is not expected to have significant noise impacts (as measured by changes in noise exposure at populated census block centroids) in 2014 and 2019, there would be no compatible land use impacts. Although there were a few grid point locations where the Proposed Action would cause increases of less than DNL .5 dB within the DNL 65 dB contour, these increases are considered *de minimis* because they are not perceptible and are will below the 1.5 DNL dB trigger for significance.

### **Department of Transportation Act, Section 4(f)**

Section 4(f) of the DOT Act (codified at 49 U.S.C. § 303(c)), states that, subject to exceptions for *de minimis* impacts:

*“... the Secretary may approve a transportation program or project (other than any project for a park road or parkway under section 204 of title) requiring the use of publicly owned land of a public park, recreation area, or wildlife and waterfowl refuge of national, State, or local significance, or land of an historic site of national, State, or local significance (as determined by the Federal, State, or local officials having jurisdiction over the park, area, refuge, or site) only if —*

- (1) there is no prudent and feasible alternative to using that land; and*
- (2) the program or project includes all possible planning to minimize harm to the park, recreation area, wildlife and waterfowl refuge, or historic site resulting from the use.”*

The term “use” includes both physical and indirect or “constructive” impacts to Section 4(f) properties. Direct use is the physical occupation or alteration (direct use) of a Section 4(f) property or any portion of a Section 4(f) property. A constructive use would occur when an action would result in substantial impairment of a resource to the degree that the activities, features, or attributes of the resource that contribute to its significance or enjoyment are substantially diminished.

FAA identified resources within the General Study Area that had the potential to qualify for protection under Section 4(f) of the DOT Act. No land acquisition, construction, or other ground disturbance activities would occur under the Proposed Action; therefore, the Proposed Action would not physically use any potential Section 4(f) resources. Consequently, the focus of the evaluation of potential Section 4(f) resources was adverse impacts that have the potential to result in a constructive use.

The inventory of 4(f) resources evaluated in Appendix F, including historic properties in Appendix G, includes the name, state, geographical coordinates (latitude and longitude) of each potential resource and presents the calculated noise exposure values under 2011 existing conditions and Proposed Action and No Action conditions for 2014 and 2019. As noted under “Noise” above, the FAA’s noise modeling included areas potentially protected under Section 4(f). However, no potential Section 4(f) resources located in areas exposed to DNL 65 dB or higher would experience a significant increase of DNL 1.5 dB or higher. Furthermore, the Proposed Action would not cause reportable increases of DNL 3 dB or higher in areas exposed to noise between DNL 60 dB and 65 dB or of DNL 5 dB or higher in areas exposed to noise between DNL 45 dB and 60 dB.

Under FAA Order 1050.1E, a significant impact would occur when a proposed action either involves more than a minimal physical use of a Section 4(f) resource or would result in a “constructive use” substantially impairing the 4(f) property. Resources agencies were consulted and since the Proposed Action would not result in either a physical or constructive use of Section 4(f) resources, there would be no significant impacts on those resources.

### **Historical and Cultural Resources**

Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended) (16 U.S.C. § 470) requires the FAA to consider the effects of its undertakings on properties listed or eligible for listing in the National Register of Historic Places (NRHP). Additionally, the Historic Sites Act of 1935 (Public Law 74-292) (16 U.S.C. 461 et seq.) was also used to augment the analysis specifically as it relates to National Historic Landmarks (NHLs) and National Natural Landmarks (NNLs) within the General Study Area.

Appendix G of the EA provides an inventory of historical and cultural resources identified and evaluated in Section 5.4 of the EA. Appendix G provides the predicted noise exposure information for both the Proposed Action and the No Action Alternative for historic properties identified in the GSA. Exhibit 4-5 shows the location of historic and cultural resources identified in the GSA. In assessing whether an undertaking, such as the Proposed Action, affects a

property listed or eligible for listing on the NRHP, FAA must consider both direct and indirect effects.

Direct effects include the physical removal or alteration of an historic resource. Indirect effects include changes in the environment of the historic resource that could substantially alter the characteristics that made it eligible for listing on the NRHP. Such changes could include changes in noise exposure and visual impacts.

To assess the potential indirect effects of the Proposed Action on historic resources, an area of potential effects (APE) was defined. Federal regulations define the APE as the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The APE for the North Texas Metroplex was defined as being contiguous with the GSA. Historic resources were identified within the GSA and their locations are shown on Exhibit 4-5 in Chapter 4 of the EA. No Indian reservations or tribal lands were identified within the GSA.

No land acquisition, construction, or other ground disturbance activities would occur under the Proposed Action; therefore, the Proposed Action would not directly (i.e., physically) affect any historical, architectural, archaeological, or cultural resources. The assessment focused on the potential for indirect adverse effects to historic and cultural resources that may result from changes in air traffic routes, such as aircraft noise and visual impacts. Based on the modeled results for the unique grids and GSA uniform grids, no historically, architecturally or culturally significant properties located in the area exposed to DNL 65 dB or higher would experience a significant increase of DNL 1.5 dB or higher. Furthermore, the Proposed Action would not cause reportable noise increases of DNL 3 dB or higher in areas exposed to noise between DNL 60 dB and 65 dB or of DNL 5 dB or higher in areas exposed to noise between DNL 45 dB and 60 dB. Therefore, the Proposed Action would not result in an adverse effect to Historic and Cultural Resources in either 2014 or 2019.

According to FAA Order 1050.1E, Appendix A, the visual sight of aircraft, aircraft contrails, or aircraft lights at night, particularly at a distance that is not normally intrusive, should not be assumed to constitute an adverse impact. Changes in aircraft routes associated with the Proposed Action would generally occur at altitudes above 3,000 feet AGL; therefore, the visual sight of aircraft and aircraft lights would not be considered intrusive. Consequently, the Proposed Action would not result in significant visual impacts. Therefore, the Proposed Action would not adversely affect the property's historic, architectural, or cultural significance through introduction of a visual feature that would diminish the integrity of the setting.

The FAA determined that under the meaning of 36 CFR, Parks, Forests, and Public Property,, section 800.5(a), Protection of Historic Properties, the Proposed Action would not have an "adverse effect" on historic resources. Additionally, in accordance with the Section 106 of the NHPA, written concurrence of FAA's determination was obtained from the Texas and Oklahoma State Historic Preservation Officers' (SHPOs) with both the definition of the APE and the finding of no adverse effects. The concurrence letters can be found in the Attachment, "Agency Concurrence Letters, Public Comment Letters and Responses to Comments, and Environmental Assessment Errata".

### **Wildlife (Avian and Bat Species)**

The greatest potential for impacts to wildlife species related to air traffic procedure changes would result from wildlife strikes on avian and bat species at altitudes below 3,000 feet AGL. The FAA's Wildlife Strike Database provides strike information that is reportable by airport, including species struck, height of strike, and type and extent of aircraft damage. Table 5-5 in Chapter 5 of the EA provides a summary of wildlife strikes reported by Study Airport between 1990 and March 2013. In total, 3,055 records provide strike altitude for incidents involving birds and bats. Of these, a total of 2,620 reported strikes (86 percent of all strikes) occurred at altitudes below 2,500 feet AGL. The decline in the number of strikes reported above 2,500 feet AGL indicates that there is less likelihood of bird/bat strikes at these altitudes. Changes to air traffic flows under the Proposed Action would primarily occur above 3,000 ft. AGL and any changes to air traffic flows under the Proposed Action that would occur below 3,000 ft. AGL are overlays to existing procedures thereby not altering current flight paths (for additional information refer to Chapter 3). Furthermore, levels of operation would remain the same as the No Action Alternative; therefore, there would be no significant impacts to avian and bat species under the Proposed Action compared with the No Action Alternative. Accordingly, the FAA has determined that the Proposed Action is not likely to adversely affect any federally-listed species for 2014 or 2019. In an email dated October 18, 2013, the U.S. Fish and Wildlife Service indicated that, based on its review of the draft EA, no significant impacts to birds or bats would be expected from implementation of the proposed project and that it had no additional comments or recommendations to offer. The email can be found in the Attachment "Agency Concurrence Letters, Public Comment Letters and Responses to Comments, and Environmental Assessment Errata".

### **Environmental Justice**

Under the Proposed Action, no areas within the General Study Area would experience a change in noise exposure or other relevant impact category, (such as air quality, hazardous materials,, and water quality) that would exceed applicable thresholds of significance. The Proposed Action would not affect low income or minority populations at a disproportionately higher level than other population segments. Therefore, no adverse direct or indirect effects would occur to any environmental justice populations within the GSA under the Proposed Action for 2014 and 2019.

### **Energy Supply**

In terms of energy use and potential effects on the depletion of energy supplies, the Proposed Action would involve changes to air traffic flows; however, the optimized air traffic routes under the Proposed Action would improve route efficiency where possible and would be expected to reduce aircraft fuel consumption overall. Therefore, the Proposed Action would not result in the depletion of local supplies of energy.

Aircraft fuel burn is considered a proxy for determining whether the Proposed Action would have a measurable effect on local energy supplies when compared with the No Action Alternative. The FAA's NIRS model calculates aircraft-related fuel burn as an output along with calculating

aircraft noise exposure. NIRS modeling indicated that less fuel would be burned under the Proposed Action in comparison with the No Action Alternative (10.5 metric tons (MT) less in the first year of implementation (2014) and 9.9 MT less in the five-year look-ahead year (2019)). Therefore, there would be no significant impact to energy supply that would exceed available or future supplies of energy.

### **Air Quality**

The Proposed Action would not change the number of aircraft operations compared with the No Action Alternative. Furthermore, the Proposed Action would result in more efficient air traffic routes and operations, resulting in a reduction in fuel burn compared with the No Action Alternative. The reduction in fuel burn (as reported above for “Energy Supply”) was used as an indicator that the Proposed Action would result in fewer emissions from aircraft operations compared with the No Action Alternative. The Proposed Action is also presumed to conform to the State Implementation Plan (SIP) for Texas. Since emissions from the Proposed Action are de minimis and presumed to conform to general conformity thresholds, no conformity determination is required. Based on section 2.1c of FAA Order 1050.1E, further analysis under NEPA is not required since emissions resulting from the Proposed Action do not exceed general conformity. Thus no significant impacts to air quality are anticipated as a result of the Proposed Action. Accordingly, implementation would not cause or contribute to a new violation of the National Ambient Air Quality Standards (NAAQS), worsen an existing violation, or delay meeting the NAAQS.

### **Climate**

Although there are no federal standards for aviation-related greenhouse gas emissions, the CEQ has indicated that climate should be considered in NEPA analyses. Greenhouse gas emissions were quantified in terms of carbon dioxide equivalent (CO<sub>2</sub>e). In accordance with FAA guidance, estimated CO<sub>2</sub> emissions were calculated from the amount of fuel burned under the No Action Alternative and the decreased fuel burn projected for the Proposed. The resulting CO<sub>2</sub> emissions were then calculated as CO<sub>2</sub>e. Based on the fuel burn values reported in the EA, CO<sub>2</sub>e emissions would be lower with implementation of the Proposed Action compared with the No Action Alternative (33.1 metric tons (MT) less in the first year of implementation (2014) and 31.2 MT less in the five-year look-ahead year (2019)).

### **Visual Impacts**

The Proposed Action does not include development, construction, or demolition of facilities; therefore, it would not disturb the aesthetic integrity of an area or result in visual contrast with the existing environment. Implementation of the Proposed Action would not increase the number of aircraft operations at the Study Airports compared with the No Action Alternative. Changes in aircraft traffic patterns under the Proposed Action are expected to be at altitudes and distances sufficiently removed from viewers that visual impacts would not be anticipated. According to FAA Order 1050.1E, Appendix A, the visual sight of aircraft, aircraft contrails, or aircraft lights at night, particularly at a distance that is not normally intrusive, should not be assumed to constitute an adverse impact. Changes in aircraft routes associated with the

Proposed Action would generally occur at altitudes above 3,000 feet AGL; therefore, the visual sight of aircraft and aircraft lights would not be considered intrusive. Consequently, the Proposed Action would not result in significant visual impacts.

### **Cumulative Impacts**

NEPA implementing regulations define cumulative impacts as the incremental impact of the action when added to the impacts of other past, present, and reasonably foreseeable future actions regardless of the agency, federal or nonfederal, undertaking such actions. Cumulative impacts can result from individually minor, but collectively significant actions taking place over a period of time. A summary of past, present, and reasonably foreseeable future actions that were considered is provided in Table 5-8 in Chapter 5 of the EA, with corrections as noted in the attached errata on page 3-7.

As stated in section 5.11.2 of the EA, projects within the vicinity of the Study Airports were reviewed to evaluate the potential for cumulative impacts. A list of potential projects proposed on or near the Study Airports is provided in Table 5-8 (and updated in the attached errata page 3-7). The potential impact related to implementation of the Proposed Action, although demonstrated to not be significant, was aircraft noise. Section 5.11.2 also considered other categories of impacts (air quality/air pollutants, fuel burn, and avian and bat species), but FAA determined those resources were not affected. Due to the nature of the Proposed Action (i.e., the lack of land disruption or construction activities), the FAA considered potential cumulative impacts for aircraft noise (effects related to changes in aircraft noise exposure include potential impacts on populations in the GSA, compatible land use, potential Section 4(f) resources,, historic, and cultural resources). Also, since the Proposed Action would not involve land acquisition or other shifts in population or communities, physical changes such as ground disturbance or facility development, or construction activities; it would not affect the other environmental resource categories specified in FAA Order 1050.1E, as listed in the introduction to Chapter 5 of the EA. Therefore, consideration was given to the ability of the identified past, present and reasonably foreseeable future actions to contribute cumulatively to the Proposed Action. Detailed discussion of the cumulative impact analysis is presented in Section 5.11 of the EA. Based on that analysis, the FAA does not expect the Proposed Action to result in significant cumulative impacts.

### **Mitigation**

Thresholds of significance for any environmental impact category would not be exceeded due to the Proposed Action; therefore, no mitigation is being proposed as part of this project.

### **Other Considerations**

The Proposed Action involves air traffic control routing changes for airborne aircraft only. The United States Government has exclusive sovereignty of airspace in the United States [49 U.S.C. Section 40103(a)]. Congress has provided extensive and plenary authority to the FAA concerning the efficient use and management of the navigable airspace, air traffic control, air navigation facilities, and the safety of aircraft and persons and property on the ground [49

U.S.C. Sections 40103(b)(1) and (2)]. To the extent applicable, and as there are no significant impacts under noise or compatible land use, the Proposed Action is consistent with the plans, goals, and policies for the area and with the applicable regulations and policies of federal, state, and local agencies.

## **VIII. AGENCY AND PUBLIC INVOLVEMENT**

Public involvement and early consultation process began with the initiation of the preparation of the EA. The FAA distributed an early notification letter announcing the intent to prepare an EA to 188 federal, state, regional, and local officials on May 6, 2013. A subsequent notification letter was sent to an additional 14 federal, state, local, and tribal officials on June 12, June 14, and July 9, 2013. In addition, a website was developed ([www.oapmenvironmental.com](http://www.oapmenvironmental.com)). The FAA provided the web address in the public notices as well as the letters to agencies and elected representatives. Copies of the notification letter, legal notice, and comments received are provided in Appendix A of the EA.

The Draft EA was issued for public review and comment on September 30, 2013. The FAA updated the project website to notify the public about the availability of the EA, including making the entire EA available for download electronically along with the underlying technical reports (Average Annual Day Flight Schedules, Aircraft Noise Technical Report, North Texas OAPM Study Team Final Report, and the North Texas Design and Implementation Team Technical Report). The FAA published notice of availability of the EA in two major newspapers. A digital copy was made available in 28 libraries; Texas and Oklahoma SHPOs; and the United States Environmental Protection Agency (EPA). In addition, the FAA sent letters to the previous recipients of the early coordination letters to update them on the status of the project, advise them of the release of the EA (including the project's web address), and solicit comments. The names and addresses of parties who received notification of availability are listed in Appendix B of the EA. Notification was also provided to an additional 175 parties (beyond those listed in Appendix B) to increase distribution at the local level around the two major airports.

The comment period ended on November 18, 2013, 49 days after the release of the Draft EA. The FAA received comments and/or concurrence letters from 31 commenters (12 agencies and 19 individuals). The FAA carefully considered all comments received and none warranted significant revision of the EA. Although the comments received resulted in no significant revisions to the EA, an errata sheet was prepared to correct the minor errors identified after the Draft EA's September 30, 2013, release. These minor errors include but are not limited to: table formatting, exhibit sourcing, updates to procedure names, etc. The errata sheet is attached to this FONSI/ROD (See Attachment, "Agency Concurrence Letters, Public Comment Letters and Responses to Comments, and Environmental Assessment Errata").

## **IX. THE AGENCY'S FINDINGS**

### **A. The North Texas OAPM Project will ensure the safety of aircraft and the efficient use of airspace (49 U.S.C. § 40103(b)).**

The Federal Aviation Act of 1958 gives the Administrator the authority and responsibility to assign by order or regulation the use of the navigable airspace in order to ensure the safety of

aircraft and the efficient use of the airspace. In its continuous effort to ensure safety of aircraft and improve the efficiency of transit through the navigable airspace, the FAA will create or modify standard instrument departure procedures (SIDs), standard terminal arrival routes (STARs), and Required Navigation Performance (RNP) Authorization Required (AR) approaches in the North Texas Metroplex. The project will enhance the efficiency of the airspace in the North Texas Metroplex by creating shorter, more predictable ground and vertical paths through the limited airspace in the North Texas Metroplex. Additionally, this project will allow the FAA to begin to achieve its NextGen goals.

In deciding to implement the Proposed Action, the FAA carefully evaluated both the Proposed Action and the No Action Alternatives. The No Action Alternative will do nothing to improve the efficiency of the airspace or address any of the three key causal factors for airspace efficiency. The No Action Alternative would not further the Agency's goal in transitioning to NextGen.

**B. This project does not involve the use of any historic sites or other properties protected under Department of Transportation Act Section 303(c), also known as Section 4(f).**

The project does not involve any physical development or modification of facilities and therefore no actual, physical use of resources protected under Section 4(f) of the Department of Transportation Act or Section 106 of the National Historic Preservation Act would result. The project would also not result in a constructive use of any protected property because it would not cause increases in noise sufficient to impair the value of those resources. None of the protected properties in the General Study Area have a quiet setting as a generally recognized purpose and attribute.

The project would not cause an adverse effect on historic resources listed on or eligible for listing on the National Register of Historic Places. This determination is based on consultation under Section 106 of the National Historic Preservation Act with the State Historic Preservation Officers in each state within the General Study Area.

**C. Clean Air Act, Section 176 (c)(1) Conformity Determination (42 U.S.C. § 7506(c)).**

The project is an air traffic control activity that adopts approach and departure procedures for air operations. It is presumed to conform under 72 Fed. Reg. 41565 (July 30, 2007). The project would not result in the development of physical facilities nor would it result in or induce an increase in operational capacity in the study area. Detailed analysis was not necessary to conclude that the project conforms to the SIP for Texas. The project will not cause a new violation of the NAAQS, worsen an existing violation, or delay meeting the standards of the NAAQS in the study area.

**D. Findings Pursuant to the Purpose and Need**

Upon implementing the Proposed Action, the airspace that serves the Study Airports would include optimized air traffic routings to improve the efficiency of the air traffic routes. Based on the EA prepared for the Proposed Action, this FONSI/ROD is issued. Both the EA and the FONSI/ROD are hereby incorporated into this decision.

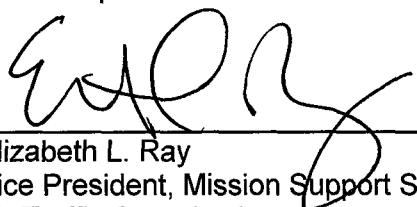
**X. DECISIONS AND ORDERS**

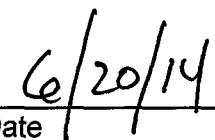
After careful and thorough consideration of the EA and the facts contained herein, I find that the Proposed Action is consistent with existing national environmental policies and objectives as set forth in Section 101 of National Environmental Policy Act and other applicable environmental requirements and will not significantly affect the quality of human environment or otherwise include any condition requiring consultation pursuant to Section 102(2)(C) of National Environmental Policy Act. Therefore, an environmental impact statement will not be prepared.

I, the undersigned, have reviewed the referenced EA including the evaluation of the purpose and need that this Project would serve, the alternative means of achieving the purpose and need, and the environmental impacts associated with these alternatives. I find the Project described in the EA is reasonably supported and issuance of a finding of no significance is appropriate. Therefore, an environmental impact statement will not be prepared.

I have carefully considered the FAA's statutory mandate under 49 U.S.C. § 40103 to ensure the safe and efficient use of the national airspace system as well as the other aeronautical goals and objectives discussed in the EA.

Accordingly, under the authority delegated to me by the Administrator of the FAA, I approve the operational changes as described in the proposed action alternative and direct that actions be taken that will enable implementation of the North Texas OAPM project.

Approved:   
Elizabeth L. Ray  
Vice President, Mission Support Services  
Air Traffic Organization  
Federal Aviation Administration

  
Date

**RIGHT OF APPEAL**

**This FONSI/ROD constitutes a final order of the FAA Administrator and is subject to exclusive judicial review under 49 U.S.C. § 46110 by the U.S. Circuit Court of Appeals for the District of Columbia or the U.S. Circuit Court of Appeals for the circuit in which the person contesting the decision resides or has its principal place of business. Any party having substantial interest in this order may apply for review of the decision by filing a petition for review in the appropriate U.S. Court of Appeals no later than 60 days after the order is issued in accordance with the provisions of 49 U.S.C. § 46110. Any party seeking to stay implementation of the ROD must file an application with the FAA prior to seeking judicial relief as provided in Rule 18(a) of the Federal Rules of Appellate Procedure.**



**Federal Aviation Administration**

**North Texas Optimization of the  
Airspace and Procedures in the Metroplex (NTX OAPM)**

**Agency Concurrence Letters, Public Comment Letters and Responses  
to Comments, and Environmental Assessment Errata**

**June 2014**



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## **1 Agency Concurrence Letters**

The Draft Environmental Assessment (EA) for the North Texas OAPM (NTX OAPM) Project required consultation with various agencies under Section 4(f) of the Department of Transportation Act (DOT Act), and Section 106 of the National Historic Preservation Act (NHPA). This section includes the letters received from the consulting agencies, providing concurrence with findings of no effects under Section 106 of the NHPA or no constructive use under Section 4(f) of the DOT Act.



## Oklahoma Archeological Survey

THE UNIVERSITY OF OKLAHOMA

September 30, 2013

Daisy Mather  
North Texas OAPM EA Lead  
Environmental Specialist  
FAA Central Service Center  
Operations Support Group, AJV-C22  
2601 Meachum Blvd  
Fort Worth, TX 76137

Re: Draft Environmental Assessment: FAA North Texas Optimization  
of Airspace and Procedures in the Metroplex (OAPM).

Dear Ms. Mather:

I have evaluated the above referenced action for its potential to affect Oklahoma's prehistoric and early historic archaeological resources. The proposed action involves only improved air traffic and navigation and no ground disturbance or increases in air operations that could indirectly affect cultural resources. Thus, I have no comment on the proposed Environmental Assessment.

This review has been conducted in cooperation with the State Historic Preservation Office, Oklahoma Historical Society.

Sincerely,  
  
Robert L. Brooks  
State Archaeologist

Cc:SHPO





**UNITED STATES DEPARTMENT OF THE INTERIOR**  
**BUREAU OF INDIAN AFFAIRS**  
**SOUTHERN PLAINS REGION**  
**BRANCH OF NATURAL RESOURCES**  
**P.O. BOX 368**  
**ANADARKO, OKLAHOMA 73005**

IN REPLY REFER TO:  
NATURAL RESOURCES (405) 247-6673

OCT 23 2013

Daisy Mather, North Texas OAPM EA Lead  
FAA Central Service Center  
Operations Support Group  
2601 Meacham Boulevard  
Fort Worth, TX 76137

Dear Ms. Mather:

Thank you for the opportunity to review the draft Environmental Assessment (EA) for the North Texas Optimization of Airspace and Procedures in the Metroplex (North Texas OAPM) project. We have reviewed the draft EA, as well as the maps that were provided, and have determined that there are no tribal or Individual Indian trust lands under the jurisdiction of the Southern Plains Region within the study area of the draft EA.

If any additional information or clarification is needed, please contact David Anderson, Regional Environmental Scientist, at 405-247-1532.

Sincerely,

Regional Director

**TEXAS HISTORICAL COMMISSION**  
*real places telling real stories*

25 October 2013

Daisy Mather  
North Texas OAPM  
Air Traffic Organization, Central Service Center  
2601 Meacham Boulevard  
Fort Worth, Texas 76137

Post-It* Fax Note	7871	Date	10/29/13	# of pages	3
To	Daisy Mather	From	Tracy Hoffman		
Co./Dept.	North Tx OAPMEALCA	Co.	Tx Historical Commission		
Phone #	817-321-7719	Phone #	512-463-2266		
Fax #	817-321-7744	Fax #			

Re: *Project review under Section 106 of the National Historic Preservation Act of 1966  
North Texas Optimization of Airspace and Procedures in the Metroplex (OAPM) Environmental Assessment – Notice of  
Availability and Request for Concurrence, multiple counties, Texas (FAA) (THC Track #201401063, see also 201307954)*

Dear Ms. Mather,

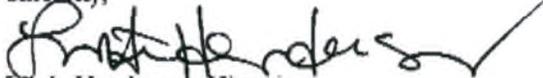
Thank you for your correspondence providing additional information regarding the above referenced project. This letter serves as comment on the proposed undertaking from the State Historic Preservation Officer (SHPO), the Executive Director of the Texas Historical Commission.

THC staff led by Linda Henderson reviewed of the material submitted, including the Environmental Assessment (EA), received on September 30, 2013. It is our understanding that the North Texas OAPM project seeks to improve the efficiency of the national airspace system in the 29-county region (26 in Texas, 3 in Oklahoma) by optimizing aircraft arrival and departure procedures at a number of airports, including Dallas/Fort Worth International (DFW), Dallas Love Field (DAL), and several satellite airports. This will involve changes in aircraft flight paths and altitudes in certain areas. Specifically, the FAA proposes to publish and implement optimized standard arrival and departure instrument procedures serving air traffic flows into and out of airports in the Houston Metroplex.

The proposed undertaking will not require any ground disturbance, construction, or land acquisition, and will not increase the number of aircraft operations within southeast Texas airspace. As requested in our agency's email correspondence of June 12, 2013, the FAA has assessed noise levels at historic properties in the APE to determine if the undertaking would result in any noise increases that would meet the criteria of adverse effect specified in 36 CFR 800.5. As indicated by Table G-1 in the materials, the majority of historic resources in the APE will have a decreased or negligible increased change in noise exposure, with only nine properties potentially having an increase of between 2 and 4 decibels. We find that this change will not diminish the integrity of the properties' setting, feeling, or association. The FAA has found that the undertaking will have no adverse effect on historic resources. Based on the information provided in the EA, the SHPO concurs with this determination.

We look forward to further consultation with your office and hope to maintain a partnership that will foster effective historic preservation. Thank you for your cooperation in this federal review process, and for your efforts to preserve the irreplaceable heritage of Texas. **If you have any questions concerning our review or if we can be of further assistance, please contact us: [linda.henderson@thc.state.tx.us](mailto:linda.henderson@thc.state.tx.us).**

Sincerely,



Linda Henderson, Historian

For: Mark Wolfe, State Historic Preservation Officer



----- Forwarded by 9-ASW-NorthTXOAPMcomment/ASW/FAA on 11/14/2013 12:48 PM -----

From: "Jackson, Lynn -FS" <[lynnjackson@fs.fed.us](mailto:lynnjackson@fs.fed.us)>  
To: 9-ASW-NorthTXOAPMcomment/ASW/FAA@FAA,  
Date: 11/14/2013 11:01 AM  
Subject: North Texas OAPM

---

The U.S. Forest Service has no issues or concerns with this project. Thank you for allowing us the opportunity to comment.

Lynn Jackson  
Forest Planner  
NEPA Coordinator  
National Forests and Grasslands in Texas  
2221 North Raguet  
Lufkin, Texas 75904  
936-639-8581 (phone)  
936-639-8511 (fax)  
[lynnjackson@fs.fed.us](mailto:lynnjackson@fs.fed.us)

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## **2 Public Comment Letters and Responses to Comments**

This section includes the comment letters received on the Draft EA for the NTX OAPM Project. The FAA received comments and/or concurrence letters from 31 commenters (12 agencies and 19 individuals). The FAA reviewed the comment letters and has provided responses to substantive comments contained therein. These responses follow the comment letters below.

## **2.1 Public Comment Letters**

----- Forwarded by 9-ASW-NorthTXOAPMcomment/ASW/FAA on 10/17/2013 03:05 PM -----

From: "Pat White" <[pat.l.white@gmail.com](mailto:pat.l.white@gmail.com)>  
To: 9-ASW-NorthTXOAPMcomment/ASW/FAA@FAA,  
Cc: Mark Phipps/ANM/FAA@FAA, <[thomas.l.laetimer@faa.gov](mailto:thomas.l.laetimer@faa.gov)>, Edward Hulse/ASW/FAA@FAA, Greg Juro/ASW/FAA@FAA, Doug Boyson/ASW/FAA@FAA, Lynn Lunsford/ASW/FAA@FAA  
Date: 10/13/2013 06:29 PM  
Subject: Draft EA and Timetable

---

Dear Daisy and Team,

1. Who on the team is not on furlough and can answer emails or phone calls?
2. Will the number of days that the government is on shutdown be added to the original end date of the comment period?
3. Should we direct our comments to the [9-ASW-NorthTXOAPMcomment@faa.gov](mailto:9-ASW-NorthTXOAPMcomment@faa.gov) ?
4. and will there be a response?

On Sept. 30, Daisy said that the letter and CD with the Draft EA was mailed on Wednesday, September 25, and that Bill Cohn and I would each receive a copy of the letter and CD. Neither of us has received it. We would still like to have a copy. I've had trouble loading from the website. The little spinner goes around and around but I only can open about 5 pages after over an hour. It's very frustrating.

I'm enclosing our addresses so you won't have to dig for them.

Thanks,

Pat White

Love Field Citizens Action Committee

Bill Cohn

4529 Belfort Avenue

Dallas, Texas 75205

Pat White

4714 Wildwood Road

Dallas, Texas 75209

New Reply Delete Archive Move to Categories Gerald ZERM

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Folders

Inbox 4

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POP

Drafts

Sent

Deleted 125

New folder...

[New folder](#)

Quick views

Documents

Flagged

Photos 2

Shipping updates

[New category](#)

# DFW runway departures only from runway 31L



Gerald ZERM 11:15 AM

To: 9-ASW-NorthTXOAPMcomments/ASW/FAA@FAA.gov

We live in Southlake Texas, which is near the western edge of DFW. Under the normal operations the flight path for aircraft out of DFW do not usually impact where we live. However when the winds are from the north or northwest departing aircraft can use 31L, or when the main north/south runways are closed for maintenance they use 31L. Daily use of runway 13R is the normal policy for arrivals, and I can see the aircraft from my address but the noise is not an impact because of the approach pattern that is close to highway Tx-114 and on overfly of Southlake proper is more commercially developed. My question is **why aren't the aircraft that depart DFW on 31L keep on a heading, that take them out from the runway a few more miles, in a corridor similar to the flight path that is used by a aircraft when 13R is used for landing?** It would seem like a simple solution. I would appreciate any fed back you can offer. Aircraft noise has greatly diminished over the years, but those cities that are close to an airport would appreciate a quieter life by thoughtful policies for departing aircraft from a major, world class air facility.

1

Gerald A. Zerm  
 1315 Kings Brook Court  
 Southlake, Texas 76092  
 817-421-8218

^ Gerald



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Mark C. Fletcher  
750 Wildwood Lane  
Southlake, TX 76092-5211

October 23, 2013

Ms. Daisy Mather – Environmental Specialist  
FAA Central Service Center  
Operations Support Group, AJV-C22  
2601 Meacham Boulevard  
Fort Worth, TX 76137

Subject: Environmental Assessment for North Texas Optimization of Airspace and Procedures in the Metroplex

Dear Ms. Daisy Mather:

In Section 5 “Environmental Consequences”, of the aforementioned subject report implies implementation of proposed RNAV approaches and departures to/from DFW would not result in a DNL increase of 1.5 dB or more in noise sensitive area exposed to aircraft noise. The report also implies that aircraft noise exposure was modeled from flight tracks on radar data collected for the existing flight conditions in 2011. In 2011 all departures /31L and arrivals to runways /13R were conducted North West (NW) of city of Southlake or the aircraft flight tracks were flown NW of Texas Hwy 114, avoiding all flights over the city and its residences.

This year the FAA has approved and is utilizing RNAV departures and arrivals to runway 31L / 13R; resulting in aircraft being flown at low altitudes over residential homes and directly over the city of Southlake. DFW airport reports the increased utilization of runways 31L / 13R is due to runway repairs at the airport and due to prevailing winds from the North.

The noise increased at my residence has been exponential this year with majority of it being associated with departing aircraft from runway 31L. The most offending aircraft is DC-9-80 taking off west bound, fully loaded, and slow climbing at flex power settings. These aircraft at less than 3000 MSL when the pass overhead. End result, the noise level is so high, it is extremely difficult to carry on personal conversation, talk on the phone, listen to TV or radio or even try to sleep until after 10:30 pm when the flights finally stop. I retire early evening and rise at 4:00 am and with the increased jet traffic noise it is having appreciable effect on my health due to sleep degradation.

The FAA and DFW Airport board need to immediately mitigate my concerns by accomplishing the following activities:

1

1. Conduct and actual environmental noise impact study with current factual data and noise measurements regarding west bound RNAV departures and arrivals to DFW runway 31L / 13R.

2. Eliminate the new RNAV departures and arrivals procedures to runway 31L / 13R and revert back to previous published procedures of having aircraft flown NW of Texas Hwy 114, avoiding all flights over the city of Southlake and its residences.
3. Revise departures and arrivals procedures to runway 31L / 13R to reduce the DNL footprint to not exceed noise level of 55 dB while being outdoors.
4. Install permanent noise monitoring stations strategically located in Southlake to monitor air traffic that is utilizing RNAV departures and arrivals to DFW runway 31L / 13R.
5. Impose on the DFW Board of Directors to create Noise Control Ordinance, similar to Orange County's General Aviation Noise Ordinance, for noise abatement procedures applicable to utilization of DFW runway 31L / 13R.

Please address my concerns and mitigate the environmental impact of excessive noise being generated from aircraft flown over my residence and city of Southlake.

Sincerely,



Mark C. Fletcher

Randy H. Varner  
Deputy Environmental Director  
NAS Fort Worth JRB, TX

10/25/13

----- Forwarded by 9-ASW-NorthTXOAPMcomment/ASW/FAA on 10/25/2013 12:02 PM -----

From: "Varner, Randy H CIV NAVFAC SE, PWD Fort Worth" <[randy.varner@navy.mil](mailto:randy.varner@navy.mil)>  
To: 9-ASW-NorthTXOAPMcomment/ASW/FAA@FAA,  
Cc: "Varner, Randy H CIV NAVFAC SE, PWD Fort Worth" <[randy.varner@navy.mil](mailto:randy.varner@navy.mil)>, "Myer, Robert E CIV NAVFACE SE PWD Fort Worth" <[robert.myer@navy.mil](mailto:robert.myer@navy.mil)>, "Wiggins, Rachel S CIV NAVFAC SE, PWD FT Worth" <[rachel.s.wiggins@navy.mil](mailto:rachel.s.wiggins@navy.mil)>, "Powers, Patrick E CIV CNRSE HQ, N3" <[patrick.e.powers@navy.mil](mailto:patrick.e.powers@navy.mil)>, "Morgan, Dianna E LT OPS, N3" <[dianna.morgan@navy.mil](mailto:dianna.morgan@navy.mil)>, "Kozminski, David T LCDR NAS JRB Fort Worth, N3" <[david.kozminski@navy.mil](mailto:david.kozminski@navy.mil)>  
Date: 10/25/2013 08:37 AM  
Subject: North Texas OAPM Draft Environmental Assessment (EA) Comments

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1 I realize this is an EA but we'd like to see a better summary of impacts to small airports. Table 3-2 just doesn't tell us anything about how the proposed action procedures may impact our operations. And for us non-flyers Table 3-2 tells us nothing.

2 The Exhibits in Chapter 3 are too busy. Maybe you could break them out to smaller areas as well so us "satellite" airfields could more easily see what is proposed to be going on in our local area.

3 The flight ops in Table 4-1 look incorrect for NAS Fort Worth. I'm not sure how you define the air operations categories but to me we should have a lot more "Military" operations and not nearly as many "General Aviation" operations.

Randy H. Varner  
Deputy Environmental Director  
NAS Fort Worth JRB, TX  
817 782-6475

----- Forwarded by 9-ASW-NorthTXOAPMcomment/ASW/FAA on 10/28/2013 07:41 AM -----

From: Maelissa Watson <mrmwatson@icloud.com>

To: 9-ASW-NorthTXOAPMcomment/ASW/FAA@FAA,

Cc: Maelissa Watson <mrmwatson@icloud.com>, Kim Edge <edgek\_1066@yahoo.com>, Mary Guenveur <mhguenveur@yahoo.com>, "Scott@scottcarlson.com" <Scott@scottcarlson.com>

Date: 10/25/2013 04:06 PM

Subject: Request for 1 month Extension to comment on E.A. since City of Dallas did not disclose it existence until Oct 23, 2013

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1 This Petition is to request a reasonable 30 day extension to comment on proposed DRAFT FAA E.A. for The DFW METROPLEX.

It is made out of extreme necessity to "prevent irreparable harm to The Green, Quite and Peaceful Residential Lakewood Neighborhood."

Prior to what is called the "Expansion of Love Field, or Modernization of Love Field" no visible Jets were seen in Lakewood ( excluding Search & Rescue and Hospital Helicopters)  
Residents of Lakewood deliberately avoided Neighborhoods around Love Field prior to the opening of DFW Airport, and to some extent thereafter because of limited South West Air Traffic.

2 Lakewood was never notified prior to new construction at Love Field of any impact on Lakewood; no Environmental Assessment was mentioned to our Neighborhood, let alone a full blown Environmental Impact Review which would be appropriate considering the magnitude of the potential changes.

In approximately the last 6 months Lakewood neighborhood has been subjected to intolerable roaring Jet Noise, early and late. Neighbors have asked their Council Representatives about what was going on but there has been no disclosure or transparency; just polite punting and giving no definite information. It was not until Oct 23, 2013, that that Petitioner was advised of the DRAFT E.A. I am a disabled person currently recovering from a broken ankle and cannot go to The Library to read these documents; nor have I the ability to download this on my computer, I tried.

Furthermore, due to degenerative arthritis, and back surgery I cannot sit at The Computer for longer than 30 minutes. We are dealing with very complicated technical and legal issues that is why I am rushing this to you on a Friday afternoon to request information and a FAIR EXTENSION TO COMMENT. There is no way a neighborhood can compile a response in 5 days, three business days.

3 So I request that you kindly send me a copy of the cited above Environmental Assessment for the Metroplex in so far as it impacts on Love Field and Lakewood Neighborhood.

Further, I just learned that the West Terminal was PERMANENTLY? CLOSED AT LOVE FIELD, who made this decision? Apparently by routing the planes EAST to Lemmon Ave has caused Severe Aviation Intrusion in Lakewood. The Jets are clearly visible out my bedroom upstairs windows, flying low and roaring like hurricane storms above my Elm tree.

4

Hence, in the interest of fairness and equity to the Citizens of a previously Non-impacted Residential Neighborhood, please tell us what is going on?. If we need to comment, please give us adequate time and due process in the participation process.

Respectfully submitted on behalf of Lakewood Neighborhood.

Maelissa Watson  
6956 Lakeshore Drive  
Dallas, TX. 75214  
Tel: (214) 327-2081  
Cell (214) 213-6643

Subj: **airport environmental impact study**  
Date: 10/26/2013 12:17:51 P.M. Central Daylight Time  
From: [DSmithCLU@aol.com](mailto:DSmithCLU@aol.com)  
To: [9-ASW-NorthTXOAPMcomment/ASW/FAA@FAA.gov](mailto:9-ASW-NorthTXOAPMcomment/ASW/FAA@FAA.gov)

1

This last month has been very unpleasant with entire days of planes taking off every 2-3 minutes. While I understand the situation, there must be some way to reduce the impact it has on an entire community.

If this were the norm, I would certainly not recommend Southland as a place to visit or live.

Regards,

Claudia M. Smith  
216 Westwood  
Southlake, TX 76092  
817-251-9469

----- Forwarded by 9-ASW-NorthTXOAPMcomment/ASW/FAA on 10/28/2013 07:44 AM -----

From: [kqford1@verizon.net](mailto:kqford1@verizon.net)  
To: 9-ASW-NorthTXOAPMcomment/ASW/FAA@FAA,  
Date: 10/27/2013 09:23 AM  
Subject: FAA NORTH TEXAS OPTIMIZATION OF AIRSPACE PUBLIC COMMENT REQUEST

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NTX OAPM EA

1

Noise pollution, environmental pollution, and safety generated by air traffic using the runways for departures and takeoffs over Southlake and Grapevine has increased dramatically over the recent past. In particular the runway with takeoffs and landings going out northwest over Grapevine and Southlake has created a totally intolerable noise level.

Having lived in these communities for several decades, I realize the agreed flight path centerline of the noise corridor originally agreed to by all parties has not been observed. Consequently, planes now both take off and land more south of the center line, and at heights which are considerably lower than originally promised and agreed with the communities. I assure you that due diligence was performed by many individuals prior to moving to Southlake (prior to any Town Square development) and observation by many I have spoken with confirm the centerline has drifted south past highway 114, and aircraft are permitted to regularly use lower elevations for their procedures.

Part of the problem, aside from the fact the FAA does not apparently provide precise instructions for takeoffs and departures, is the size of the aircraft using the runway. The larger planes, particularly those with more than two engines, are reluctant or incapable of reaching an acceptable elevation to minimize noise when taking off, or are not able to descend properly because of their size. Noise db level must regularly be above any approved and acceptable levels when these infractions occur, which sometimes is frequently throughout the day and evening and night time hours.

In addition, I have noticed the length of the runway is much less in length than the north/south runways, thus the noise and potential safety issues and factors need to be addressed. As I observe the large aircraft skimming over the heart of downtown Southlake, I shudder when I think of the severe consequences to property and life which could occur with any serious malfunction, much less the damage being generated to the property and environment.

2

The original noise corridor center line going out over Southlake provided a safer and cleaner departure/takeoff corridor. Utilization of this original centerline (north of Hwy 114 primarily thru Southlake) would provide a more acceptable solution to the use of the runway. In addition, property built subsequent to the agreed upon center line provided for noise abatement, etc, while property now being exposed by flights directly over the Southlake Town Square area were not originally part of the increased noise abatement requirements.

3

Consequently the FAA, DFW Airport authority and cities of Grapevine and Southlake must observe the original agreements and intentions in providing a safe and tolerable solution to the air traffic problems which residents of these communities are experiencing.

Ken Ford  
800 Wildwood Lane  
Southlake, Texas 76092

817 481 2973  
[kqford1@verizon.net](mailto:kqford1@verizon.net)

Please keep my contact information private.

From: MICHAEL G KROPOSKI <[mkroposki@sbcglobal.net](mailto:mkroposki@sbcglobal.net)>  
To: 9-ASW-NorthTXOAPMcomment/ASW/FAA@FAA,  
Date: 10/28/2013 07:14 PM  
Subject: Comments on the draft North Texas OAPM EA

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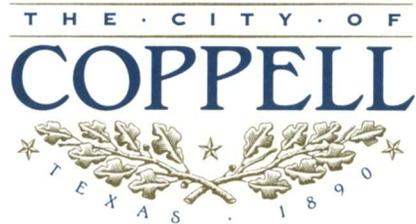
Dear Sirs,

1. The Aircraft Noise Technical Report on page 42 at paragraph 3.2.8 indicates that Stage length was used as a surrogate for determination of take off weight. However INM and NIRS use a factor of 65% payload in determining take off weight. The recent large increases in passenger load factors render the 65% payload factor seriously inaccurate. A sample of recent actual departure weights shows that many aircraft have take off weights which correspond to 1-2 stage lengths greater than the INM default factor of 65%. INM calculations show that this underestimate of take off weight yields an underestimate of aircraft noise levels of 1-2 dB. Given that the level of significance is 1.5 dB an underestimate of 1-2 dB substantially removes the ability to comply with NEPA regulations if there is a potential finding of no impacts!

At the very least a sampling of actual take off weights needs to be compiled and compared to the INM surrogate weights and appropriate adjustments made as is suggested in the INM manuals

2. NEPA regulations require a statement of the level of uncertainty in any environmental impact analysis. In a recent noise analysis in the Boston area the FAA response to a comment asking for the level of uncertainty in INM was that INM and similar noise analysis software had a level of uncertainty in the DNL projections of about 3-5 dB. If the present study has a different level of uncertainty this needs to be stated in the EA documents.

Respectfully submitted,  
Michael Kroposki



October 28, 2013

NTX OAPM EA

Ms. Daisy Mather - Environmental Specialist  
FAA Central Service Center  
Operations Support Group, AJV-C22  
2601 Meacham Boulevard  
Fort Worth, TX 76137

RE: Comments of City of Coppell, Texas on NTX OAPM EA

Dear Ms. Mather:

Thank you for the opportunity to submit comments, on behalf of the City of Coppell, Texas, with respect to the Draft Environmental Assessment for North Texas Optimization of Airspace and Procedures in the Metroplex (the "Draft EA").

1 Coppell is located immediately north of Dallas-Fort Worth International Airport (DFW) and experiences frequent overflights from low-flying aircraft, mostly from operations at DFW. Coppell's primary concern, with respect to the proposed airspace redesign project, relates to potential noise impacts. As such, we are both surprised and disappointed that a more concerted effort was not made to contact the Mayor, City Council, or City Manager's Office regarding an issue of such importance that could have long-term impacts to our community.

2 With our proximity to DFW International Airport in mind, and with the understanding that the public comment period will end only a few days after our learning of the issue, we have endeavored to understand the manner in which the proposed project would impact those who reside, attend school, work, or otherwise spend time in Coppell. Unfortunately, the Draft EA fails to provide sufficient information to enable us to gain—and to convey to our citizenry—a meaningful understanding of how the proposed project would change the location, altitude, frequency, time of day, or single-event or cumulative noise levels associated with aircraft operations over Coppell.

To enable Coppell officials, as well as the FAA, to understand the nature and potential significance of any noise or related impacts from the proposed project in Coppell, we respectfully request that the Final EA provide the information and answers to questions requested below:

3

1. Please provide graphics depicting existing flight paths over Coppell with respect to north-flow and south-flow conditions, respectively, at DFW. Recognizing that individual operations may deviate from normal flight paths for many different reasons, please depict the flight paths in a manner that excludes aberrational or infrequent operations.

4

2. Please provide graphics depicting any new flight paths over Coppell associated with the proposed project, and in connection with the graphics explain the conditions under which the new flight paths would be utilized (e.g., north-flow at DFW).

5

3. Please provide the following information with respect to average daily operations on each existing or new flight path over Coppell under the proposed project:

- a. The frequency of operations during each hour of the day, to the extent that information is among the data input into the Integrated Noise Model (INM) or otherwise; and
- b. The range of altitudes that are or would be experienced over specific locations in Coppell that provide a representative sample of the various portions of Coppell that will experience overflights (the "Coppell sites"). Recognizing that the altitudes associated with departures, in particular, will vary depending on a host of factors—including type of aircraft, meteorological conditions, destination, passenger and cargo load, etc.—we request information regarding the lowest and highest expected overflights, as well as the altitude range of the most frequent operations.

6

4. Please provide the information requested in Paragraph 3 with respect to each existing flight path over Coppell and current conditions.

7

5. Please provide the following information regarding the conditions that would be experienced on an average day at each of the Coppell sites under the proposed project:

- a. Single-event noise levels, measured using the Sound Exposure Level (SEL) metric, associated with arrivals and departures, respectively, for different types of aircraft;
- b. Time-above 65 decibels (TA 65 dBA); and
- c. Day-night average sound level (DNL).

8

6. Please provide the information requested in Paragraph 5 with respect to current conditions.

Ms. Daisy Mather - Environmental Specialist

October 28, 2013

Page 3

At this point we are unable to provide additional comments as we do not know the answers to the questions we have posed in this letter. Given the real potential of negative impacts to our community, particularly as it relates to possible changes in flight patterns that would result in aircraft over-flights where none exist today, we will absolutely continue to monitor this process very closely. Further intrusion of aircraft flight patterns over our community will be met with the strongest resistance possible. Please let me know if any of the foregoing requests require clarification. Thank you for consideration of these comments and questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Clay Phillips".

Clay Phillips  
City Manager

Date: October 29, 2013

Daisy Mather, Environmental Specialist  
FAA Central Service Center, Operations Support Group  
2601 Meacham Boulevard  
Fort Worth, TX 76137  
9-ASW-NorthTXOAPMcomment/ASW/FAA@FAA.gov  
(817) 321-7700

Re: Draft Environmental Assessment for North Texas OAPM

Ms. Mather,

You recently published the Draft Environmental Assessment for North Texas Optimization of Airspace and Procedures in the Metroplex (OAPM) and are currently soliciting comments. On behalf of the Love Field Citizens Action Committee and the thousands of people who live in the neighborhoods surrounding Love Field, this is our response. We urgently request the following:

- 1**
- Adoption of a specified RW13L RNAV departure that would overfly Lemmon Avenue. This will meet your objective of better sequencing of DAL aircraft with DFW, while protecting the environmental quality for the tens of thousands of people surrounding Love Field.

The Federal Aviation Act of 1958 set dual missions for the FAA: safety, and the promotion of air commerce. Years later, noise abatement was identified as an item to be addressed by the FAA. In the subsequent years, noise abatement has been a distant third priority.

**2**

To illustrate the point, see attachment A of this letter, which is the current approach plate for the ILS 13L at Love Field. The missed approach procedure directs the pilot to climb to 1000' then turn eastbound (100°), directly over our noise sensitive neighborhoods. For years we have attended noise abatement meetings with the FAA assuring us it was doing everything possible to mitigate noise impact. Yet, in this approach procedure, the FAA seems to intentionally send aircraft at high engine power in a low, slow turn directly over one of our neighborhoods. It is hard to imagine a procedure that would create more noise than this. We hope this serious oversight will be corrected.

Your report proposes RNAV departures for Love Field for both southerly and northerly flows. It is gratifying to see the FAA finally include RNAV departures in the OAPM. The Love Field neighborhood groups have proposed RNAV departures for years, because they provide the capability to control ground track in a way that minimizes noise impact.

Yet, the RNAV SIDs in your report are described in only general terms. There is much discussion of how they will assist in sequencing Love Field aircraft with traffic from DFW, yet little mention of environmental goals.

3

To provide an arbitrary RNAV departure would be environmentally reckless, since an undesirable ground track could actually be worse than what exists now. An RNAV departure that is slightly left of RW 13L centerline would be a disaster, directing aircraft directly over our neighborhoods.

4

Our neighborhood organization has consistently advocated for a RW13L RNAV departure that would overfly Lemmon Avenue. Lemmon Avenue is very close to extended runway centerline, and is a 6 lane thoroughfare populated by car lots, Home Depot, and fast food restaurants. It is the obvious choice for minimizing noise impact. Yet, the Draft Environmental Assessment doesn't mention it. To be clear: RNAV departures with arbitrary ground tracks are worse than no RNAVs at all.

5

A discussion of noise abatement issues at Love Field is conspicuously absent in your report. The current 13L ILS procedure already contains the oversight of heavy noise impact on our neighborhoods. We are concerned that a similar oversight is possible for any new RNAV departures proposed in the OAPM, if the environmental impact of the ground track isn't a guiding principle.

In summary, we now have the opportunity to achieve two goals at the same time:

1. Improved sequencing of aircraft between DFW and Love Field, and
2. Improving the environment impact on the thousands of Love Field neighbors.

We are committed to helping the FAA succeed, while protecting the environment for our homes. Please contact us so that we can make the OAPM a success on every level.

Sincerely,

William F. Cohn  
Captain, Delta Air Lines (Retired)  
Board Member, Love Field Citizens Action Committee  
Member, Love Field Environmental Advisory Committee  
billcohn73@gmail.com  
(214) 616-3147

Pat White  
Chair, Love Field Citizens Action Committee  
Member, Love Field Environmental Advisory Committee  
[charles4@airmail.net](mailto:charles4@airmail.net)  
(214)352-7872

DALLAS, TEXAS

AL-106 (FAA)

13234

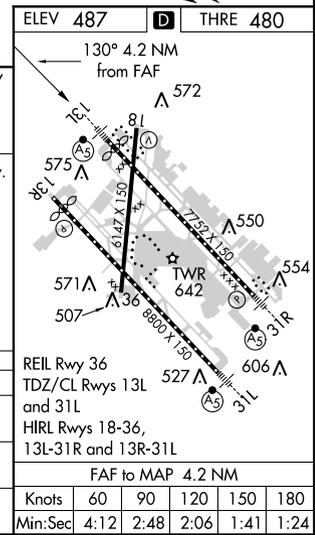
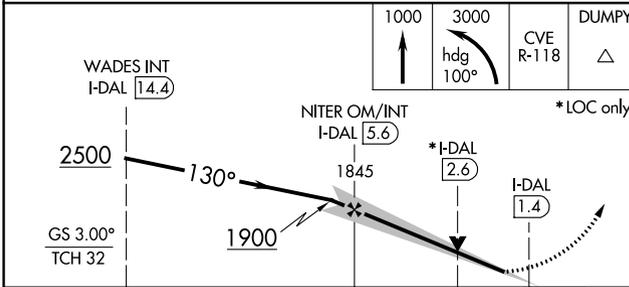
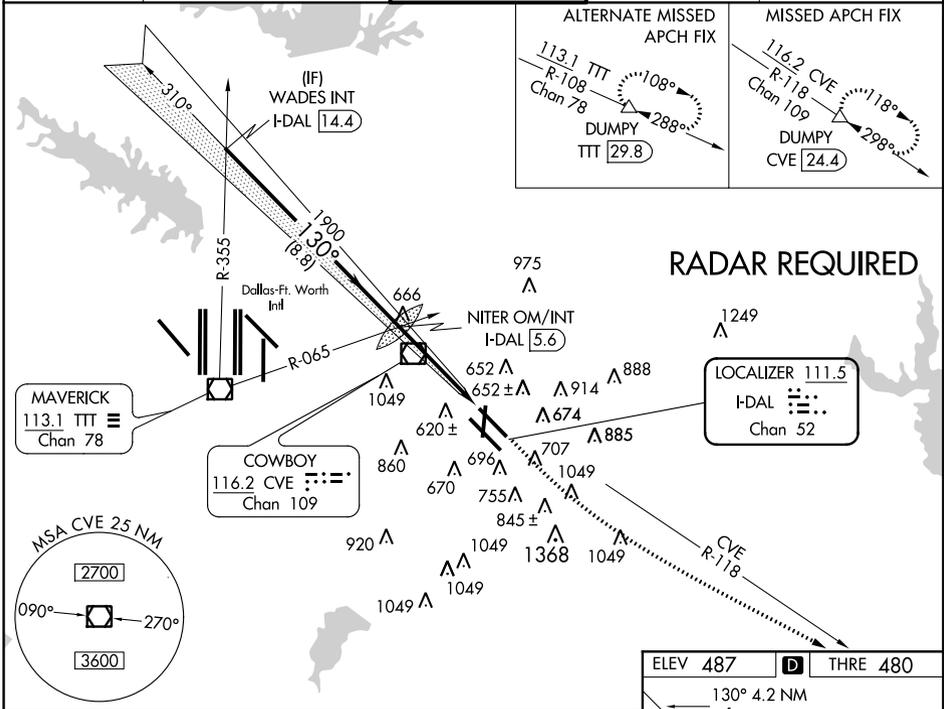
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<b>111.5</b>	<b>130°</b>	THRE	<b>480</b>
Chan 52		Apt Elev	<b>487</b>

# ILS or LOC Y RWY 13L

DALLAS-LOVE FIELD (DAL)

<p><b>⚠</b> Circling Rwy 18/36 NA at night. DME required. Simultaneous approach authorized with Rwy 13R. Simultaneous approach authorized with DFW ILS or LOC Rwy 17L.</p>	<p><b>MALS R</b></p>	<p><b>MISSED APPROACH:</b> Climb to 1000 then climbing left turn to 3000 on heading 100° and CVE VOR/DME R-118 to DUMPY/CVE 24.4 DME and hold.</p>
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<p>ATIS <b>120.15</b></p>	<p>REGIONAL APP CON NORTH <b>124.3 282.275</b> SOUTH <b>125.2 343.65</b></p>	<p>LOVE TOWER <b>123.7 239.3</b></p>	<p>GND CON <b>121.75 348.6</b></p>	<p>CLNC DEL <b>127.9</b></p>
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CATEGORY	A	B	C	D
S-ILS 13L	680/18		200 (200-½)	
S-LOC 13L	920/24	440 (500-½)	920/40	440 (500-¾)
CIRCLING	1020-1	533 (600-1)	1020-1½ 533 (600-½)	1160-2¼ 673 (700-2¼)

DALLAS, TEXAS  
Amdt 32 27JUN13

32°51'N-96°51'W

# DALLAS-LOVE FIELD (DAL)

## ILS or LOC Y RWY 13L

SC-2, 17 OCT 2013 to 14 NOV 2013

SC-2, 17 OCT 2013 to 14 NOV 2013

DALLAS, TEXAS

AL-106 (FAA)

13234

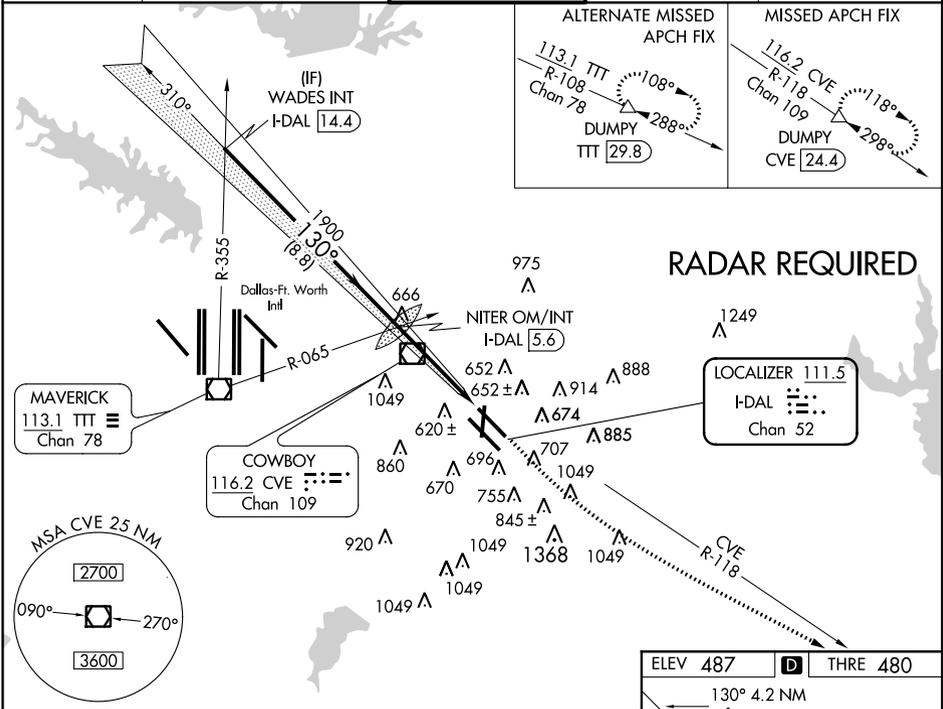
LOC/DME I-DAL	APP CRS	Rwy Idg	<b>7352</b>
<b>111.5</b>	<b>130°</b>	THRE	<b>480</b>
Chan 52		Apt Elev	<b>487</b>

# ILS or LOC Y RWY 13L

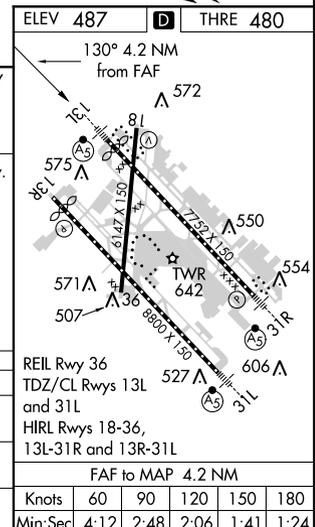
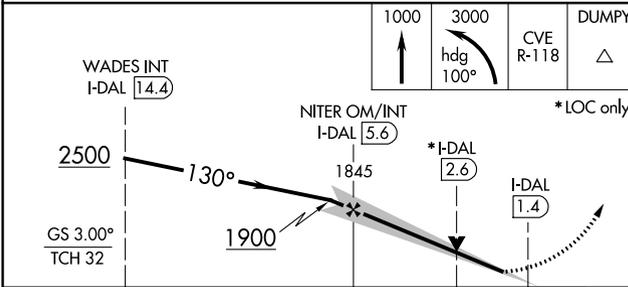
DALLAS-LOVE FIELD (DAL)

<p><b>⚠</b> Circling Rwy 18/36 NA at night. DME required. Simultaneous approach authorized with Rwy 13R. Simultaneous approach authorized with DFW ILS or LOC Rwy 17L.</p>	<p><b>MALS R</b></p>	<p><b>MISSED APPROACH:</b> Climb to 1000 then climbing left turn to 3000 on heading 100° and CVE VOR/DME R-118 to DUMPY/CVE 24.4 DME and hold.</p>
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<p>ATIS <b>120.15</b></p>	<p>REGIONAL APP CON NORTH <b>124.3 282.275</b> SOUTH <b>125.2 343.65</b></p>	<p>LOVE TOWER <b>123.7 239.3</b></p>	<p>GND CON <b>121.75 348.6</b></p>	<p>CLNC DEL <b>127.9</b></p>
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**RADAR REQUIRED**



CATEGORY	A	B	C	D
S-ILS 13L	680/18		200 (200-½)	
S-LOC 13L	920/24	440 (500-½)	920/40	440 (500-¾)
CIRCLING	1020-1	533 (600-1)	1020-1½ 533 (600-½)	1160-2¼ 673 (700-2¼)

DALLAS, TEXAS  
Amdt 32 27JUN13

32°51'N-96°51'W

## DALLAS-LOVE FIELD (DAL) ILS or LOC Y RWY 13L

SC-2, 17 OCT 2013 to 14 NOV 2013

SC-2, 17 OCT 2013 to 14 NOV 2013

----- Forwarded by 9-ASW-NorthTXOAPMcomment/ASW/FAA on 10/31/2013 08:56 AM -----

From: "Jenkinson, Joel" <[joel.jenkinson@urs.com](mailto:joel.jenkinson@urs.com)>  
To: 9-ASW-NorthTXOAPMcomment/ASW/FAA@FAA,  
Date: 10/30/2013 04:31 PM  
Subject: FW: Comments on North TX OAPM Draft EA

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E-mail address for comments provided in September 30 cover letter mailing is incorrect; re-sending with corrected e-mail address (from website).

---

**From:** Jenkinson, Joel  
**Sent:** Wednesday, October 30, 2013 4:22 PM  
**To:** [9-ASW-NorthTXOAPMcomment/ASW/FAA@FAA.gov](mailto:9-ASW-NorthTXOAPMcomment/ASW/FAA@FAA.gov)  
**Cc:** Lisa Pyles; Lea Dunn; Cunningham, Scott; Darci Neuzil; [joe.mcanally@addisonairport.net](mailto:joe.mcanally@addisonairport.net)  
**Subject:** Comments on North TX OAPM Draft EA

Ms. Daisy Mather  
Environmental Specialist  
North Texas OAPM EA Lead  
FAA Central Service Center  
Operations Support Group, AJV-C22  
2601 Meacham Blvd.  
Fort Worth, TX 76137

**RE: Comments from Addison Airport on the North TX OAPM Draft EA**

1 Addison Airport's primary concern with the NTX OAPM is whether arrival and departure procedures detailed therein were designed under the assumption that the DFW Class B airspace will be changed (expanded) as proposed in the NPRM that was published in the January 22, 2013 edition of the Federal Register (Proposed Modification of Dallas/Fort Worth Class B Airspace Area; TX: Docket No. FAA-2012-1168, Airspace Docket No. 07-AWA-3). As detailed in the attached comment (submitted in response to the DFW Class B airspace modification NPRM) Addison is strongly opposed to the lowering of the DFW Class B airspace floor over Addison Airport as contemplated in the NPRM.

2 The procedures of concern to Addison are primarily the Standard Terminal Arrival Routes (STARs) serving DAL in a south traffic flow, particularly the FINGR FIVE and the HIBIL ONE but also including other STARs such as the BACHR ONE, KNEAD SIX, REDDN ONE, and YEAGR ONE. These arrival routes bring traffic inbound for Dallas Love Field (DAL) directly over Addison Airport (ADS), and we were unable to determine from the draft EA at what altitude these arrivals will be crossing over Addison. If these arrival routes were designed with the assumption that the DFW Class B floor will be lowered to 2,500 feet (MSL) over Addison, then Addison objects for the same reasons stated in the attached comments on the DFW Class B airspace NPRM (which have yet to be addressed by FAA). We request that FAA provide additional information, specifically whether the Proposed Action assumes modifications to the DFW Class B airspace as proposed by FAA in January, and the profiles (altitudes) of the aforementioned STARs.

3 We also note that Table 4-1 (on page 4-121) is in error, in that air traffic figures reported in the table are not all associated with the correct airports. For example, the third line in the table intends to report traffic for Fort Worth Meacham Airport (FTW) but the data are actually Addison's traffic counts. The fourth line intends to report Addison Airport (ADS) traffic figures, but actually gives those for Fort Worth Alliance (AFW). The table should be revised to associate the correct airport designators with the corresponding traffic figures.

Section 4.3.1 of the draft EA addresses noise impacts. With respect to noise impact modeling and

4

according to the draft EA "FAA Order 1050.1E states that the Noise Integrated Routing System (NIRS) should be used for flight track changes over large areas and at altitudes over 3,000 AGL. Specifically, for the Proposed Action, 1050.1E specifies use of NIRS, Version 7.0b." The document goes on to state that the noise model considers only IFR traffic and that "Most aircraft around major airports operate under IFR to obtain direction on separation from surrounding aircraft from air traffic control (ATC) in these busy areas. Those aircraft operating under Visual Flight Rules (VFR) are unaffected by the Proposed Action."

If the profiles of arrival and departure routes in the Proposed Action are different than existing -- particularly if they are lower in certain areas -- then we respectfully disagree that VFR aircraft are unaffected by the Proposed Action. There are designated VFR flyways around the periphery of Class B airspace that may be affected by changes in arrival and departure profiles (altitudes) and changes in the Class B airspace that may be made to accommodate new arrival and departure procedures. Again, our specific concern is in the vicinity of Addison Airport. If the Proposed Action anticipates expansion of the DFW Class B airspace over Addison Airport (per FAA's January 22, 2013 NPRM) and the STARs for DAL arrivals in south flow have lower altitudes over ADS as a result, then there is an inevitable effect on VFR traffic in the vicinity of ADS, namely that it will be compressed by the expansion of the DFW Class B and VFR aircraft will be forced to operate at lower altitudes. If traffic in the vicinity of ADS (VFR traffic in particular, and 60-65% of the traffic at ADS is VFR) is therefore restricted to lower altitudes, then there will be a corresponding increase in noise impact on the community as a result. We respectfully disagree with FAA's conclusions that there will be no effect on VFR traffic. We request that FAA re-examine areas where VFR flight patterns may be altered by the Proposed Action, specifically in areas where VFR traffic may move to lower altitudes to remain clear of Class B airspace and particularly in the vicinity of Addison.

We conclude our remarks with an acknowledgment and appreciation of the work that FAA has done on the North Texas OAPM project, and that the proposed changes are a positive contribution to the goals of enhancing safety margins and improving operational efficiencies in the DFW Metroplex airspace. However, Addison remains concerned that improvements in operational efficiency for DAL arrivals (particularly in south flow) may be at the expense of safety degradation and increased noise impacts around Addison due to compression of the airspace available to Addison's air traffic and other VFR traffic in the vicinity of Addison.

Joel Jenkinson, A.A.E.  
Airport Director  
Addison Airport

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March 22, 2013

Mr. Gary A. Norek  
Docket Operations, M-30  
U.S. Department of Transportation  
1200 New Jersey Avenue SE  
Rm. W12-140 West Building Ground Floor  
Washington, D.C. 20590-0001

**Re:** Notice of Proposed Rulemaking, Proposed Modification of Dallas/Fort Worth Class B Airspace Area; TX: Docket No. FAA-2012-1168, Airspace Docket No. 07-AWA-3

Mr. Norek,

On behalf of Addison Airport, I am writing to oppose the proposed lowering of the DFW Class B airspace floor over Addison Airport (as illustrated below) and to oppose the lowering of the ADS Class D ceiling.



**Figure 1:** Proposed lowering of DFW Class B floor to 2,500 feet MSL over Addison.

*Addison prefers No Change to the existing Class B over ADS*

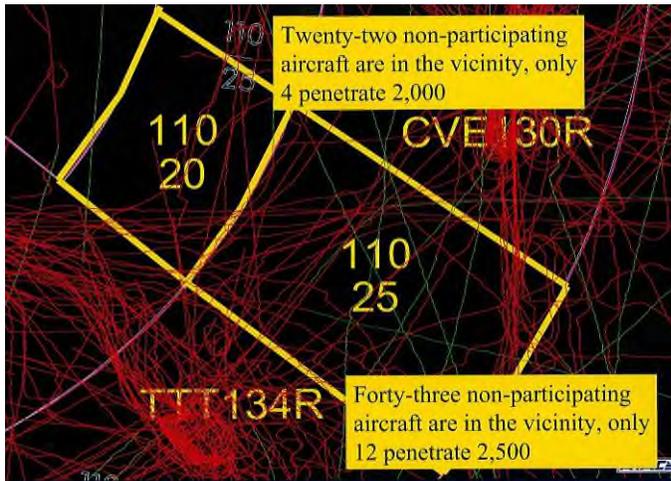
**Addison Airport strongly prefers that procedures for approaches to Runways 13L and 13R at DAL be modified to remain within the existing Class B airspace.**

Per the ‘Summary’ statement in the Notice of Proposed Rulemaking (NPRM) “This action proposes to modify the Dallas/Fort Worth, TX Class B airspace to ensure containment of large turbine-powered aircraft flying instrument procedures to and from the Dallas/Fort Worth International Airport (DFW) and Dallas Love Field Airport (DAL) within Class B airspace.” While we agree with the goal of containing aircraft approaches within the Class B airspace, there are two ways to achieve this goal: either (1) modify the airspace, or (2) modify the approach procedures. Addison supports modifying the approach procedures.

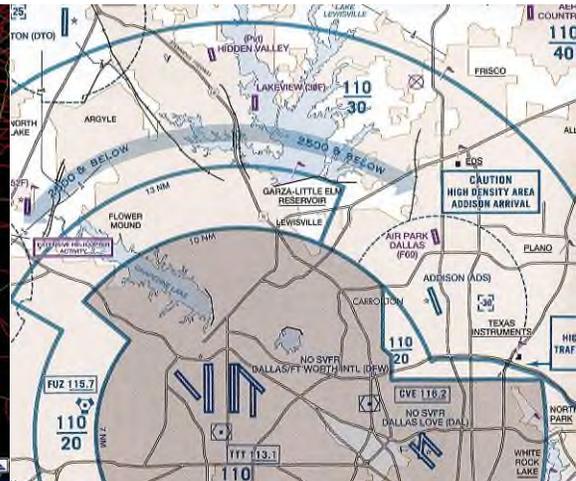
*The FAA’s argument that lowering the ceiling would have little impact on “non-participating” aircraft is unpersuasive*

The FAA asserted that the impact of the proposed Class B airspace expansion on “non-participating” aircraft will not be significant. In support of this argument, they presented a few graphics such as that shown in Figure 2, where radar tracks of “non-participating” aircraft were plotted in areas where the Class B airspace was proposed to be expanded. In one segment where the floor of the Class B was proposed to be lowered

to 2,500 MSL, it is noted that out of 43 “non-participating aircraft” tracked, “only 12 penetrate 2,500” feet. The floor of the DFW Class B in that area is at 3,000 feet; it is common practice for “non-participating” aircraft to remain at least 500 feet below Class B airspace. Therefore, it is no surprise that very few aircraft in that area were operating within 500 feet of the Class B floor, especially given the fact that there is also a designated VFR flyway in that area at 2,500 MSL and below. Lowering the ceiling by 500 feet will therefore force the “non-participating” aircraft to lower altitudes.



**Figure 2:** Radar tracks of “non-participating” aircraft southeast of Dallas Love Field (DAL).



**Figure 3:** VFR Flyway north of Dallas/Fort Worth International Airport (DFW), near Addison.

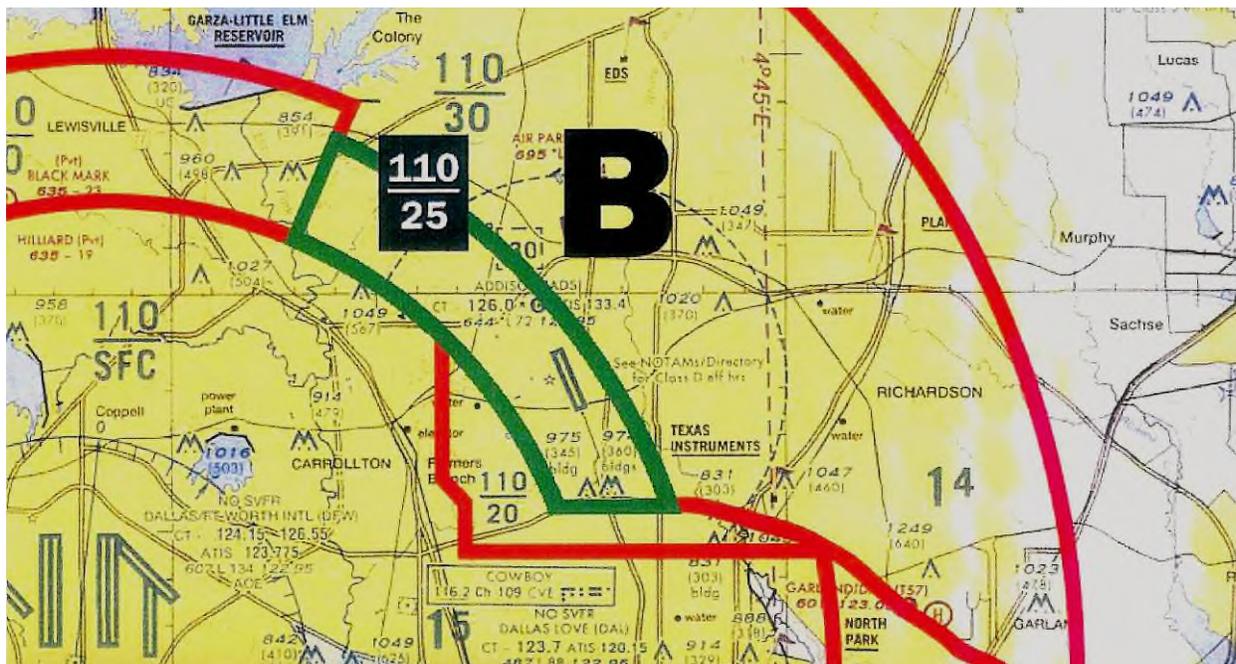
The FAA, in presentations made in 2008 to the Ad Hoc Committee and pilot groups, asserted that the proposed lowering of the Class B floor in the vicinity of Addison Airport (ADS) “does not overly restrict non-participating aircraft.” However, FAA has never presented any data to support this claim – not even in graphic form as in Figure 2 (above) – and has never defined what would be considered “overly restrictive.” The FAA should provide data to support its assertion.

Departures from ADS are held at 2,000 MSL, while VFR arrivals to ADS are kept at 2,500 MSL and IFR arrivals are at 3,000 MSL. As the cautionary statement on the chart (Figure 3, above) notes, north of ADS is a “high density area” for Addison arrivals. The FAA assertion in the NPRM that the proposed lowering of the Class B floor to 2500 MSL over Addison “would continue to support VFR aircraft ingressing and egressing ADS from/to the east without compression” fails to address the more serious issue of airspace compression north and northwest of Addison in the area of heavy ADS arrivals where there is also a designated VFR flyway at 2,500 MSL and below (see Figure 3) as well as another airport (Airpark Dallas, F69).

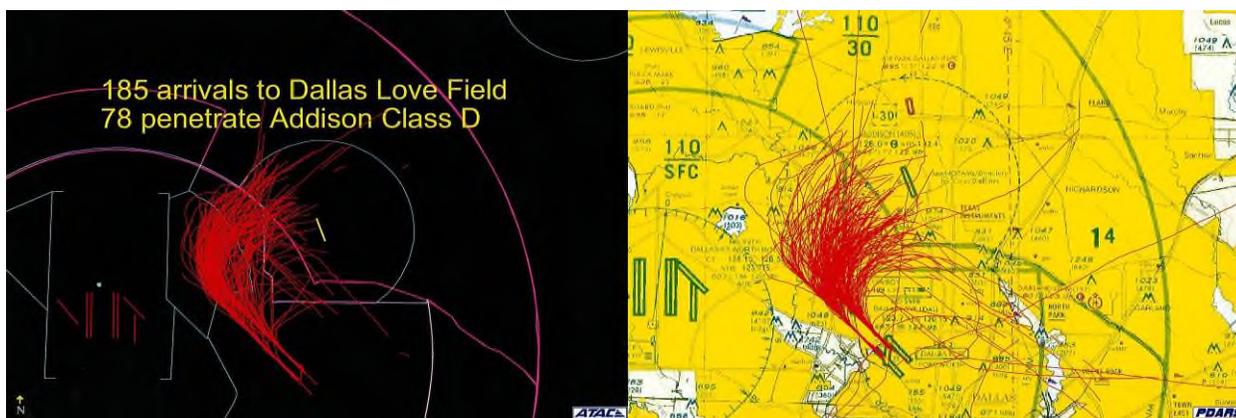
*The FAA’s own radar data suggests that there is no need to lower the current Class B floor to 2,500 feet East of Addison’s runway.*

As previously noted, Addison Airport strongly prefers that the DFW Class B airspace remain unchanged in the vicinity of ADS. However, if it is determined that expansion of the Class B airspace in this area is desirable and necessary to contain approaches of

large turbine-powered aircraft to Runways 13L and 13R at DAL, such expansion should be more limited in extent than the current FAA proposal. Figure 4 shows the final (2008) recommendation of the Ad Hoc Committee. The FAA's current proposal "reduces the lateral size of the proposed subarea ... by adjusting the outer boundary to match the 13-NM arc of the adjacent existing Class B airspace ... segment located north of DFW" but provides no rational basis for setting the outer arc at 13-NM.



**Figure 4:** The Ad Hoc Committee recommendation for lowering the DFW Class B floor to 2,500 feet MSL over Addison was more limited in scope than FAA's current proposal.

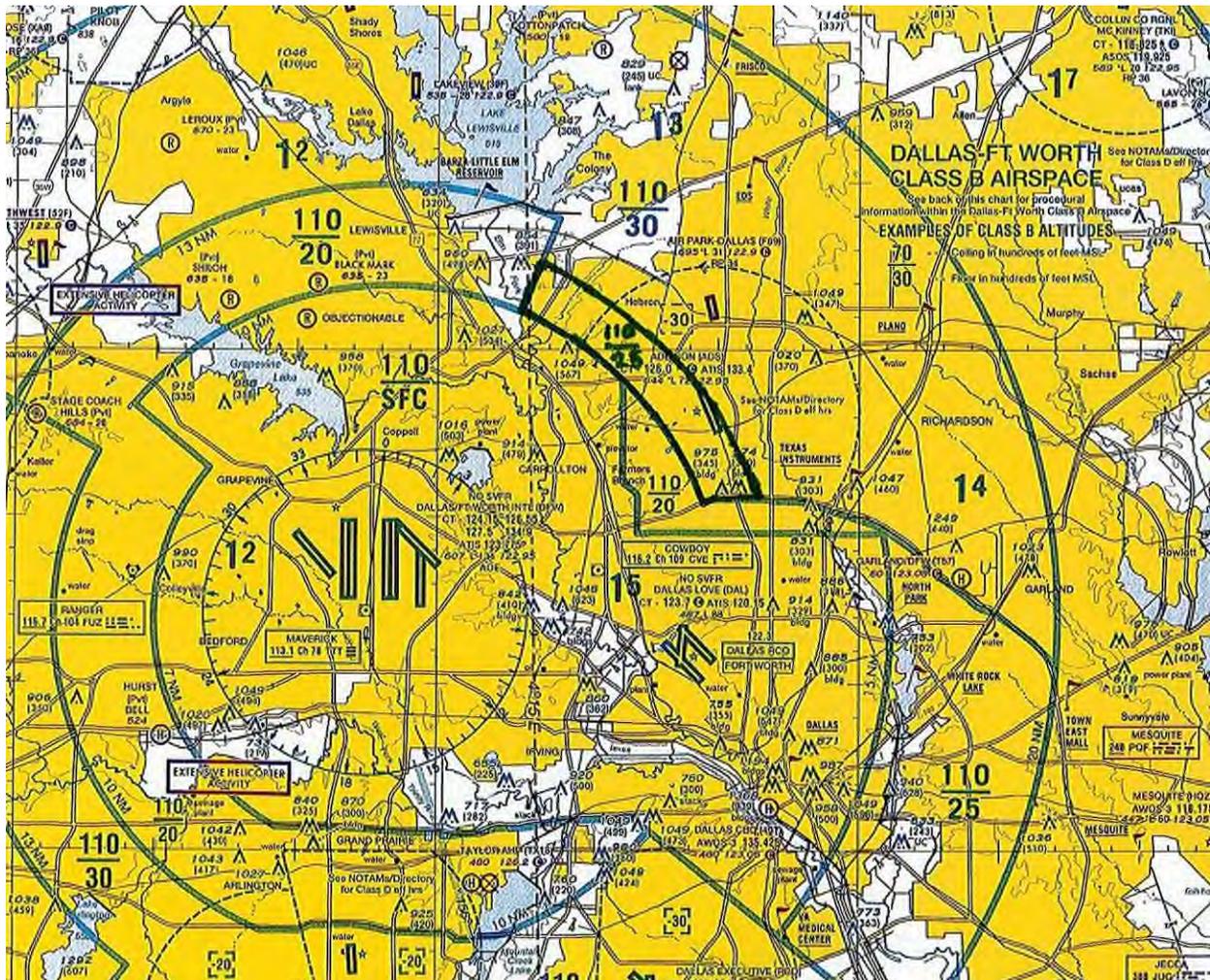


**Figure 5a:** Radar tracks of arrivals to DAL over ADS, showing 78 of 185 arrivals penetrating the ADS Class D airspace. **Figure 5b:** Another image of DAL arrivals over ADS, shown against a Terminal Area Chart.

Figures 5a and 5b show the radar tracks of arrivals to Runways 13L and 13R at DAL passing over ADS. The tracks start as the aircraft descend through 3,000 MSL. As is clear from these figures, the overwhelming majority of aircraft approaching DAL do not descend below 3,000 MSL (below the existing DFW Class B floor) until crossing WEST

of Addison's runway. This supports the idea that limiting expansion of the Class B airspace to an arc passing over Addison's runway is sufficient to contain the approaches into Dallas Love Field.

Addison's proposed alternative limiting expansion of the DFW Class B over ADS includes setting the outer arc at 11.5 NM.



**Figure 6:** Proposed alternative for lowering the DFW Class B floor to 2,500 feet MSL over Addison limits the lateral extent of the Class B expansion. This alternative would contain the approaches to DAL (see Figures 5a and 5b) while providing prominent landmarks on the ground to enable non-participating VFR aircraft to visually identify the boundaries of the Class B airspace.

Figure 6 illustrates Addison's proposed alternative to limit the expansion of the DFW Class B over ADS to an area between the 10-NM and 11.5-NM arcs. This proposal is consistent with the recommendation of the Ad Hoc Committee and sufficient to contain the DAL approaches. Furthermore, it provides excellent, easily-identified landmarks to aid VFR pilots in identifying the boundaries of the Class B airspace: the Galleria (a cluster of tall structures) at the south end; Addison's runway in the center; and a large landfill at the northern end of the 11.5-NM arc. As stated in the NPRM, "FAA agrees that

using prominent landmarks, when available and supportive, to describe Class B airspace boundaries enables non-participant VFR aircraft to visually identify the boundaries and to avoid unintended incursions into Class B airspace.” FAA’s own proposal (with the 13-NM outer arc) provides no such visual references for VFR pilots. In addition, limiting the Class B expansion to an 11.5-NM outer arc per Addison’s proposal greatly reduces the area of concern for airspace compression north and northwest of ADS.

*NextGen may eliminate the need for Class B expansion*

Approach procedures currently in use require a series of step-changes in altitude. The “NextGen” air traffic control system will enable continuous descent profiles, which may eliminate the need to expand Class B airspace to contain these approaches. If the proposed expansion of Class B airspace is implemented, it seems likely that the changes will remain in place regardless of whether “NextGen” ATC needs it to contain continuous descent approaches. While it may be desirable to make some changes to ensure that current approaches are fully contained within Class B airspace, FAA should commit to re-examining the Class B airspace needs when “NextGen” procedures are implemented.

*Addison opposes reducing the ADS Class D ceiling because it results in uncontrolled airspace in a high traffic area*

In the NPRM, it is noted that “to overcome potential confusion, unintentional airspace incursions, or perceived flight safety issues associated with the ADS Class D airspace area having two different ceilings as a result of this proposed action, the FAA is also considering amending the ADS Class D airspace area with a single ceiling ‘to but not including 2,500 feet MSL’ as a separate airspace action.” At present, the ceiling of the ADS Class D lies immediately below the floor of the DFW Class B. Lowering the ADS Class D ceiling as FAA suggests would leave a 500-foot thick slice of uncontrolled airspace above the ADS Class D and below the DFW Class B. Addison believes that this area of uncontrolled airspace in a high traffic area would pose a real and far greater flight safety concern than any “perceived” (but unnamed) flight safety concern or any possibility of confusion resulting from the ADS Class D having two different ceilings. Addison is strongly opposed to this suggested change.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Joel P. Jenkinson". The signature is written in a cursive, flowing style.

Joel P. Jenkinson, Ph.D., A.A.E.  
Director, Addison Airport

**From:** 9-ASW-NorthTXOAPMcomment@faa.gov  
**Sent:** Wednesday, October 30, 2013 6:28 AM  
**To:** Joe J Sansone  
**Subject:** Re: FAA North Texas Optimization of Airspace and Procedures in the Metroplex (OAPM) Draft Environmental Assessment (EA) Notice of Availability

Mr. Sansone,

Information concerning the proposed North Texas OAPM project and how to comment can be found at [http://www.oapmenvironmental.com/ntx\\_metroplex/ntx\\_outreach.html](http://www.oapmenvironmental.com/ntx_metroplex/ntx_outreach.html).

Sincerely,

Daisy Mather  
Environmental Protection Specialist  
FAA. ATO Central Service Center  
Airspace and Procedures South Team  
Operations Support Group, AJV, C22  
2601 Meacham Blvd. (4500 Mercantile Plaza)  
Fort Worth, TX 76137  
9-ASW-NorthTXOAPMcomment  
817-321-7700 (office)  
817-321-7649 (fax)

From: Joe J Sansone <[Joe.Sansone@ipaper.com](mailto:Joe.Sansone@ipaper.com)>  
To: 9-ASW-NorthTXOAPMcomment/ASW/FAA@FAA,  
Date: 10/29/2013 11:01 AM  
Subject: FAA North Texas Optimization of Airspace and Procedures in the Metroplex (OAPM) Draft Environmental Assessment (EA) Notice of Availability

1 How can I participate in this?

215 Eastwood  
Southlake, TX 76092  
October 25, 2013

NTX OAPM EA  
Ms. Daisy Mather - Environmental Specialist  
FAA Central Service Center  
Operations Support Group, AJV-C22  
2601 Meacham Blvd.  
Ft. Worth, TX 76137

Subject: Airport Environmental Impact Study

Dear Ms. Mather:

When the NW runway is used for take offs, the noise level prohibits being outside or even opening windows. Sometimes the large planes prevent us from hearing a telephone conversation. This has started as early as 6:45 AM and has lasted until almost 11 PM. Most of the time you are still hearing the noise of the last plane as a new one takes off. The noise is loud enough that it makes you angry.

We have lived in Southlake since 1983 and have become very accustomed to the airport traffic. However, this past month has been disruptive to our lives and the enjoyment of our property. In fact, if this situation were permanent, I would be moving.

1

We would like to see abatement procedures in place that reduce this deafening roar for 15 or 16 hours a day. Right now, it appears that nothing is being done as the planes aren't even flying over the outer marker which would certainly reduce some of the noise.

While we realize the airport requires maintenance, the situation this past 30 days has been an unreasonable hardship and we would appreciate not having to go through this every year.

Regards,



Diane Smith Faughn



Larry L. Faughn

“George” as forwarded by Southlake Deputy Mayor – Pamela Muller

----- Forwarded by 9-ASW-NorthTXOAPMcomment/ASW/FAA on 11/04/2013 08:48 AM -----

From: Pamela Muller <[place6@ci.southlake.tx.us](mailto:place6@ci.southlake.tx.us)>  
To: 9-ASW-NorthTXOAPMcomment/ASW/FAA@FAA,  
Date: 11/02/2013 02:09 PM  
Subject: FW: letter

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To whom it may concern:

My name is George, I live Southlake. I moved to Southlake almost 25 years ago in January of 1989. During that time, until recently, the number of departures from Runway 31L was minimal and only when a thunderstorm or extremely strong winds forced it use.

1

Something has drastically changed. Since August of 2012 there have been weeks on end when we've experienced an unprecedented number of departures from Rwy 31L, sometimes over 300 in a day. When I retired in 2005 if I had known then about what we're experiencing now we would have moved.

Although the FAA went to great lengths to develop and chart a noise profile for arrivals and landings on 13R no such analysis was ever done for departures from the same runway.

Unlike arrivals to 13R where aircraft use the ILS localizer for precise course guidance during departures on 31L there is no attempt to maintain course. Aircraft are cleared for takeoff and told to maintain runway heading. After airborne the aircraft drift off runway centerline due to the wind, mostly to the south and sometimes a great deal off centerline passing over housing developments within just a few miles from the runway.

2

Why was the FAA concerned about noise during arrivals to 13R when engine power is reduced and not be interested in mitigating the noise generated during departures from 31L when aircraft engines are at takeoff or climb power and making substantially more noise?

There are relatively simple solutions. The easiest would be to mandate pilots of jet aircraft fly their established Noise Abatement Procedure. In addition, establish a Standard Instrument Departure (SID) that directs the pilots to fly the 31L localizer back course or an RNAV equitant until reaching a specified altitude at which time they would be cleared to an enroute fix.

If not addressed and resolved the noise from departing aircraft on 31L will have a substantial detrimental impact on the City's quality of life and reputation. If not alleviated many will not move into the noise impacted areas of Southlake and many residents will move out of Southlake.

Regards,

George  
Southlake, TX

----- Forwarded by 9-ASW-NorthTXOAPMcomment/ASW/FAA on 11/04/2013 08:47 AM -----

From: "STEMPFLEY, TROY D GS-11 USAF ACC 366 OSS/OSAR" <[troy.stempfley@us.af.mil](mailto:troy.stempfley@us.af.mil)>  
To: 9-ASO-ATO-ATLOAPMEA/ASO/FAA@FAA, 9-ASW-HoustonOAPMcomment/ASW/FAA@FAA, 9-ASW-NorthTXOAPMcomment/ASW/FAA@FAA, 7-ANM-NorCalOAPM/ANM/FAA@FAA, 9-ASO-DCOAPMcomment/ASO/FAA@FAA,  
Cc: "TROY.STEMPFLY@HOTMAIL.COM" ([TROY.STEMPFLY@HOTMAIL.COM](mailto:TROY.STEMPFLY@HOTMAIL.COM)) <[TROY.STEMPFLY@HOTMAIL.COM](mailto:TROY.STEMPFLY@HOTMAIL.COM)>  
Date: 11/03/2013 01:23 PM  
Subject: request for information on OAPM

---

Ladies & Gentlemen

My name is Troy Stempfley I'm a student with Embry Riddle University in the process of developing my Capstone project completing my BS in Professional Aeronautics. My Capstone research project will focus on the Airport requirement and changes needed to effectively implement the Nextgen program. I visited the OAPM website and retrieved your contact information with the hopes that you may be able to provide some data and or "lesson learn" from the early implementation within your purview. Specifically Airport structural needs for to optimize the use of Nextgen, Airspace protection and route changes, the effect of none PBN equipped aircraft operating with the Metrozones and proposed corrective actions.

1

I understand your busy schedules and appreciate your time; if there is somewhere or some other person I can talk to, to get the information please either forward this email on or reply with the needed point of contact.

Thank you,  
Vr  
Troy Stempfley

----- Forwarded by 9-ASW-NorthTXOAPMcomment/ASW/FAA on 11/05/2013 12:09 PM -----

From: Joe J Sansone <[Joe.Sansone@paper.com](mailto:Joe.Sansone@paper.com)>  
To: 9-ASW-NorthTXOAPMcomment/ASW/FAA@FAA,  
Date: 11/05/2013 10:34 AM  
Subject: Excessive Airplane noise in Southlake due to take offs on runway 31L

---

Name: Joe Sansone  
Address: 1218 Forest Hills Drive  
Phone: 8174218962  
e-mail address: [jsanson9@verizon.net](mailto:jsanson9@verizon.net)

Dear Executive:

I would request that you all mandate that the pilots follow the same straight path they use when they land the planes when they take off using runway 31L.

1

If the planes take off on runway 31L did so in the straight path they follow when landing on 31L and not being allow to or not be instructed by the Air Traffic Controller to take a course to the left off the straight path until over lake Grapevine this would resolve the issue of excessive noise from the planes taking off from 31L and then traveling over Southlake's schools, homes, and Townsquare.

Instituting this simple rule would not place an undue burden on the pilots, the FAA, the Airlines, or the DFW airport and should be adopted.

Thank you for considering this request. In addition, please be informed that I would be willing to serve on a "board" or "commission" formed to address this matter.

Respectfully,

Joe Sansone

----- Forwarded by 9-ASW-NorthTXOAPMcomment/ASW/FAA on 11/07/2013 10:42 AM -----

From: "Jenkinson, Joel" <[joel.jenkinson@urs.com](mailto:joel.jenkinson@urs.com)>  
To: 9-ASW-NorthTXOAPMcomment/ASW/FAA@FAA,  
Date: 11/06/2013 04:02 PM  
Subject: Questions Regarding the North TX OAPM Draft EA

---

Daisy Mather  
Environmental Protection Specialist  
FAA. ATO Central Service Center  
Airspace and Procedures South Team  
Operations Support Group, AJV, C22  
2601 Meacham Blvd. (4500 Mercantile Plaza)  
Fort Worth, TX 76137  
9-ASW-NorthTXOAPMcomment  
817-321-7700 (office)  
817-321-7649 (fax)

Daisy,

1

I have some questions regarding design of the new instrument procedures proposed in the NTX OAPM. Were the new procedures designed based on DFW Class B airspace as it is presently configured, or were the procedures designed based on DFW Class B airspace as it was proposed to be modified in the NPRM published in the Federal Register on January 22, 2013?

2

Can you provide the vertical profiles (altitudes) of some of the proposed procedures, specifically the STARs for DAL in south flow that pass over ADS? I am most interested in the FINGR FIVE and the HIBIL ONE, but would also like to see the vertical profiles of the BACHR ONE, KNEAD SIX, REDDN ONE, and YEAGR ONE.

Thanks,

Joel

Joel Jenkinson, A.A.E.  
Airport Director  
Addison Airport  
972-392-4850

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----- Forwarded by 9-ASW-NorthTXOAPMcomment/ASW/FAA on 11/08/2013 09:11 AM -----

From: "Jenkinson, Joel" <[joel.jenkinson@urs.com](mailto:joel.jenkinson@urs.com)>  
To: 9-ASW-NorthTXOAPMcomment/ASW/FAA@FAA,  
Cc: "[Admin-ntx@hmmh.com](mailto:Admin-ntx@hmmh.com)" <[Admin-ntx@hmmh.com](mailto:Admin-ntx@hmmh.com)>  
Date: 11/07/2013 01:05 PM  
Subject: RE: Questions Regarding the North TX OAPM Draft EA

---

Daisy,

**1** My previous e-mail (below) was not intended as a comment. It is a relatively simple question followed by a request for some additional information. I would very much appreciate a simple response to my simple question, which I will rephrase:

Were the new instrument procedures proposed in the NTX OAPM developed:

(a) based on DFW Class B airspace as it is presently configured

or

(b) based on DFW Class B airspace as it was proposed to be modified in the NPRM published in the January 22, 2013 Federal Register?

This does not require anyone to "develop a response"; it's either one or the other, and I would very much like to know which it is.

As for my request for additional information, I will reiterate that as well: can you or someone else please provide the vertical profiles of the STARS serving DAL in south flow, referenced below? The NTX OAPM Draft EA provides incomplete information in that only the ground tracks (two-dimensional information) are provided for the proposed new procedures. Instrument procedures are inherently three-dimensional, and I am simply asking to be provided with a specific, limited subset of that three-dimensional information to help me understand and evaluate potential impacts on Addison Airport and the neighboring communities.

Best Regards,

Joel

Joel Jenkinson, A.A.E.  
Airport Director  
Addison Airport  
972-392-4850

From: Karen Burton <[stkaren@verizon.net](mailto:stkaren@verizon.net)>  
To: 9-ASW-NorthTXOAPMcomment/ASW/FAA@FAA,  
Date: 11/10/2013 09:35 AM  
Subject: OAPM

---

1

I am interested in learning more about this EA.  
How can I be involved?

Karen Burton

----- Forwarded by 9-ASW-NorthTXOAPMcomment/ASW/FAA on 11/12/2013 12:50 PM -----

From: Maelissa Watson Elmer <[maelissawatson@yahoo.com](mailto:maelissawatson@yahoo.com)>

To: 9-ASW-NorthTXOAPMcomment/ASW/FAA@FAA, [CEO@southwest.com](mailto:CEO@southwest.com)CEO,

Cc: Kim Edge <[edgek\\_1066@yahoo.com](mailto:edgek_1066@yahoo.com)>, Mary Guenveur <[mhguenveur@yahoo.com](mailto:mhguenveur@yahoo.com)>, "Timdalbey@att.net" <[Timdalbey@att.net](mailto:Timdalbey@att.net)>

Date: 11/10/2013 04:30 PM

Subject: Fwd: Dallas neighbors praise Southwest for reducing noise around Love Field

---

Begin forwarded message:

**From:** Maelissa Watson <[mrmwatson@icloud.com](mailto:mrmwatson@icloud.com)>

**Subject:** Dallas neighbors praise Southwest for reducing noise around Love Field

**Date:** November 10, 2013 3:53:09 PM CST

**To:** [dschechter@wfaa.com](mailto:dschechter@wfaa.com)

**Cc:** "[brittanydunn@gmail.com](mailto:brittanydunn@gmail.com)" <[brittanydunn@gmail.com](mailto:brittanydunn@gmail.com)>, Maelissa Watson Elmer <[maelissawatson@yahoo.com](mailto:maelissawatson@yahoo.com)>

Big Story ! What has happened is that Love Field Operators just diverted the air traffic to Lakewood, White Rock Lake, and all of East Dallas; neighborhoods that had NO JET OR PLANE NOISE BEFORE. They will not get away with it. Lakewood may not have the financial resources of Highland Park but we are not paupers either; and they can start at Square One with a full blown Environmental Impact Statement on a newly impacted neighborhoods.

----- Forwarded by 9-ASW-NorthTXOAPMcomment/ASW/FAA on 11/14/2013 12:46 PM -----

From: Mary Guenveur <[mhguenveur@yahoo.com](mailto:mhguenveur@yahoo.com)>  
To: 9-ASW-NorthTXOAPMcomment/ASW/FAA@FAA,  
Date: 11/13/2013 03:57 PM  
Subject: Fw: Increase in Air traffic in East Dallas

---

On Wednesday, November 13, 2013 3:53 PM, Mary Guenveur <[mhguenveur@yahoo.com](mailto:mhguenveur@yahoo.com)> wrote:

1 There has been a significant increase in air traffic over the Lakewood area and Whiterock area of Dallas. This is very disruptive and sometimes the planes are back to back resulting in non-stop noise. This was not a problem a year ago. Neighbors are very concerned because we moved to this area for the tranquil environment. Why has there been an increase in air traffic?

Sincerely,

Mary Guenveur  
214 3211303

----- Forwarded by 9-ASW-NorthTXOAPMcomment/ASW/FAA on 11/14/2013 12:46 PM -----

From: Maelissa Watson <[maelissawatson@yahoo.com](mailto:maelissawatson@yahoo.com)>  
To: 9-ASW-NorthTXOAPMcomment/ASW/FAA@FAA,  
Date: 11/13/2013 04:26 PM  
Subject: Fw: Frequency of flights Fight Pattern Change in the Advocate website

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----- Forwarded Message -----

**From:** Brittany Nunn <[brittanydnunn@gmail.com](mailto:brittanydnunn@gmail.com)>  
**To:** [Timdalbey@att.net](mailto:Timdalbey@att.net); Mary Guenveur <[mhguenveur@yahoo.com](mailto:mhguenveur@yahoo.com)>; Maelissa Watson <[maelissawatson@yahoo.com](mailto:maelissawatson@yahoo.com)>; Kim Edge <[edgek\\_1066@yahoo.com](mailto:edgek_1066@yahoo.com)>  
**Cc:** Brittany Nunn <[brittanydnunn@gmail.com](mailto:brittanydnunn@gmail.com)>  
**Sent:** Wednesday, November 13, 2013 3:51 PM  
**Subject:** Re: Frequency of flights

All,

The story is posted on the website:

<http://lakewood.advocatemag.com/2013/11/13/neighbors-claim-increase-air-traffic-east-dallas-city-says-otherwise/>

Please let me know if you see anything that doesn't look right. I tried to keep it as simple as possible.

Brittany

# BEFORE THE FEDERAL AVIATION ADMINISTRATION

## FAA North Texas Optimization of Airspace and Procedures in the Metroplex (OAPM) Draft Environmental Assessment (EA)

### PETITION TO INCORPORATE EA INTO AN EIS FOR DALLAS LOVE FIELD AND DFW AIRPORTS

#### Statutory and Legal Introduction:

Section 1508.9 of Council Environmental Quality's (CEQ's) National Environmental Act (NEPA) requires a concise public document that has three defined functions:

- 1 It briefly provides sufficient evidence and analysis for determining whether to prepare an Environmental Impact Statement (EIS);
2. It aids an agency's compliance with NEPA when no EIS is necessary, i.e., It helps to indentify better alternative measures; and
3. It facilitates preparation of an EIS when one is necessary- Section 1508.9(a)

Since the Environment Assessment (EA) is a concise document, it should not contain long descriptions or detailed data, which the agency may have gathered.

1

The captioned EA has over 1000 pages prepared by The California Consulting Firm of Miller Miller, Miller & Hanson. (Incorporated herein by reference)

2

Modeling noise analysis is based on already outdated, incomplete, erroneous, scattered, and projected flight histories. It was compiled in 2011, making no analysis or mention of The Wright Amendment, and that projected increase in air traffic. The proposed acquisition of U.S. Air by American Airlines, or the fact that U.S. Air, a smaller airline that has for years has been in competition with Southwest Airlines would explode local traffic and noise. The American Airline facilities under construction at Love Field Airport would facilitate, not only additional flights by U.S. Air but also by American to their already established destinations, and destinations currently serviced by Southwest Airlines. U.S. Air like Southwest, using smaller aircraft carrying heavier loads and creating more noise. Either way, increased air traffic can be anticipated from Love Field<sup>1</sup>

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<sup>1</sup> This document was prepared before November 12, 2013, prior to the Department of Justice announcement of a settlement allowing the merger of U.S. Airway and AMR Corporation. It now appears that AMR must divest two gates at Love Field. It is unknown how many gates American have under contract.

3

The Harris report dwell in depth on The U.S. Census Bureau statistics to support their findings of no impact in their analysis of population density and integrated noise impact in the 60-mile radius they chose to use. By using the 60 mile Radius they diluted the noise impact on closer in neighborhoods. It may be small point, but not insignificant, i.e., no accounting being made for 250,000 Refugees that were moved by a Church Agency in December 2012, to Lake Highlands, East Dallas from the former Borneo Region. Moreover, given the dramatic increase in Texas Population, over a thousand new residents a day is moving into Texas Cities. (Texas Monthly Magazine November 2013).

### **PREFACE OF THE SOCIAL AND POLITICAL HISTORY BEHIND THE RULEMAKING**

4

In commenting on any proposed rulemaking, it is important to identify the statutory authority for the Rulemaking, and if there is a singular or dual purpose behind the rulemaking. I learned this in my younger years when I worked on the Environmental Subcommittee of the American Petroleum Institute (API) and numerous Texas Oil and Gas Committees. The primary source authorization for the FAA North Texas Optimization of Airspace and Procedures in the Metroplex (OAPM) Draft Environmental Assessment (EA) -is the FAA Modernization and Reform Act of 2012, and the secondary authorization is The Wright Amendment 2006. There is a dual purpose behind the FAA Modernization and Reform Act:

- Earmark financing of in excess of \$60 billion over a 5-year period, for the FAA to support the Airline Industry, Drone Technology Companies, Aircraft Manufacturing, and the development and implementation of NextGen Technology. (Note the time frame of the Act and the proposed regulations)
- The secondary purpose is ideological and political, as is apparent on the face of the legislation. The goal is to reduce the role of Government control and regulation of the airwaves, and limit or phase out Air Traffic Controllers (ATC) that were thoughtfully installed in more sane times to protect the safety of the flying public. In the Statute note the words "Union" "De-Certification of the Union" "Public-Private Financing and Partnerships" " Privatization" "Deregulation".
- Some Lakewood and East Dallas neighbors question the benefit or need for possible deregulation. Drawing attention to previous deregulation experiences, such as The Public Utilities. In Texas both Natural Gas supply and Electric supply was deregulated, and what are the results? The guaranteed source of supply paid for by the Consumers over the years lost forever. The public facilities and contractual supply benefits ended up as assets for the New Power Ventures, and especially for the unscrupulous Financiers, and Hedge Fund Mongols resulting in crippling Debt and astronomical energy prices for consumers of the new so-called Public Utilities. Does the Consumer today witness a definite and

guaranteed source of supply? No, all they experience is fraud and abuse. Many new suppliers are facing bankruptcy. The Banks were deregulated, and we suffered from 2008 Melt Down caused by Wall Street. Citizens retirement assets in IRA's lost billions in value, and millions of citizens were irreparably harmed with painful disappearance of assets, and default on home Mortgages. "Get the Government out of our Business "is not always the correct solution.

- The Wright Amendment was a gift from Senator Kay Bailey Hutchinson to the City of Dallas while her husband acts as the Bond Attorney for the City.

Sadly Texas has regressed in Environmental Protection since the 1980's when so much was accomplished from Coastal Zone Management, to cleaning up the Houston Ship Channel, and the 1960's and 1970's particulate air smog in Houston. Then Texas had some responsible major Corporations with a commitment to social responsibility even to health and environmental governance. Texas and Federal Enforcement Agencies took their mission and role seriously. No consideration is made in the EA in its projections on air pollution in the aggressive gas play from the Barnett Shale in and around the Metroplex. No weight apparently has been given to these noisy projects from fracturing of shale or to the air emissions from operations in the general area between The City of Dallas and Ft. Worth. Actually the City of Dallas signed a contract for drilling on City Parkland.

Comments to the EA may be scant because even in Lakewood and other adjacent neighborhoods Dallas Professionals are hesitant to publicly voice any objection to the NextGen proposal even though they are extremely upset and disturbed by the recent change in flight patterns and the noise. City Hall has in the past telephoned persons who objected to City Programs and got their names and Employers, created files, and in some instances contacted Employers. Professionals who work for Firms that does business with the City fear adverse impact on their business opportunities for City work, especially in areas where City Permits are granted to their clients. This writer also fears retaliation, however, age has seasoned wisdom; and conscience and disruption of daily life from Jet Noise, prompts this course of action. The State Environmental Agencies will probably not comment about additional pollution from the aircrafts in the North Texas Metroplex. Some Agency's has to enforce the law in a fair and even handed manner, and that is not going to be the Texas Environmental Agencies, since **Anarchists** currently indirectly control them,

The Harris Consulting Team may have been given a task with directives to formulate Models based on defined criteria. Were they ever told that Dallas was non-attainment for Clean Air? A mention was made that they assumed that (a conforming?) State Implantation Plan (SIP) was in place. They can answer to that. Therefore, the Harris Team may not have been made aware of the

5 cont'd

background documents such as Dallas Master Plan or the statistics published in 2001 for Love Field with 32 gates not 20 gates.

The Dallas Master Plan is ample evidence of the motivation, that the driving economic force of the Love Field Operator is profit, and maximization of facilities to create profit. Profit is not totally at variance with Environmental Protection of Metroplex Citizens, but there must be a balance. Whether there was other private studies conducted by The City of Dallas for Love Field using federal funds from Bock Grants is not known. The Block Grant financing would obligate The Love Field Operator to comply with Federal laws. From the information available there was never an EIS conducted for Love Field Airport. The testimony in *Southwest Airlines* case cited below, revealed that fact, i.e., that Love Field slipped through the cracks when the EIS was conducted in the early 1970's for then new, DFW Airport. *City of Dallas, Texas et al v. Southwest Airlines Company Defendant 371F. Supp.1015 (1973). 1025.* The Decision was confirmed in the Fifth Circuit Court of Appeals May 31, 1974. Rehearing *en banc* Denied June 24, 1974.

After circumstances surrounding the phase out or closure of Love Field for DFW Airport did not transpire, the first study was prepared by GRA:

*"The starting point for the impact analysis update was the completion of the analysis of air service activity in the absence of the Wright Amendment, performed by the firm of GRA, Inc. GRA performed the market analysis of scheduled service opportunities and profit potentials in much the same manner as would an airline itself, assuring the study of an accurate and authoritative starting point.*

(Page vii BMJM AVIATION 5.31.2006.

DMJM AVIATION Used GRA as subcontractors to utilize their experience from previous work in **"Dallas Love Field Impact Analysis Update" In the Absence of the Wright Amendment" May 31, 2006.**

(This Document is incorporated herein by reference.)

The BMJM Aviation Report reveals important considerations and facts not discussed in The Harris Report.

*"In each case of the No Wright Amendment scenarios, the Master Plan 32 Gate regional jet fleet mix has been replaced for the most part by standard air carrier jets. These aircraft are larger and have a louder noise footprint than CRJ, EMB145 aircraft. Furthermore under the service analysis some are departing at heavier take off weight to service more non-stop destinations than were possible under the Wright Amendment." Page ES-6.*

6

**PROFIT ADVANTAGE FROM LOVE FIELD:**

*"If developing forecasts... Two scenarios were examined 20 and 32 gates, which creates a different profit opportunities for airlines because more gates can physically accommodate more traffic, if it were profitable.... it was assumed that **point -to-point carriers could produce up to 10 to 11 departures and arrivals (turns) per gate***

*per day at DAL, while hub-and -spoke carriers would produce on average 8 (turns) per day. The difference between the two carriers is due primarily to their business models: hub carriers must time flights to match connecting hub banks, whereas point-to point carriers do not". (Emphasis added).* This is still very relevant to Love Field because of their business model as point-to point destinations.

In November 2013, there appears to be conflicting views between the Operators of Love Field and the Lakewood/ East Dallas Neighbors regarding Love Field's recent operational flight patterns. See Declaration Historic Absence Of Airplane Visual and Noise Impact on Dallas Lakewood Neighborhood (this testimony is incorporated herein by reference) The Love Field Operator says there is no increase in air traffic, which the residents deny. However, there is a change in the direction of the traffic towards the East. Previously, Southwest Airline had its runways on Denton Drive, the West side of the airport. When the new runways were built (we understand that 11 are already operational with 9 more to be built) Flight Take-off and Arrivals have resulted in the diversion of traffic and noise East to Lakewood and all of East Dallas.

7

Reference is made here, to the interview by Brittany Nunn, a Reporter and Lakewood East Dallas Editor for The Advocate, a local publication.<sup>2</sup> Love Field Operator sent no NOTICE or had communication with the Residents of Lakewood or East Dallas prior to the new Construction, without an EIS, at Dallas Love Field. The consultations and outreach were with the traditionally noise impacted regions, circular around the Dallas Airport and Highland Park. The Dallas Morning News reported that The Mayor of Dallas in October 2013, met with University Park residents wherein he promised to do something about the Love Field noise.

Highland Park is an elite, super rich neighborhood; and they have hired a former Judge -Attorney to represent them to negotiate with The City, at a cost of \$4000 a month. (See WFAA News Report on Improvement in Noise around Love Field attached hereto and incorporated herein by reference.)<sup>3</sup> What is also missing from the whole scenario is the well-known political and economic fact that Dallas City Council is, and has been for years been controlled by The Dallas Citizens Council, Businessmen and Financial Moguls. The Citizens Council support and finance the election of chosen City Council Members that they can control. Many of Dallas's most powerful and influential Businessmen and their families live in Highland Park and University Park (Park Cities). Also incorporated herein by reference, is a book entitled:

"Dallas Citizens Council- An Obligation of Leadership" by Darwin Payne.

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<sup>2</sup> The Advocate Story dated, November 13, 2013, is attached as "Exhibit A" to the mailed documents to The FAA.

<sup>3</sup> The WFAA report will be attached as " Exhibit B" to this mailed document.

Additionally, the assurances under 49USC Section 47107 have not been made public to the Residents of Lakewood and East Dallas. For e.g.,  
The Secretary of Transportation must approve the current layout plan of an Airport.

8

*"The Secretary will approve the plan and any revision or modification before the plan, revision, or modification takes effect: (emphasis added) "The owner or operator will not make or allow any alteration in the airport or any of its facilities if the alteration does not comply with the plan the Secretary approves, and the Secretary is of opinion that the alteration may effect adversely the safety, utility, or efficiency of the airport. "*

Finally, in the EA analysis it is so important to reiterate that Financing authorization for the NextGen Technology is found in FAA Modernization and Reform Act of 2012. In a time when The Nation is cutting budgets, many residents of the Lakewood Neighborhood noticed that \$60 BILLION is earmarked over 5 years, to study and implement the NextGen Technology. The message the Neighborhoods asked this writer to convey, loud and clear to The FAA, is that the residential lifestyle and quality of life in our East Dallas Neighborhoods will not be compromised so Pilots can make simpler straight run departures and arrivals; irrespective of the efficiency, convenience or lower cost of the auto pilot Technology. Currently Lakewood and the Historic Districts are seeing Southwest Airlines Jets flying very, very low, the logo on the airline is clearly visible to people walking their dogs. The flashing lights are appearing in resident's windows. The noise is deafening, in the early mornings, as early as 3:37 a.m. some days, at noon, late afternoon and evenings. At times the noise would literally waken the dead.

9

Additionally DFW Flights are now causing a constant drone, why are DFW Flights now flown with a drone impact over Lakewood? This also is new. Turbo Props from Addison Airport, with its runway changed to the East, is newly very disruptive. Young Mothers complain that their babies are awakened by the loud, roaring Jet noise. Residents of Lakewood pay a premium for their homes both in purchase price and high property taxes, because of the park-like settings, proximity to White Rock Lake, and cultural events such as Shakespeare in Amphitheatre Park at Samuell Grand Park. The Neighborhood states that it will not stand quite, while our neighborhood and adjacent East Dallas Parks and Lakes are being destroyed by noise and pollution. In the interest of Environmental Justice, and plain common law Equity, over a million residents should not have their health and lives destroyed for NextGen Pilots convenience, that is a benefit for only a few powerful Airline Corporations. Lakewood was listed Number 5 out of 10 of The Area's 10 Healthiest Neighborhoods October 4, 2013 Dallas Morning News.

##### 5. Lakewood:

*Unlike many areas of Dallas, Lakewood has a level of air pollution one might expect in the suburbs, well below the regional average. Add that to White Rock Park and White Rock Creek Trail, and you have the City's No.1 neighborhood for healthy living. Page 27. "*

10

While Environmental Justice is usually defined by the impact on low-income minority neighborhoods around big City Airports and Refineries. This scenario does indeed apply in a segment of East Dallas especially in the area around Fair Park that is on the National Historic Register, and to The Queen City area in The Peak Historic District. These areas are primarily black and Hispanic populated areas; people who cannot speak for themselves, so they asked us to speak for them. It is important to note the HUD has set a standard of 65 db for public housing, and it is doubtful whether that standard is being observed in Fair Park area currently; or in The Peak and Munger Place Historic areas where, when the jets fly overhead; people's conversations become inaudible to the listener. Moreover, these residents cannot watch their TV's from static nuisance. T.V. they said was their primary form of relaxation and entertainment after a hard day of manual labor. They do not go to the Opera or Theatre or dine at up-scale Restaurants. These are no insignificant facts. The Harris Draft EA tried to conform their Noise Impact analysis to fit the 65 db, that is very noticeable, and basically said it is acceptable to hear a portion of a conversation?

11

It is strange that there was no viable discussion in the EA. regarding the health aspects of pollution, in a City that is non-attainment for air quality. It is public record (Dallas Morning News October 2013) that The National Lung Association recently submitted an AMA Doctors Report on Childhood Asthma in the North Texas -Dallas area, to the Texas CEQ asking that the coal burning emissions from two coal fired Plants downwind from Dallas cease because of a near emergency situation with children breathing problems. Their request was denied. Attached is an article referencing British Scientists, by Andrea Perry ". That people living in communities close to airports are being warned that they could be at greater risk of cancer caused by pollution from jet exhausts...." " Aviation emissions are transmitted by a spray that is dispersed overhead, that cannot be filtered out by our lungs and is directly transmitted into our bloodstream. The mist is a sticky substance that attaches to vegetation and is also ingested and drank."<sup>4</sup>

12

The major environmental benefit documented in favor of implementing the NextGen Technology, was less pollution from fuel savings by implementing straight auto piloted routes. No mention or recommendation is made that the Airlines cease using Avgas with its lead content, sooty emissions, CO2, Nox, volcanic ash, and wake turbulence. Using refined gasoline would benefit the environment but it would cost the airlines more. If the average Taxpayer even knew how much they subsidize commercial aviation, including million to The Aviation Trust Fund, they would be a lot more unhappy about the extra charge for baggage, and the blatant disruption of their lifestyle. Current law imposes a total tax of 24.4 cents per gallon on Kerosene. However, a reduce tax rates apply for kerosene removed directly from a terminal in the fuel tank of a commercial aircraft making the tax rate 4.4 cents per gallon. For kerosene for non-commercial aviation the tax is 21.9 cents per gallon. The Commercial Airline Kerosene is indeed a bargain. Texas is generous in other ways

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<sup>4</sup> Article: Now living by airports can give you cancer. Exhibit "C" to mailed Document

also to the Commercial Airlines and Airline Manufactures, and history shows that the FAA has always been cozy with the airline industry it is supposed to regulate. Texas State Proposition 4 that passed November 2013 gave a tax exemption from sales tax for aircraft parts stored in the State. In this area of the equal treatment of environmental impacts the current DRAFT EA is deficient and slanted; and that is why an immediate impartial EIS should be commenced.

The Harris report recommends the adoption of certain European Union standards, and criteria for NextGen technology. Yet The U.S. Airline Industry and The FAA vigorously oppose any adoption of European standards to mitigate the carbon emissions of airline operations on Global warming. The FAA should use:

*“All political diplomatic, and legal tools at the disposal of the United States to ensure that the European Union’s emissions trading scheme is not applied to aircraft registered by the United State or operators of those aircraft, including the mandates that United States carriers provide emissions data to or purchase emission allowances from or surrender emissions allowances to the European Union Member State.”* Section 509 (3) The FAA Modernization and Reform Act of 2012, and remember this Act is the authorization for preparation and implementation The OAMP Draft E.A. for Love Field and DFW.

The death knell to the credibility of the DRAFT EA is: in The Final Report on **Implementation of NextGen Initiatives.**”

Here the Consultants cover themselves. “The North Texas Metroplex Prototype Study Team (PST) was one of the first OAMP Study Teams formed.” P.1.

*“The OAPM expedited timeline and focused scope bound airspace and procedures solutions to those that can be achieved without requiring an Environmental Impact Statement (EIS) e.g. only requiring an Environmental Assessment (EA) or Categorical Exclusion (CATEX) and within the current infrastructure and operating criteria. The Study Team results may also identify airspace and procedural solutions that do not fit within the environmental; and criteria boundaries of an OAMP project. These other recommendations then become candidates for other integrated airspace and procedures efforts.”* P. 3.

Two types of assessments were made to gauge the potential benefits of proposed solutions: Qualitative and Quantitative.

**“ Qualitative assessments are those that the PSA could not measure, but would certainly result from the implementation of the proposed solution. “** (Emphasis added) These assessments included:

- *Impact on Air Traffic Control (ACT) task complexity*
- *Ability to apply procedural separation (laterally or vertical segregated flows)*
- *Ability to enhance safety*

- *Improved connectivity to en route structure*
- *Improvement to security (avoiding restricted airspace)*
- *Reduction in communications (cockpit and controller)*
- *Reduction in need for Traffic Management Initiatives (TMI)*
- *Improved track predictability and repeatability*

*Reduce reliance on ground-based navigational aids (NAVAIDS)*

*Task complexity, for example, can be lessened through the application of structured PBN procedures versus the use of radar vectors, but quantifying that impact is difficult. Reduced communications between pilot and controller, as well as reduced potential for operational errors, are examples of metrics associated with controller task complexity that were not quantified.” P.3*

As the FAA well knows, an EIS is a detailed analysis that serves to insure that the policies and goals defined in NEPA are infused into the ongoing programs and actions of the federal agency. The EIS should provide a major study, and in particular significant impacts where no environmental impacts previously existed.

It appears that Lakewood has been victimized with new Flight Patterns that is seriously impacting a virgin, previously un-impacted neighborhood. An EIS would propose reasonable alternatives that should enhance the quality of the human environment. The standard format for an EIS as outlined in Section 1502.10 of the NEPA Regulations should be followed.

13

Respectfully submitted,

MRM Watson

6956 Lakeshore Drive,

Dallas, TX. 75214

Tel: 214-327-32081

Mobile: 214 213-6643

E-mail: [mrmwatson@icloud.com](mailto:mrmwatson@icloud.com)

Comments submitted on behalf of some concerned and impacted residents in the Lakewood Neighborhood and East Dallas Residential Neighborhoods.

**DECLARATION OF HISTORIC ABSENCE OF  
AIRPLANE VISUAL AND NOISE IMPACT ON THE  
DALLAS LAKEWOOD NEIGHBORHOOD**

In accordance with 28 U.S.C. § 1746, I, Maelissa Watson Elmer, make the following Declaration:

My name is Maelissa Watson Elmer, and I have resided for about forty years in the neighborhood of Lakewood in East Dallas at a residence approximately two blocks from White Rock Lake.

I am above the age of eighteen years. I have the legal and mental capacity to make this Declaration, and I have personal knowledge of the facts that are stated herein.

I am familiar with the historic noise radius emanating from Love Field. In 1973 prior to diligently looking for a home to purchase, my husband and I lived in the Knox Henderson area close to Highland Park. Daily I walked over to the Lakeside Park in Highland Park, and became aware of the air traffic noise disturbance there then. At that time Love Field was the only Air Port in Dallas. We deliberately chose not to purchase a house near Love Field because we did not want to be subjected to noise or pollution from aircraft.

I also have personal knowledge of the layout and noise radiating from Love Field prior to reconstruction of the Airport. During a period in the 1980's I commuted Monday to Friday on Southwest Airlines and Muse Airlynes to Hobby Airport in Houston to work in my profession.

We purchased our home in Lakewood in 1973, our daughter was born here, and until now we have enjoyed the beauty, peace, and tranquility of the neighborhood.

On or about June 2013, while I was convalescing at home from an accident, I became aware of loud noises, like an approaching thunderstorms, that I later identified as Jet noise in the early morning, beginning once more around noon and lasting to late afternoon, and again into the night. I contacted my local Congressional Representative to have DOT investigate the source of new air traffic in Lakewood. He never responded, nor did he, to my knowledge, make available to his Constituents

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The FAA North Texas Optimization of Airspace Draft Environmental Assessment (EA). I have since become aware in reading the Record that he was notified in May 2013, in an initial screening on the Draft Environmental Assessment.

I sent e-mail to my Dallas City Council Representative Sheffie Kadane seeking to understand what was happening in our Lakewood neighborhood. The Director of Aviation Mark Daubner apparently was assigned to speak and communicate with me. When we talked he implied that I was making a mountain out of a molehill and that there was no increase in air traffic or new traffic over our Lakewood neighborhood. I asked him to put that in writing as a number of my neighbors heard what I did. After follow-up emails and my letter to the Mayor, he sent me a second letter disclosing the FAA OAMP Environmental Assessment with only a few days remaining to comment by October 30, 2013. A one-month extension was then requested from The FAA. A 19-day extension was granted, together with and a CD of the proposed regulations and analyses prepared by a consulting firm in California. From the information I received, it took the consulting firm approximately three years to complete the study, but now The Lakewood Neighborhood only have 19 days to analyze and study over 1000 pages of impact material with complicated noise formulas.

I fear the current jet noise is affecting the neighborhood as a desirable and healthy place to live; reducing property values, and may force residents to move from the neighborhood. In the past two Sunday mornings, I was awoken from a deep sleep by a loud roaring jet at 3:33 a.m. I got up and looked out the window to see aircraft lights flashing above my tall Asiatic Elm tree.

I declare under penalty of perjury, that the foregoing is true and correct.

Executed on the      day of November 2013.

---

Maelissa Watson Elmer

(A signed original is being mailed to the FAA by United States Post Office and will be Stamped November 18, 2013)



Integrity ★ Service ★ Innovation

November 18, 2013

NTX OAPM EA  
Ms. Daisy Mather - Environmental Specialist  
FAA Central Service Center  
Operations Support Group, AJV-C22  
2601 Meacham Boulevard  
Fort Worth, TX 76137

RE: COMMENTS ON NTX OAPM EA

Dear Ms. Mather:

Thank you for the opportunity to submit comments on behalf of the City of Colleyville, Texas, with respect to the Draft Environmental Assessment for North Texas Optimization of Airspace and Procedures in the Metroplex (the "Draft EA"). Our city is located near Dallas-Fort Worth International Airport (DFWIA) and experiences frequent overflights from low-flying aircraft.

1 Our city's primary concern with respect to the proposed airspace redesign project relates to potential noise impacts. We have endeavored to understand the manner in which the proposed changes would impact our citizens. Unfortunately, the Draft EA fails to provide sufficient information that would enable us to gain a meaningful understanding of how this proposal might change the location, altitude, frequency, time of day, or noise levels associated with aircraft operations over our community.

2 To that end, we have requested that officials at DFWIA host a meeting with FAA staff and impacted cities designed to educate our officials about the nature and potential significance of any noise pollution from the proposed project. We are both surprised and disappointed that a more concerted effort was not made to contact our Mayor, City Council, or City Manager's Office regarding an issue of such importance that could have long-term impacts to our community.

3 In the meantime, we respectfully object to the proposal given the real potential for a negative impact to our community, particularly as it relates to possible changes in flight patterns that would result in aircraft overflights where none exist today.

Thank you for consideration of these comments and for honoring our request for a briefing.

Sincerely,

  
Jennifer Fadden  
City Manager

Comments on the OAPM (Optimization of Airspace and Procedures in the Metroplex)  
Environmental Assessment to the Federal Aviation Administration (FAA) Fort Worth,  
Texas

By: Tim Dalbey

local resident: 2719 Santa Cruz Drive, Dallas , Texas 75227)

18 November 2013

To

Daisy Mather, Environmental Specialist  
FAA Central Service Center  
Operations Support Group, AJV-C22  
2601 Meacham Boulevard  
Fort Worth, Texas 76137

EA is for optimizing flight departures and arrivals at 21 airports within a 60 mile radius within the Metroplex but states that the OAPM does not increase the overall number of aircraft operations within north Texas airspace.

Early notice of the OAPM went out in May 2013, but many citizens are just now finding out about the proposal, EA, and were not notified by the city of Dallas for such communities in east Dallas neighborhoods (ie. Lakewood, Lake Highlands, Casa Linda, Casa View, Coronado Hills, Mt. Auburn, Buckner Terrace, Piedmont, Parkdale, etc. to list a few neighborhoods) where for instance over 60 percent of the air traffic out of DAL passes over the neighborhoods and the jet engine noise is a problem.

However, in Volume II Attachment 2, North Texas OAPM Study Area Airports lists 22 and there are some others not listed (see comments). This EA is not really about the environment and is more of a management plan containing lengthy descriptives about changing over from a ground based radar system to a digital GPS satellite navigational system that is touted to be more optimal and efficient for air traffic control. No doubt Love Field (DAL) air traffic is going to increase with the renewal of the airport and the withdrawal of the Wright amendment in 2014. Figures 3-8 through 3-20 ... show the flight patterns based on different alternatives but Figure 3-19 shows the cumulative air patterns which is a blob of ink over the central area.

1

Only Chapter 4 gets into the environment and mostly from a noise basis. There are too many planes now with a plane leaving/landing DAL every five minutes that creates a perpetual jet background noise during operation hours for eighteen hours a day. There is nothing in the EA about avian life, flight pathways, population, varieties, etc. The Dallas area has been crewate numerous wetlands along the Trinity river, East Fork of the Trinity river Elm, Fork of the Trinity river and west Fork of the Trinity river to name a few. Refuges such as John Bunker Sands Wetland have been established to filter

2

2 cont'd

water and the migratory birds is astonishing. There are no references that show Wood Storks, White Ibis, Roseate Spoonbills, White pelicans in our area but they have migrated into the area by the hundreds. These large birds along with herons, egrets, ducks, geese, and cranes that use the Trinity river corridor as a minor flyway twice a year on their migrations north and south. At a minimum these should have been included.

3

The new flight patterns out of DAL to the east has increased the jet noise. The dense population of east Dallas was not considered in depth and the citizens were not notified in the May notices.

Thank you for the opportunity to comment.

Timothy S. Dalbey  
Geoarchaeologist/Environmental Scientist

----- Forwarded by 9-ASW-NorthTXOAPMcomment/ASW/FAA on 11/19/2013 12:48 PM -----

From: Kim Edge <[edgek\\_1066@yahoo.com](mailto:edgek_1066@yahoo.com)>  
To: 9-ASW-NorthTXOAPMcomment/ASW/FAA@FAA,  
Date: 11/18/2013 04:37 PM  
Subject: OAPM Public Comment

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1 We chose to buy a home in Lakewood neighborhood for the unique historic architecture shaded by beautiful old trees and close proximity to White Rock Lake Park, one of the city's few undeveloped green spaces, also enjoyed by migratory birds. It's hard to believe you are in a city walking along the trails in the Old Fish Hatchery Area, built by the Dallas park Board in 1930, until you hear the intrusion of jet planes flying directly overhead. I also noticed while at the veterinarians office that jet planes were flying over Fair Park, a National Historic Landmark. Since flight traffic has drastically increased over East Dallas, I feel special considerations should be made for air traffic over parks.

I live 2 blocks from White Rock Lake and can read the logo on some Southwest planes heading to Love Field. I also noticed while in my home that I could hear planes over a lawn mower and two leaf blowers in my neighbor's front yard across the street. Prior to moving to Lakewood in 1996, I lived and worked about a mile from Love Field, we chose Lakewood as we did not want to live near an airport.

Kim Edge

Sent from my iPhone



NTX OAPM EA  
Ms. Daisy Mather - Environmental Specialist  
FAA Central Service Center  
Operations Support Group, AJV-C22  
2601 Meacham Boulevard  
Fort Worth, TX 76137

**RE: COMMENTS ON NTX OAPM EA**

Dear Ms. Mather:

Thank you for the opportunity to submit comments on behalf of the City of Euless, Texas, with respect to the Draft Environmental Assessment for North Texas Optimization of Airspace and Procedures in the Metroplex (the "Draft EA"). Our city is located adjacent to Dallas-Fort Worth International Airport (DFWIA) and experiences frequent overflights from low-flying aircraft.

**1** Our city's primary concern with respect to the proposed airspace redesign project relates to potential noise impacts. We have endeavored to understand the manner in which the proposed changes would impact our citizens. Unfortunately, the Draft EA fails to provide sufficient information that would enable us to gain a meaningful understanding of how this proposal might change the location, altitude, frequency, time of day, or noise levels associated with aircraft operations over our community.

**2** To that end, we have requested that officials at DFWIA host a meeting with FAA staff and impacted cities designed to educate our officials about the nature and potential significance of any noise pollution from the proposed project. We are both surprised and disappointed that a more concerted effort was not made to contact the Mayor, City Council, or City Manager's Office regarding an issue of such importance that could have long-term impacts to our community.

Thank you for consideration of these comments and for honoring our request for a briefing.

Sincerely,

Chris D. Barker  
Assistant City Manager

MAYOR  
*Joel T. Williams, III*

MAYOR PRO TEM  
*Laurence W. Nixon*

COUNCIL MEMBERS  
*Andrew Barr*  
*Will C. Beecherl*  
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THE TOWN OF  
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TEXAS

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*Gayle Kirby*

November 18, 2013

Ms. Daisy Mather - Environmental Specialist  
FAA Central Service Center  
Operations Support Group, AJV-C22  
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Fort Worth, TX 76137

**RE: NTC OAPMEA**

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<sup>1</sup> Airports Council International – North America

<sup>2</sup> Case 1:13-cv-01236-CKK Document 148 Filed 11/12/13, page 9, footnote 5

Unfortunately, this strategic short coming is only the first error, and the following additional errors make the Draft EA non-responsive to FAA Order 1050.1E and the National Environmental Policy Act of 1969.

### **Failure to Release Documents Related to Cumulative Impacts**

2 While Table 5-8 of the Draft EA lists Potential for Cumulative Impact From the Proposed Action, the Draft EA fails to recognize and consider all the potential on-airport projects that contribute to the cumulative impacts and completely ignores all the recent flight procedure modifications by Southwest Airlines that contribute to this proposed action's cumulative impacts. It is imperative that this Draft EA address all the on-airport changes and modifications. On September 26, 2013 a Freedom Of Information Act (FOIA) request was submitted to FAA in order to evaluate these impacts that were not addressed in the Draft EA. Unfortunately, FAA has provided none of the requested information. FAA's release of the requested information is essential for an independent and transparent evaluation of cumulative impacts. It is imperative that FAA adhere to its legal obligations under the Freedom of Information Act and until FAA does so, the public comment period for this Draft EA should remain open. Further, the public comment period should remain open for a minimum of 30 days after FAA provides the information, so the information can be considered in the development of comments.

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It is requested that the FAA follow the White House's Council on Environmental Quality guidance documents by developing and examining alternatives that could result in reduced environmental impacts, and would also satisfy the Purpose and Need that is identified in Chapter 2.

### **Missing Analysis**

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---

<sup>3</sup> Forty Most asked questions concerning CEQ's National Environmental Policy Act regulations, March 16, 1981

<sup>4</sup> Final Guidance on NEPA Efficiencies, March 6, 2012

4 cont'd

categories plus cumulative impacts. The Draft EA should explain why it has license to ignore the explicit requirements of FAA Order 1050.1E.

5 Similarly, the Draft EA misses all impacts associated with the enhanced capacity and commensurate increase in activity at Love Field. These impacts include the air quality impacts not covered by the cited Presumed to Conform, the traffic impacts to severely congested roads, and the impact on 4(f) and Section 106 resources. All of these impacts should be fully evaluated.

#### Inconsistencies with published data

6 The Draft EA identifies a total of 2,762 North Texans that would have a significant exposure to aircraft noise (> 65 DNL). However, published data from Love Field indicates that more than 27,558 Love Field neighbors suffer from significant exposure to noise. Having two documents that use FAA models and methodologies but have a ten fold disagreement on the magnitude of population experiencing significant noise impacts is alarming. Clearly the Draft EA should have been aware that the NIRS model was inappropriate to examine impacts adjacent to the Airport. Further, the Draft EA should have considered the existing information in the Love Field documents, including exposed population and also the parks and schools that are inside the 70 DNL and inside the 65 DNL. At a minimum, the Draft EA needs to acknowledge other publicly available information and reconcile why the results of the Draft EA can reach wildly different conclusions. Absent a reconciliation, the integrity of the Draft EA's simplified Noise analysis (i.e. NIRS) and the findings from that analysis are suspect at best.

7 Likewise, the Draft EA identifies Runway 13R at DFW Airport used for secondary departures. Historic NEPA determinations prohibit the use of this runway for any jet departures and the runway has had almost non-existent use over the past decade with turbo-prop departures. This single runway represents the focal point of potential airspace conflicts between Love Field and DFW, but the Draft EA cannot even document how the runway is used. This glaring error in the Draft EA undermines the credibility of all other analysis in the document.

#### Degradation of Section 106 Properties

8 The Highland Park Shopping Village (HPSV) is threatened by surrounding development and growth in the region. However, the Draft EA merely recognizes that HPSV is a historic district, and does not look at the impacts this action will cause to the property. Traffic on Mockingbird Lane is a serious problem for HPSV and the increase in traffic resulting from increased activity at Love Field that this action facilitates will irreparably harm HPSV. Further, no coordination was undertaken with the Town's study on the future role of HPSV.

#### Conclusion

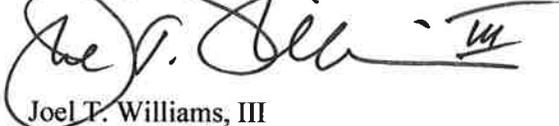
9 In summary, the Draft EA is predicated on a world view that air traffic and this proposed action is independent of anything that happens around an airport. Unfortunately, this is not true, as the Justice Department concluded; Love Field is a highly constrained airport. Thus, the expansion of airspace capacity this proposed action will achieve will result in impacts at Love Field and to the neighbors surrounding Love Field. It is absolutely essential that the scope of this EA include all consequences that will directly result from the proposed action.

10 Further, it is clear that the Draft EA is administratively and technically flawed. Unfortunately, it is impossible to fully evaluate the technical analysis of the Draft EA until FAA responds to the September 26, 2013 FOIA request regarding connected actions and cumulative impacts. As such,

10 cont'd

we request that the comment period remain open for 30 days following the FAA's release of all materials requested under FOIA.

Sincerely,

A handwritten signature in black ink, appearing to read "Joel T. Williams, III". The signature is written in a cursive style with a large initial "J" and a distinct "III" at the end.

Joel T. Williams, III  
Mayor

cc: Town Council

# Love Field Neighborhoods

November 18, 2013

Ms. Daisy Mather - Environmental Specialist  
FAA Central Service Center  
Operations Support Group, AJV-C22  
2601 Meacham Boulevard  
Fort Worth, TX 76137

RE: NTX OAPM EA

Dear Ms. Mather,

We, the undersigned, appreciate the opportunity to respond to the draft Environmental Assessment. We agree with the submissions made by William Cohn and Pat White on October 29, 2013 (Attachment A) and by the Mayor of Highland Park, Joel Williams, on November 18, 2013 (Attachment B) and hereby adopt their comments. Please consider this letter with its attachments as our response to the North Texas OAPM draft Environmental Assessment.

1

*J. Blair*  
SCHIP  
Neighborhood

*David Anderson*  
ABPA spouse

*Neil Johnson*  
Turtle Creek / Oak Lawn

*Joyce Lockley*  
North Park Love Field  
Community ~~Pat~~ Civic  
League

*Mary Lundberg*  
Lake Ridge Estates

*Bob Plesinger* - Bluffview

*Cheryl* (GREENWAY PARKS)

*F. Wick* - Dallas / Bluffview

*Robert S. Farnell* and  
Mockingbird Park Neighborhood

# ATTACHMENT A

William F. Cohn

4529 Belfort Avenue • Dallas, TX 75205  
Phone: 214.616-3147 • E-Mail: billcohn73@gmail.com

Date: October 29, 2013

Daisy Mather, Environmental Specialist  
FAA Central Service Center, Operations Support Group  
2601 Meacham Boulevard  
Fort Worth, TX 76137  
9-ASW-NorthTXOAPMcomment/ASW/FAA@FAA.gov  
(817) 321-7700

Re: Draft Environmental Assessment for North Texas OAPM

Ms. Mather,

You recently published the Draft Environmental Assessment for North Texas Optimization of Airspace and Procedures in the Metroplex (OAPM) and are currently soliciting comments. On behalf of the Love Field Citizens Action Committee and the thousands of people who live in the neighborhoods surrounding Love Field, this is our response. We urgently request the following:

- Adoption of a specified RW13L RNAV departure that would overfly Lemmon Avenue. This will meet your objective of better sequencing of DAL aircraft with DFW, while protecting the environmental quality for the tens of thousands of people surrounding Love Field.

The Federal Aviation Act of 1958 set dual missions for the FAA: safety, and the promotion of air commerce. Years later, noise abatement was identified as an item to be addressed by the FAA. In the subsequent years, noise abatement has been a distant third priority.

To illustrate the point, see attachment A of this letter, which is the current approach plate for the ILS 13L at Love Field. The missed approach procedure directs the pilot to climb to 1000' then turn eastbound (100°), directly over our noise sensitive neighborhoods. For years we have attended noise abatement meetings with the FAA assuring us it was doing everything possible to mitigate noise impact. Yet, in this approach procedure, the FAA seems to intentionally send aircraft at high engine power in a low, slow turn directly over one of our neighborhoods. It is hard to imagine a procedure that would create more noise than this. We hope this serious oversight will be corrected.

Your report proposes RNAV departures for Love Field for both southerly and northerly flows. It is gratifying to see the FAA finally include RNAV departures in the OAPM. The Love Field neighborhood groups have proposed RNAV departures for years, because they provide the capability to control ground track in a way that minimizes noise impact.

Yet, the RNAV SIDs in your report are described in only general terms. There is much discussion of how they will assist in sequencing Love Field aircraft with traffic from DFW, yet little mention of environmental goals.

To provide an arbitrary RNAV departure would be environmentally reckless, since an undesirable ground track could actually be worse than what exists now. An RNAV departure that is slightly left of RW 13L centerline would be a disaster, directing aircraft directly over our neighborhoods.

Our neighborhood organization has consistently advocated for a RW13L RNAV departure that would overfly Lemmon Avenue. Lemmon Avenue is very close to extended runway centerline, and is a 6 lane thoroughfare populated by car lots, Home Depot, and fast food restaurants. It is the obvious choice for minimizing noise impact. Yet, the Draft Environmental Assessment doesn't mention it. To be clear: RNAV departures with arbitrary ground tracks are worse than no RNAVs at all.

A discussion of noise abatement issues at Love Field is conspicuously absent in your report. The current 13L ILS procedure already contains the oversight of heavy noise impact on our neighborhoods. We are concerned that a similar oversight is possible for any new RNAV departures proposed in the OAPM, if the environmental impact of the ground track isn't a guiding principle.

In summary, we now have the opportunity to achieve two goals at the same time:

1. Improved sequencing of aircraft between DFW and Love Field, and
2. Improving the environment impact on the thousands of Love Field neighbors.

We are committed to helping the FAA succeed, while protecting the environment for our homes. Please contact us so that we can make the OAPM a success on every level.

Sincerely,

William F. Cohn  
Captain, Delta Air Lines (Retired)  
Board Member, Love Field Citizens Action Committee  
Member, Love Field Environmental Advisory Committee  
billcohn73@gmail.com  
(214) 616-3147

Pat White  
Chair, Love Field Citizens Action Committee  
Member, Love Field Environmental Advisory Committee  
charles4@airmail.net  
(214)352-7872

DALLAS, TEXAS

AL-106 (FAA)

13234

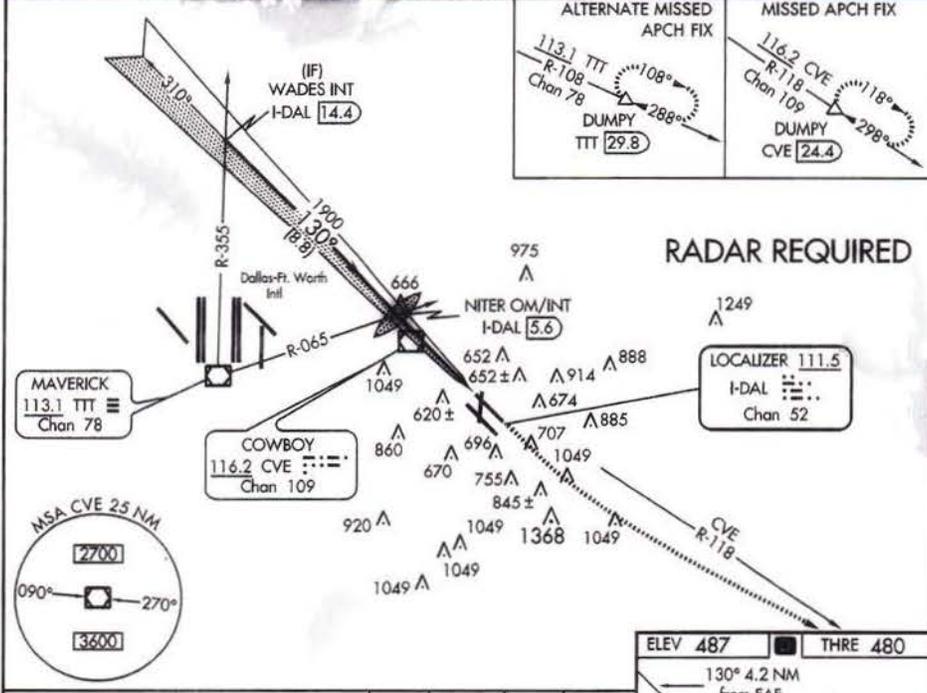
LOC/DME I-DAL <b>111.5</b> Chan 52	APP CRS <b>130°</b>	Rwy Idg THRE <b>480</b> Apt Elev 487
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### ILS or LOC Y RWY 13L DALLAS-LOVE FIELD (DAL)

⚠ Circling Rwy 18/36 NA at night. DME required. Simultaneous approach authorized with Rwy 13R. Simultaneous approach authorized with DFW ILS or LOC Rwy 17L.

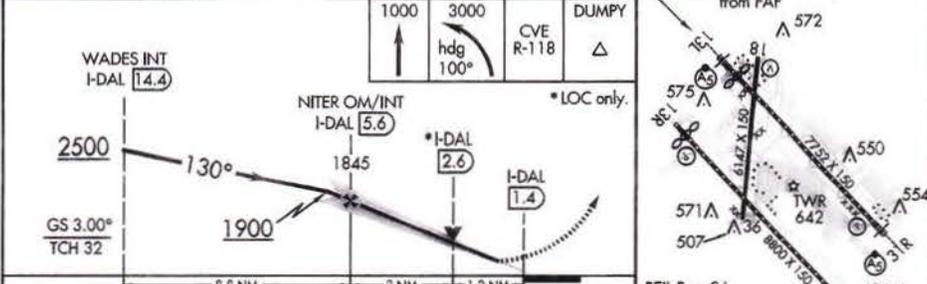
MALSR MISSED APPROACH: Climb to 1000 then climbing left turn to 3000 on heading 100° and CVE VOR/DME R-118 to DUMPY/CVE 24.4 DME and hold.

ATIS <b>120.15</b>	REGIONAL APP CON NORTH <b>124.3 282.275</b> SOUTH <b>125.2 343.65</b>	LOVE TOWER <b>123.7 239.3</b>	GND CON <b>121.75 348.6</b>	CLNC DEL <b>127.9</b>
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SC-2, 17 OCT 2013 to 14 NOV 2013

SC-2, 17 OCT 2013 to 14 NOV 2013



REIL Rwy 36	575	571	507	572	550	554	606
TDZ/CL Rwy 13L and 31L	81	81	81	81	81	81	81
HIRL Rwy 18-36, 13L-31R and 13R-31L	81	81	81	81	81	81	81
FAF to MAP 4.2 NM	60	90	120	150	180		
Min:Sec	4:12	2:48	2:06	1:41	1:24		

DALLAS, TEXAS Amdt 32 27JUN13 32°51'N-96°51'W DALLAS-LOVE FIELD (DAL) ILS or LOC Y RWY 13L

MAYOR  
*Joel T. Williams, III*

MAYOR PRO TEM  
*Laurence W. Nixon*

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November 18, 2013

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Sincerely,

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Joel T. Williams, III  
Mayor

cc: Town Council



United States Department of the Interior

NATIONAL PARK SERVICE  
INTERMOUNTAIN REGION  
12795 West Alameda Parkway  
P.O. Box 25287  
Denver, Colorado 80225-0287



IN REPLY REFER TO:  
IMR-EQ-L7619

NOV 20 2013

VIA ELECTRONIC MAIL: NO HARD COPY TO FOLLOW

Memorandum

To: Daisy Mather, Environmental Specialist, Federal Aviation Administration,  
Central Service Center

From: Associate Regional Director, Resource Stewardship and Science,  
Regional Science Advisor

Subject: The National Park Service comments on the Federal Aviation Administration North Texas  
Optimization of Airspace and Procedures in the Metroplex Draft Environmental Assessment

Thank you for the opportunity to review and provide comments on the Federal Aviation Administration (FAA) North Texas Optimization of Airspace and Procedures in the Metroplex (OAPM) Draft Environmental Assessment (EA). The National Park Service (NPS) notes the following changes that we request be made to the review document.

Every mention of National Natural Landmark (NNL) sites is currently presented alongside references to historic or cultural resources. NNL sites recognize natural features of significance, not historic or cultural features. Therefore, to better represent these areas, we recommend changing the resource category to "Historic, Architectural, Archeological, Cultural and Natural Heritage Resources." Along these lines, specific changes we are requesting to the document include the following:

1

- Page 4-143, section 4.3.4:
- Change section title to "Historical, Architectural, Archeological, Cultural and Natural Heritage Resources." Page 4-143, section 4.3.4.1:

2

- Remove the reference to the three NNLs, then see the next comment.

3

- Page 4-143:
  - Create a subsection "4.3.4.2 Natural Heritage Resources" and note that three NNL sites occur within the General Study Area (GSA) (Dinosaur Valley State Park, Greenwood Canyon and the Fort Worth Nature Center and Refuge). No additional analysis of potential impacts are warranted for Dinosaur Valley and Greenwood Canyon as the significant resources recognized at those sites are paleontological features and not affected by the proposed action. The Fort Worth Nature Center and Refuge is designated an NNL for its outstanding examples of cross timbers-plains association and river bottom hardwood forests, all of which support high wildlife diversity. The proposed action does not involve ground disturbance and thus the significant ecological communities will not be affected by the proposed action. Any potential concerns to bat and avian communities at this site are covered by the general discussions of this project on those resources.

4

- Page 4-136, Table 4-4:

4 cont'd

- The first property type listed is "Historic Sites", delete the reference to the "National Registry of Natural Landmarks."

Other items that need to be corrected in the document include the following:

5

- Exhibit 4-4:
  - The three areas identified in the legend as National Parks are not NPS units. Caddo National Grassland and Lyndon B. Johnson National Grassland are managed by the US Forest Service and Sheppard AFB Recreation Area is managed by the DOD, these areas need to be correctly noted as such.
  - Dinosaur Valley NNL needs to be added to this map given that it falls within the GSA and is identified in Appendix F.

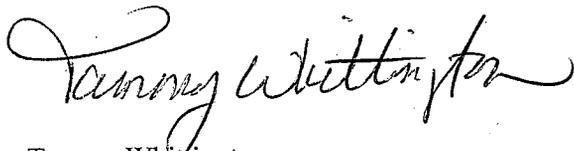
6

- Exhibit 4-5:
  - Change the map title to "Historical, Cultural and Natural Heritage Resources" for consistency with the above recommended changes.

7

- Several sites in Appendix F are incorrectly listed as National Natural Landmarks. All of following sites need to be changed to a National Historic Landmark:
  - Page F-11, Dealey Plaza Historic District
  - Page F-13, Fair Park Texas Centennial Buildings
  - Page F-14, Fort Richardson
  - Page F-17, Highland Park Shopping Village
  - Page F-34, Porter Farm
  - Page F-37, Rayburn Samuel T. House

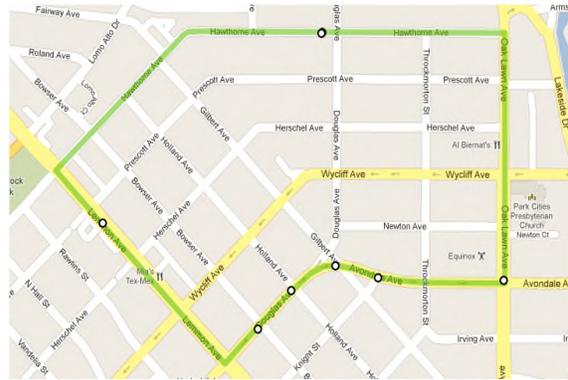
Thank you again for the opportunity to provide these comments. If you have further questions regarding these comments, you may contact Heather Germaine, Regional NNL Coordinator, at 303-969-2945 or [heather\\_germaine@nps.gov](mailto:heather_germaine@nps.gov).



Tammy Whittington

cc:

Patrick Malone, Assistant Regional Director, Natural Resources, Intermountain Region, NPS  
Theresa Ely, Soundscape and Night Sky Coordinator, Intermountain Region, NPS  
Heather Germaine, NNL Coordinator, Intermountain Region, NPS  
Randy Stanley, Physical Scientist, Intermountain Region, NPS  
Tom Keohan, NHL Coordinator, Intermountain Region, NPS  
David Hurd, Environmental Compliance Specialist, Intermountain Region, NPS  
Vicki Ward, Overflights Branch Chief, Natural Sounds & Night Skies Division, NPS



November 18, 2013

Ms. Daisy Mather – Environmental Specialist  
FAA Central Service Center  
Operations Support Group, AJV-C22  
2601 Meacham Boulevard  
Fort Worth, TX 76137

RE: NTX OAPM EA

Dear Ms. Mather,

1

The SOHIP neighborhood of Dallas has 825+ members. The neighborhood would like to confirm that we agree with the submissions made by William Cohn and Pat White on October 29, 2013 and by the Mayor of Highland Park, Joel Williams, on November 18, 2013. Upon reviewing the documents and comments, we would like it to be documented that our neighborhood is in agreement with their comments.

Sincerely,

Ed Blair  
Leader SOHIP  
4130 Herschel Ave.  
Dallas, TX 75219  
[egblair@sbcglobal.net](mailto:egblair@sbcglobal.net)  
214-293-1290

----- Forwarded by 9-ASW-NorthTXOAPMcomment/ASW/FAA on 11/19/2013 12:47 PM -----

From: Maelissa Watson <[mrmwatson@icloud.com](mailto:mrmwatson@icloud.com)>  
To: 9-ASW-NorthTXOAPMcomment/ASW/FAA@FAA,  
Date: 11/18/2013 03:28 PM  
Subject: Lakewood Neighbor Comment on Dirty Air North TX.

---

Dear Daisy:

A Lakewood neighbor just handed me a hand written note regarding the current condition of what she calls "Dirty Air in Dallas. " that she read in some publication.

"North Texas is continually and repeatedly violating the Clean Air Act. We are now in a 16 year pattern of noncompliance, and are in ongoing violation of Federal Law. The Clean Air Act mandates that ozone pollution does not exceed 75 parts per billion. 2013 measurements from the Texas Commission on Environmental Quality (CEQ) shows that Dallas and much of North Texas has been hovering between and above 80 parts per billion." She insists "we are breaking even lower 1997 standards. "

1

She also requests that we get in the Record "that the new pollution from Southwest Airlines flights over our neighborhoods are leaving white cam trails with the liquid pollution."  
" There is so much flight activity , she timed a jet ever 5 minutes over East Dallas either from Love Field or DFW " She has "also observed that these cam trails are becoming a permanent cloud disfigurement in our Lakewood and East Dallas skies."  
"Southwest Airlines must cease and desist from further pollution of our neighborhood."

Sincerely,

Maelissa Watson  
(On behalf of a portion of the Residents in The Lakewood Neighborhood)

----- Forwarded by 9-ASW-NorthTXOAPMcomment/ASW/FAA on 11/18/2013 09:54 AM -----

From: Maelissa Watson <[mrmwatson@icloud.com](mailto:mrmwatson@icloud.com)>  
To: 9-ASW-NorthTXOAPMcomment/ASW/FAA@FAA,  
Cc: Maelissa Watson <[mrmwatson@icloud.com](mailto:mrmwatson@icloud.com)>  
Date: 11/18/2013 07:57 AM  
Subject: Revision p. 5 with Footnote adding Site Plans for Love Field

---

Dear Daisy:

I know this will be a busy day for you with all the comments rolling in.

This has been a "fire drill" on an almost impossible schedule, for the Lakewood Neighborhood trying to meet and discuss our concerns, as to how we were going to voice and express our dismay with the new Flight Patterns. The Noise and Frequency of Flights now over Lakewood and East Dallas are every five minutes.

Residents who have maids and service people such as Carpenters and Pool men come to peoples homes, ( I do not) were directed to me to listen to their concerns.

From what I understand the noise and intrusion is even worse near Fair Park and the Peak Historic, and Munger District. I know that some neighbors of The Swiss Avenue Historic District ( on the The National Register) came to Harryette Ehrhardt, a former Democratic Senator in The Texas Legislature. She asked me to bring her a copy of the FAA Notice, which I did last Thursday, but that left little or no time to comment.

I personally checked Munger and Peek Historic Districts for noise by myself. I am now able to drive short distances, but not as far as Fair Park with all the cross roads and traffic.

I also own a Victorian house, that I have been restoring in Queen City, Peak area. When I parked there the noise and low flights were terrible. (I had not been there since May, 2013.) Little Hispanic Boys kept pointing to the Jets in the air. Their Mothers with babies in push carts, tried to communicate that babies could not sleep, joining their two hands together and placing them under their head sideways. When I purchased that property in 2004 Jets were not visible and there was no audible Jet noise.

This is a new impact from the rebuilding of Love Field. That is why I added a foot note to page 5 to incorporate the Old, and Current Site Plans for Love Field.

Last night I e-mailed you what I could, basic documents, but not having a scanner I could not send signed documents or attachments.

As soon as the Post Office opens this morning I will take the Paper Filing with Attachments and have it stamped with today's (November 18th) date.

1

Please make sure that the complete filing is part of the Record in this Administrative Rule Making.

Thank you for your patience and help.

Sincerely,

Maelissa

# BEFORE THE FEDERAL AVIATION ADMINISTRATION

## FAA North Texas Optimization of Airspace and Procedures in the Metroplex (OAPM) Draft Environmental Assessment (EA)

### PETITION TO INCORPORATE EA INTO AN EIS FOR DALLAS LOVE FIELD AND DFW AIRPORTS

#### Statutory and Legal Introduction:

Section 1508.9 of Council Environmental Quality's (CEQ's) National Environmental Act (NEPA) requires a concise public document that has three defined functions:

- 1 It briefly provides sufficient evidence and analysis for determining whether to prepare an Environmental Impact Statement (EIS);
2. It aids an agency's compliance with NEPA when no EIS is necessary, i.e., It helps to indentify better alternative measures; and
3. It facilitates preparation of an EIS when one is necessary- Section 1508.9(a)

Since the Environment Assessment (EA) is a concise document, it should not contain long descriptions or detailed data, which the agency may have gathered.

1

The captioned EA has over 1000 pages prepared by The California Consulting Firm of Miller Miller, Miller & Hanson. (Incorporated herein by reference)

2

Modeling noise analysis is based on already outdated, incomplete, erroneous, scattered, and projected flight histories. It was compiled in 2011, making no analysis or mention of The Wright Amendment, and that projected increase in air traffic. The proposed acquisition of U.S. Air by American Airlines, or the fact that U.S. Air, a smaller airline that has for years has been in competition with Southwest Airlines would explode local traffic and noise. The American Airline facilities under construction at Love Field Airport would facilitate, not only additional flights by U.S. Air but also by American to their already established destinations, and destinations currently serviced by Southwest Airlines. U.S. Air like Southwest, using smaller aircraft carrying heavier loads and creating more noise. Either way, increased air traffic can be anticipated from Love Field<sup>1</sup>

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<sup>1</sup> This document was prepared before November 12, 2013, prior to the Department of Justice announcement of a settlement allowing the merger of U.S. Airway and AMR Corporation. It now appears that AMR must divest two gates at Love Field. It is unknown how many gates American have under contract.

3

The Harris report dwell in depth on The U.S. Census Bureau statistics to support their findings of no impact in their analysis of population density and integrated noise impact in the 60-mile radius they chose to use. By using the 60 mile Radius they diluted the noise impact on closer in neighborhoods. It may be small point, but not insignificant, i.e., no accounting being made for 250,000 Refugees that were moved by a Church Agency in December 2012, to Lake Highlands, East Dallas from the former Borneo Region. Moreover, given the dramatic increase in Texas Population, over a thousand new residents a day is moving into Texas Cities. (Texas Monthly Magazine November 2013).

## **PREFACE OF THE SOCIAL AND POLITICAL HISTORY BEHIND THE RULEMAKING**

In commenting on any proposed rulemaking, it is important to identify the statutory authority for the Rulemaking, and if there is a singular or dual purpose behind the rulemaking. I learned this in my younger years when I worked on the Environmental Subcommittee of the American Petroleum Institute (API) and numerous Texas Oil and Gas Committees. The primary source authorization for the FAA North Texas Optimization of Airspace and Procedures in the Metroplex (OAPM) Draft Environmental Assessment (EA) -is the FAA Modernization and Reform Act of 2012, and the secondary authorization is The Wright Amendment 2006. There is a dual purpose behind the FAA Modernization and Reform Act:

- Earmark financing of in excess of \$60 billion over a 5-year period, for the FAA to support the Airline Industry, Drone Technology Companies, Aircraft Manufacturing, and the development and implementation of NextGen Technology. (Note the time frame of the Act and the proposed regulations)
- The secondary purpose is ideological and political, as is apparent on the face of the legislation. The goal is to reduce the role of Government control and regulation of the airwaves, and limit or phase out Air Traffic Controllers (ATC) that were thoughtfully installed in more sane times to protect the safety of the flying public. In the Statute note the words “Union” “De-Certification of the Union” “Public-Private Financing and Partnerships” “ Privatization” “Deregulation”.
- Some Lakewood and East Dallas neighbors question the benefit or need for possible deregulation. Drawing attention to previous deregulation experiences, such as The Public Utilities. In Texas both Natural Gas supply and Electric supply was deregulated, and what are the results? The guaranteed source of supply paid for by the Consumers over the years lost forever. The public facilities and contractual supply benefits ended up as assets for the New Power Ventures, and especially for the unscrupulous Financiers, and Hedge Fund Mongols resulting in crippling Debt and astronomical energy prices for consumers of the new so-called Public Utilities. Does the Consumer today witness a definite and

guaranteed source of supply? No, all they experience is fraud and abuse. Many new suppliers are facing bankruptcy. The Banks were deregulated, and we suffered from 2008 Melt Down caused by Wall Street. Citizens retirement assets in IRA's lost billions in value, and millions of citizens were irreparably harmed with painful disappearance of assets, and default on home Mortgages. "Get the Government out of our Business "is not always the correct solution.

- The Wright Amendment was a gift from Senator Kay Bailey Hutchinson to the City of Dallas while her husband acts as the Bond Attorney for the City.

Sadly Texas has regressed in Environmental Protection since the 1980's when so much was accomplished from Coastal Zone Management, to cleaning up the Houston Ship Channel, and the 1960's and 1970's particulate air smog in Houston. Then Texas had some responsible major Corporations with a commitment to social responsibility even to health and environmental governance. Texas and Federal Enforcement Agencies took their mission and role seriously. No consideration is made in the EA in its projections on air pollution in the aggressive gas play from the Barnett Shale in and around the Metroplex. No weight apparently has been given to these noisy projects from fracturing of shale or to the air emissions from operations in the general area between The City of Dallas and Ft. Worth. Actually the City of Dallas signed a contract for drilling on City Parkland.

Comments to the EA may be scant because even in Lakewood and other adjacent neighborhoods Dallas Professionals are hesitant to publicly voice any objection to the NextGen proposal even though they are extremely upset and disturbed by the recent change in flight patterns and the noise. City Hall has in the past telephoned persons who objected to City Programs and got their names and Employers, created files, and in some instances contacted Employers. Professionals who work for Firms that does business with the City fear adverse impact on their business opportunities for City work, especially in areas where City Permits are granted to their clients. This writer also fears retaliation, however, age has seasoned wisdom; and conscience and disruption of daily life from Jet Noise, prompts this course of action. The State Environmental Agencies will probably not comment about additional pollution from the aircrafts in the North Texas Metroplex. Some Agency's has to enforce the law in a fair and even handed manner, and that is not going to be the Texas Environmental Agencies, since **Anarchists** currently indirectly control them,

4

The Harris Consulting Team may have been given a task with directives to formulate Models based on defined criteria. Were they ever told that Dallas was non-attainment for Clean Air? A mention was made that they assumed that (a conforming?) State Implantation Plan (SIP) was in place. They can answer to that. Therefore, the Harris Team may not have been made aware of the

4 cont'd

background documents such as Dallas Master Plan or the statistics published in 2001 for Love Field with 32 gates not 20 gates.

The Dallas Master Plan is ample evidence of the motivation, that the driving economic force of the Love Field Operator is profit, and maximization of facilities to create profit. Profit is not totally at variance with Environmental Protection of Metroplex Citizens, but there must be a balance. Whether there was other private studies conducted by The City of Dallas for Love Field using federal funds from Bock Grants is not known. The Block Grant financing would obligate The Love Field Operator to comply with Federal laws. From the information available there was never an EIS conducted for Love Field Airport. The testimony in *Southwest Airlines* case cited below, revealed that fact, i.e., that Love Field slipped through the cracks when the EIS was conducted in the early 1970's for then new, DFW Airport. *City of Dallas, Texas et al v. Southwest Airlines Company Defendant 371F. Supp.1015 (1973). 1025.* The Decision was confirmed in the Fifth Circuit Court of Appeals May 31, 1974. Rehearing *en banc* Denied June 24, 1974.

After circumstances surrounding the phase out or closure of Love Field for DFW Airport did not transpire, the first study was prepared by GRA:

*"The starting point for the impact analysis update was the completion of the analysis of air service activity in the absence of the Wright Amendment, performed by the firm of GRA, Inc. GRA performed the market analysis of scheduled service opportunities and profit potentials in much the same manner as would an airline itself, assuring the study of an accurate and authoritative starting point.*

(Page vii BMJM AVIATION 5.31.2006.

DMJM AVIATION Used GRA as subcontractors to utilize their experience from previous work in **"Dallas Love Field Impact Analysis Update"**

**In the Absence of the Wright Amendment" May 31, 2006.**

(This Document is incorporated herein by reference.)

The BMJM Aviation Report reveals important considerations and facts not discussed in The Harris Report.

*"In each case of the No Wright Amendment scenarios, the Master Plan 32 Gate regional jet fleet mix has been replaced for the most part by standard air carrier jets. These aircraft are larger and have a louder noise footprint than CRJ, EMB145 aircraft. Furthermore under the service analysis some are departing at heavier take off weight to service more non-stop destinations than were possible under the Wright Amendment." Page ES-6.*

5

**PROFIT ADVANTAGE FROM LOVE FIELD:**

*"If developing forecasts... Two scenarios were examined 20 and 32 gates, which creates a different profit opportunities for airlines because more gates can physically accommodate more traffic, if it were profitable.... it was assumed that **point -to-point carriers could produce up to 10 to 11 departures and arrivals (turns) per gate***

***per day at DAL, while hub-and –spoke carriers would produce on average 8 (turns) per day. The difference between the two carriers is due primarily to their business models: hub carriers must time flights to match connecting hub banks, whereas point-to point carriers do not”. (Emphasis added).*** This is still very relevant to Love Field because of their business model as point-to point destinations.

In November 2013, there appears to be conflicting views between the Operators of Love Field and the Lakewood/ East Dallas Neighbors regarding Love Field’s recent operational flight patterns. See ***Declaration Historic Absence Of Airplane Visual and Noise Impact on Dallas Lakewood Neighborhood*** (this testimony is incorporated herein by reference) The Love Field Operator says there is no increase in air traffic, which the residents deny. However, there is a change in the direction of the traffic towards the East. Previously, Southwest Airline had its runways on Denton Drive, the West side of the airport. When the new runways were built (we understand that 11 are already operational with 9 more to be built) Flight Take-off and Arrivals have resulted in the diversion of traffic and noise East to Lakewood and all of East Dallas.

Reference is made here, to the interview by Brittany Nunn, a Reporter and Lakewood East Dallas Editor for The Advocate, a local publication.<sup>2</sup> Love Field Operator sent no NOTICE or had communication with the Residents of Lakewood or East Dallas prior to the new Construction, without an EIS, at Dallas Love Field. The consultations and outreach were with the traditionally noise impacted regions, circular around the Dallas Airport and Highland Park. The Dallas Morning News reported that The Mayor of Dallas in October 2013, met with University Park residents wherein he promised to do something about the Love Field noise.

Highland Park is an elite, super rich neighborhood; and they have hired a former Judge -Attorney to represent them to negotiate with The City, at a cost of \$4000 a month. (See WFAA News Report on Improvement in Noise around Love Field attached hereto and incorporated herein by reference.)<sup>3</sup> What is also missing from the whole scenario is the well-known political and economic fact that Dallas City Council is, and has been for years been controlled by The Dallas Citizens Council, Businessmen and Financial Moguls. The Citizens Council support and finance the election of chosen City Council Members that they can control. Many of Dallas’s most powerful and influential Businessmen and their families live in Highland Park and University Park (Park Cities). Also incorporated herein by reference, is a book entitled:

“Dallas Citizens Council- An Obligation of Leadership” by Darwin Payne.

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<sup>2</sup> The Advocate Story dated, November 13, 2013, is attached as “Exhibit A” to the mailed documents to The FAA.

<sup>3</sup> The WFAA report will be attached as “ Exhibit B” to this mailed document.

Additionally, the assurances under 49USC Section 47107 have not been made public to the Residents of Lakewood and East Dallas. For e.g.,  
The Secretary of Transportation must approve the current layout plan of an Airport.

6

*"The Secretary will approve the plan and any revision or modification before the plan, revision, or modification takes effect: (emphasis added) "The owner or operator will not make or allow any alteration in the airport or any of its facilities if the alteration does not comply with the plan the Secretary approves, and the Secretary is of opinion that the alteration may effect adversely the safety, utility, or efficiency of the airport. "*

7

Finally, in the EA analysis it is so important to reiterate that Financing authorization for the NextGen Technology is found in FAA Modernization and Reform Act of 2012. In a time when The Nation is cutting budgets, many residents of the Lakewood Neighborhood noticed that \$60 BILLION is earmarked over 5 years, to study and implement the NextGen Technology. The message the Neighborhoods asked this writer to convey, loud and clear to The FAA, is that the residential lifestyle and quality of life in our East Dallas Neighborhoods will not be compromised so Pilots can make simpler straight run departures and arrivals; irrespective of the efficiency, convenience or lower cost of the auto pilot Technology. Currently Lakewood and the Historic Districts are seeing Southwest Airlines Jets flying very, very low, the logo on the airline is clearly visible to people walking their dogs. The flashing lights are appearing in resident's windows. The noise is deafing, in the early mornings, as early as 3:37 a.m. some days, at noon, late afternoon and evenings. At times the noise would literally waken the dead.

8

Additionally DFW Flights are now causing a constant drone, why are DFW Flights now flown with a drone impact over Lakewood? This also is new. Turbo Props from Addison Airport, with its runway changed to the East, is newly very disruptive. Young Mothers complain that their babies are awakened by the loud, roaring Jet noise. Residents of Lakewood pay a premium for their homes both in purchase price and high property taxes, because of the park-like settings, proximity to White Rock Lake, and cultural events such as Shakespeare in Amphitheatre Park at Samuell Grand Park. The Neighborhood states that it will not stand quite, while our neighborhood and adjacent East Dallas Parks and Lakes are being destroyed by noise and pollution. In the interest of Environmental Justice, and plain common law Equity, over a million residents should not have their health and lives destroyed for NextGen Pilots convenience, that is a benefit for only a few powerful Airline Corporations. Lakewood was listed Number 5 out of 10 of The Area's 10 Healthiest Neighborhoods October 4, 2013 Dallas Morning News.

9

*5. Lakewood:  
Unlike many areas of Dallas, Lakewood has a level of air pollution one might expect in the suburbs, well below the regional average. Add that to White Rock Park and White Rock Creek Trail, and you have the City's No.1 neighborhood for healthy living. Page 27. "*

10

While Environmental Justice is usually defined by the impact on low-income minority neighborhoods around big City Airports and Refineries. This scenario does indeed apply in a segment of East Dallas especially in the area around Fair Park that is on the National Historic Register, and to The Queen City area in The Peak Historic District. These areas are primarily black and Hispanic populated areas; people who cannot speak for themselves, so they asked us to speak for them. It is important to note the HUD has set a standard of 65 db for public housing, and it is doubtful whether that standard is being observed in Fair Park area currently; or in The Peak and Munger Place Historic areas where, when the jets fly overhead; people's conversations become inaudible to the listener. Moreover, these residents cannot watch their TV's from static nuisance. T.V. they said was their primary form of relaxation and entertainment after a hard day of manual labor. They do not go to the Opera or Theatre or dine at up-scale Restaurants. These are no insignificant facts. The Harris Draft EA tried to conform their Noise Impact analysis to fit the 65 db, that is very noticeable, and basically said it is acceptable to hear a portion of a conversation?

11

It is strange that there was no viable discussion in the EA. regarding the health aspects of pollution, in a City that is non-attainment for air quality. It is public record (Dallas Morning News October 2013) that The National Lung Association recently submitted an AMA Doctors Report on Childhood Asthma in the North Texas -Dallas area, to the Texas CEQ asking that the coal burning emissions from two coal fired Plants downwind from Dallas cease because of a near emergency situation with children breathing problems. Their request was denied. Attached is an article referencing British Scientists, by Andrea Perry ". That people living in communities close to airports are being warned that they could be at greater risk of cancer caused by pollution from jet exhausts...." " Aviation emissions are transmitted by a spray that is dispersed overhead, that cannot be filtered out by our lungs and is directly transmitted into our bloodstream. The mist is a sticky substance that attaches to vegetation and is also ingested and drank."<sup>4</sup>

12

The major environmental benefit documented in favor of implementing the NextGen Technology, was less pollution from fuel savings by implementing straight auto piloted routes. No mention or recommendation is made that the Airlines cease using Avgas with its lead content, sooty emissions, CO2, Nox, volcanic ash, and wake turbulence. Using refined gasoline would benefit the environment but it would cost the airlines more. If the average Taxpayer even knew how much they subsidize commercial aviation, including million to The Aviation Trust Fund, they would be a lot more unhappy about the extra charge for baggage, and the blatant disruption of their lifestyle. Current law imposes a total tax of 24.4 cents per gallon on Kerosene. However, a reduce tax rates apply for kerosene removed directly from a terminal in the fuel tank of a commercial aircraft making the tax rate 4.4 cents per gallon. For kerosene for non-commercial aviation the tax is 21.9 cents per gallon. The Commercial Airline Kerosene is indeed a bargain. Texas is generous in other ways

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<sup>4</sup> Article: Now living by airports can give you cancer. Exhibit "C" to mailed Document

also to the Commercial Airlines and Airline Manufactures, and history shows that the FAA has always been cozy with the airline industry it is supposed to regulate. Texas State Proposition 4 that passed November 2013 gave a tax exemption from sales tax for aircraft parts stored in the State. In this area of the equal treatment of environmental impacts the current DRAFT EA is deficient and slanted; and that is why an immediate impartial EIS should be commenced.

The Harris report recommends the adoption of certain European Union standards, and criteria for NextGen technology. Yet The U.S. Airline Industry and The FAA vigorously oppose any adoption of European standards to mitigate the carbon emissions of airline operations on Global warming. The FAA should use:

*“All political diplomatic, and legal tools at the disposal of the United States to ensure that the European Union’s emissions trading scheme is not applied to aircraft registered by the United State or operators of those aircraft, including the mandates that United States carriers provide emissions data to or purchase emission allowances from or surrender emissions allowances to the European Union Member State.”* Section 509 (3) The FAA Modernization and Reform Act of 2012, and remember this Act is the authorization for preparation and implementation The OAMP Draft E.A. for Love Field and DFW.

The death knell to the credibility of the DRAFT EA is: in The Final Report on **Implementation of NextGen Initiatives.**”

Here the Consultants cover themselves. “The North Texas Metroplex Prototype Study Team (PST) was one of the first OAMP Study Teams formed.” P.1.

*“The OAPM expedited timeline and focused scope bound airspace and procedures solutions to those that can be achieved without requiring an Environmental Impact Statement (EIS) e.g. only requiring an Environmental Assessment (EA) or Categorical Exclusion (CATEX) and within the current infrastructure and operating criteria. The Study Team results may also identify airspace and procedural solutions that do not fit within the environmental; and criteria boundaries of an OAMP project. These other recommendations then become candidates for other integrated airspace and procedures efforts.”* P. 3.

Two types of assessments were made to gauge the potential benefits of proposed solutions: Qualitative and Quantitative.

**“ Qualitative assessments are those that the PSA could not measure, but would certainly result from the implementation of the proposed solution. “** (Emphasis added) These assessments included:

- *Impact on Air Traffic Control (ACT) task complexity*
- *Ability to apply procedural separation (laterally or vertical segregated flows)*
- *Ability to enhance safety*

- *Improved connectivity to en route structure*
- *Improvement to security (avoiding restricted airspace)*
- *Reduction in communications (cockpit and controller)*
- *Reduction in need for Traffic Management Initiatives (TMI)*
- *Improved track predictability and repeatability*

*Reduce reliance on ground-based navigational aids (NAVAIDS)*

*Task complexity, for example, can be lessened through the application of structured PBN procedures versus the use of radar vectors, but quantifying that impact is difficult. Reduced communications between pilot and controller, as well as reduced potential for operational errors, are examples of metrics associated with controller task complexity that were not quantified.” P.3*

As the FAA well knows, an EIS is a detailed analysis that serves to insure that the policies and goals defined in NEPA are infused into the ongoing programs and actions of the federal agency. The EIS should provide a major study, and in particular significant impacts where no environmental impacts previously existed.

It appears that Lakewood has been victimized with new Flight Patterns that is seriously impacting a virgin, previously un-impacted neighborhood. An EIS would propose reasonable alternatives that should enhance the quality of the human environment. The standard format for an EIS as outlined in Section 1502.10 of the NEPA Regulations should be followed.

13

Respectfully submitted,

MRM Watson

6956 Lakeshore Drive,

Dallas, TX. 75214

Tel: 214-327-32081

Mobile: 214 213-6643

E-mail: [mrmwatson@icloud.com](mailto:mrmwatson@icloud.com)

Comments submitted on behalf of some concerned and impacted residents in the Lakewood Neighborhood and East Dallas Residential Neighborhoods.

**DECLARATION OF HISTORIC ABSENCE OF  
AIRPLANE VISUAL AND NOISE IMPACT ON THE  
DALLAS LAKEWOOD NEIGHBORHOOD**

In accordance with 28 U.S.C. § 1746, I, Maelissa Watson Elmer, make the following Declaration:

My name is Maelissa Watson Elmer, and I have resided for about forty years in the neighborhood of Lakewood in East Dallas at a residence approximately two blocks from White Rock Lake.

I am above the age of eighteen years. I have the legal and mental capacity to make this Declaration, and I have personal knowledge of the facts that are stated herein.

I am familiar with the historic noise radius emanating from Love Field. In 1973 prior to diligently looking for a home to purchase, my husband and I lived in the Knox Henderson area close to Highland Park. Daily I walked over to the Lakeside Park in Highland Park, and became aware of the air traffic noise disturbance there then. At that time Love Field was the only Air Port in Dallas. We deliberately chose not to purchase a house near Love Field because we did not want to be subjected to noise or pollution from aircraft.

I also have personal knowledge of the layout and noise radiating from Love Field prior to reconstruction of the Airport. During a period in the 1980's I commuted Monday to Friday on Southwest Airlines and Muse Airlynes to Hobby Airport in Houston to work in my profession.

We purchased our home in Lakewood in 1973, our daughter was born here, and until now we have enjoyed the beauty, peace, and tranquility of the neighborhood.

On or about June 2013, while I was convalescing at home from an accident, I became aware of loud noises, like an approaching thunderstorms, that I later identified as Jet noise in the early morning, beginning once more around noon and lasting to late afternoon, and again into the night. I contacted my local Congressional Representative to have DOT investigate the source of new air traffic in Lakewood. He never responded, nor did he, to my knowledge, make available to his Constituents

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The FAA North Texas Optimization of Airspace Draft Environmental Assessment (EA). I have since become aware in reading the Record that he was notified in May 2013, in an initial screening on the Draft Environmental Assessment.

I sent e-mail to my Dallas City Council Representative Sheffie Kadane seeking to understand what was happening in our Lakewood neighborhood. The Director of Aviation Mark Daubner apparently was assigned to speak and communicate with me. When we talked he implied that I was making a mountain out of a molehill and that there was no increase in air traffic or new traffic over our Lakewood neighborhood. I asked him to put that in writing as a number of my neighbors heard what I did. After follow-up emails and my letter to the Mayor, he sent me a second letter disclosing the FAA OAMP Environmental Assessment with only a few days remaining to comment by October 30, 2013. A one-month extension was then requested from The FAA. A 19-day extension was granted, together with and a CD of the proposed regulations and analyses prepared by a consulting firm in California. From the information I received, it took the consulting firm approximately three years to complete the study, but now The Lakewood Neighborhood only have 19 days to analyze and study over 1000 pages of impact material with complicated noise formulas.

I fear the current jet noise is affecting the neighborhood as a desirable and healthy place to live; reducing property values, and may force residents to move from the neighborhood. In the past two Sunday mornings, I was awoken from a deep sleep by a loud roaring jet at 3:33 a.m. I got up and looked out the window to see aircraft lights flashing above my tall Asiatic Elm tree.

I declare under penalty of perjury, that the foregoing is true and correct.

Executed on the      day of November 2013.

\_\_\_\_\_

Maelissa Watson Elmer

(A signed original is being mailed to the FAA by United States Post Office and will be Stamped November 18, 2013)

EXHIBIT #A<sup>4</sup>

NEWSLETTER SIGNUP

NEIGHBORHOOD ADVERTISE CONTACT BACKS CLASSIFIEDS

Search



TECHNOLOGY YOU EXPECT FROM A BIG BANK. SERVICE YOU DON'T.



DAILY DIGEST HOT TOPICS MAGAZINE DINING EVENTS CLASSIFIEDS GALLERY RESOURCES

Neighbors claim a change in air traffic over East Dallas, City says otherwise (poll)

12 Nov 2013 by Bethany Rubin

Within the last month, several East Dallas neighbors have emailed us at Advocate about noise from incoming and outgoing airplanes flying over the White Rock Lake area. They are concerned the FAA has changed the flight patterns of the planes heading Love Field, which they say has caused extra noise within the last year or so at their homes in East Dallas.

However, Mark Dushner, the director of aviation with the City of Dallas, says there has been no recent change in the flight patterns over East Dallas and he's not sure why some East Dallas residents seem to be hearing more noise than in the past.

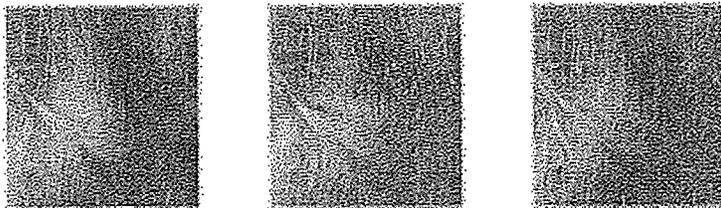
"That's not to say that I'm disagreeing with the residents in the White Rock Lake area who believe it's noisier," he says, "but I can only provide the numbers and show them what we see as far as activity."

For a few months earlier this year, there was an increase in the amount of airplanes flying out of the eastern runway (the Lemmon Avenue runway) when the airport was opening the new terminal, and that did impact East Dallas, he says. However, he says that shift in traffic has subsided almost back to normal, and the commercial traffic is once again going to and from both the Denton and Lemmon runways.

"The usage is kind of back --- not exactly, but closer --- to what it used to be," he says.

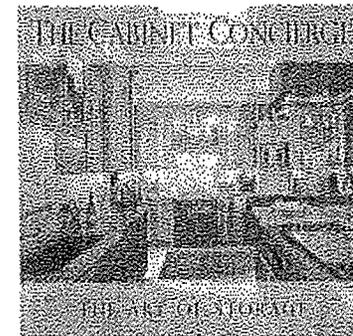
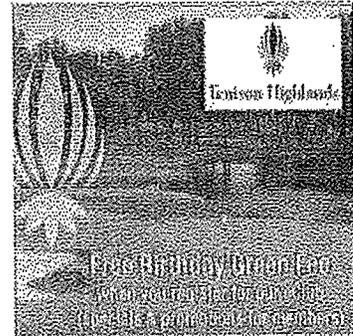
Dushner sent two charts, which you can view here: The General Aviation Yearly Comparison Jan 11 - Sept 13 shows the number of flights departing and arriving from both the Lemmon and the Denton runways, and the August Activity Analysis Information Line Graph, which shows activity at Love Field all the way back to the peak of air traffic at Love Field in 2000.

He also sent these pictures, which show the traffic patterns of airplanes in July 2011, July 2012 and July 2013. The green lines show airplanes that are below 3,000 feet, the yellow lines show planes between 3,000 and 6,000 feet, and the red lines show planes above 6,000 feet. The blue box outlines White Rock Lake.



Neighbors are concerned that once the Wright Amendment is lifted there will be even more traffic coming out of Love Field and going over East Dallas.

Another main concern is with a new procedure called the North Texas Optimization of Airspace and Procedures in the Metroplex (NTX OAMP). Right now, the FAA is testing out what they call the Next Gen technology, which is designed to use satellite-based communications, rather than requiring planes to fly indirect routes over radar towers.



"Satellite navigation will let pilots know the precise locations of other airplanes around them," the Next Gen website explains. "That allows more planes in the sky while enhancing the safety of travel. Satellite landing procedures will let pilots arrive at airports more predictably and more efficiently. And once on the ground, satellite monitoring of airplanes leads to getting you to the gate faster."

Neighbors are curious if the testing of these optimization technologies has caused a change in flight patterns. One neighbor, who asked to remain anonymous, requested a copy of the Environmental Assessment documentation. In a release, (you can view the FAA Letter here), the U.S. Department of Transportation Federal Aviation Administration states:

"This project would involve changes in aircraft flight paths and altitudes in certain areas. However, it will not require any ground disturbances or increase the number of aircraft operations with the NTZ (noise) airspace area."

However, Dasher says the optimization procedure hasn't caused any changes to the flight pattern. "I spoke with the FAA, and they said there has been no change with any procedures," he says. "Looking at one year compared to another, they don't appear to be any lower near Lakewood."

Still, neighbor Mary Gannour says there has been a noticeable change in the amount of noise caused by airplanes flying over her home in East Dallas, and she wants to know the cause. She has emailed Dasher and filed at least a couple of noise complaints via the Love Field noise complaint hotline, but she hasn't been satisfied with the responses.

"I just want a one sentence response as to why there is more air traffic now than there was a year ago, and no one can seem to do that," Gannour says.

"It has changed. You cannot deny there's an increase because too many people have noticed it. Something has changed. You cannot walk out on my front porch and be there for 30 minutes without hearing at least two very low flying airplanes back-to-back, and it is so loud."

She has begun watching the Flight Aware tracker, which shows the flights that fly to and from Dallas Love Field, and some of the especially loud airplanes are flying as close as 2,000 feet over East Dallas, she says.

If you have noticed increased noise in air traffic at your home in the past few months or year, you can file a noise complaint form here. Also, the FAA has granted an extension to comment on the North Texas Optimization of Airspace and Procedures in the Multiple-Environment Assessment. To do so, first read the document (attached FAA letter), and then email your comments to Daisy Walker at D-AEW-NorthTXOPMent@FAA.gov before the deadline of Nov. 18.

Do you think there has been a recent increase in air traffic noise in East Dallas?

No

Yes

Couldn't say less

Something different:

See what your neighbors think. PollID:131220

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About the Author

BRITTANY BURN is the Lakewood/East Dallas editor. Email [burnb@advocatemag.com](mailto:burnb@advocatemag.com)

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## Dallas neighbors praise Southwest for reducing noise around Love Field



by DAVID SCHECHTER

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WFAA

Posted on September 13, 2013 at 6:16 PM

DALLAS -- Neighbors outraged over a huge spike in airport noise near Love Field say noise levels are noticeably down.

The noise started after a major airport renovation changed some traffic patterns at the airport.

The decline in noise is a result of Southwest Airlines reducing the use of runway along Lemmon Avenue, which flies over residential neighborhoods.

Dallas and Highland Park residents who live nearby, like Judd Bradbury, have high praise for Southwest.

"They've demonstrated fairly swiftly that we recognize we have an issue," Bradbury said. "It was a planning oversight and we're going to take strong actions to correct our part of what's going on."

In June, News 8 broke the news that runway usage over residential areas was up 131 percent. That led to a series of public meetings and changes by Southwest.

"Hearing that our neighbors have noticed the results of the diligent and cooperative work efforts among our Pilots, the FAA, and Love Field operations is certainly what we hoped to achieve," the airline wrote in a statement.

But neighbors aren't quite feeling the love for the City of Dallas, which runs Love Field. They say small jets are not being discouraged from flying over residential areas, which is voluntary.

"It's still a core frustration. We're still getting flights at 1 a.m., 3 a.m. that are coming in low to the neighborhood," said Bradbury, whose been a vocal critic of Love Field.

The city sent letters to the owners of the planes -- not the pilots - asking them to chose another runway in the future.

Margaret Keliher, the former Dallas County Judge, was hired by the Town of Highland Park to reduce airport noise.

"I think the pilots definitely need to be notified," she said, "and I just think one letter going out is not quite adequate if you're trying to change behavior."

Airport Director Mark Duebner declined to comment on camera Friday. However, he said complaints to the airport are way down and he is looking for ways to improve communication with private pilots in an effort to keep a lid on the noise problem.

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Exhibit "C"

# Mail Online

## Now living by airports can give you cancer

by ANDREA PERRY, femail.co.uk

It's not only flying that can damage your health, now people living in communities close to airports are being warned that they could be at greater risk from cancer caused by pollution from jet exhausts.

Plane Truth, a report by Transport 2000 says that people and the environment face serious threats from the rapidly-growing aviation industry, including more noise and climate change gases.

Airports produce large amounts of toxic emissions that are a threat to human health, including nitrogen oxides and volatile organic compounds (VOCs).

Research in the United States has linked VOCs generated by SeaTac airport in Chicago to elevated rates of cancer in the vicinity.

Health workers also found high numbers of cases of the brain cancer called glioblastoma. Normally fatal, it ends the life of only one in 25,000 people, but the city of SeaTac which has a population of 23,000, had experienced at least five deaths from the disease.

The cluster of cases were at the north end of the airport, the direction the wind usually blows. Stories of families and circles of friends being decimated by cancers were also common in the area.

Heathrow Airport is already one of the UK's main producers of VOCs but there has been no research into the implications for people living near airports in the UK.

It is not easy to obtain data on toxic emissions produced by UK airports, as the government's position is that aviation contributes very little to local air pollution.

A spokesman for Transport 2000 said: 'The question is why hasn't any research been done. No-one seems to be taking this threat seriously and we really should be asking more questions about the affects on health caused by the aviation industry.'

In America researchers, who carried out a study on SeaTac Airport in Chicago found that carbon monoxide registered above federal guidelines and added to the risk of cancer.

Other airport produced toxic pollutants are highly suspected to cause many other illnesses such as, birth defects, respiratory illnesses, liver damage, and heart diseases.

Aviation emissions are transmitted by a spray that is dispersed overhead, that cannot be filtered out by our lungs and is directly transmitted into our blood stream. The mist is a sticky substance that attaches to vegetation and is also ingested and drank.

Transport 2000 predict that by 2015 air travel will more than double 1995 levels and if current trends continue, by 2050 passenger-kilometres flown could grow to between five and nine times the figure for 1995.

Professor John Whitelegg, who researched the report, highlighted the need for more stringent standards on noise and emissions around airports, better monitoring of the effects of air travel and more promotion of the alternatives such as rail for short-haul flights.

He called for an environmental charge on air travel based on emissions and the ending of tax exemption on aviation fuel.

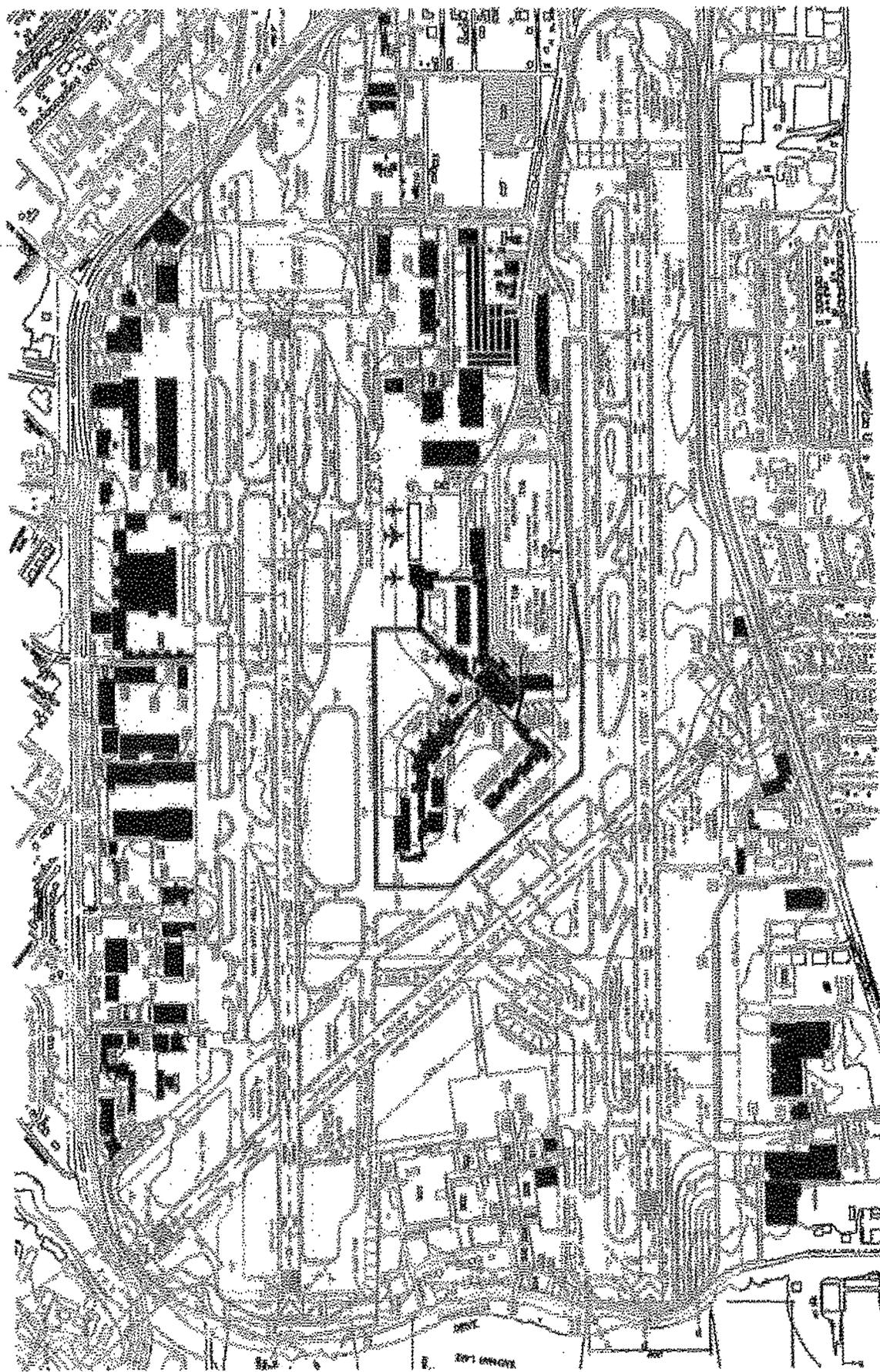
The report said that World Health Organisation noise limits are regularly exceeded, with one in eight people in the UK affected by noise pollution from aircraft.

It claimed that by 2050 aviation is set to become one of the biggest single sources of greenhouse gas emissions with around 10 per cent of climate change directly attributable to aircraft.

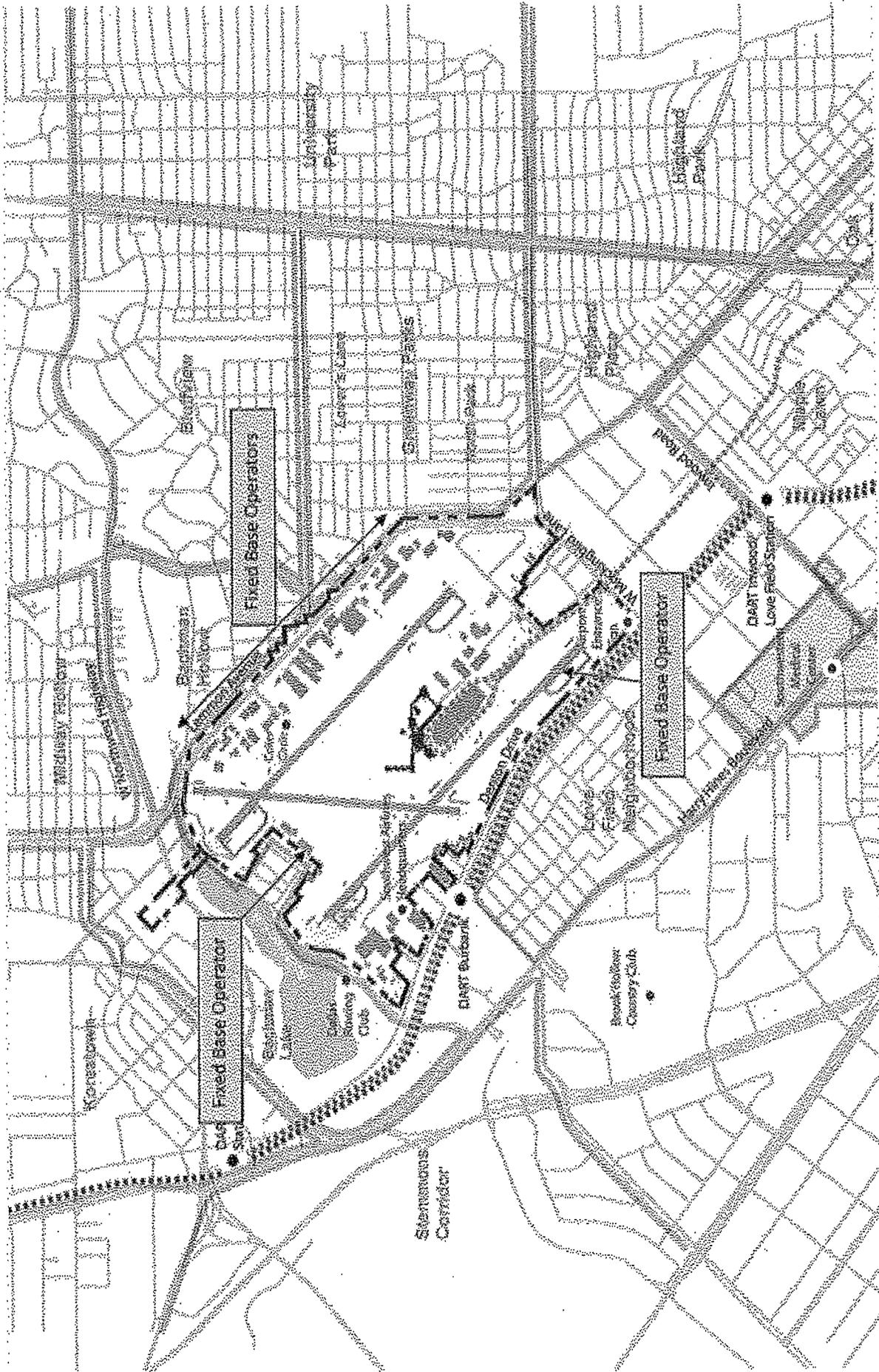
Stephen Joseph, Director of Transport 2000, said: 'Aviation has got away with too much for too long. People and the environment will pay the price if we let air travel continue to soar.'

*Site Plans Love Field Airport*

**DALLAS LOVE FIELD PRIOR TO LFMP**

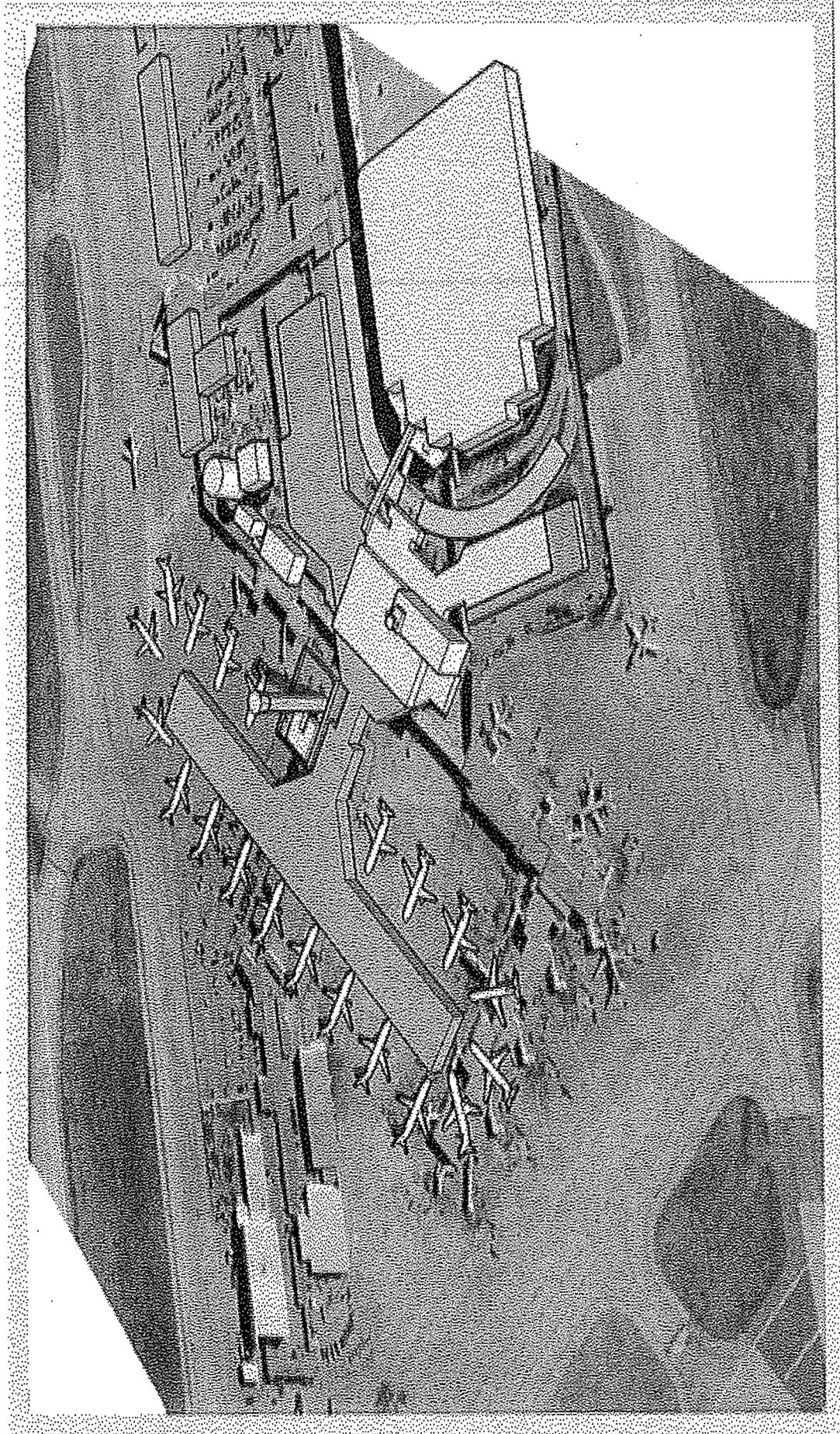


Site Plans Love Field Airport



*Site Plans Love Field Airport*

# LFMP NEW TERMINAL CONSTRUCTION



Base Photograph = Old Terminal (Facilities to be Demolished)  
 Blue Schematic Overlay = New Construction



City Manager's Office

1400 Main Street | Suite 460 | Southlake, Texas 76092 | (p) 817-748-8400 | (f) 817-748-8010

November 18, 2013

NTX OAPM EA  
Ms. Daisy Mather - Environmental Specialist  
FAA Central Service Center  
Operations Support Group, AJV-C22  
2601 Meacham Blvd.  
Fort Worth, Texas 76137

Re: Responsive Comments of the City of Southlake, Texas to the Material  
Contained in NTX OAPM EA

Dear Ms. Mather:

The City of Southlake has been made aware that the FAA is seeking comments on the draft environmental assessment for North Texas Optimization of Air Space and Procedures in the Metroplex (the "draft EA"). In response to this request, the City is submitting the comments based upon the information contained in the "draft EA". While the City appreciates the opportunity to be involved in this process, our comments might have been far more developed if a greater outreach and educational effort had been made to help the City fully understand the project.

The City has reviewed the OAPM document, and supports the FAA's desire to increase the efficiency and economy envisioned in the "Next Gen" approach to air space management and utilization. Much of Southlake's economy has benefitted from the proximity of the Dallas Fort Worth (DFW) International Airport and its supporting facilities. The City has worked cooperatively with the FAA and the DFW International Airport board and staff relating to airport operations and development for many years and will continue this relationship into the future. Anything that improves the aviation environment for the DFW International Airport has the potential to be beneficial to the City of Southlake.

The notification requesting public comments arrived at an unusually sensitive time for the City and its residents. As a matter of pure coincidence, the DFW International Airport leadership had initiated a program of runway maintenance starting in August 2011. The runway surface work required the closure and/or limited use of runway 18L/36R for approximately one or two months. In order to accommodate the loss of the runway under remodeling, the FAA worked through the air control system to divert significant numbers of jet aircraft operations to runway 13R/31L. Runway 13R/31L has

its northern end on an axis leading in close proximity to the heavily developed residential and commercial areas of the City of Southlake.

It is my understanding that runway 13R/31L has historically been principally used to accommodate arrivals in the day-to-day air traffic management program for the DFW International Airport complex, but has not typically been used for departures. During the course of the recent runway rehabilitation, there were a number of days in which the northern winds required that jet aircraft operations use the northern approach and departure route into runway 13R/31L. Departures create more noise impact, but we have understood that the situation was temporary, based on the runway maintenance program.

The impact of the route change on the local environment has caused concern. As you may know, the City of Southlake has developed in an urban village format around Southlake Town Square. The commercial shopping focus is built around outdoor parks, plazas and gathering places in a pedestrian-friendly downtown square. During significant periods of time this summer, aircraft arrival and departure operations were disruptive of the environment of Town Square, as well as nearby residential neighborhoods. Elected officials and staff received a number of complaints about the noise impacts. It is our understanding that DFW International Airport staff also received many complaints about the change. Long-time residents, many of whom have airline industry backgrounds, have told us that they have no memory of overflight impacts to this magnitude.

This experience has been a reminder of how changes to flight patterns can affect Southlake's quality of life.

The City of Southlake has historically worked with the FAA and DFW Airport to ensure that it can be a supportive neighbor and to minimize any negative consequences or compatibility issues relating to the location of the City at the boundary of the Airport. Southlake worked with the airport planners in the late 1980's (during the development of the earlier environmental impact study) to identify the best methods of addressing land use incompatibility issues. The result of this effort was development of Air Corridor Utilization Zones to clearly identify areas of overflight impact to address noise compatibility issues. Environmental analysts and air operations planners identified specific arrival and departure corridors using the then state-of-the art route system to establish defined flight corridors. The resulting agreement has guided the planning and development of our City since that time.

Specific environmental mapping showing the 75 LDN corridor and the 65 LDN corridor were developed as part of the earlier environmental impact assessment process

and were provided at FAA direction to neighboring cities to use in the development of their communities. The City of Southlake adopted a Master Land Use Plan based upon and incorporating the air corridors generated through the study. The City's Master Plan and the Municipal Zoning Ordinance that implemented the land use plan established a set of regulations that ensured that permitted uses were designed to work with a noise-impacted environment thereby reducing incompatibility issues. On the boundaries of the overflight corridors, the City's Zoning Ordinances permitted a gradual change in the type of permitted land uses to allow residential and traditional commercial uses that might have been impacted by unacceptable levels of noise if they were located directly in the overflight path.

The City of Southlake has grown from a population of 6,100 in 1988 to a population estimated to be 27,080 in 2013 (per the North Central Texas Council of Governments). The City has brought hundreds of acres of land into development as expensive single family residential homes and high end commercial centers. We have been recognized at the state and national level for our successful urban village theme. Landowners and developers have made investments relying on the City's master planning and zoning structures. These significant investments have occurred in the City based on the location of the established airport overlay zone.

The recent change in air usage characteristics on runway 13R/31L necessitated by the runway maintenance activities has reinforced to the residents and to the leadership of the City of Southlake how important it was to ensure that land uses on the ground were appropriately planned in a way to avoid incompatible disruption by routine air operations. Our recent experiences have underscored for us the need to clearly understand and share our concerns regarding any changes to flight operations.

We have reviewed the OAPM document to assess its impact on the community. It is an exhaustive technical document that has involved a great deal of study. As such, the City can, at best, raise concerns that the document presents which relate to local land use impacts. The City's principal concern is with noise and noise impacts.

The traditional system of air traffic control operations that have guided the development and operation of DFW for generations has been centered on the NAVAID system which involves ground-based beacons that essentially guide aircraft on their route through defined air corridors. As the Next Gen material clearly reflects, this may not be the most economical or efficient way to manage air traffic but it provided a certain level of predictability in identifying the corridors along which aircraft would operate. The potential conversion to the RNAV system which is based on satellite GPS control of air navigation and flow is by design not structured in the same manner. The first paragraph of Section 2.1 on Page 2-26, of the OAPM draft concludes with a statement as follows:

1 “..., RNAV procedures are free of such lateral and vertical flight path limitations typical of conventional procedures.” As the City understands the RNAV theory, aircraft will not be required to track the ground-based NAVAID beacons but will be free to follow more efficient routes by simply relying on the satellite GPS route control system. The City’s concern centers on how far the need for efficiency and economy may drive air operations into flight patterns that negatively impact the City. If a departing aircraft is able to leave the airport and not be restricted to NAVAID beacons but is able to initiate turns at an earlier point to begin to direct the aircraft to its destination, there may be an obvious change in the flight path of the aircraft as they depart the airport. Aircraft utilizing northern departures may be executing turning movements that will take them away from the corridors that have historically been used and move the aircraft (with its related noise impacts) over the more developed residential and commercial portions of the City while they are still climbing out on their take off profile. The recent use of runway 13R/31L for jet operations during periods of northern wind prevalence has demonstrated to the City that such changes will result in negative impacts to our City’s developed environment.

2 The City’s concern is further enhanced by the limited discussion contained in 2.1.2 of the OAPM on Page 2-30, of a possible change to entry or exit gates affecting air operations. Under the current NAVAID system, there are defined “entry gates” and “exit gates” through which air traffic control personnel route arriving and departing aircraft to avoid conflict in approach or departure and to ensure transition to the NAVAID routes. The new approach seems to address a change to this concept known as “floating fixes” which would allow the “entry” and “exit” gates to move based upon winds, traffic and route needs assessed on an ongoing basis by air traffic operations personnel and airline personnel. Exactly where and how this will work is left a little vague because the concept seems to emphasize the need for flexibility to allow these to shift in order to optimize air operation needs. At the City level this translates to a concern that the new “entry” and “exit” gates may float until they carry arriving or departing aircraft over the more developed portions of the City thereby potentially changing the character of the local environment in significant ways.

3 The information provided on historic noise activities is based upon earlier aircraft operations using the NAVAID systems along the air corridor systems around which the City had devised its land use plan. The text of the OAPM document in explaining the new Next Gen change seems to suggest the whole purpose of the RNAV conversion is to free air operations from the vertical and lateral restrictions of NAVAID. How far will this go in shifting the entry and exit gates where the aircraft will depart the DFW complex and leave the metropolitan area? Will there be a shift of air operations over the portions of the City of Southlake that were not planned, zoned, designed or developed to accommodate jet aircraft over flight at climbing or descending altitudes and power settings?

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4 The City of Southlake recognizes that the purpose of the public comment period is to seek identification of issues or concerns that might require follow-up by the FAA in proceeding with the OAPM for the Next Gen project. The difficulty that we face is that we cannot address the issue with which we have our greatest concern. FAA projects are undertaken in conformance with Order 1050.1E in evaluating environmental impacts. Section 14.3 provides us with guidance as to what a "significant impact" threshold would be in terms of noise generated by air operations. The provisions of 14.4 of the Order define how the analysis of significant impacts is undertaken. The problem the City faces is that the description of the RNAV program raises significant questions as to whether or not modeling or analysis has been undertaken and completed that will accurately assess the impacts of the new flight paths that might be created under the RNAV system. The City of Southlake has developed its entire land use planning, zoning and economic development system based upon its understanding that the FAA would follow the historic, agreed-upon air corridors on arrival and departure operations. DFW International Airport strongly advocated our adoption of land use plans to protect the air corridors and the FAA joined them in urging our full compliance with that concept. The City of Southlake believes it has been a good and committed partner and has complied with the planned concept. The OAPM, and its supporting documents, is filled with a combination of flexible language and highly technical air operation material (based upon the RNAV system) which does not reassure local officials that our efforts to work with the FAA to achieve compatibility will be honored.

5

An option for addressing this concern is to arrange a meeting where the RNAV local impact can be fully explained to city representatives from the boundary cities that surround the airport. If the FAA could provide answers to questions about projected arrival and departure routes during the climb out or entry into the airport, it would be helpful. Information on the altitudes projected for the aircraft at different points would also be useful. The RNAV system has value in terms of flight efficiency and economy when the aircraft arriving or departing the airport have reached a distance and altitude that minimizes the noise impact when they begin executing turning maneuvers toward their transitional or ultimate destinations.

As we mentioned previously, Southlake has many residents who are involved with the airline industry. In fact, some of our residents are pilots who routinely fly the aircraft into and out of the DFW area. They have shared their concerns with us, along with the concerns of their friends and neighbors who have experienced noise impacts. Working with you to ensure that we have complete and accurate information would assist us in our attempts to answer their questions and ensure that we have fully conveyed our concerns to you.

In summary, the City of Southlake wants to register concerns about the draft environmental assessment based upon the potential changes to the well-established

corridors that have guided our City's development and investment. We believe such changes will result in negative impacts. Additionally, we are concerned that there may be impacts we do not yet fully understand and would like to spend time with your staff to ensure we have not overlooked anything important.

Sincerely,



Shana K. Yelverton  
City Manager

----- Forwarded by 9-ASW-NorthTXOAPMcomment/ASW/FAA on 11/19/2013 12:57 PM -----

From: Karen Burton <[stkaren@verizon.net](mailto:stkaren@verizon.net)>  
To: 9-ASW-NorthTXOAPMcomment/ASW/FAA@FAA,  
Date: 11/19/2013 09:12 AM  
Subject: EA

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Hello All,

I realize my e-mail will be thrown out because it is too late. The reason for my tardiness is that I really do not see how my voice will matter. I have lived in my home for 16 years. And during that time, I have a noticed a great increase in air traffic around my home. I have read the EA and, my understanding is limited. I can not tell if this will help or harm my situation. My home is directly under the approach path for south wind traffic. The planes fly over non stop at 10,000 and more frequently now 5,000 ft. I could not wait for winds to shift north bound. Then, I would have a quiet day. Now, north wind approach flies directly over my house. Also, take off for 31L flies directly in front of my house. I was told that take off from 31L will 'never' be a norm after the maintenance on the runways has completed. The maintenance has competed and there are take off's from 31L. Take off from 36L instead of heading north out over the lake then bank south now, turns over Southlake and banks right over my house turning south. Landings for 31L and 36L are the same. Instead of flying over the lake then cut in for landings ,which was the norm, planes fly directly over Southlake. Some south of 114 then cut in for landing. I understand the need to stream line and make things more efficient. Southlake residents are not here for the long haul. They want good education for there children and then get out. A recent study , I believe in JAMA, found that there is a 25% increase in heart attack and stroke in seniors who live in ear shot of an airport. Basically noise pollution from air traffic. That is what Southlake is experiencing now. Why can't the FAA implement noise abatement procedures for Southlake?

1

I do realize that this will go no where. But, you have my two cents.

Thanks for your time,

Karen Burton

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## 2.2 Responses to Comments

**Table 2-1 NTX OAPM Draft Environmental Assessment Responses to Comments**

Agency / Organization	Name	Letter Date	Comment Number	Comment	FAA Response
<b>Concurrence Letters</b>					
Oklahoma Archaeological Survey	Robert L. Brooks	9/30/2013	OAS1	Proposed action involves only improved air traffic and navigation and no ground disturbance or increases in air operations that could indirectly affect cultural resources; no comment on the EA. The review has been conducted in cooperation with the State Historic Preservation Office, Oklahoma Historical Society.	Comment noted
Bureau of Indian Affairs - Southern Plains Office	Bruce Maytubby	10/23/2013	BIA1	We have reviewed the draft EA, as well as the maps that were provided, and have determined that there are no tribal or Individual Indian trust lands under the jurisdiction of the Southern Plains Region within the study area of the draft EA.	Comment noted
Texas State Historic Preservation Office	Linda Henderson	10/29/2013 (faxed date)	SHPO1	The FAA has found that the undertaking will have no adverse effect on historic resource. Based on the information provided in the EA, the SHPO concurs with this determination.	Comment noted
U.S. Forest Service	Linda Jackson	11/14/2013	LJ1	The U.S. Forest Service has no issues or concerns with this project. Thank you for allowing us the opportunity to comment.	Statement noted.

Comments Received					
none	Gerald Zerm	10/22/2013	GZ1	Why aren't the aircraft that depart DFW on Runway 31L kept on a heading, that take them out from the runway a few more miles, in a corridor similar to the flight path that is used by a aircraft when Runway 13R is used for landing?	<p>The commenter's question pertains to current operations and existing procedures for Runway 31L at DFW. Existing procedures are designed to meet applicable safety and design standards and are optimized for the current operating configuration at DFW. FAA continues to operate within the parameters set by the DFW Runway Use plan. It is important to note that the proposed OAPM project, if approved, would not be implemented until the fall of 2014.</p> <p>The objective of the North Texas OAPM project is to improve the flexibility and predictability of air traffic routes in the North Texas Metroplex by increasing the use of PBN technology. The study team did not identify the operations of Runway 31L as an opportunity to meet this objective because usage of Runway 31L at DFW is low in comparison to that of other runways at the Study Airports.</p> <p>As discussed in Section 2.2 of the Draft EA, the purpose of the North Texas OAPM project is to take advantage of the benefits of performance based navigation by implementing RNAV procedures that will help improve the efficiency of the airspace in the North Texas Metroplex. The purpose of the North Texas OAPM project is not to abate existing aircraft noise issues associated with current operations at North Texas Metroplex airports. However, the potential for environmental impacts, including noise related to implementing the Proposed Action, is assessed in the Draft EA; the project does not propose any procedures that would result in significant or reportable noise impacts.</p> <p>See Chapter 5 Environmental Consequences of the Draft EA and the Aircraft Noise Technical Report for discussion of the noise analysis and the potential environmental impacts associated with implementation of the North Texas OAPM project.</p>
none	Mark C. Fletcher	10/23/2013	MF1	Conduct and actual environmental noise impact study with current factual data and noise measurements regarding west bound RNA V departures and arrivals to DFW RUNWAY 31L13R.	<p>The commenter's question pertains to current operations and existing procedures for Runway 31L at DFW. Existing procedures are designed to meet applicable safety and design standards and are optimized for the current operating configuration at DFW. FAA continues to operate within the parameters set by the DFW Runway Use plan. It is important to note that the proposed OAPM project, if approved, would not be implemented until the fall of 2014.</p>

				<p>There have been no recent procedural changes that altered either the lateral or vertical components of the existing procedures for Runway 31L and no new procedures for Runway 31L have been added. The increased use of Runway 31L described in this comment is temporary and stems from runway closures related to construction projects and the occurrence of certain weather conditions. For more information regarding ongoing and future construction projects at the DFW airport see <a href="http://www.dfwairport.com/define/construction/index.php">http://www.dfwairport.com/define/construction/index.php</a>.</p> <p>The objective of the North Texas OAPM project is to improve the flexibility and predictability of air traffic routes in the North Texas Metroplex by increasing the use of PBN technology. The study team did not identify the operations of Runway 31L as an opportunity to meet this objective because usage of Runway 31L at DFW is low in comparison to that of other runways at the Study Airports.</p> <p>The NTX Draft EA discloses potential environmental impacts related to the Proposed Action. The thresholds for identifying significant noise impacts and reportable noise increases are established in FAA Order 1050.1e, Chg. 1, Policies and Procedures for Considering Environmental Impacts, and are provided in Table 5-2 of this EA. The results of the noise analysis conducted for the Draft EA indicate that noise levels within the Study Area resulting from implementation of the Proposed Action would not meet or exceed FAA's established noise thresholds. The Proposed Action would not result in a DNL increase of 1.5 dB or more in noise sensitive areas exposed to aircraft noise at or above DNL 65 dB. See page 5-170 of the EA for more information pertaining to the NTX OAPM Draft EA noise analysis.</p>
			MF2	<p>Eliminate the new RNAV departures and arrivals procedures to RUNWAY 31L/13R and revert back to previous published procedures of having aircraft flown NW of Texas Hwy 114, avoiding all flights over the City of Southlake and its residences.</p> <p>The commenter's question pertains to current operations and existing procedures for Runway 31L at DFW. Existing procedures are designed to meet applicable safety and design standards and are optimized for the current operating configuration at DFW. FAA continues to operate within the parameters set by the DFW Runway Use plan. It is important to note that the proposed OAPM project, if approved, would not be implemented until the fall of 2014.</p>

					<p>The objective of the North Texas OAPM project is to improve the flexibility and predictability of air traffic routes in the North Texas Metroplex by increasing the use of PBN technology. The study team did not identify the operations of Runway 31L as an opportunity to meet this objective because usage of Runway 31L at DFW is low in comparison to that of other runways at the Study Airports.</p> <p>There have been no recent procedural changes that altered either the lateral or vertical components of the existing procedures for Runway 31L and no new procedures for Runway 31L have been added. The increased use of Runway 31L described in this comment is temporary and stems from runway closures related to construction projects and the occurrence of certain weather conditions. For more information regarding ongoing and future construction projects at the DFW airport see <a href="http://www.dfairport.com/redefine/construction/index.php">http://www.dfairport.com/redefine/construction/index.php</a>.</p>
			MF3	<p>Revise departures and arrivals procedures to RUNWAY 31L/13R to reduce the DNL footprint to not exceed noise level of 55 dB while being outdoors.</p>	<p>The commenter's question pertains to current operations and existing procedures for Runway 31L at DFW. It is important to note that the proposed OAPM project, if approved, would not be implemented until the fall of 2014.</p> <p>There have been no recent procedural changes that altered either the lateral or vertical components of the existing procedures for Runway 31L and no new procedures for Runway 31L have been added. The increased use of Runway 31L described in this comment is temporary and stems from runway closures related to construction projects and the occurrence of certain weather conditions. For more information regarding ongoing and future construction projects at the DFW airport see <a href="http://www.dfairport.com/redefine/construction/index.php">http://www.dfairport.com/redefine/construction/index.php</a>.</p> <p>Existing procedures are designed to meet applicable safety and design standards and are optimized for the current operating configuration at DFW. FAA continues to operate within the parameters set by the DFW Runway Use plan. The objective of the North Texas OAPM Project is to improve the flexibility and predictability of air traffic routes in the North Texas Metroplex by increasing the use of PBN technology. The study team did not identify the operations of Runway 31L as an opportunity to meet this objective because usage of Runway 31L at DFW is low in comparison to that of other runways at the Study Airports.</p>

					<p>The NTX Draft EA discloses potential environmental impacts related to the Proposed Action. The thresholds for identifying significant noise impacts and reportable noise increases are established in FAA Order 1050.1e, Chg. 1, Policies and Procedures for Considering Environmental Impacts, and are provided in Table 5-2 of this EA. The results of the noise analysis conducted for the Draft EA indicate that noise levels within the Study Area resulting from implementation of the Proposed Action would not meet or exceed FAA's established noise thresholds. See Section 5.1.2 (pg. 5-170) for more information pertaining to the NTX OAPM Draft EA noise analysis.</p>
			MF4	<p>Install permanent noise monitoring stations strategically located in Southlake to monitor air traffic that is utilizing RNA V departures and arrivals to DFW RUNWAY 31L/13R.</p>	<p>The commenter's question pertains to current operations and existing procedures for Runway 31L at DFW. It is important to note that the proposed OAPM project, if approved, would not be implemented until the fall of 2014.</p> <p>The results of the noise analysis conducted for the Draft EA indicate that noise levels within the Study Area resulting from implementation of the Proposed Action would not meet or exceed FAA's established noise thresholds. See Section 5.1.2 (pg. 5-170) for more information pertaining to the NTX OAPM Draft EA noise analysis.</p> <p>The EA did not identify any significant noise impacts as a result of the Proposed Action necessitating mitigation. Moreover, noise monitoring is not required for FAA NEPA noise evaluations.</p>
			MF5	<p>Impose on the DFW Board of Directors to create Noise Control Ordinance, similar to Orange County's General Aviation Noise Ordinance, for noise abatement procedures applicable to utilization of DFW Runway 31L/13R.</p>	<p>The Commenter's question pertains to current operations and existing procedures for Runway 31L at DFW. As discussed in Section 2.2 of the Draft EA, the purpose of the North Texas OAPM project is to take advantage of the benefits of performance based navigation by implementing RNAV procedures that will help improve the efficiency of the airspace in the North Texas Metroplex. Within this context, the North Texas OAPM project does not plan to include procedures that may result in significant noise impacts.</p> <p>It is not the purpose of the North Texas OAPM project to abate existing aircraft noise issues associated with operations at the North Texas Metroplex airports; however, the potential for environmental impacts, including noise related to implementing the Proposed Action is assessed in the Draft EA. When compared to the No Action Alternative</p>

					– wherein no changes other than those previously planned for are made to the procedures used in the North Texas Metroplex – the Proposed Action would not result in significant or reportable noise impacts to communities around the Study Airports. Please see Chapter 5, Environmental Consequences, of the Draft EA and the Aircraft Noise Technical Report for discussion of the potential environmental impacts associated with implementation of the North Texas OAPM project.
NAS Fort Worth JRB	Randy Varner	10/25/2013	JRB1	We'd like to see a better summary of impacts to small airports. Table 3-2 just doesn't tell us anything about how the proposed action procedures may impact our operations. And for us non-flyers Table 3-2 tells us nothing.	The purpose of Table 3-2 is to describe the various procedures included as part of the Proposed Action. The potential environmental impacts associated with the Proposed Action and the methodologies used to conduct the impact analyses are discussed in Chapter 5 of the Draft EA.  Detailed information on the noise analysis is available in the Aircraft Noise Technical Report, and details related to each procedure depicted in Table 3-2 are provided in the D&I Team Report, both available on the OAPM Project website <a href="http://www.oapmenvironmental.com/ntx_metroplex/ntx_docs.html#_MON_1410530416">http://www.oapmenvironmental.com/ntx_metroplex/ntx_docs.html#_MON_1410530416</a>
			JRB2	The Exhibits in Chapter 3 are too busy. Maybe you could break them out to smaller areas as well so us "satellite" airfields could more easily see what is proposed to be going on in our local area.	The electronic versions of the documents are zoomable and may provide a greater level of detail for the reader.
			JRB3	The flight ops in Table 4-1 look incorrect for NAS Fort Worth. I'm not sure how you define the air operations categories but to me we should have a lot more "Military" operations and not nearly as many "General Aviation" operations.	Table 4-1 has been corrected and is included as part of the North Texas OAPM EA errata (see Section 3.2, Corrections to Exhibits).
Lakewood Neighborhood	Maelissa Watson	10/25/2013	MW1	This Petition is to request a reasonable 30 day extension to comment on proposed DRAFT FAA E.A. for The DFW METROPLEX.	The FAA extended the period for public review and comment on the Draft North Texas OAPM EA to November 18th, 2013. This provided the public 18 additional days to review and comment on the Draft EA.
			MW2	Lakewood was never notified prior to new construction at Love Field of any impact on Lakewood; no Environmental Assessment was mentioned to our Neighborhood, let alone a full blown Environmental Impact Review which would be appropriate considering the magnitude of the potential changes.	The Commenter's question pertains to current operations and existing procedures for DAL related to new construction that are not associated or connected with the NTX OAPM Project.  The changes in runway usage related to ongoing new construction undertaken by DAL are temporary. For more

					<p>information, see the DAL modernization website for construction updates <a href="http://www.lovefieldmodernizationprogram.com">http://www.lovefieldmodernizationprogram.com</a></p> <p>The objective of the North Texas OAPM Project is to improve the flexibility and predictability of air traffic routes in the North Texas Metroplex by increasing the use of PBN technology.</p>
None	Claudia Smith	10/26/2013	CS1	<p>This last month has been very unpleasant with entire days of planes taking off every 2-3 minutes. While I understand the situation, there must be some way to reduce the impact it has on an entire community.</p>	<p>The Commenter's question pertains to current operations and existing procedures for Runway 31L at DFW. Existing procedures are designed to meet applicable safety and design standards and are optimized for the current operating configuration at DFW. FAA continues to operate within the parameters set by the DFW Runway Use plan.</p> <p>It is important to note that the proposed OAPM project, if approved, would not be implemented until the fall of 2014.</p> <p>The objective of the North Texas OAPM project is to improve the flexibility and predictability of air traffic routes in the North Texas Metroplex by increasing the use of PBN technology.</p> <p>The study team did not identify the operations of Runway 31L as an opportunity to meet this objective because usage of Runway 31L at DFW is low in comparison to that of other runways at the Study Airports. As discussed in Section 2.2 of the Draft EA, the purpose of the North Texas OAPM project is to take advantage of the benefits of performance based navigation by implementing RNAV procedures that will help improve the efficiency of the airspace in the North Texas Metroplex.</p> <p>The purpose of the North Texas OAPM project is not to abate existing aircraft noise issues associated with current operations at North Texas Metroplex airports. However, the potential for environmental impacts, including noise related to implementing the Proposed Action, is assessed in the Draft EA; the project does not propose any procedures that would result in significant or reportable noise impacts. See Chapter 5 Environmental Consequences of the Draft EA and the Aircraft Noise Technical Report for discussion of the noise analysis and the potential environmental impacts associated with implementation of the North Texas OAPM project.</p>

none	Ken Ford	10/27/2013	KF1	<p>1) Noise pollution, environmental pollution, and safety generated by air traffic using the runways for departures and takeoffs over Southlake and Grapevine has increased dramatically over the recent past. In particular the runway with takeoffs and landings going out northwest over Grapevine and Southlake has created a totally intolerable noise level. Having lived in these communities for several decades, I realize the agreed flight path centerline of the noise corridors originally agreed to by all parties has not been observed. Consequently, planes now both take off and land more south of the center line, and at heights which are considerably lower than originally promised and agreed with the communities. 2) The original noise corridor center line going out over Southlake provided a safer and cleaner departure/takeoff corridor. Utilization of this original centerline (north of Hwy 114 primarily thru Southlake) would provide a more acceptable solution to the use of the runway. In addition, property built subsequent to the agreed upon center line provided for noise abatement, etc, while property now being exposed by flights directly over the Southlake Town Square area were not originally part of the increased noise abatement requirements. 3) Consequently the FAA, "DFW Airport authority and cities of Grapevine and Southlake must observe the original agreements and intentions in providing a safe and tolerable solution to the air traffic problems which residents of these communities are experiencing.</p>	<p>The Commenter's question pertains to current operations and existing procedures for Runway 31L at DFW. Existing procedures are designed to meet applicable safety and design standards and are optimized for the current operating configuration at DFW. FAA continues to operate within the parameters set by the DFW Runway Use plan.</p> <p>It is important to note that the proposed OAPM project, if approved, would not be implemented until the fall of 2014.</p> <p>The objective of the North Texas OAPM project is to improve the flexibility and predictability of air traffic routes in the North Texas Metroplex by increasing the use of PBN technology.</p> <p>The study team did not identify the operations of Runway 31L as an opportunity to meet this objective because usage of Runway 31L at DFW is low in comparison to that of other runways at the Study Airports. There have been no recent procedural changes that altered either the lateral or vertical components of the existing procedures for Runway 31L and no new procedures for Runway 31L have been added. The increased use of Runway 31L described in this comment is temporary and stems from runway closures related to construction projects and the occurrence of certain weather conditions. For more information see the DFW airport website for construction updates <a href="http://www.dfwairport.com/redefine/construction/index.php">http://www.dfwairport.com/redefine/construction/index.php</a>.</p> <p>As discussed in Section 2.2 of the Draft EA, the purpose of the North Texas OAPM project is to take advantage of the benefits of performance based navigation by implementing RNAV procedures that will help improve the efficiency of the airspace in the North Texas Metroplex. The purpose of the North Texas OAPM project is not to abate existing aircraft noise issues associated with current operations at North Texas Metroplex airports. However, the potential for environmental impacts, including noise and environmental pollution related to implementing the Proposed Action, is assessed in the Draft EA; the project does not propose any procedures that would result in significant or reportable noise impacts.</p> <p>See Chapter 5 Environmental Consequences of the Draft EA and the Aircraft Noise Technical Report for discussion of</p>
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					<p>the noise analysis and the potential environmental impacts associated with implementation of the North Texas OAPM project.</p>
<p>none</p>	<p>Michael G. Kroposki</p>	<p>10/28/2013</p>	<p>MK1</p>	<p>The Aircraft Noise Technical Report on page 42 at paragraph 3.2.8 indicates that Stage length was used as a surrogate for determination of take off weight. However INM and NIRS use a factor of 65% payload in determining take off weight. The recent large increases in passenger load factors render the 65% payload factor seriously inaccurate. A sample of recent actual departure weights shows that many aircraft have take off weights which correspond to 1-2 stage lengths greater than the INM default factor of 65%. INM calculations show that this under estimate of take off weight yields an underestimate of aircraft noise levels of 1-2 dB. Given that the level of significance is 1.5 dB an underestimate of 1-2 dB substantially removes the ability to comply with NEPA regulations if there is a potential finding of no significant impacts!</p> <p>At the very least a sampling of actual take off weights needs to be compiled and compared to the INM surrogate weights and appropriate adjustments made as is suggested in the INM manuals</p>	<p>The Commenter's assumption that calculated DNLs are significantly underestimated is not accurate and appears to be based on his assumption that the passenger load factor is the prevailing variable in the noise model. The average weight calculation includes more than passenger load factor. It also includes the weight of the aircraft, cargo, and fuel. Noise calculations are sensitive to many noise modeling input variables. It is not technically sound to look at one variable, e.g., takeoff weight, in isolation.</p> <p>For example, the noise model uses a conservative value of 100% thrust for departure procedures, although airlines typically do not use 100% power in takeoff. Thrust reduction at takeoff varies. Therefore, the 100% thrust assumption will result in higher noise calculations than may occur for particular departures. The goal of the noise analysis is to capture the average annual conditions at the airport. The FAA has determined that the DNL results do not exceed the FAA's threshold for a significant noise impact or reportable noise increases.</p> <p>The analysis of potential noise impacts was undertaken following established and approved methodologies using the FAA's approved noise model for assessing noise impacts associated with air traffic changes over broad areas.</p> <p>As described in Section 4.3.1.1 of the EA, Noise Modeling Methodology, the FAA Order 1050.1E states that the Noise Integrated Routing System (NIRS) should be used for flight track changes over large areas and at altitudes over 3,000 AGL. More specifically, for proposed actions such as in the North Texas OAPM project, 1050.1E specifies use of NIRS Version 7.0b.</p> <p>More information on the NIRS model can be found on the FAA website  <a href="http://www.faa.gov/about/office_org/headquarters_offices/a/pl/research/models/nirs_nst">http://www.faa.gov/about/office_org/headquarters_offices/a/pl/research/models/nirs_nst</a>.</p>

			MK2	NEPA regulations require a statement of the level of uncertainty in any environmental impact analysis. In a recent noise analysis in the Boston area the FAA response to a comment asking for the level of uncertainty in INM was that INM and similar noise analysis software had a level of uncertainty in the DNL projections of about 3-5 dB. If the present study has a different level of uncertainty this needs to be stated in the EA documents.	<p>The Draft EA was prepared in compliance with FAA Order 1050.1E, Chg. 1, and satisfies the requirements of NEPA as well as the implementing regulations issued by the Council on Environmental Quality (CEQ)(40 CFR Parts 1500-1508).</p> <p>The analysis of potential noise impacts was undertaken using FAA's standard noise model for projects of this kind, following established and approved methodologies. Accordingly, the EA meets and satisfies the requirements of NEPA. Comments and responses on environmental documentation prepared for other, unrelated projects are not applicable to this project.</p>
City of Coppell	Clay Phillips	10/29/2013	COP1	Surprised and disappointed that a more concerted effort was not made to contact the Mayor, City Council, or City Manager's Office regarding an issue of such importance that could have long-term impacts on our community.	<p>The FAA made every effort to treat all of the towns and cities within the study area fairly. See section 2.6 of the Draft EA for details of the scoping process the FAA undertook as part of the North Texas OAPM EA.</p> <p>In addition to the notification described in section 2.6, the FAA published a Notice of Availability of the Draft EA in two local newspapers: The Dallas Morning News and the Ft. Worth Star Telegram on September 30, 2013, placed electronic copies of the Draft EA at 28 local libraries, and sent written NOA to 180 federal, state, regional, county level officials, and other interested parties. The Draft EA was also available for comment on the OAPM Environmental website throughout the original comment period from September 30, 2013 to October 30, 2013 <a href="http://oapmenvironmental.com/ntx_metroplex/ntx_docs.html">http://oapmenvironmental.com/ntx_metroplex/ntx_docs.html</a></p> <p>FAA undertook a second and expanded mailing of the Notice of Availability of the Draft EA that included the officials for cities in the immediate DFW/DAL area on October 29, 2013. The FAA extended the period for public review and comment on the Draft EA to November 18, 2013. This provided the public 18 additional days to review and comment on the Draft EA.</p> <p>Also, in compliance with FAA Order 1050.1E, Chg. 1, the FAA is responding to all comments received from the public.</p>

			COP2	<p>Unfortunately, the Draft EA fails to provide sufficient information to enable us to gain- and to convey to our citizenry - a meaningful understanding of how the proposed project would change the location, altitude, frequency, time of day, or single-event or cumulative noise levels associated with aircraft operations over Coppell.</p>	<p>The Draft EA was prepared in compliance with FAA Order 1050.1E, Chg. 1, and satisfies the requirements of NEPA as well as the implementing regulations issued by the Council on Environmental Quality (CEQ)(40 CFR Parts 1500-1508). There were no procedural changes to existing initial departure tracks and altitudes or final approach tracks and altitudes for DFW over the City of Coppell.</p> <p>Furthermore, the environmental analysis conducted in support of the Draft EA indicates that there would be no significant or reportable impacts to the City of Coppell resulting from the Proposed Action. For further details regarding procedures specific to DFW refer to the North Texas OAPM Design and Implementation Team Technical Report and the Aircraft Noise Technical Report available at <a href="http://oapmenvironmental.com/ntx_metroplex/ntx_docs.html">http://oapmenvironmental.com/ntx_metroplex/ntx_docs.html</a></p>
			COP3	<p>1) Please provide graphics depicting existing flight paths over Coppell with respect to north-flow and south-flow conditions, respectively, at DFW. Recognizing that individual operations may deviate from normal flight paths for many different reasons, please depict the flight paths in a manner that excludes aberrational or infrequent operations.</p> <p>2) Please provide graphics depicting any new flight paths over Coppell associated with the proposed project, and in connection with the graphics explain the conditions under which the new flight paths would be utilized (e.g. , north-flow at DFW);</p>	<p>The NTX OAPM Draft EA was prepared in accordance with the requirements of FAA Order 1050.1E, Chg. 1, Policies and Procedures for Considering Environmental Impacts, and employs FAA's required methods of analysis, metrics, and thresholds of significance described therein. The order determines that the cumulative noise energy exposure of individuals to noise resulting from aviation activities must be established in terms of yearly day/night average sound level (DNL). Supplemental noise metrics such as Sound Exposure Level (SEL) or Time Above 65 decibels (T A 65dB) are not required.</p> <p>There were no procedural changes to existing initial departure tracks and altitudes or final approach tracks and altitudes for DFW over the City of Coppell. Furthermore, the environmental analysis conducted in support of the Draft EA indicates that there would be no significant or reportable impacts to the City of Coppell resulting from the Proposed Action. For further details regarding procedures specific to DFW refer to the North Texas OAPM Design and Implementation Team Technical Report and the Aircraft Noise Technical Report available at <a href="http://oapmenvironmental.com/ntx_metroplex/ntx_docs.html">http://oapmenvironmental.com/ntx_metroplex/ntx_docs.html</a></p>

			<p>COP3 (cont'd)</p> <p>3) Please provide the following information with respect to average daily operations on each existing or new flight path over Coppell under the proposed project:</p> <p>a. The frequency of operations during each hour of the day, to the extent that information is among the data input into the Integrated Noise Model (INM) or otherwise; and</p> <p>b. The range of altitudes that are or would be experienced over specific locations in Coppell that provide a representative sample of the various portions of Coppell that will experience overflights (the "Coppell sites"). Recognizing that the altitudes associated with departures, in particular, will vary depending on a host of factors- including type of aircraft, meteorological conditions, destination, passenger and cargo load, etc.-we request information regarding the lowest and highest expected overflights, as well as the altitude range of the most frequent operations;</p>	<p>See COP3 response above.</p>
			<p>COP 3 (cont'd)</p> <p>4) Please provide the information requested in Paragraph 3 with respect to each existing flight path over Coppell and current conditions;</p> <p>5) Please provide the following information regarding the conditions that would be experienced on an average day at each of the Coppell sites under the proposed project:</p> <p>a. Single-event noise levels, measured using the Sound Exposure Level (SEL) metric, associated with arrivals and departures, respectively, for different types of aircraft;</p> <p>b. Time-above 65 decibels (T A 65 dB A); and</p> <p>c. Day-night average sound level (DNL);</p> <p>6) Please provide the information requested in Paragraph 5 with respect to current conditions.</p>	<p>See COP 3 response above.</p>

Love Field Citizens Action Committee	William Cohn	10/29/2013	WC1	Adoption of a specified RW13L RNAV departure that would overfly Lemmon Avenue. This will meet your objective of better sequencing of DAL aircraft with DFW, while protecting the environmental quality for the tens of thousands of people surrounding Love Field.	As part of the North Texas OAPM project the FAA has developed a proposed off-the-ground RNAV procedure for Runway 13L at DAL that will produce a repeatable and precise ground track. The procedure names are: LNDRE, CURLO, KKITY, and SWTSR.  For further details regarding procedures specific to DFW refer to the North Texas OAPM Design and Implementation Team Technical Report and the Aircraft Noise Technical Report available at <a href="http://oapmenvironmental.com/ntx_metroplex/ntx_docs.html">http://oapmenvironmental.com/ntx_metroplex/ntx_docs.html</a>
			WC2	1) To illustrate the point, see attachment A of this letter, which is the current approach plate for the ILS 13L at Love Field. The missed approach procedure directs the pilot to climb to 1000' then turn eastbound (100°), directly over our noise sensitive neighborhoods. For years we have attended noise abatement meetings with the FAA assuring us it was doing everything possible to mitigate noise impact. Yet, in this approach procedure, the FAA seems to intentionally send aircraft at high engine power in a low, slow turn directly over one of our neighborhoods. It is hard to imagine a procedure that would create more noise than this. We hope this serious oversight will be corrected.	1) The objective of the North Texas OAPM project is to improve the flexibility and predictability of air traffic routes in the North Texas Metroplex by increasing the use of PBN technology. The study team did not identify missed approach procedures as an opportunity to meet this objective because of the low usage rates of these procedures. In addition, missed approach procedures are developed in accordance with FAA Order 8260.3 United States Standard for Terminal Instrument Procedures (TERPS) and are designed to provide separation between adjacent runways and obstacle clearance.

			<p>WC 2 (cont'd)</p>	<p>2) To provide an arbitrary RNAV departure would be environmentally reckless, since an undesirable ground track could actually be worse than what exists now. An RNAV departure that is slightly left of RW 13L centerline would be a disaster, directing aircraft directly over our neighborhoods.:</p> <p>3) Our neighborhood organization has consistently advocated for a RW13L RNAV departure that would overfly Lemmon Avenue. Lemmon Avenue is very close to extended runway centerline, and is a 6 lane thoroughfare populated by car lots, Home Depot, and fast food restaurants. It is the obvious choice for minimizing noise impact. Yet, the Draft Environmental Assessment doesn't mention it. To be clear: RNAV departures with arbitrary ground tracks are worse than no RNAVs at all.</p>	<p>2) &amp; 3) The objective of the North Texas OAPM project is to improve the flexibility and predictability of air traffic routes in the North Texas Metroplex by increasing the use of PBN technology. All proposed RNAV and RNP-AR procedures developed for DAL as part of the North Texas OAPM overlay existing flight tracks and altitude profiles while using RNAV criteria to add precision and predictability. Designing a procedure to follow a visual reference such as a road is a step backwards from the introduction of modern technologies such as PBN. For further details regarding procedures specific to DAL refer to the North Texas OAPM Design and Implementation Team Technical Report available at <a href="http://oapmenvironmental.com/ntx_metroplex/ntx_docs.html">http://oapmenvironmental.com/ntx_metroplex/ntx_docs.html</a></p>
			<p>WC3</p>	<p>A discussion of noise abatement issues at Love Field is conspicuously absent in your report. The current 13L ILS procedure already contains the oversight of heavy noise impact on our neighborhoods. We are concerned that a similar oversight is possible for any new RNAV departures proposed in the OAPM, if the environmental impact of the ground track isn't a guiding principle.</p>	<p>Existing noise abatement procedures for DAL were retained in the designs for both the Proposed Action and the No Action as stated in section "Major Study Airports - Departures" on page 54 of the Aircraft Noise Technical Report available at <a href="http://oapmenvironmental.com/ntx_metroplex/ntx_docs.html">http://oapmenvironmental.com/ntx_metroplex/ntx_docs.html</a></p> <p>As discussed in Section 2.2 of the Draft EA, the purpose of the North Texas OAPM project is to take advantage of the benefits of performance based navigation by implementing RNAV procedures that will help improve the efficiency of the airspace in the North Texas Metroplex. The purpose of the North Texas OAPM project is not to abate existing aircraft noise issues associated with current operations at North Texas Metroplex airports. However, the potential for environmental impacts, including noise related to implementing the Proposed Action, is assessed in the Draft EA; the project does not propose any procedures that would result in significant or reportable noise impacts.</p> <p>See Chapter 5 Environmental Consequences of the Draft EA and the Aircraft Noise Technical Report for discussion of the noise analysis and the potential environmental impacts associated with implementation of the North Texas OAPM project.</p>

Addison Airport (ADS)	Joel Jenkinson (URS)	10/30/2013	ADS1	<p>Addison Airport's primary concern with the NTX OAPM is whether arrival and departure procedures detailed therein were designed under the assumption that the DFW Class B airspace will be changed (expanded) as proposed in the NPRM that was published in the January 22, 2013 edition of the Federal Register (Proposed Modification of Dallas/Fort Worth Class B Airspace Area; TX: Docket No. FAA-2012-1168, Airspace Docket No. 07-AWA-3). As detailed in the attached comment (submitted in response to the DFW Class B airspace modification NPRM) Addison is strongly opposed to the lowering of the DFW Class B airspace floor over Addison Airport as contemplated in the NPRM.</p>	<p>The proposed North Texas OAPM project and the proposed Class B airspace changes in the Dallas/Fort Worth area have independent utility. Both proposed projects were subject to the NEPA environmental review process. Approval of proposed Class B modifications was not considered as an underlying assumption in the design of the North Texas OAPM Proposed Action procedures. Furthermore, the North Texas OAPM designs are independent of the Class B modifications. The approval or disapproval of the Class B modifications will have no impact on the North Texas OAPM designs, but the project was included in the cumulative impacts analysis for the draft EA. The North Texas OAPM designs did not modify any VFR routes or traffic patterns. The proposed Class B changes were reviewed as part of cumulative impact analysis for the draft EA, but provide no additional impact cumulatively because they did not influence procedure design.</p>
			ADS2	<p>1) If these arrival routes were designed with the assumption that the DFW Class B floor will be lowered to 2,500 feet (MSL) over Addison, then Addison objects for the same reasons stated in the attached comments on the DFW Class B airspace NPRM (which have yet to be addressed by FAA). We request that FAA provide additional information, specifically whether the Proposed Action assumes modifications to the DFW Class B airspace as proposed by FAA in January, and the profiles (altitudes) of the aforementioned STARs</p> <p>2). If the profiles of arrival and departure routes in the Proposed Action are different than existing -- particularly if they are lower in certain areas -- then we respectfully disagree that VFR aircraft are unaffected by the Proposed Action. There are designated VFR flyways around the periphery of Class B airspace that may be affected by changes in arrival and departure profiles (altitudes) and changes in the Class B airspace that may be made to accommodate new arrival and departure procedures. Again, our specific concern is in the vicinity of Addison Airport. If the Proposed Action anticipates expansion of the DFW Class B airspace over Addison</p>	<p>The proposed North Texas OAPM project and the proposed Class B airspace changes in the Dallas/Fort Worth area have independent utility. Both proposed projects were subject to the NEPA environmental review process. Approval of proposed Class B modifications was not considered as an underlying assumption in the design of the North Texas OAPM Proposed Action procedures.</p> <p>Furthermore, the North Texas OAPM designs are independent of the Class B modifications. The approval or disapproval of the Class B modifications will have no impact on the North Texas OAPM designs, but the project was included in the cumulative impacts analysis for the draft EA. The North Texas OAPM designs did not modify any VFR routes or traffic patterns.</p> <p>The proposed Class B changes were reviewed as part of cumulative impact analysis for the draft EA, but provide no additional impact cumulatively because they did not influence procedure design. For further details regarding procedures refer to the North Texas OAPM Design and Implementation Team Technical Report available at <a href="http://oapmenvironmental.com/ntx_metroplex/ntx_docs.html">http://oapmenvironmental.com/ntx_metroplex/ntx_docs.html</a></p>

				<p>Airport (per FAA's January 22, 2013 NPRM) and the STARs for DAL arrivals in south flow have lower altitudes over ADS as a result, then there is an inevitable effect on VFR traffic in the vicinity of ADS, namely that it will be compressed by the expansion of the DFW Class B and VFR aircraft will forced to operate at lower altitudes. If traffic in the vicinity of ADS (VFR traffic in particular, and 60-65% of the traffic at ADS is VFR) is therefore restricted to lower altitudes, then there will be a corresponding increase in noise impact on the community as a result. We respectfully disagree with FAA's conclusions that there will be no effect on VFR traffic. We request that FAA re-examine areas where VFR flight patterns may be altered by the Proposed Action, specifically in areas where VFR traffic may move to lower altitudes to remain clear of Class B airspace and particularly in the vicinity of Addison.</p>	
			ADS3	<p>We also note that Table 4-1 (on page 4-121) is in error, in that air traffic figures reported in the table are not all associated with the correct airports.</p>	<p>Table 4-1 has been corrected and is included as part of the North Texas OAPM EA errata (see page 3-2).</p>
none	Mr. & Mrs. Faughn	11/1/2013	F1	<p>We would like to see abatement procedures in place that reduce this deafening roar for 15 or 16 hours a day. Right now, it appears that nothing is being done as the planes aren't even flying over the outer marker which would certainly reduce some of the noise.</p>	<p>Based on Commenter's reference to the NW Runway, this response assumes that the comment refers to the use of Runway 31L at DFW. The Commenter's concerns pertain to current operations and existing procedures for Runway 31L at DFW. It is important to note that the proposed OAPM project, if approved, would not be implemented until the fall of 2014. Existing procedures are designed to meet applicable safety and design standards and are optimized for the current operating configuration at DFW. FAA continues to operate within the parameters set by the DFW Runway Use plan.</p> <p>The objective of the North Texas OAPM project is to improve the flexibility and predictability of air traffic routes in the North Texas Metroplex by increasing the use of PBN technology. The study team did not identify the operations of Runway 31L as an opportunity to meet this objective because usage of Runway 31L at DFW is low in comparison to that of other runways at the Study Airports.</p>

					<p>As discussed in Section 2.2 of the Draft EA, the purpose of the North Texas OAPM project is to take advantage of the benefits of performance based navigation by implementing RNAV procedures that will help improve the efficiency of the airspace in the North Texas Metroplex.</p> <p>The purpose of the North Texas OAPM project is not to abate existing aircraft noise issues associated with current operations at North Texas Metroplex airports. However, the potential for environmental impacts, including noise related to implementing the Proposed Action, is assessed in the Draft EA; the project does not propose any procedures that would result in significant or reportable noise impacts. See Chapter 5 Environmental Consequences of the Draft EA and the Aircraft Noise Technical Report for discussion of the noise analysis and the potential environmental impacts associated with implementation of the North Texas OAPM project.</p>
none	George	11/2/2013	G1	<p>1) Something has drastically changed. Since August 2012 there have been weeks on end when we've experienced and unprecedented number of departures from Runway 31L, sometimes over 300 in a day; 2) Why was the FAA concerned about noise during arrivals to 13R when engine power is reduced and not be interested in mitigating the noise generated during departures from 31L when aircraft engines are at takeoff or climb power and making substantially more noise?</p>	<p>The Commenter's question pertains to current operations and existing procedures for Runway 31L at DFW. It is important to note that the proposed OAPM project, if approved, would not be implemented until the fall of 2014.</p> <p>Existing procedures are designed to meet applicable safety and design standards and are optimized for the current operating configuration at DFW. FAA continues to operate within the parameters set by the DFW Runway Use plan.</p> <p>The objective of the North Texas OAPM project is to improve the flexibility and predictability of air traffic routes in the North Texas Metroplex by increasing the use of PBN technology. The study team did not identify the operations of Runway 31L as an opportunity to meet this objective because usage of Runway 31L at DFW is low in comparison to that of other runways at the Study Airports.</p> <p>There have been no recent procedural changes that altered either the lateral or vertical components of the existing procedures for Runway 31L and no new procedures for Runway 31L have been added. The increased use of Runway 31L described in this comment is temporary and stems from runway closures related to construction projects and the occurrence of certain weather conditions. For more information see the DFW airport website for construction updates</p>

					<p><a href="http://www.dfwairport.com/redefine/construction/index.php">http://www.dfwairport.com/redefine/construction/index.php</a></p> <p>As discussed in Section 2.2 of the Draft EA, the purpose of the North Texas OAPM project is to take advantage of the benefits of performance based navigation by implementing RNAV procedures that will help improve the efficiency of the airspace in the North Texas Metroplex.</p> <p>The purpose of the North Texas OAPM project is not to abate existing aircraft noise issues associated with current operations at North Texas Metroplex airports. However, the potential for environmental impacts, including noise related to implementing the Proposed Action, is assessed in the Draft EA; the project does not propose any procedures that would result in significant or reportable noise impacts. See Chapter 5 Environmental Consequences of the Draft EA and the Aircraft Noise Technical Report for discussion of the noise analysis and the potential environmental impacts associated with implementation of the North Texas OAPM project.</p>
none	Joe Sansone	11/5/2013	JS2	<p>I would request that you all mandate that the pilots follow the same straight path they use when they land the planes when they take off using Runway 31L. If the planes take off on Runway 31L did so in the straight path they follow when landing on 31L and not being allow to or not be instructed by the Air Traffic Controller to take a course to the left off the straight path until over lake Grapevine this would resolve the issue of excessive noise from the planes taking off from 31L and then traveling over Southlake's schools, homes, and Townsquare.</p>	<p>The Commenter's question pertains to current operations and existing procedures for Runway 31L at DFW. It is important to note that the proposed OAPM project, if approved, would not be implemented until the fall of 2014.</p> <p>Existing procedures are designed to meet applicable safety and design standards and are optimized for the current operating configuration at DFW. FAA continues to operate within the parameters set by the DFW Runway Use plan.</p> <p>The objective of the North Texas OAPM project is to improve the flexibility and predictability of air traffic routes in the North Texas Metroplex by increasing the use of PBN technology. The study team did not identify the operations of Runway 31L as an opportunity to meet this objective because usage of Runway 31L at DFW is low in comparison to that of other runways at the Study Airports.</p> <p>The North Texas OAPM project did not propose any procedural changes to existing initial departure tracks and altitudes or final approach tracks and altitudes for DFW over the City of Southlake. Furthermore, the environmental analysis conducted in support of the Draft EA indicates that there would be no significant or reportable noise impacts to the City of Southlake resulting from the Proposed Action.</p>

					<p>For further details regarding procedures specific to DFW refer to the North Texas OAPM Design and Implementation Team Technical Report and the Aircraft Noise Technical Report available at <a href="http://oapmenvironmental.com/ntx_metroplex/ntx_docs.html">http://oapmenvironmental.com/ntx_metroplex/ntx_docs.html</a></p> <p>As discussed in Section 2.2 of the Draft EA, the purpose of the North Texas OAPM project is to take advantage of the benefits of performance based navigation by implementing RNAV procedures that will help improve the efficiency of the airspace in the North Texas Metroplex.</p> <p>The purpose of the North Texas OAPM project is not to abate existing aircraft noise issues associated with current operations at North Texas Metroplex airports. However, the potential for environmental impacts, including noise related to implementing the Proposed Action, is assessed in the Draft EA; the project does not propose any procedures that would result in significant or reportable noise impacts. See Chapter 5 Environmental Consequences of the Draft EA and the Aircraft Noise Technical Report for discussion of the noise analysis and the potential environmental impacts associated with implementation of the North Texas OAPM project.</p>
none	Mary Guenveur	11/13/2013	MG1	<p>There has been a significant increase in air traffic over the Lakewood area and Whiterock area of Dallas. This is very disruptive and sometimes the planes are back to back resulting in non-stop noise. This was not a problem a year ago. Neighbors are very concerned because we moved to this area for the tranquil environment. Why has there been an increase in air traffic?</p>	<p>The commenter's question pertains to current operations and existing procedures for DAL. Existing procedures are designed to meet applicable safety and design standards and are optimized for the current operating configuration at DAL. It is important to note that the proposed OAPM project, if approved, would not be implemented until the fall of 2014. The objective of the North Texas OAPM project is to improve the flexibility and predictability of air traffic routes in the North Texas Metroplex by increasing the use of PBN technology. The changes in runway usage described in this comment are temporary and stem from construction projects recently undertaken by DAL. For more information see the DAL modernization website for construction updates (<a href="http://www.lovefieldmodernizationprogram.com/">http://www.lovefieldmodernizationprogram.com/</a>)</p>
none	MRM Watson (aka. Maelissa Watson)	11/17/2013	MW1	<p>The captioned EA has over 1000 pages prepared by The California Consulting Firm of Miller Miller, Miller &amp; Hanson. (Incorporated herein by reference) Modeling noise analysis is based on already outdated, incomplete, erroneous, scattered, and projected flight histories.</p>	<p>The environmental analysis performed for the North Texas OAPM project was conducted in accordance with the requirements of FAA Order 1050.1E, Chg. 1, Policies and Procedures for Considering Environmental Impacts. The order specifies the level of environmental analysis required given the nature and potential impacts of the federal action. As shown by the analysis performed for the Draft EA, there</p>

					are no significant impacts associated with the project and therefore an EIS is not required. As discussed in Sections 4.1.1 and 4.3.1 of the Draft EA, 2011 represents the latest year at the time the analysis was initiated for which sufficient data was available to describe existing conditions in the Metroplex. For more information on the data inputs used in preparation of the noise analysis see Section 2.0 of the Average Annual Day Flight Schedule and the Noise Analysis Technical Report.
			MW2	The study was compiled in 2011, making no analysis or mention of The Wright Amendment, and that projected increase in air traffic.	The flight schedule used in the Draft North Texas OPAM EA is based on the FAA Terminal Area Forecast (TAF) which does account for future impacts of the expiration of the Wright Amendment (see Average Annual Day Flight Schedules on pages 1 and 11.)
			MW3	The Harris report dwell in depth on The U.S. Census Bureau statistics to support their findings of no impact in their analysis of population density and integrated noise impact in the 60-mile radius they chose to use. By using the 60 mile Radius they diluted the noise impact on closer in neighborhoods.	The Study Area for the Draft North Texas OAPM EA was delineated in accordance with guidance provided in FAA Order 1050.1E related to air traffic actions, and is described in Section 4.1, of the Draft EA. In addition, population analysis was conducted for the entire study area, including neighborhoods located close in to the study airports.
			MW5	The Harris Consulting Team may have been given a task with directives to formulate Models based on defined criteria. Were they ever told that Dallas was non-attainment for Clean Air? A mention was made that they assumed that (a conforming?) State Implantation Plan (SIP) was in place. They can answer to that. Therefore, the Harris Team may not have been made aware of the background documents such as Dallas Master Plan or the statistics published in 2001 for Love Field with 32 gates not 20 gates.	The Draft North Texas OAPM EA does address non-attainment in Section 4.3.8 Air Quality beginning on page 4-159 of the draft EA.
			MW6	The DMJM Aviation Report reveals important considerations and facts not discussed in The Harris Report. <i>"In each case of the No Wright Amendment scenarios, the Master Plan 32 Gate regional jet fleet mix has been replaced for the most part by standard air carrier jets. These aircraft are larger and have a louder noise footprint than CRJ, EMB145 aircraft. Furthermore under the service analysis some are departing at heavier take off weight to service more non-stop destinations than were possible under the Wright Amendment."</i> Page	The DMJM <i>"Dallas Love Field Impact Analysis Update: In the Absence of the Wright Amendment"</i> May 31, 2006 report was used to inform future runway use for the North Texas OAPM EA.  The forecast for DAL was adjusted by using the FAA's Terminal Area Forecast (TAF). The FAA confirmed that the TAF data used for this forecast included the expansion of operations at DAL due to the expiration of the Wright Amendment. (Page 11, AAD Technical report). The TAF separates the future operations by AC, AT, GA and MIL. The AC category (aircraft with greater than 60 seats) has

				ES-6.	the largest increase due to the expiration of the Wright amendment. The 2019 fleet mix also had other adjustments such as the retirement of out-of-production aircraft types and as stated in the comment the shifting by airlines to use larger RJ aircraft types and the reduction of the CRJ and E145 types.
			MW7	When the new runways were build (we understand that 11 are already operational with 9 more to be built) Flight Take-off and Arrivals have resulted in the diversion of traffic and noise East to Lakewood and all of East Dallas.	No new runways have been built recently in the North Texas Metroplex area.  The OAPM project, if approved, would be implemented in the fall of 2014, thus any alleged changes to air traffic operations at DAL taking place before that time cannot be attributed to the OAPM project. For more information see the DAL modernization website for construction updates <a href="http://www.lovefieldmodernizationprogram.com">http://www.lovefieldmodernizationprogram.com</a>
			MW8	Additionally, the assurances under 49USC Section 47107 have not been made public to the Residents of Lakewood and East Dallas. For e.g., The Secretary of Transportation must approve the current layout plan of an Airport. <i>"The Secretary will approve the plan and any revision or modification before the plan, revision, or modification takes effect: (emphasis added) "The owner or operator will not make or allow any alteration in the airport or any of its facilities if the alteration does not comply with the plan the Secretary approves, and the Secretary is of opinion that the alteration may effect adversely the safety, utility, or efficiency of the airport."</i>	The North Texas OAPM project does not result in changes to airport layout plans for any of the study airports.
			MW9	Additionally DFW Flights are now causing a constant drone, why are DFW Flights now flown with a drone impact over Lakewood? This also is new. Turbo Props from Addison Airport, with its runway changed to the East, is newly very disruptive.	The Commenter appears to be describing existing conditions in the Lakewood area. It is important to note that the proposed OAPM project, if approved, would not be implemented until the fall of 2014.  The Commenter's question pertains to current operations and existing procedures for DFW. Existing procedures are designed to meet applicable safety and design standards and are optimized for the current operating configuration at DFW. FAA continues to operate within the parameters set by the DFW Runway Use plan.  The objective of the North Texas OAPM project is to improve the flexibility and predictability of air traffic routes in the North Texas Metroplex by increasing the use of PBN technology

			MW10	<p>While Environmental Justice is usually defined by the impact on low-income minority neighborhoods around big City Airports and Refineries. This scenario does indeed apply in a segment of East Dallas especially in the area around Fair Park that is on the National Historic Register, and to The Queen City area in The Peak Historic District. These areas are primarily black and Hispanic populated areas; people who cannot speak for themselves, so they asked us to speak for them. It is important to note the HUD has set a standard of 65 db for public housing, and it is doubtful whether that standard is being observed in Fair Park area currently; or in The Peak and Munger Place Historic areas where, when the jets fly overhead; people's conversations become inaudible to the listener. Moreover, these residents cannot watch their TV's from static nuisance. T.V. they said was their primary form of relaxation and entertainment after day of manual labor. They do not go to the Opera or Theatre or dine at up-scale Restaurants. These are no insignificant facts. The Harris Draft EA tried to conform their Noise Impact analysis to fit the 65 db, that is very noticeable, and basically said it is acceptable to hear portion of a conversation?</p>	<p>The NTX OAPM Draft EA was prepared in accordance with the requirements of FAA Order 1050.1E, Chg. 1, Policies and Procedures for Considering Environmental Impacts, and employs FAA's required methods of analysis, metrics, and thresholds of significance described therein. Information on the environmental impacts associated with the Proposed Action is provided in Chapter 5 of this EA. Each impact category required to be analyzed was considered in Chapter 5, including Environmental Justice, Noise, and Historical resources. There were no significant impacts in any impact category.</p>
			MW11	<p>It is strange that there was no viable discussion in the EA. regarding the health aspects of pollution, in a City that is non-attainment for air quality. It is public record (Dallas Morning News October 2013) that The National Lung Association recently submitted an AMA Doctors Report on Childhood Asthma in the North Texas –Dallas area, to the Texas CEQ asking that the coal burning emissions from two coal fired Plants downwind from Dallas cease because of a near emergency situation with children breathing problems. Their request was denied. Attached is an article referencing British Scientists, by Andrea Perry “. That people living in communities close to airports are being warned that they could be at greater risk of</p>	<p>Air quality was discussed in Section 4.3.8 and Section 5.8 of the Draft EA. There are no significant air quality impacts as a result of the Proposed Action. Greenhouse gasses and climate change were discussed in Section 4.3.9 and Section 5.9 of the Draft EA in accordance with FAA Order 1050.1e Policies and Procedures for Considering Environmental Impacts.</p>

				<p>cancer caused by pollution from jet exhausts....” “ Aviation emissions are transmitted by a spray that is dispersed overhead, that cannot be filtered out by our lungs and is directly transmitted into our bloodstream. The mist is a sticky substance that attaches to vegetation and is also ingested and drank.”</p>	
			MW12	<p>The major environmental benefit documented in favor of implementing the NextGen Technology, was less pollution from fuel savings by implementing straight auto piloted routes. No mention or recommendation is made that the Airlines cease using Avgas with its lead content, sooty emissions, CO2, Nox, volcanic ash, and wake turbulence. Using refined gasoline would benefit the environment but it would cost the airlines more.</p> <p>In this area of the equal treatment of environmental impacts the current DRAFT EA is deficient and slanted; and that is why an immediate impartial EIS should be commenced.</p>	<p>In Section 5.8 of the EA, CO2 emissions were calculated from the amount of fuel burned under the No Action Alternative and the decreased fuel burn projected for the Proposed Action in 2014 and 2019 (see Section 5.8.2). The resulting CO2 emissions were then calculated as CO2e.</p> <p>The Proposed Action would reduce fuel burn in comparison with the No Action Alternative and, thus, reduce MT of CO2e emissions. Therefore, no increase in GHGs would result from implementation of the Proposed Action when compared to the No Action Alternative and no significant impacts would be anticipated.</p>
			MW13	<p>It appears that Lakewood has been victimized with new Flight Patterns that is seriously impacting a virgin, previously un-impacted neighborhood. An EIS would propose reasonable alternatives that should enhance the quality of the human environment. The standard format for an EIS as outlined in Section 1502.0 of the NEPA Regulations should be followed.</p>	<p>The Commenter’s concerns and objections refer to existing conditions in the Lakewood area, not the Proposed Action or proposed air traffic procedures.</p> <p>It is important to note that the proposed OAPM project, if approved, would not be implemented until the fall of 2014.</p> <p>Existing procedures are designed to meet applicable safety and design standards and are optimized for the current operating configuration at DFW. FAA continues to operate within the parameters set by the DFW Runway Use plan.</p> <p>The objective of the North Texas OAPM project is to improve the flexibility and predictability of air traffic routes in the North Texas Metroplex by increasing the use of PBN technology. The Draft EA was prepared in compliance with FAA Order 1050.1E, Chg. 1, and satisfies the requirements of NEPA as well as the implementing regulations issued by the Council on Environmental Quality (CEQ)(40 CFR Parts 1500-1508).</p>

*Environmental Assessment for North Texas  
Optimization of Airspace and Procedures in the Metroplex*

None	Maelissa Watson	11/18/2013	MW1	Please make sure that the complete filing is part of the Record in this Administrative Rule Making.	Comment noted. All attachments were added to the administrative file for the North Texas OAPM EA and are attached as part of the FONSI/ROD.
City of Highland Park	Mayor Joel Williams, III	11/18/2013	HP1	Unfortunately, the analysis in the Draft EA is inherently flawed. It is based on the assumption that reducing airspace delays and making the National Airspace System more efficient will have no impact on congested airport facilities. (...) As noted in the recent Antitrust Procedures and Penalties Act filing by the Justice Department, Dallas Love Field is a highly congested airport that is gate constrained. Moreover, as stated in the Competitive Impact Statement prepared by the Justice Department, the current levels of efficiency create an effective cap on the cap city at the Love Field gates. Therefore it is obviously clear that changing the efficiency level, changes the cap, and therefore realizing additional capacity will increase flights and the impacts to neighborhoods. In order for this draft EA to engage in meaningful and scientifically robust environmental analysis, the FAA must examine all impacts of this proposed action, including the increased traffic that will be stimulated at Love Field. The failure to recognize the linkage between increased aircraft activity at a highly congested airport negates the viability of all analysis contained in the Draft EA.	The North Texas OAPM project does not increase capacity of any of the study airports. The objective of the North Texas OAPM project is to improve the flexibility and predictability of air traffic routes in the North Texas Metroplex by increasing the use of PBN technology. The improvements proposed as part of the North Texas OAPM project do not impact gate utilization.
			HP2	<b>Failure to Release Documents Related to Cumulative Impacts</b> While Table 5-8 of the Draft EA lists Potential for Cumulative Impact From the Proposed Action, the Draft EA fails to recognize and consider all the potential on-airport projects that contribute to the cumulative impacts and completely ignores all the recent flight procedure modifications by Southwest Airlines that contribute to this proposed action's cumulative impacts. It is imperative that this Draft EA address all the on-airport changes and modifications. On September 26, 2013 a Freedom Of Information Act (FOIA) request	The FAA responded to FOIA 2014-000295SW dated September 26, 2013 by providing copies of documents related to on-airport projects at DAL, including the terminal reconstruction. The terminal is scheduled to open on October 13, 2014 and the number of gates will be reduced from 32 to 20.  Changes in runway usage that may occur during the phased construction are temporary and would not affect runway use assumptions utilized in the EA for purposes of analyzing noise impacts of the Proposed Action, including the cumulative impact analysis.

			<p>was submitted to FAA in order to evaluate these impacts that were not addressed in the Draft EA. Unfortunately, FAA has provided none of the requested information. FAA's release of the requested information is essential for an independent and transparent evaluation of cumulative impacts. It is imperative that FAA adhere to its legal obligations under the Freedom of Information Act and until FAA does so, the public comment period for this Draft EA should remain open. Further, the public comment period should remain open for a minimum of 30 days after FAA provides the information, so the information can be considered in the development of comments.</p>	<p>The FAA has not implemented any recent changes that would alter the lateral or vertical components of existing air traffic procedures at DAL as result of the on-airport construction projects or added new air traffic procedures at DAL.</p> <p>For further details regarding procedures specific to DAL refer to the North Texas OAPM Design and Implementation Team Technical Report and the Aircraft Noise Technical Report available at <a href="http://oapmenvironmental.com/ntx_metroplex/ntx_docs.html">http://oapmenvironmental.com/ntx_metroplex/ntx_docs.html</a></p>
		HP3	<p><b>Alternative Identification/ Purpose and Need</b> Section 2.2 of the Draft EA asserts that the purpose of the action is to meet a congressional mandate to publish procedures that will improve transitions between en route and terminal airspace. However, the dismissal of an alternative advocated by Mr. Cohn (Appendix B of the Draft EA) appears to rely on a need to enhance capacity and efficiency — a topic that is not identified in Section 2.2 of the Draft EA. The White House's Council on Environmental Quality guidance documents<sup>34</sup> strongly encourages federal agencies to develop alternatives that minimize environmental impacts while also meeting Purpose and Need. The Draft EA needs to identify all alternatives that could meet the Purpose and Need, not just the preferred action. As an example, Mr. Cohn's suggested alternative appears to fully meet the stated purpose and need while also resulting in materially reduced environmental impacts. It is also likely that many other alternatives that result in reduced environmental impacts could be developed if the FAA team was willing to develop alternatives that did not singularly prioritize capacity enhancement — a priority that wasn't even deemed necessary to include in the Purpose and Need.</p>	<p>The objective of the North Texas OAPM project is to improve the flexibility and predictability of air traffic routes in the North Texas Metroplex by increasing the use of PBN technology.</p> <p>All proposed RNAV and RNP-AR procedures developed for DAL as part of the North Texas OAPM overlay existing flight tracks and altitude profiles while using RNAV criteria to add precision and predictability.</p> <p>Designing a procedure to follow a visual reference such as a road is a step backwards from the introduction of modern technologies such as PBN. For further details regarding procedures specific to DAL refer to the North Texas OAPM Design and Implementation Team Technical Report available at <a href="http://oapmenvironmental.com/ntx_metroplex/ntx_docs.html">http://oapmenvironmental.com/ntx_metroplex/ntx_docs.html</a></p>

			HP4	<p><b>Missing Analysis</b>          FAA Order 1050.1E cites 18 impact categories and multiple executive orders that need to be considered throughout the document, but Chapter 5 of the Draft EA only examines 10 impact categories plus cumulative impacts. The Draft EA should explain why it has license to ignore the explicit requirements of FAA Order 1050.1E.</p>	<p>The NTX OAPM Draft EA was prepared in accordance with the requirements of FAA Order 1050.1E, Chg. 1, Policies and Procedures for Considering Environmental Impacts. The environmental resource categories or sub-categories listed in Appendix A of FAA Order 1050.1E that would remain unaffected by the Proposed Action are addressed in Section 4.2 Resources Categories and Subcategories Not Affected. These resource categories would not be affected because the resource either does not exist within the GSA or the types of activities associated with the Proposed Action would not affect them. Accordingly, they are not carried forward in the draft EA for further detailed analysis.</p>
			HP5	<p>Similarly, the Draft EA misses all impacts associated with the enhanced capacity and commensurate increase in activity at Love Field. These impacts include the air quality impacts not covered by the cited Presumed to Conform, the traffic impacts to severely congested roads, and the impact on 4(f) and Section 106 resources. All of these impacts should be fully evaluated.</p>	<p>The North Texas OAPM project does not increase capacity of any of the study airports. In addition, the level of operations and type of aircraft forecasted to operate at DAL would be the same between No Action and Proposed Action.</p> <p>The objective of the North Texas OAPM project is to improve the flexibility and predictability of air traffic routes in the North Texas Metroplex by increasing the use of PBN technology.</p> <p>Refer to sections 4.3.8 and 5.8 of the Draft EA for air quality analysis; sections 4.3.3 and 5.3 for Department of Transportation Act, Section 4(f) Resources; and sections 4.3.4 and 5.4 for Historical, Architectural, Archeological, and Cultural Resources.</p>
			HP6	<p><b>Inconsistencies with published data</b>          The Draft EA identifies a total of 2,762 North Texans that would have a significant exposure to aircraft noise (&gt; 65 DNL). However, published data from Love Field indicates that more than 27,558 Love Field neighbors suffer from significant exposure to noise. Having two documents that use FAA models and methodologies but have a ten fold disagreement on the magnitude of population experiencing significant noise impacts is alarming. Clearly the Draft EA should have been aware that the NIRS model was inappropriate to examine impacts adjacent to the Airport. Further, the Draft EA should have considered the existing information in the Love Field documents, including exposed</p>	<p>The environmental analysis conducted in support of the Draft EA indicates that there would be no significant or reportable noise impacts resulting from the Proposed Action within the study area (including no significant or reportable noise impacts to any school or park).</p> <p>Previous reports referred to in the comment are based on analyses using a fleet mix from around the year 2000 and do not account for the recent phase out of Stage 2 Jets.</p> <p>As described in section 4.3.1.1 Noise Modeling Methodology the FAA Order 1050.1E states that NIRS should be used for flight track changes over large areas and at altitudes over 3,000 AGL. More specifically, for proposed actions such as in the North Texas OAPM project, 1050.1E specifies use of NIRS Version 7.0b.</p>

				<p>population and also the parks and schools that are inside the 70 DNL and inside the 65 DNL. At a minimum, the Draft EA needs to acknowledge other publicly available information and reconcile why the results of the Draft EA can reach wildly different conclusions. Absent a reconciliation, the integrity of the Draft EA's simplified Noise analysis (i.e. NIRS) and the findings from that analysis are suspect at best.</p>	<p>For additional details related to noise modeling refer to the Aircraft Noise Technical Report available at <a href="http://oapmenvironmental.com/ntx_metroplex/ntx_docs.html">http://oapmenvironmental.com/ntx_metroplex/ntx_docs.html</a> More information on the NIRS model can be found on the FAA website <a href="http://www.faa.gov/about/office_org/headquarters_offices/apl/research/models/nirs_nst">http://www.faa.gov/about/office_org/headquarters_offices/apl/research/models/nirs_nst</a></p>
			HP7	<p>Likewise, the Draft EA identifies Runway 13R at DFW Airport used for secondary departures. Historic NEPA determinations prohibit the use of this runway for any jet departures and the runway has had almost non-existent use over the past decade with turbo-prop departures. This single runway represents the focal point of potential airspace conflicts between Love Field and DFW, but the Draft EA cannot even document how the runway is used. This glaring error in the Draft EA undermines the credibility of all other analysis in the document.</p>	<p>Analysis performed for the North Texas OAPM EA assumes no jet departures for Runway 13R at DFW. For additional information regarding the use of DFW Runway 13R see Exhibit 1-9 of the North Texas OAPM EA and Table 6 of the Aircraft Noise Technical Report. Table 5 of the Aircraft Noise Technical Report mistakenly lists Runway 13R as a south flow departure runway; see revised Table 5 in the errata.</p>
			HP8	<p><b>Degradation of Section 106 Properties</b> The Highland Park Shopping Village (HPSV) is threatened by surrounding development and growth in the region. However, the Draft EA merely recognizes that HPSV is a historic district, and does not look at the impacts this action will cause to the property. Traffic on Mockingbird Lane is a serious problem for HPSV and the increase in traffic resulting from increased activity at Love Field that this action facilitates will irreparably harm HPSV. Further, no coordination was undertaken with the Town's study on the future role of HPSV.</p>	<p>The North Texas OAPM project does not result in increased activity levels at DAL. The objective of the North Texas OAPM project is to improve the flexibility and predictability of air traffic routes in the North Texas Metroplex by increasing the use of PBN technology.</p> <p><i>For additional details refer to comment HP5 above.</i></p>
			HP9	<p>In summary, the DRAFT EA is predicated on a world view that air traffic and this proposed action is independent of anything that happens around the airport. Unfortunately that is not true, as the Justice Department concluded; Love Field is a highly constrained airport. Thus, the expansion of airspace capacity this proposed action will achieve will result in impacts at Love Fields and to the neighbors surrounding Love Field.</p>	<p>The North Texas OAPM project does not increase capacity of any of the study airports. The objective of the North Texas OAPM project is to improve the flexibility and predictability of air traffic routes in the North Texas Metroplex by increasing the use of PBN technology.</p> <p><i>For additional details refer to comments HP1 and HP5 above.</i></p>

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			HP10	Unfortunately, it is impossible to fully evaluate the technical analysis of the Draft EA until the FAA responds to the September 26, 2013 FOIA request regarding connected actions and cumulative impacts. As such, we request that the comment period remain open for 30 days following the FAA's release of all materials requested under FOIA.	See response to HP2.
City of Euless	Chris Barker, Asst. City Mgr	11/18/2013	EU1	Our city's primary concern with respect to the proposed airspace redesign project relates to potential noise impacts. We have endeavored to understand the manner in which the proposed changes would impact our citizens. Unfortunately, the Draft EA fails to provide sufficient information that would enable us to gain a meaningful understanding of how this proposal might change the location, altitude, frequency, time of day, or noise levels associated with aircraft operations over our community.	The FAA will continue to operate within the parameters set by the DFW Runway Use plan. The North Texas OAPM project did not propose any procedural changes to existing initial departure tracks and altitudes or final approach tracks and altitudes for DFW over the City of Euless. Furthermore, the environmental analysis conducted in support of the Draft EA indicates that there would be no significant or reportable noise impacts to the City of Euless resulting from the Proposed Action.  For further details regarding procedures specific to DFW refer to the North Texas OAPM Design and Implementation Team Technical Report and the Aircraft Noise Technical Report available at <a href="http://oapmenvironmental.com/ntx_metroplex/ntx_docs.html">http://oapmenvironmental.com/ntx_metroplex/ntx_docs.html</a>
			EU2	To that end, we have requested that officials at DFWIA host a meeting with FAA staff and impacted cities designed to educate our officials about the nature and potential significance of any noise pollution from the proposed project. We are both surprised and disappointed that a more concerted effort was not made to contact the Mayor, City Council, or City Manager's Office regarding an issue of such importance that could have long-term impacts to our community.	The FAA made every effort to treat all of the towns and cities within the study area fairly. See section 2.6 of the Draft EA for details of the scoping process the FAA undertook as part of the North Texas OAPM EA.  In addition to the notification described in section 2.6, the FAA published a Notice of Availability of the Draft EA in two local newspapers: The Dallas Morning News and the Ft. Worth Star Telegram on September 30, 2013, placed electronic copies of the Draft EA at 28 local libraries, and sent written NOA to 180 federal, state, regional, and county level officials, and other interested parties.  The Draft EA was also available for comment on the OAPM Environmental website throughout the original comment period from September 30, 2013 to October 30, 2013 <a href="http://oapmenvironmental.com/ntx_metroplex/ntx_docs.html">http://oapmenvironmental.com/ntx_metroplex/ntx_docs.html</a>  FAA undertook a second and expanded mailing of the Notice of Availability of the Draft EA that included the officials for cities in the immediate DFW/DAL area on October 29, 2013. The FAA extended the period for public

					<p>review and comment on the Draft EA to November 18, 2013. This provided the public 18 additional days to review and comment on the Draft EA.</p> <p>Also, in compliance with FAA Order 1050.1E, Chg. 1, the FAA is responding to all comments received from the public.</p>
City of Southlake	Shana Yelverton, City Manager	11/18/2013	SL1	<p>"(...), RNAV procedures are free of such lateral and vertical flight path limitations typical of conventional procedures." As the City understands the RNAV theory, aircraft will not be required to track the ground-based NAVAID beacons but will be free to follow more efficient routes by simply relying on the satellite GPS route control system. The City's concern centers on how far the need for efficiency and economy may drive air operations into flight patterns that negatively impact the City. If a departing aircraft is able to leave the airport and not be restricted to NAVAID beacons but is able to initiate turns at an earlier point to begin to direct the aircraft to its destination, there may be an obvious change in the flight path of the aircraft as they depart the airport. Aircraft utilizing northern departures may be executing turning movements that will take them away from the corridors that have historically been used and move the aircraft (with its related noise impacts) over the more developed residential and commercial portions of the City while they are still climbing out on their take off profile. The recent use of runway 13R/31L for jet operations during periods of northern wind prevalence has demonstrated to the City that such changes will result in negative impacts to our City's developed environment.</p>	<p>The FAA will continue to operate within the parameters set by the DFW Runway Use plan. The North Texas OAPM project did not propose any changes to existing locations of initial departure tracks and altitudes or final approach tracks and altitudes for DFW over the City of Southlake. Additionally, the environmental analysis conducted in support of the Draft EA indicates that there would be no significant or reportable noise impacts to the City of Southlake resulting from the Proposed Action.</p> <p>For further details regarding procedures specific to DFW refer to the North Texas OAPM Design and Implementation Team Technical Report and the Aircraft Noise Technical Report available at <a href="http://oapmenvironmental.com/ntx_metroplex/ntx_docs.html">http://oapmenvironmental.com/ntx_metroplex/ntx_docs.html</a></p>
			SL2	<p>The City's concern is further enhanced by the limited discussion contained in 2.1.2 of the OAPM on Page 2-30, of a possible change to entry or exit gates affecting air operations. Under the current NAVAID system, there are defined "entry gates" and "exit gates" through which air traffic control personnel route arriving and departing aircraft to avoid conflict</p>	<p>The implementation of the floating fix concept would not alter any existing locations of initial departure tracks and altitudes or final approach tracks and altitudes for DFW over the City of Southlake.</p> <p>The implementation of the floating fix concept will not change the existing location of initial departure flight tracks.</p>

				<p>in approach or departure and to ensure transition to the NAVAID routes. The new approach seems to address a change to this concept known as "floating fixes" which would allow the "entry" and "exit" gates to move based upon winds, traffic and route needs assessed on an ongoing basis by air traffic operations personnel and airline personnel. Exactly where and how this will work is left a little vague because the concept seems to emphasize the need for flexibility to allow these to shift in order to optimize air operation needs. At the City level this translates to a concern that the new "entry" and "exit" gates may float until they carry arriving or departing aircraft over the more developed portions of the City thereby potentially changing the character of the local environment in significant ways.</p>	
			SL3	<p>The information provided on historic noise activities is based upon earlier aircraft operations using the NAVAID systems along the air corridor systems around which the City had devised its land use plan. The text of the OAPM document in explaining the new Next Gen change seems to suggest the whole purpose of the RNAV conversion is to free air operations from the vertical and lateral restrictions of NAVAID. How far will this go in shifting the entry and exit gates where the aircraft will depart the DFW complex and leave the metropolitan area? Will there be a shift of air operations over the portions of the City of Southlake that were not planned, zoned, designed or developed to accommodate jet aircraft over flight at climbing or descending altitudes and power settings?</p>	<p>The implementation of the floating fix concept would not alter any existing locations of initial departure tracks and altitudes or final approach tracks and altitudes for DFW over the City of Southlake.</p> <p>Furthermore, the environmental analysis conducted in support of the Draft EA indicates that there would be no significant or reportable impacts to the City of Southlake resulting from the Proposed Action.</p>
			SL4	<p>The difficulty that we face is that we cannot address the issue with which we have our greatest concern. FAA projects are undertaken in conformance with Order 1050.1E in evaluating environmental impacts. Section 14.3 provides us with guidance as to what a "significant impact" threshold would be in terms of noise generated by air operations.</p>	<p>The NTX OAPM Draft EA was prepared in accordance with the requirements of FAA Order 1050.1E, Chg. 1, Policies and Procedures for Considering Environmental Impacts, and employs FAA's required methods of analysis, metrics, and thresholds of significance described therein.</p> <p>The modeling analysis was performed in close coordination with the North Texas OAPM Design and Implementation</p>

				The provisions of 14.4 of the Order define how the analysis of significant impacts is undertaken. The problem the City faces is that the description of the RNAV program raises significant questions as to whether or not modeling or analysis has been undertaken and completed that will accurately assess the impacts of the new flight paths that might be created under the RNAV system.	Team and local FAA facilities. Coordination included comprehensive validation of assumptions as well as input and output of the NIRS modeling for Existing Conditions/No Action/Proposed Action for all study years.  Detailed information on the noise analysis is available in the Aircraft Noise Technical Report, and details related to each procedure depicted in Table 3-2 are provided in the D&I Team Report, both available on the OAPM Project website <a href="http://www.oapmenvironmental.com/ntx_metroplex/ntx_docs.html">http://www.oapmenvironmental.com/ntx_metroplex/ntx_docs.html</a>
Love Field Neighborhoods	Brian Wilk (emailed on behalf of signatories)	11/18/2013	LF1	We agree with the submissions made by William Cohn and Pat White on October 29, 2013 (Attachment A) and by the Mayor of Highland Park, Joel Williams, on November 18, 2013 (Attachment B) and hereby adopt their comments. Signed by 9 individuals. 2 letters attached.	Comment noted. See responses WC1-WC5.
none	Tim Dalbey	11/18/2013	TD1	This EA is not really about the environment and is more of a management plan containing lengthy descriptives about changing over from a ground based radar system to a digital GPS satellite navigational system that is touted to be more optimal and efficient for air traffic control. No doubt Love Field (DAL) air traffic is going to increase with the renewal of the airport and the withdrawal of the Wright amendment in 2014. Figures 3-8 through 3-20 (...) show the flight patterns based on different alternatives but Figure 3-19 shows the cumulative airpatterns which is a blob of ink over the central area.	The Draft EA was prepared in compliance with FAA Order 1050.1E, Chg. 1, and satisfies the requirements of NEPA as well as the implementing regulations issued by the Council on Environmental Quality (CEQ)(40 CFR Parts 1500-1508).  The Draft North Texas EA addresses all appropriate environmental impact categories as described in Chapter 4 Affected Environment and Chapter 5 Environmental Consequences. Analysis of potential noise impacts was undertaken using FAA's standard noise model for projects of this kind, following established and approved methodologies.  For further details see a grid point analysis of Existing Noise Exposure Population Centroids on Exhibit 4-2, 2014 Change of Potential Population Exposed to Aircraft Noise on Exhibit 5-1, and 2019 Change of Potential Population Exposed to Aircraft Noise on Exhibit 5-2. As can be seen, there are no significant or reportable noise impacts as a result of the proposed action.  Finally, the flight schedule used in the Draft EA based on the FAA Terminal Area Forecast (TAF) which does account for future impacts of the expiration of the Wright Amendment (see Average Annual Day Flight Schedules on pages 1 and 11).

			TD2	<p>There is nothing in the EA about avian life, flight pathways, population, varieties, etc. The Dallas area has been create numerous wetlands along the Trinity river, East Fork of the Trinity river Elm, Fork of the Trinity river and west Fork of the Trinity river to name a few. Refuges such as John Bunker Sands Wetland have been established to filter water and the migratory birds is astonishing. There are no references that show Wood Storks, White Ibis, Roseate Spoonbills, White pelicans in our area but they have migrated into the area by the hundreds. These large birds along with herons, egrets, ducks, geese, and cranes that use the Trinity river corridor as a minor flyway twice a year on their migrations north and south. At a minimum these should have been included.</p>	<p>There are several references for bird species that inhabit North Central Texas including "Birds of North-Central Texas" by Warren Pulich (1988). Pulich includes a checklist of bird species and potential for their occurrence in North Central Texas by season. The citations for the species identified in the comment letter are as follows: Wood Stork (rare in summer and fall), White Ibis (casual in fall, meaning the species is out of its normal range but can be expected to occur again) , Roseate Spoonbill (casual in summer and fall), and White Pelican (common in summer and fall).</p> <p>John Bunker Sands Wetlands Center is located 25 miles east of Dallas. Its website includes a list of 235 bird species that have been identified on property since February 2011 and the list includes the bird species noted in the comment letter.</p> <p>Of the 3,977 wildlife strikes reported at DFW since reporting began in 1990, one has been for the roseate spoonbill and the other bird species listed in the comment have not been recorded.</p>
			TD3	<p>The new flight patterns out of DAL to the east has increased the jet noise. The dense population of east Dallas was not considered in depth and the citizens were not notified in the May notices.</p>	<p>The Commenter's concerns pertain to current operations and existing procedures for DAL. Existing procedures are designed to meet applicable safety and design standards and are optimized for the current operating configuration at DAL.</p> <p>The FAA has not:          1) implemented any recent changes that would alter the lateral or vertical components of existing air traffic procedures at DAL, or          2) added new air traffic procedures at DAL.</p> <p>It is important to note that the proposed OAPM project, if approved, would not be implemented until the fall of 2014.</p> <p>The objective of the North Texas OAPM project is to improve the flexibility and predictability of air traffic routes in the North Texas Metroplex by increasing the use of PBN technology. The changes in runway usage described in this comment are temporary and stem from construction projects recently undertaken by DAL. For more information see the DAL modernization website for construction updates <a href="http://www.lovefieldmodernizationprogram.com">http://www.lovefieldmodernizationprogram.com</a>.</p>

SoHIP (South of Highland Park)	Ed Blair	11/18/2013	SH1	The neighborhood would like to confirm that we agree with the submissions made by William Cohn and Pat White on October 29, 2013 and by the Mayor of Highland Park, Joel Williams, on November 18, 2013.	Comment noted. See responses WC1-WC5.
none	Kim Edge	11/18/2013	KE1	I also noticed while at the veterinarians office that jet planes were flying over Fair Park, a National Historic Landmark. Since flight traffic has drastically increased over East Dallas, I feel special considerations should be made for air traffic over parks.	<p>The Commenter's concern pertains to current operations and existing procedures for DAL. Existing procedures are designed to meet applicable safety and design standards and are optimized for the current operating configuration at DAL.</p> <p>The FAA has not:  1) implemented any recent changes that would alter the lateral or vertical components of existing air traffic procedures at DAL, or  2) added new air traffic procedures at DAL.</p> <p>It is important to note that the proposed OAPM project, if approved, would not be implemented until the fall of 2014.</p> <p>The objective of the North Texas OAPM project is to improve the flexibility and predictability of air traffic routes in the North Texas Metroplex by increasing the use of PBN technology. The changes in runway usage described in this comment are temporary and stem from construction projects recently undertaken by DAL. For more information see the DAL modernization website for construction updates <a href="http://www.lovefieldmodernizationprogram.com">http://www.lovefieldmodernizationprogram.com</a>.</p> <p>As discussed in Section 2.2 of the Draft EA, the purpose of the North Texas OAPM project is to take advantage of the benefits of performance based navigation by implementing RNAV procedures that will help improve the efficiency of the airspace in the North Texas Metroplex. The purpose of the North Texas OAPM project is not to abate existing aircraft noise issues associated with current operations at North Texas Metroplex airports. However, the potential for environmental impacts, including noise related to implementing the Proposed Action, is assessed in the Draft EA; the project does not propose any procedures that would result in significant or reportable noise impacts.</p> <p>See Chapter 5 Environmental Consequences of the Draft EA and the Aircraft Noise Technical Report for discussion of the noise analysis and the potential environmental impacts</p>

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					associated with implementation of the North Texas OAPM project. Refer to Section 1, Agency Concurrence Letters, of the errata for determination of no adverse effects by the Texas Historical Commission dated October 23, 2013.
City of Colleyville	Jennifer Fadden, City Manager	11/18/2013	CC1	Our city's primary concern with respect to the proposed airspace redesign project relates to potential noise impacts. We have endeavored to understand the manner in which the proposed changes would impact our citizens. Unfortunately, the Draft EA fails to provide sufficient information that would enable us to gain a meaningful understanding of how this proposal might change the location, altitude, frequency, time of day, or noise levels associated with aircraft operations over our community.	<p>The North Texas OAPM project did not propose any procedural changes to existing initial departure tracks and altitudes or final approach tracks and altitudes for DFW over the City of Colleyville. Furthermore, the environmental analysis conducted in support of the Draft EA indicates that there would be no significant or reportable impacts to the City of Colleyville resulting from the Proposed Action.</p> <p>For further details see a grid point analysis of Existing Noise Exposure Population Centroids on Exhibit 4-2, 2014 Change of Potential Population Exposed to Aircraft Noise on Exhibit 5-1, and 2019 Change of Potential Population Exposed to Aircraft Noise on Exhibit 5-2.</p> <p>As can be seen, there are no significant or reportable noise impacts as a result of the proposed action. For further details regarding procedures specific to DFW refer to the North Texas OAPM Design and Implementation Team Technical Report and the Aircraft Noise Technical Report available at <a href="http://oapmenvironmental.com/ntx_metroplex/ntx_docs.html">http://oapmenvironmental.com/ntx_metroplex/ntx_docs.html</a></p>
			CC2	To that end, we have requested that officials at DFWIA host a meeting with FAA staff and impacted cities designed to educate our officials about the nature and potential significance of any noise pollution from the proposed project. We are both surprised and disappointed that a more concerted effort was not made to contact our Mayor, City Council, or City Manager's Office regarding an issue of such importance that could have long-term impacts to our community.	<p>The FAA made every effort to treat all of the towns and cities within the study area fairly. See section 2.6 of the Draft EA for details of the scoping process the FAA undertook as part of the North Texas OAPM EA.</p> <p>In addition to the notification described in section 2.6, the FAA published a Notice of Availability of the Draft EA in two local newspapers: The Dallas Morning News and the Ft. Worth Star Telegram on September 30, 2013, placed electronic copies of the Draft EA at 28 local libraries, and sent written NOA to 180 federal, state, regional, county level officials, and other interested parties.</p> <p>The Draft EA was also available for comment on the OAPM Environmental website throughout the original comment period from September 30, 2013 to October 30, 2013 <a href="http://oapmenvironmental.com/ntx_metroplex/ntx_docs.html">http://oapmenvironmental.com/ntx_metroplex/ntx_docs.html</a></p> <p>FAA undertook a second and expanded mailing of the Notice of Availability of the Draft EA that included the</p>

					<p>officials for cities in the immediate DFW/DAL area on October 29, 2013. The FAA extended the period for public review and comment on the Draft EA to November 18, 2013. This provided the public 18 additional days to review and comment on the Draft EA.</p> <p>Also, in compliance with FAA Order 1050.1E, Chg. 1, the FAA is responding to all comments received from the public.</p>
			CC3	<p>In the meantime, we respectfully object to the proposal given the real potential for a negative impact to our community, particularly as it relates to possible changes in flight patterns that would result in aircraft overflights where none exist today.</p>	<p>The North Texas OAPM project did not propose any procedural changes to existing initial departure tracks and altitudes or final approach tracks and altitudes for DFW over the City of Colleyville. Furthermore, the environmental analysis conducted in support of the Draft EA indicates that there would be no significant or reportable impacts to the City of Colleyville resulting from the Proposed Action.</p> <p>For additional details see a grid point analysis of Existing Noise Exposure Population Centroids on Exhibit 4-2, 2014 Change of Potential Population Exposed to Aircraft Noise on Exhibit 5-1, and 2019 Change of Potential Population Exposed to Aircraft Noise on Exhibit 5-2.</p> <p>As can be seen, there are no significant or reportable noise impacts as a result of the proposed action. For further details regarding procedures specific to DFW refer to the North Texas OAPM Design and Implementation Team Technical Report and the Aircraft Noise Technical Report available at <a href="http://oapmenvironmental.com/ntx_metroplex/ntx_docs.html">http://oapmenvironmental.com/ntx_metroplex/ntx_docs.html</a></p>
National Park Service - Intermountain Region	Tammy Whittington	11/18/2013	NP1	<p>Every mention of National Natural Landmark (NNL) sites is currently presented alongside references to historic or cultural resources. NNL sites recognize natural features of significance, not historic or cultural features. Therefore, to better represent these areas, we recommend changing the resource category to "Historic, Architectural, Archeological, Cultural and Natural Heritage Resources." Along these lines, specific changes we are requesting to the document include the following:</p>	<p>FAA incorporated some of NPS's comments, as noted below. Some editorial comments have not been incorporated for consistency with FAA Order 1050.1E (specifically, FAA Order 1050.1E organizationally groups National Natural Landmarks with Historic and Cultural Resources). FAA notes that NPS did not object to the impact analysis.</p>

			NP2	Page 4-143, section 4.3.4: Change section title to "Historical, Architectural, Archeological, Cultural and Natural Heritage Resources."	FAA did not change the section title for consistency with FAA Order 1050.1E (specifically, FAA Order 1050.1E organizationally groups National Natural Landmarks with Historic and Cultural Resources).
			NP3	<b>Page 4-143, section 4.3.4.1:</b> o Remove the reference to the three NNLs, then see the next comment. <b>Page 4-143:</b> Create a subsection "4.3.4.2 Natural Heritage Resources" and note that three NNL sites occur within the General Study Area (GSA) (Dinosaur Valley State Park, Greenwood Canyon and the Fort Worth Nature Center and Refuge). No additional analysis of potential impacts are warranted for Dinosaur Valley and Greenwood Canyon as the significant resources recognized at those sites are paleontological features and not affected by the proposed action. The Fort Worth Nature Center and Refuge is designated an NNL for its outstanding examples of cross timbers-plains association and river botany hardwood forests, all of which support high wildlife diversity. The proposed action does not involve ground disturbance and thus the significant ecological communities will not be affected by the proposed action. Any potential concerns to bat and avian communities at this site are covered by the general discussions of this project on those resources.	FAA incorporated some of NPS's comments in Chapters 4 and 5, on pages 4-143, 5-183 and 5-184, as documented in the errata. FAA did not create a new subsection for consistency with FAA Order 1050.1E (specifically, FAA Order 1050.1E organizationally groups National Natural Landmarks with Historic and Cultural Resources).
			NP4	<b>Page 4-136, Table 4-4:</b> The first property type listed is "Historic Sites", delete the reference to the "National Registry of Natural Landmarks."	Comment noted. Requested correction accepted and included in the errata.
			NP5	<b>Exhibit 4-4:</b> The three areas identified in the legend as National Parks are not NPS units. Caddo National Grassland and Lyndon B. Johnson National Grassland are managed by the US Forest Service and Sheppard AFB Recreation Area is managed by the DOD, these areas need to be correctly noted as such. Dinosaur Valley NNL needs to be added to this map given that it falls within the GSA and is identified in Appendix F.	Comment noted. Requested correction accepted and included in the errata.

			NP6	<b>Exhibit 4-5:</b> Change the map title to "Historical, Cultural and Natural Heritage Resources" for consistency with the above recommended changes.	FAA did not change the section title of Exhibit 4-4 for consistency with FAA Order 1050.1E (specifically, FAA Order 1050.1E organizationally groups National Natural Landmarks with Historic and Cultural Resources).
			NP7	<b>Several sites in Appendix F</b> are incorrectly listed as National Natural Landmarks. All of following sites need to be changed to a National Historic Landmark: Page F-11, Dealey Plaza Historic District Page F-13, Fair Park Texas Centennial Buildings Page F-14, Fort Richardson Page F-17, Highland Park Shopping Village Page F-34, Porter Farm Page F-37, Rayburn Samuel T. House	Comment noted. Requested correction accepted and included in the errata.
none	Karen Burton	11/19/2013	KB2	Why can't FAA implement noise abatement procedures for Southlake?	<p>The commenter's question pertains to current operations and existing procedures for Runway 31L at DFW. It is important to note that the proposed OAPM project, if approved, would not be implemented until the fall of 2014.</p> <p>Existing procedures are designed to meet applicable safety and design standards and are optimized for the current operating configuration at DFW. FAA continues to operate within the parameters set by the DFW Runway Use plan.</p> <p>The objective of the North Texas OAPM project is to improve the flexibility and predictability of air traffic routes in the North Texas Metroplex by increasing the use of PBN technology. As discussed in Section 2.2 of the Draft EA, the purpose of the North Texas OAPM project is to take advantage of the benefits of performance based navigation by implementing RNAV procedures that will help improve the efficiency of the airspace in the North Texas Metroplex.</p> <p>The purpose of the North Texas OAPM project is not to abate existing aircraft noise issues associated with current operations at North Texas Metroplex airports. However, the potential for environmental impacts, including noise related to implementing the Proposed Action, is assessed in the Draft EA; the project does not propose any procedures that would result in significant or reportable noise impacts. See Chapter 5 Environmental Consequences of the Draft EA and the Aircraft Noise Technical Report for discussion of the noise analysis and the potential environmental impacts associated with implementation of the North Texas OAPM project.</p>

### 3 Environmental Assessment Errata

The errata sheet corrects errors, omissions, and other minor adjustments that were identified after the printing of the Draft EA for the North Texas OAPM Project in September 2013. This errata sheet must be attached to the EA to comprise a full and complete record of the environmental analysis for the project. The EA will not be reprinted.

Section 3.1 provides changes and additions for text and tables. Section 3.2 provides changes and additions to exhibits. Section 3.3 provides changes to the Appendices. Section 3.4 provides a detailed description of the proposed action procedure adjustments implemented after issuance of the Draft EA for the North Texas OAPM Project.

Changes in text and tables are indicated with ~~strikeout~~ type where the text is removed and replaced. New text is indicated with **bold italic** type where corrections are indicated. Changes to exhibits are noted by the same font changes as the text or are summarized in the introduction to the respective exhibit.

#### 3.1 Corrections to Text and Tables

##### Chapter 2

On page 2-28 in Table Notes at the bottom of the page, the following corrections will be made: Cleburne Municipal will be changed to **Cleburne Regional Airport**.

##### Chapter 3

On page 3-68 the following corrections will be made:

#### 3.2.1 No Action Alternative

Under the No Action Alternative, the procedures in use in the North Texas Metroplex as of 2011 (representing existing conditions) would generally remain the same. The only modification from today would be a change to the DUMPY FOUR arrival serving both DFW and DAL. This modification would correct ground tracks of arriving aircraft to account for historical wind drift. This change would be **has** independent **utility from** of the Proposed Action and would be implemented in the absence of the Proposed Action.<sup>1</sup>

<sup>1</sup> **Impacts associated with modifications to DUMPY FOUR are considered in the cumulative impacts section.**

On page 3-69 the following corrections will be made:

##### 3.2.1.1 No Action Alternative Standard Procedures

**Table 3-1** lists the names of the No Action Alternative procedures, the procedure type (i.e., SID or STAR), the basis of design (indicated by the type of navigational aid the procedures are based on: NAVAID (shown as VHF Omnidirectional Range [VOR]), RNAV, or radar vectors), and the airports served. In addition, the table includes the number of runway and en route transitions for each procedure and, where applicable, by

airport, and the entry/exit points served by the procedure. The No Action Alternative includes current procedures, as well as procedures **a procedure** with independent utility (**DUMPY FOUR**) that are **is** expected to be put into effect prior to the implementation of the North Texas OAPM.

On page 3-90, the following addition will be made:

### **3.3.2.1 Proposed Action Procedure Adjustments**

***Following release of the Draft Environmental Assessment (EA) for public review, the FAA's Aeronautical Navigation Products office completed the independent quality assurance process prior to the flight check step to review the proposed Area Navigation (RNAV) and Required Navigation Performance (RNP) approach procedures to Dallas-Love Field (DAL) Runway's 31L, 31R, 13L, and 13R. As a part of this quality assurance process, updated design criteria were applied which required adjustments to the locations of several waypoints associated with the proposed procedures. As a result, some of the waypoints were moved laterally and some were moved along the path of the route. Movement of waypoints along the path of the routes does not have the potential to change impacts and do not require any additional screening or analysis. For the waypoints that were moved laterally, FAA conducted a screening assessment to determine if the changes would result in potential significant noise impacts or reportable noise increases<sup>1</sup>.***

***The screening analysis evaluated the change in lateral distance for the moved waypoints and the altitude at which aircraft are expected to cross those waypoints. The lateral distance change for the waypoints ranged from 6 to 128 feet, with an average change of 46 feet. Based on the designed descent angle, the altitudes expected at each waypoint ranged from 1,100 feet Above Ground Level (AGL) to 2,800 feet AGL with an average altitude of approximately 2,000 feet AGL for all the waypoints. The expected altitudes did not change when compared to the original design evaluated in the Draft EA.***

***The screening analysis determined that, for the waypoints that had lateral adjustments, there was no potential for them to cause significant noise impact or reportable noise increases that would require further analysis. Therefore, additional noise modeling is not required as the screening analysis results are consistent with the conclusions provided in the Draft EA. No noise screening was required for the other waypoints that were moved along the path of the procedure.***

***For more detailed information related to the changes made for each waypoint for the DAL approaches to Runways 31L, 31R, 13L and 13R, please refer to the updated Optimization of Airspace and Procedures in the Metroplex Design Submission: Executive Summary for the North Texas Metroplex, "Attachment A: Proposed Final Design Submission Packages", and "Attachment B: Records of Changes to Final Design Submission Packages".***

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<sup>1</sup> Mitre-Center for Advanced Aviation Development. Guidance for Noise Screening of Air Traffic Actions. Revision 1.1. December 2012. (Available on [http://oapmenvironmental.com/ntx\\_metroplex/ntx\\_docs.html](http://oapmenvironmental.com/ntx_metroplex/ntx_docs.html).)

On page 3-91, Table 3-2, the following corrections will be made to reflect that the following procedure names were changed after the release of the Draft EA. Only the procedure names were changed and the procedure designs remain unaffected.

**Table 3-2 Procedures Under the Proposed Action Alternative (1 of 4)**

<u>Proposed Action Procedure</u>	<u>No Action Alternative Procedure</u>	<u>Procedure Type</u>	<u>Basis of Design</u>	<u>Airport Served</u>	<u>Transitions (En Route / Runway)</u>	<u>Exit / Entry Point Served</u>	<u>Objective</u>
<del>BAWLZ</del> <b>FORNY</b> ONE	JAGGO THREE	STAR	RNAV	DFW (Dual)	4/0	Southeast (North Flow)	Flexibility
<del>CHUKK</del> <b>LOADS</b> ONE	DUMPY FOUR	STAR	RNAV	East SATs	4/0	Southeast (South Flow)	Segregation & Predictability
<del>DAMNS</del> <b>HOWIG</b> ONE	WORTH SEVEN	SID	RNAV	SATs	6/2	West (North Flow)	Predictability
<del>EMMIT</del> <b>EMMTT</b> ONE	DALLAS NINE	SID	RNAV	DAL	5/4	East (North Flow)	Predictability

On page 3-93, Table 3-2, the following corrections will be made to reflect that the following procedure name was changed after the release of the Draft EA. Only the procedure name was changed and the procedure design remains unaffected.

<u>Proposed Action Procedure</u>	<u>No Action Alternative Procedure</u>	<u>Procedure Type</u>	<u>Basis of Design</u>	<u>Airport Served</u>	<u>Transitions (En Route / Runway)</u>	<u>Exit / Entry Point Served</u>	<u>Objective</u>
<del>SKTER</del> <b>ZACHH</b> ONE	NOBLY FOUR	SID	RNAV	DFW	1/8	East	Predictability

**Chapter 4**

On page 4-121, Table 4-1, the following corrections will be made to fix a table alignment issue that occurred during document formatting. The NIRS modeling reflects the numbers of aircraft operations listed in the corrected version of the table:

**Table 4-1 Airport Operations by Airport and Category**

<u>Airport Code</u>	<u>Air Carrier</u>	<u>Air Taxi</u>	<u>General Aviation</u>	<u>Military</u>	<u>Total</u>
DFW	467,912	172,629	6,074	188	646,803

Airport Code	Air Carrier	Air Taxi	General Aviation	Military	Total
DAL	87,063	29,351	61,677	1107	179,198
<del>FTW</del> <b>ADS</b>	114	10,751	79,812	449	91,126
<del>ADS</del> <b>AFW</b>	7,686	4,077	88,990	18726	119,479
<del>AFW</del> <b>FTW</b>	40	7,664	67,466	749	75,919
<del>NFW</del> <b>DTO</b>	4	756	147,115	156	148,031
TKI	1	1,328	81,557	52	82,938
GKY	18	556	74,521	102	75,197
<del>DTO</del> <b>RBD</b>	0	426	57,375	319	58,120
<del>RBD</del> <b>FWS</b>	0	147	54,826	222	55,195
<del>FWS</del> <b>NFW</b>	118	0	253	27,836	28,207
<b>Total Operations</b>	<b>562,956</b>	<b>227,685</b>	<b>719,666</b>	<b>49,906</b>	<b>1,560,213</b>

Source: FAA ATADS (2011) – *DFW, DAL, ADS, AFW, FTW, DTO, TKI, GKY, RBD, FWS*;  
*NAS JRB Fort Worth Air Traffic Activity Report (ATAR 2011) - NFW*

Prepared By: Harris Miller Miller & Hanson Inc., October 2012

On page 4-129, Table 4-3 the following corrections will be made to reflect the final set of NIRS modeling input. The color labels have been updated to match the corresponding graphic Exhibit 4-2, Existing (2011) Noise Exposure Population Centroids. This correction does not change any conclusions published in the Draft EA.

**Table 4-3 Existing Conditions – Estimated Population Exposed to Aircraft Noise within General study area (2011)**

DNL Range (dB)	Population	Percent of Total	Color
Less than DNL 45	<del>3220543</del> <b>3,144,384</b>	<del>47.29%</del> <b>46.61%</b>	Grey
DNL 45 to less than DNL 50	<del>2662526</del> <b>2,716,310</b>	<del>39.95%</del> <b>40.27%</b>	Dark Blue
DNL 50 to less than DNL 55	<del>614689</del> <b>631,674</b>	<del>9.11%</del> <b>9.36%</b>	Light Blue <b>Cyan</b>
DNL 55 to less than DNL 60	<del>195674</del> <b>199,334</b>	<del>2.85%</del> <b>2.96%</b>	Dark Green Light Green
DNL 60 to less than DNL 65	<del>49350</del> <b>50,697</b>	0.75%	<b>Yellow</b>
DNL 65 to less than DNL 70	<del>2762</del> <b>3,145</b>	0.05%	<del>Yellow</del> <b>Orange</b>
Total	6745544	100.00%	

Sources: NIRS Version 7.0b3; US Census Bureau, 2010 Census Redistricting Data (Public Law 94-171) Summary File  
Prepared by: Harris Miller Miller & Hanson Inc., ~~September 2012~~ **August 2013**

On page 4-136, Table 4-4 will be corrected in response to a National Park Service comment (email: T. Whittington Nov 20, 2013):

**Table 4-4      Types of Section 4(f) Resources Considered in the General Study Area (1 of 2)**

<b>Section 4(f) Property Type</b>	<b>Responsible Agency/Agencies</b>
Historic Sites (Only those listed on the National Register of Historic Places, <del>National Registry of Natural Landmarks</del> )	National Park Service, State and Local Agencies
National Forests and Grasslands	U.S. Forest Service
National Historical Park, National Historic Site, and International Historic Site	National Park Service
National Lakeshore	National Park Service
National Memorial	National Park Service
National Natural Landmarks	National Park Service
National Historic Landmarks	National Park Service
National Military Park, National Battlefield Park, National Battlefield Site, and National Battlefield	National Park Service

On page 4-143, Section 4.3.4.1, will be corrected in response to a National Park Service comment (email: T. Whittington Nov 20, 2013):

Exhibit 4-5 shows the location of historic and cultural resources identified in the GSA. A total of ~~515~~ **512** properties (506 NRHP listed properties, ~~3 National Natural Landmark (NNL) properties~~ and 6 National Historic Landmark (NHL) properties) were identified within Texas and none in Oklahoma. Appendix G includes a list of the historic and cultural resources identified in the GSA, the state and county in which they are located, and DNL under existing conditions.

***National Natural Landmark (NNL) is an area designated by the Secretary of the Interior as being of national significance to the United States because it is an outstanding example(s) of major biological and geological features. Three NNL sites occur within the GSA (Dinosaur Valley State Park, Greenwood Canyon and the Fort Worth Nature Center and Refuge) and all three are within Texas. These sites are also depicted on Exhibit 4-5 and included in Appendix G. Any potential concerns to wildlife (Avian and Bat) species are covered in other sections of this EA, in particular Sections 4.3.5 and 5.5.***

On page 4-149, Table 4-7 General study area Airports Wildlife and Avian/Bat Strike Summary 2011 – table notes: ~~Mid-way~~ (JWY) changed to **Mid-Way** (JWY)

## Chapter 5

On page 5-171, the following paragraph will be corrected to:

**Average Annual Day IFR-Filed Aircraft Flight Schedules:** The IFR-filed aircraft flight schedules identify arrival and departure times, aircraft types, and origin/destination

information for an average annual day (AAD) in 2014 and in 2019. For the 2014 and 2019 forecast years, the data was based on the FAA's ~~2012~~ **2011** Terminal Area Forecast (TAF),<sup>51</sup> which was supplemented with additional details such as arrival/departure times, aircraft types, and origin/destination information (for additional details please refer to the Average Annual Day Flight Schedules Technical Report, available on the North Texas OAPM EA website, [http://oapmenvironmental.com/ntx\\_metroplex/ntx\\_docs.html](http://oapmenvironmental.com/ntx_metroplex/ntx_docs.html)). **The expiration of the Wright Amendment in 2014 is factored into the FAA's TAF data and is accounted for in the 2014 and 2019 aircraft flight schedules.**

On page 5-171, footnote 51, will be corrected to:

<sup>51</sup> Federal Aviation Administration, Terminal Area Forecast (2012 **2011**) ( <https://aspm.faa.gov/main/taf.asp>)(Accessed March 2013-April 2012.)

On page 5-180, the following paragraph will be corrected to:

### **5.2.1 Summary of Impacts**

Under both the Proposed Action and No Action Alternative, there would be no changes in aircraft noise exposure that would exceed the FAA's significance thresholds for noise impacts on people. Therefore, neither the Proposed Action nor the No Action Alternative would result in significant compatible land use impacts.

***Although there were a few grid points that indicated the potential for less than DNL .5 dB increases close to DNL 65 dB levels, these increases are considered to be de minimis because they are not perceptible and are well below the 1.5 DNL dB trigger for significance***

On page 5-183, the first paragraph Section 5.4.1, will be corrected in response to a National Park Service comment (email: T. Whittington Nov 20, 2013):

The aircraft noise exposure analysis indicates that there would be no adverse effects to any historic resource, tribal land, NHL or NNL as a result of noise under the Proposed Action compared with the No Action Alternative. Furthermore, any changes in aircraft traffic patterns are expected to occur at altitudes and distances from viewers that would not substantially impair the view or setting of historic resources, tribal lands, NHLs or NNLs. Therefore, no adverse indirect effects to historic resources or tribal lands under the Proposed Action would be anticipated for 2014 or 2019. Furthermore, because the airspace changes do not involve any changes on the ground, ~~there would~~ no adverse direct effects to historic resources, **NHLs or NNLs**, under the Proposed Action would be anticipated for 2014 or 2019.–

On page 5-184, the first paragraph Section 5.4.3, will be corrected in response to a National Park Service comment (email: T. Whittington Nov 20, 2013):

Neither the Proposed Action nor the No Action Alternative would include any ground disturbance, construction, or land acquisition; therefore, neither alternative would physically destroy or alter any historic, architectural, **NHLs, NNLs**, or cultural resources, including any on Tribal Lands. The FAA also assessed noise levels at historic properties within the APE to determine if the Proposed Action would result in any noise increases that would diminish the integrity of a property's setting for those properties for which their setting contributes to historical or cultural significance.

On page 5-187, the total number of identified bird strikes listed as 2,498 in Table 5-5 is incorrect and should be 1,134 (addition error). In addition, the total number of all strikes listed as 1,387 in Table 5-5 is also incorrect and should be 3,055 (addition error). All of the other information listed in Table 5-5 is correct.

**Table 5-5 FAA Wildlife Strike Database Records for Study Airports by Altitude (1990 – March 2013)**

Type of Strike <sup>1</sup>	2,500 ft. AGL or less	>2,500 ft. AGL to <= 10,000 ft. AGL	Greater than 10,000 ft. AGL	Total
Identified Bird	1,101	31	2	<del>2,498</del> <b>1,134</b>
Bats	4	0	0	4
Unknown Bird (avian)	38	9	1	48
Unknown Bird (avian) – Large	26	15	1	42
Unknown Bird (avian) – Medium	582	155	31	768
Unknown Bird (avian) – Small	843	172	18	1,033
Identified Non Avian	26	0	0	26
<b>Total<sup>2</sup></b>	<b>2,620</b>	<b>382</b>	<b>53</b>	<del>4,387</del> <b>3,055</b>
<b>Percent<sup>3</sup></b>	<b>86%</b>	<b>12%</b>	<b>2%</b>	<b>100%</b>

*Notes:*

*1/ Includes total number of strikes, even if species was unknown. Uses data for KADS, KAFW, KCPT, KDAL, KDFW, KDTO, KFTW, KFWS, KGKY, KHQZ, KLNC, KNFW, KRBD, and KTKL. No strikes reported for KGPM, 4T2, 50F, KLUD, F46, F41, KWEA, and KJWY. This table presents strike data for all 22 airports affected by the Proposed Action.*

*2/ One thousand seven-hundred ten (1,710) reported strikes did not include altitude information and are not included in this table.*

*3/ Percentages may not add to 100% due to rounding.*

Source: U.S. Department of Transportation, Federal Aviation Administration, FAA Wildlife Strike Database (<http://wildlife.faa.gov/>)

Prepared by: Harris Miller Miller & Hanson Inc., August 2013

On page 5-189, the first paragraph of Section 5.7.3, the following corrections will be made to the text to reflect the final set of modeling results:

Table 5-6 presents the results of the fuel burn analysis for the Proposed Action and No Action Alternative. Compared with the No Action Alternative, the Proposed Action would result in a decrease in total metric tons of aircraft fuel burned: ~~229.4~~ **10.5** metric tons (MT) less in 2014 and ~~254.7~~ **9.9** MT less in 2019. Therefore, there would be no significant adverse impact to energy supply.

On page 5-189, Table 5-6, the following corrections will be made to the text to reflect the final set of modeling results:

**Table 5-6 Energy Consumption Comparison**

	2014		2019	
	<u>No Action</u>	<u>Proposed Action</u>	<u>No Action</u>	<u>Proposed Action</u>
Fuel Burn (MT)	<del>3,106.50</del> <b>3,110.3</b>	<del>3,095.9</del> <b>3,099.8</b>	<del>3,497.4</del> <b>3,501.4</b>	<del>3,484.9</del> <b>3,491.5</b>
Volume Change (MT) (Proposed Action – No Action)		<del>-10.6</del> <b>-10.5</b>		<del>-12.2</del> <b>-9.9</b>
Percent Change from No Action		-0.34%		<del>-0.35%</del> <b>-0.28%</b>

Notes:

**Totals may not add up due to rounding.**

Source: Harris Miller Miller & Hanson Inc., ~~June~~ **August** 2013 (NIRS modeling results)

Prepared By: Harris Miller Miller & Hanson Inc., ~~June~~ **August** 2013

On page 5-191, the first paragraph of Section 5.9.3, the following corrections will be made to the text to reflect the final set of modeling results:

Table 5-7 shows project-related ~~CO<sub>2</sub>e~~ **CO<sub>2</sub>e** emissions: ~~33.6~~ **33.1** MT<sup>63</sup> less in 2014 and ~~38.5~~ **31.2** MT less in 2019. In 2014, CO<sub>2</sub> emissions under the Proposed Action would be ~~9,767.5~~ **9,780.0** MT of CO<sub>2</sub>e (0.34 percent lower than the No Action Alternative). In 2019, CO<sub>2</sub> emissions under the Proposed Action would be ~~10,994.8~~ **11,015.7** MT of CO<sub>2</sub>e (~~0.35~~ **0.28** percent lower than the No Action Alternative). In sum, the Proposed Action would reduce fuel burn in comparison with the No Action Alternative and, thus, reduce MT of CO<sub>2</sub>e emissions. Therefore, no increase in GHGs would result from implementation of the Proposed Action when compared to the No Action Alternative and no impacts would be anticipated.

On page 5-191, Table 5-7, the following corrections will be made to the text to reflect the final set of modeling results:

**Table 5-7 CO<sub>2</sub>e Emissions – 2014 and 2019**

	2014		2019	
	<u>No Action</u>	<u>Proposed Action</u>	<u>No Action</u>	<u>Proposed Action</u>
CO <sub>2</sub> e Emissions (MT)	<del>9,801.1</del> <b>9,813.1</b>	<del>9,767.5</del> <b>9,780.0</b>	<del>11,033.3</del> <b>11,046.8</b>	<del>10,994.8</del> <b>11,015.7</b>
Volume Change (MT) (Proposed Action – No Action)		<del>-33.6</del> <b>-33.1</b>		<del>-38.5</del> <b>-31.2</b>
		-0.34%		<del>-0.35%</del> <b>-0.28%</b>

Notes: MT = Metric tons of CO<sub>2</sub> equivalent

**Totals may not add up due to rounding.**

Source: Harris Miller Miller & Hanson Inc., ~~June~~ **August** 2013 (NIRS modeling results)

Prepared By: Harris Miller Miller & Hanson Inc., ~~June~~ **August** 2013

On page 5-193, the following correction will be made:

Other categories of impacts considered in this EA, but demonstrated to not affect the resource, include:

- **Fuel Burn and Air Quality** - The Proposed Action results in lower quantities of fuel burned and correspondingly lower amounts air pollutants and greenhouse gases emitted; therefore, the Proposed Action would not cumulatively contribute to potential effects on energy use, air pollutants emitted, and greenhouse gases emitted of other past, present, and reasonably foreseeable future projects.

On page 5-194, Table 5-8 will be appended with the following information to reflect an additional project with potential for cumulative impacts:

**Table 5-8 Potential for Cumulative Impacts from the Proposed Action and Other Past, Present, and Reasonably Foreseeable Future Actions**

<b>Projects at North Texas OAPM Airports</b>		
<b>Project</b>	<b>Description</b>	<b>Potential for Cumulative Effects</b>
<i>Dallas Love Field (DAL) Passenger Terminal Renovation/Modernization Program<sup>2</sup></i>	<i>The City of Dallas proposed a passenger terminal renovation/modernization program at DAL. The purpose of the proposed renovation/modernization was to improve operational efficiency and increase levels of passenger service. The FAA made a determination that the project was categorically excluded from further environmental evaluation in accordance with FAA Order 1050.1E. (CATEX dated April, 2008)</i>	<i>Proposed flight operations activity levels for the North Texas OAPM Proposed Action and No Action were modeled using TAF data, which included best available information on future planned operations levels. There is no indication that this project would alter aircraft operations levels in the TAF. No significant impacts are expected in conjunction with implementation of the Proposed Action.</i>

<sup>2</sup> The FAA approved the passenger terminal renovation/modernization program at Dallas Love Field Airport based upon a categorical exclusion on April 8, 2008. The terminal project retains the existing number of gates (20), but rebuilds and renovates the terminal to improve its operational efficiency and increases the level of service for passengers. The airport sponsor is currently in phase 4 of 5 of completing construction of the terminal project. The FAA included the terminal project in Table 5-8 because it technically qualifies as a “past, present, reasonably foreseeable future action”. However, the FAA has determined that it does not contribute to the potential cumulative noise and air quality impacts of the North Texas OAPM. Construction of the terminal is scheduled to be completed on or about October 13, 2014, which is about one month after the FAA plans to publish the North Texas OAPM procedures. Construction has been designed to minimize impacts on taxi times to use the preferential runway, Runway 13R, in later phases. Moreover, in FAA’s experience pilots typically prefer to use the longer preferred runway where, as here, there is a marginal difference in taxi times. Considering these factors, the runway assumptions used in modeling potential noise impacts of the North Texas OAPM in the EA remain reasonable and valid.

### **3.4 Corrections to Exhibits**

In chapter 3, the following corrections will be made to reflect changes to procedure names implemented by the D&I team in order to comply with RNP design criteria (see revised D&I Technical Report for further details):

#### **Chapter 3**

On Exhibit 3-21 (page 3-104), the following corrections will be made:  
LNDRY ONE is renamed to LNDRE ONE, four instances  
SKTER ONE is renamed to ZACHH ONE, one instance

On Exhibit 3-22 (page 3-106), the following corrections will be made:  
BAWLZ ONE is renamed to FORNY ONE, four instances

On Exhibit 3-23 (page 3-108), the following corrections will be made:  
SKTER ONE is renamed to ZACHH ONE, one instance

On Exhibit 3-24 (page 3-110), the following corrections will be made:  
CHUKK ONE is renamed to LOADS ONE, three instances

On Exhibit 3-25 (page 3-112), the following corrections will be made:  
DAMNS ONE is renamed to HOWIG ONE, five instances

#### **Chapter 4**

On page 4-138, Section 4.3.3.1 Potential Section 4(f) Resources in the General Study Area, the following correction will be made:

Data collected from both federal and state sources was used to identify Section 4(f) resources located within the GSA. A total of ~~1,220~~ **1,218** Section 4(f) resources were identified within the GSA. Exhibit 4-4 depicts the locations of all potential Section 4(f) resources within the GSA, excluding historic and cultural resources. The locations of historic and cultural resources, discussed in Section 4.3.4, are depicted on Exhibit 4-5. Appendix F includes a list of the Section 4(f) resources identified in the GSA, the type of resource (i.e., federal, state, or local), the state and county in which they are located, site acreage, and DNL under existing conditions.

On page 4-139, Exhibit 4-4 will be corrected in response to a National Park Service comment (email: T. Whittington Nov 20, 2013):

(The following properties changed classification per National Park Service letter and are not shown with strikeout)

- Caddo National Grassland was listed as a National Park and is corrected to US Forest Service.
- Lyndon B. Johnson National Grassland was listed as a National Park and is corrected to US Forest Service.
- Sheppard AFB Recreation Area was listed as a National Park and is corrected to Department of Defense.

- Dinosaur Valley was listed as a State Park and is corrected to a National Natural Landmark.
- Several State Parks will change identification number in the Exhibit. Identification numbers 10 through 16 will be corrected to 9 through 15 respectively; the data source will be corrected

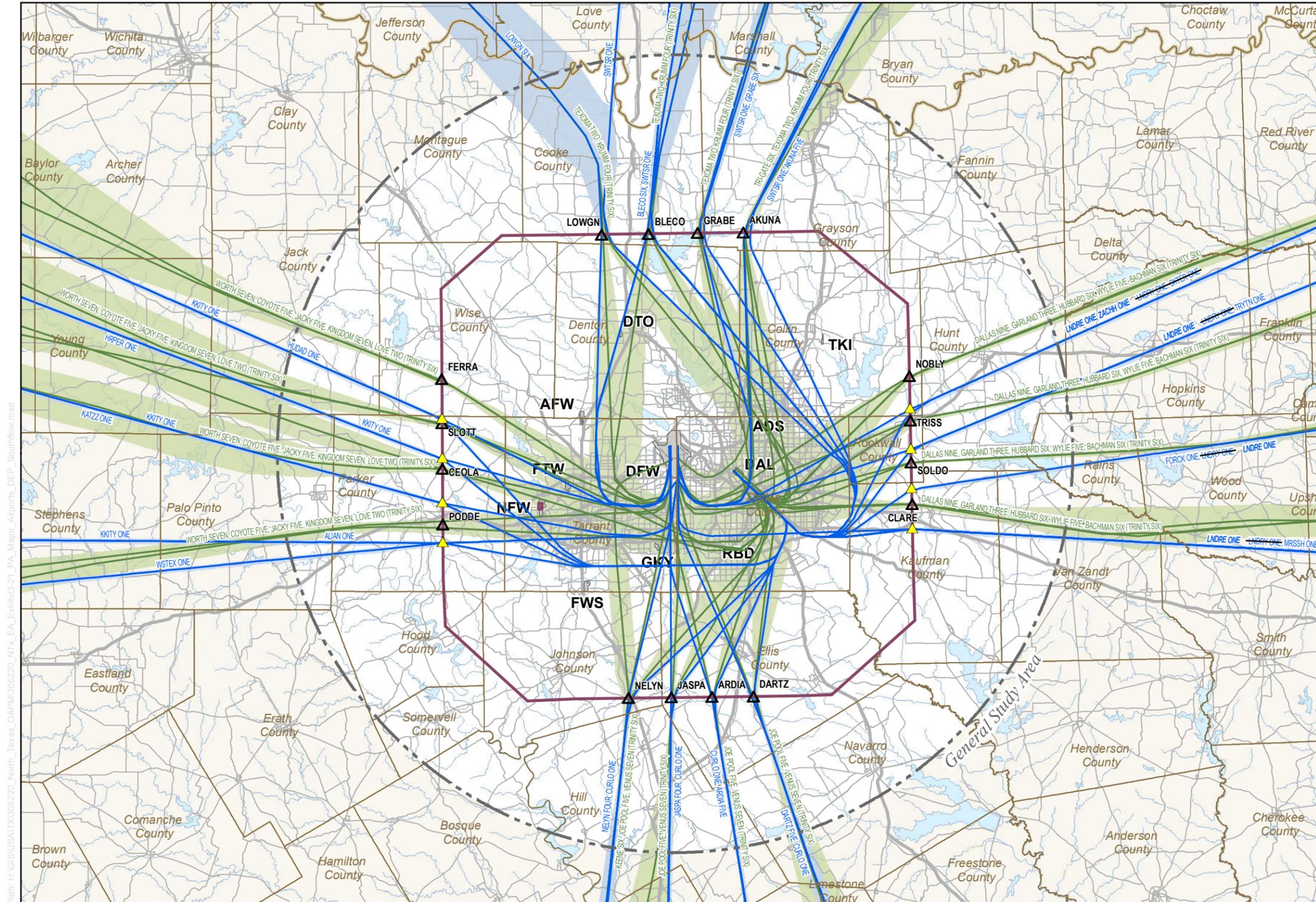
On page 4-141, Exhibit 4-5 the data source will be corrected in response to a National Park Service comment (email: T. Whittington Nov 20, 2013):

## Chapter 5

On page 5-176, Exhibit 5-1 and page 5-178, Exhibit 5-2 the following corrections will be made to correct for erroneously included information:

***The legend is corrected to reflect the criteria for determining impact of changes in aircraft noise as described in the EA, including but not limited to Section 5.1.2, and in accordance with the requirements of FAA Order 1050.1E; the information struck out was included erroneously; no other changes to the exhibit. The data source is corrected.***

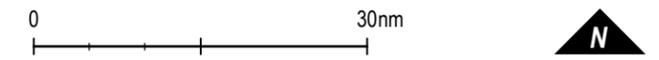
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**LEGEND**

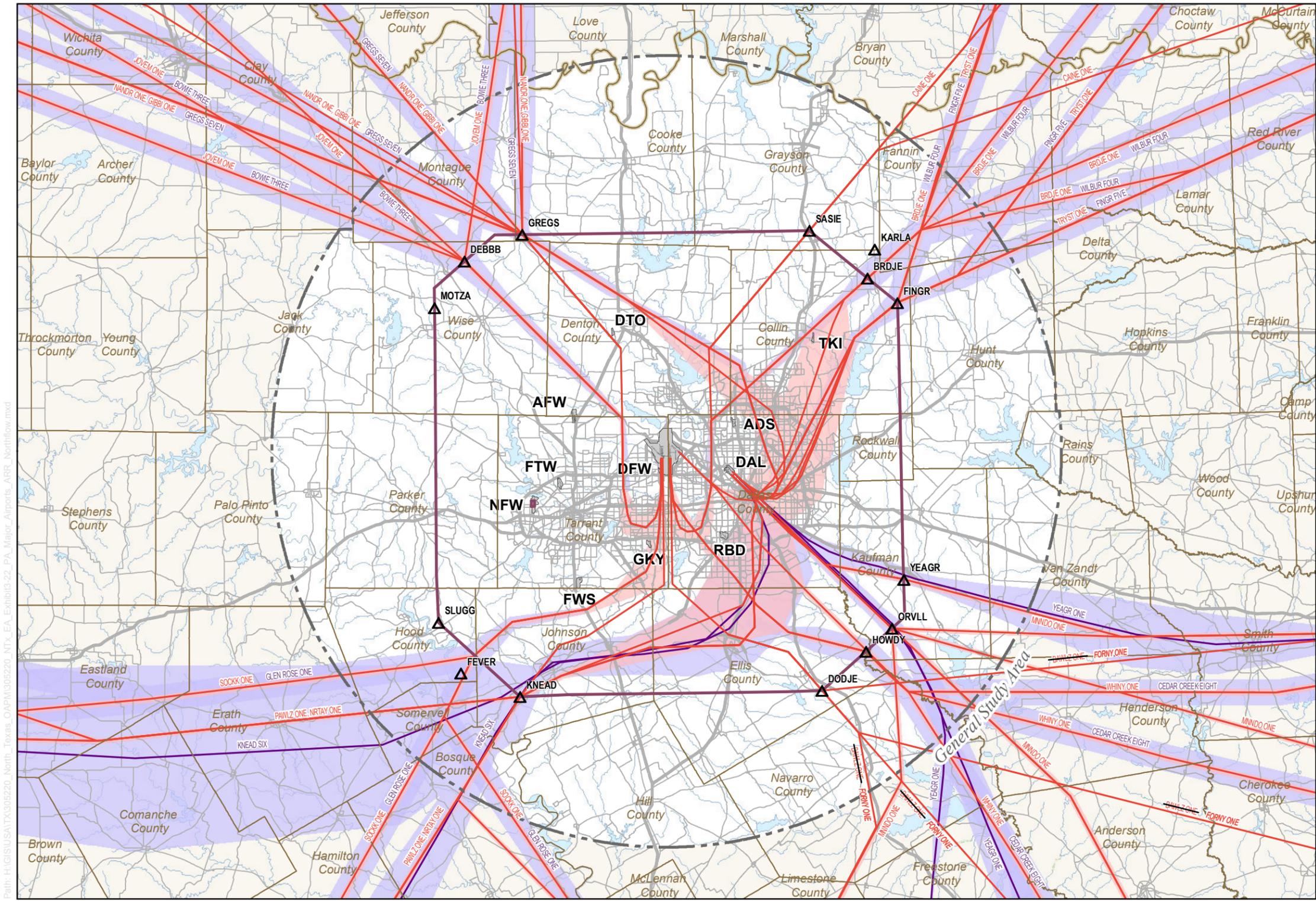
- General Study Area
- Study Airport Area
- D10 TRACON Boundary
- Proposed Action Departure Flow (RNAV)
- Proposed Action Departure Flow (Conventional, Ground tracks unchanged between Existing/No Action/Proposed Action)
- Navigational Fix
- Floating Fix
- State Boundary
- County Boundary
- Interstate Highway
- Secondary Roads
- Highways
- Water
- River/Stream

- Notes:
- ADS - Addison Airport
  - AFW - Fort Worth Alliance Airport
  - DAL - Dallas Love Field
  - DFW - Dallas Fort Worth International Airport
  - DTO - Denton Municipal Airport
  - FTW - Fort Worth Meacham International Airport
  - FWS - Fort Worth Spinks Airport
  - GKY - Arlington Municipal Airport
  - NFW - Fort Worth Naval Air Station
  - RBD - Dallas Executive Airport
  - TKI - Collin County Regional Airport at McKinney
- TRACON - Terminal Radar Approach Control  
D10 - Dallas-Fort Worth TRACON  
RNAV - Area Navigation



Data Source: HMMH Analysis 2012 (Study Area Boundary); MITRE (TRACON Boundary); PDARS (Traffic Flow Data); digital - Terminal Procedures Publication (Navigation Fixes); National Atlas(Lakes/Rivers); Environmental Systems Research Institute, Inc.(State/County Boundaries, City Points, Roads, Airport Boundaries)  
Prepared By: Harris Miller Miller & Hanson Inc., August 2013





**LEGEND**

- General Study Area
- Study Airport Area
- D10 TRACON Boundary
- Proposed Action Arrival Flow (RNAV)
- Proposed Action Arrival Flow (Conventional)
- Navigational Fix
- State Boundary
- County Boundary
- Interstate Highway
- Secondary Roads
- Highways
- Water
- River/Stream

Notes:  
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**NFW** - Fort Worth Naval Air Station  
**RBD** - Dallas Executive Airport  
**TKI** - Collin County Regional Airport at McKinney

**TRACON** - Terminal Radar Approach Control  
**D10** - Dallas-Fort Worth TRACON  
**RNAV** - Area Navigation

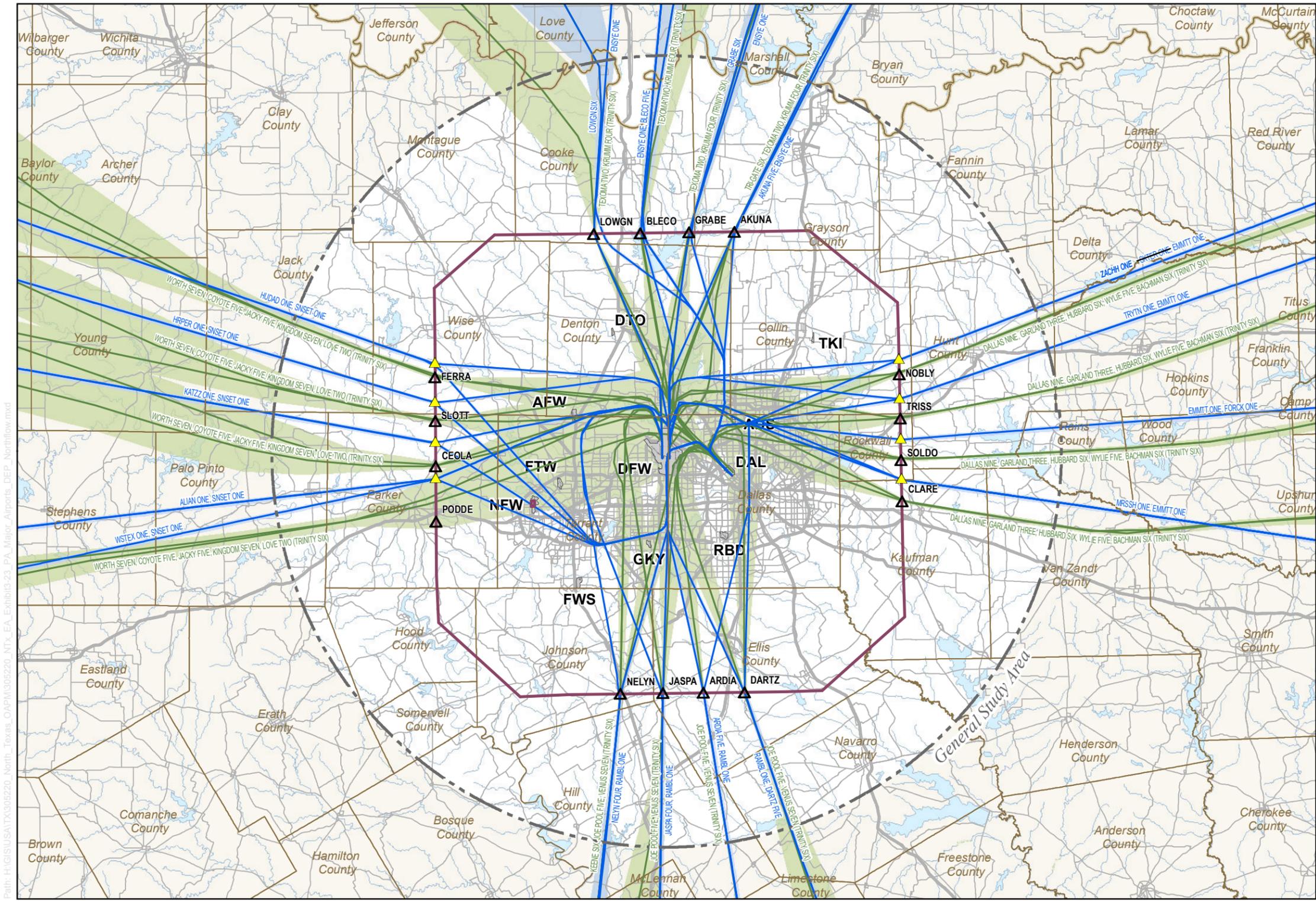


Data Source: HMMH Analysis 2012 (Study Area Boundary); MITRE (TRACON Boundary); PDARS (Traffic Flow Data); digital - Terminal Procedures Publication (Navigation Fixes); National Atlas(Lakes/Rivers); Environmental Systems Research Institute, Inc.(State/County Boundaries, City Points, Roads, Airport Boundaries)  
 Prepared By: Harris Miller Miller & Hanson Inc., August 2013

Exhibit 3-22

**Proposed Action Alternative  
Major Study Airports Arrivals North Flow**

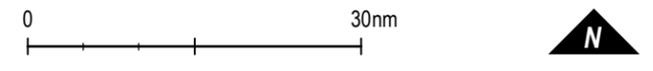




**LEGEND**

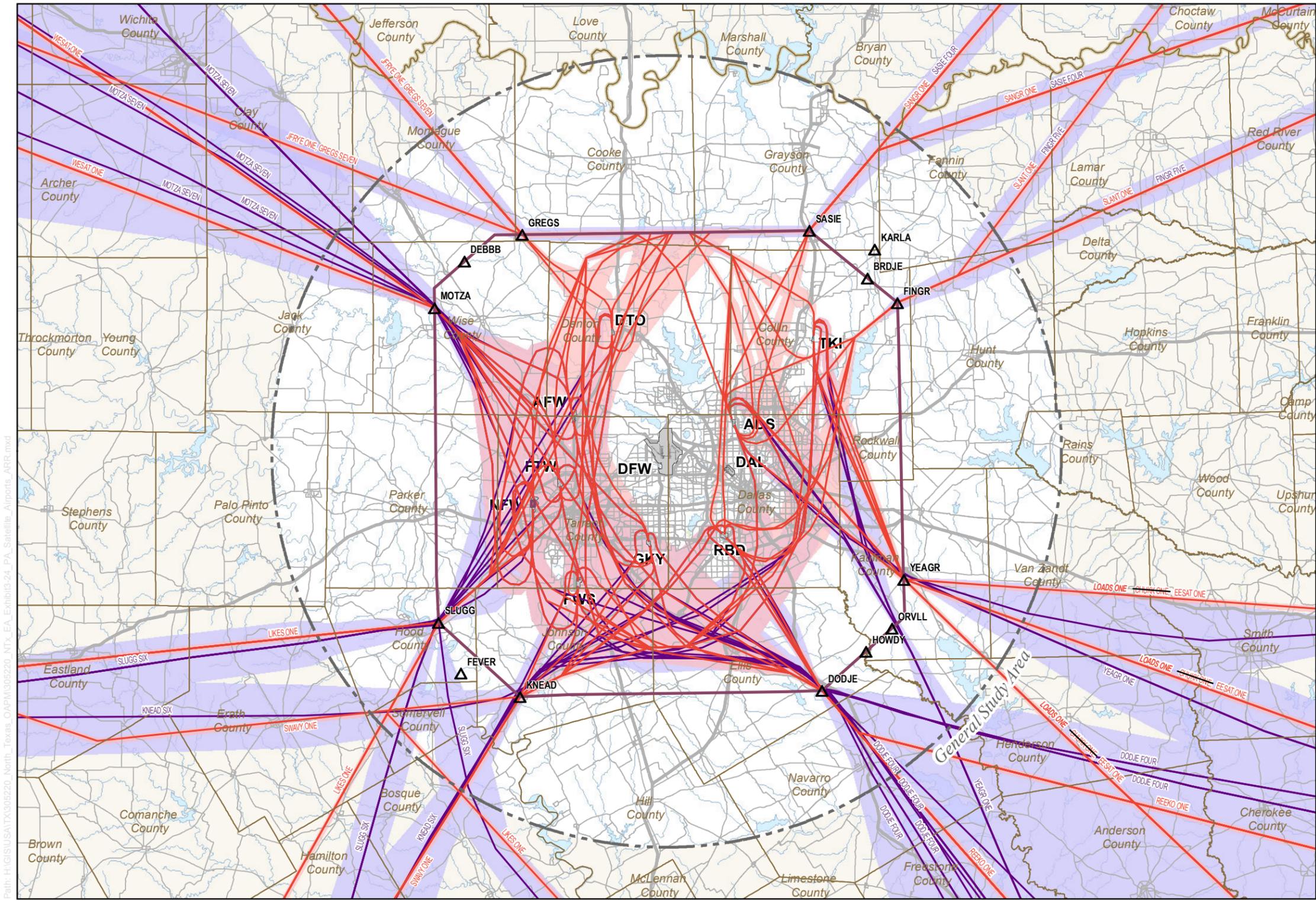
- General Study Area
- Study Airport Area
- D10 TRACON Boundary
- Proposed Action Departure Flow (RNAV)
- Proposed Action Departure Flow (Conventional, Ground tracks unchanged between Existing/No Action/Proposed Action)
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- Floating Fix
- State Boundary
- County Boundary
- Interstate Highway
- Secondary Roads
- Highways
- Water
- River/Stream

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  - FWS - Fort Worth Spinks Airport
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  - NFW - Fort Worth Naval Air Station
  - RBD - Dallas Executive Airport
  - TKI - Collin County Regional Airport at McKinney
- TRACON - Terminal Radar Approach Control  
D10 - Dallas-Fort Worth TRACON  
RNAV - Area Navigation



Data Source: HMMH Analysis 2012 (Study Area Boundary); MITRE (TRACON Boundary); PDARS (Traffic Flow Data); digital - Terminal Procedures Publication (Navigation Fixes); National Atlas(Lakes/Rivers); Environmental Systems Research Institute, Inc.(State/County Boundaries, City Points, Roads, Airport Boundaries)  
Prepared By: Harris Miller Miller & Hanson Inc., August 2013





**LEGEND**

- General Study Area
- Study Airport Area
- D10 TRACON Boundary
- Proposed Action Arrival Flow (RNAV)
- Proposed Action Arrival Flow (Conventional)
- Navigational Fix
- State Boundary
- County Boundary
- Interstate Highway
- Secondary Roads
- Highways
- Water
- River/Stream

Notes:  
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**TKI** - Collin County Regional Airport at McKinney  
  
**TRACON** - Terminal Radar Approach Control  
**D10** - Dallas-Fort Worth TRACON  
**RNAV** - Area Navigation



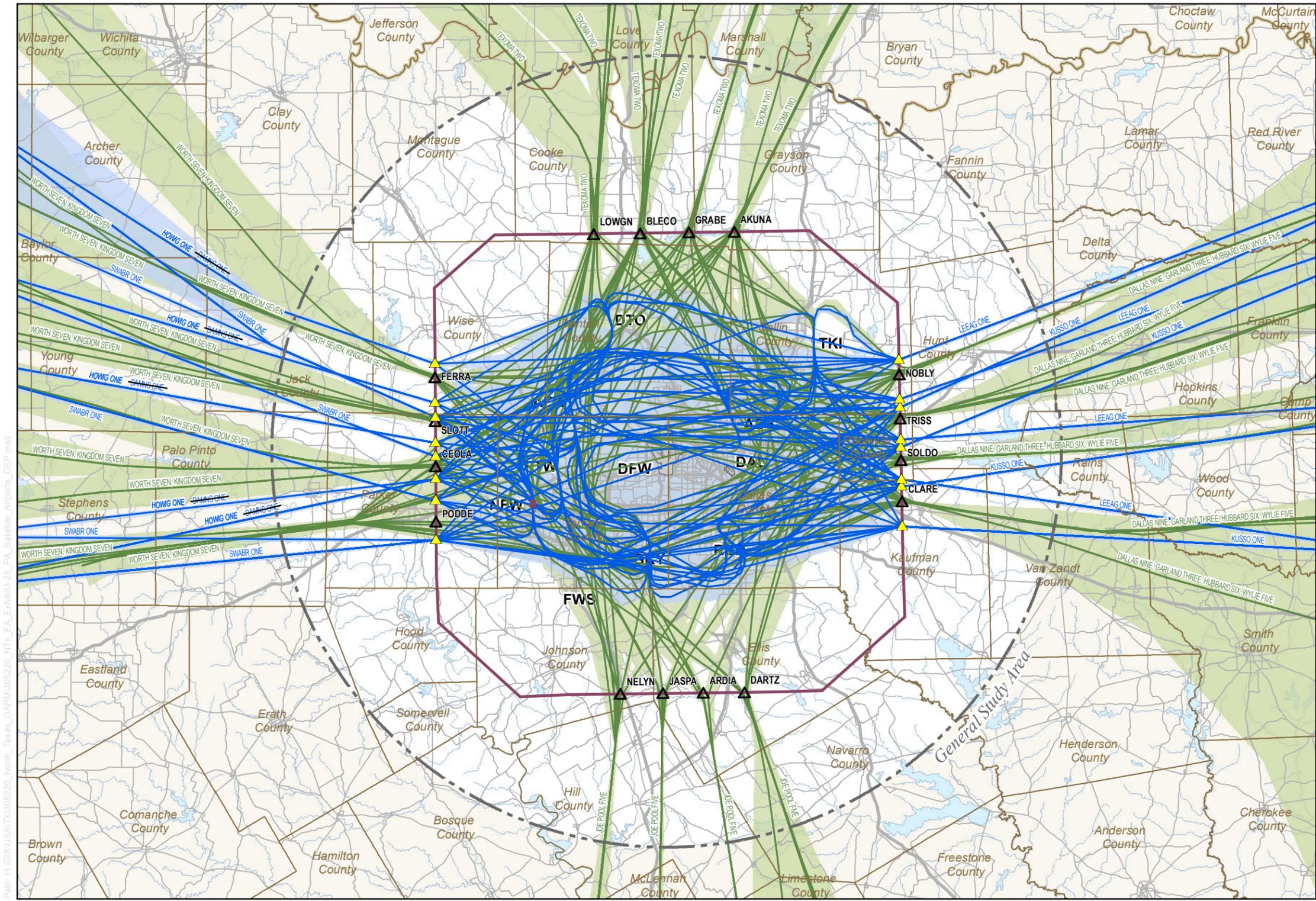
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Data Source: HMMH Analysis 2012 (Study Area Boundary); MITRE (TRACON Boundary); PDARS (Traffic Flow Data); digital - Terminal Procedures Publication (Navigation Fixes); National Atlas (Lakes/Rivers); Environmental Systems Research Institute, Inc. (State/County Boundaries, City Points, Roads, Airport Boundaries)  
 Prepared By: Harris Miller Miller & Hanson Inc., August 2013

Exhibit 3-24

**Proposed Action Alternative  
Satellite Study Airports Arrivals**

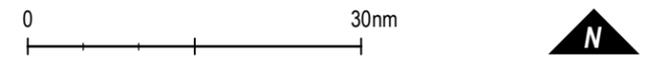




**LEGEND**

- General Study Area
- Study Airport Area
- D10 TRACON Boundary
- Proposed Action Departure Flow (RNAV)
- Proposed Action Departure Flow (Conventional, Ground tracks unchanged between Existing/No Action/Proposed Action)
- Navigational Fix
- Floating Fix
- State Boundary
- County Boundary
- Interstate Highway
- Secondary Roads
- Highways
- Water
- River/Stream

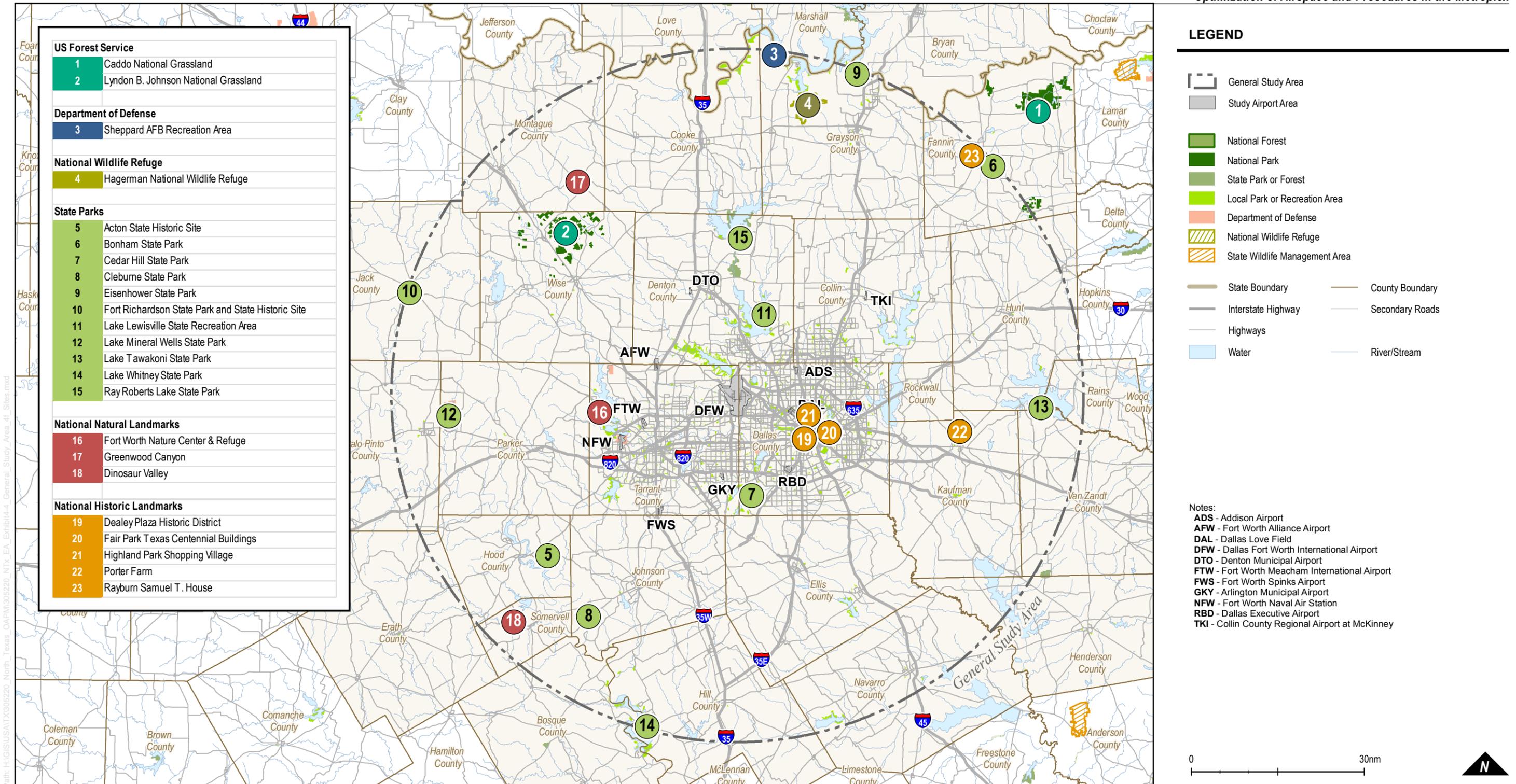
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- TRACON - Terminal Radar Approach Control  
D10 - Dallas-Fort Worth TRACON  
RNAV - Area Navigation



Path: H:\GIS\USATX\305220\_North\_Texas\_OAPM\305220\_NTx\_EA\_Exhibit3-25\_PA\_Satellite\_Airports\_DEP.mxd

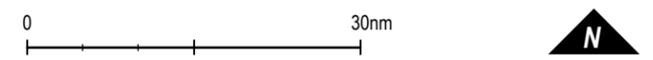
Data Source: HMMH Analysis 2012 (Study Area Boundary); MITRE (TRACON Boundary); PDARS (Traffic Flow Data); digital - Terminal Procedures Publication (Navigation Fixes); National Atlas(Lakes/Rivers); Environmental Systems Research Institute, Inc.(State/County Boundaries, City Points, Roads, Airport Boundaries)  
Prepared By: Harris Miller Miller & Hanson Inc., August 2013





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Notes:  
**ADS** - Addison Airport  
**AFW** - Fort Worth Alliance Airport  
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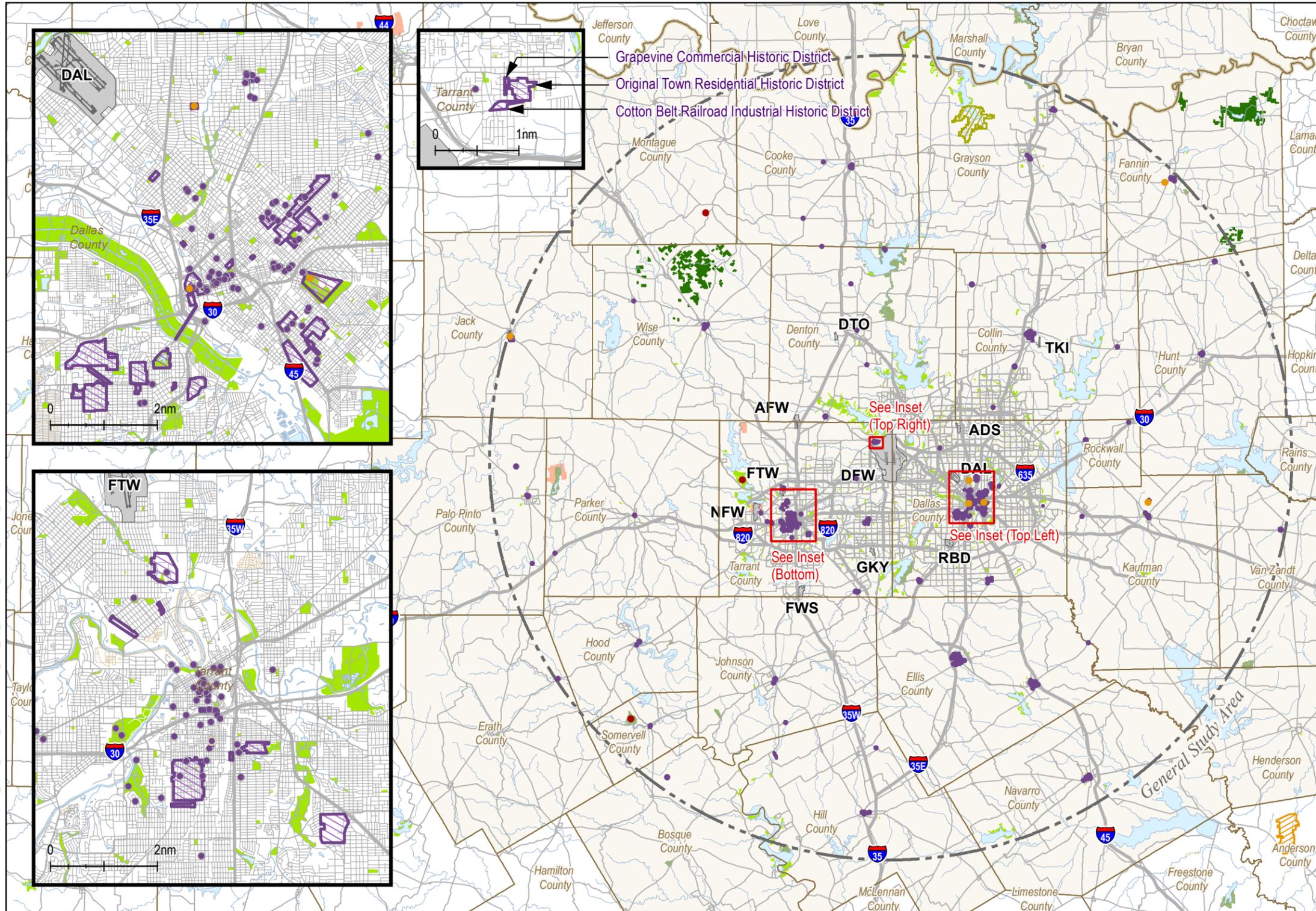


Data Source: National Atlas(Lakes/Rivers), September 10, (Updated); Environmental Systems Research Institute, Inc. (State/County Boundaries, City Points, Roads, Airport Boundaries), May 03, 2012; National Atlas (Wilderness Areas), February 08, 2012; Texas Natural Resource Information System (TNRIS) (Wildlife Management Areas), February 08, 2012; US Fish & Wildlife Service (National Wildlife Refuge), June 13, 2012; United States Dept. of Agriculture (National Forest), May 07, 2012; National Park Service (National Park), February 07, 2012; TNRIS (State Parks or Forest/Local Parks), May 03, 2012; TNRIS (Department of Defense), February 08, 2012; Environmental Systems Research Institute, Inc. (Local Parks (ESRI)), May 03, 2012; **National Registry of Natural Landmarks, (NPS) May 31, 2013**  
 Prepared By: Harris Miller Miller & Hanson Inc., October 2012 August, 2013

Exhibit 4-4

General Study Area 4(f) Sites

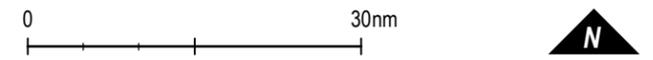




**LEGEND**

- General Study Area
- Study Airport Area
- National Register Historic Place
- National Register Historic District
- National Natural Landmarks
- National Historic Landmarks
- National Forest
- National Park
- State Park or Forest
- Local Park or Recreation Area
- Department of Defense
- National Wilderness Area
- National Wildlife Refuge
- State Wildlife Management Area
- State Boundary
- County Boundary
- Interstate Highway
- Secondary Roads
- Highways
- Water
- River/Stream

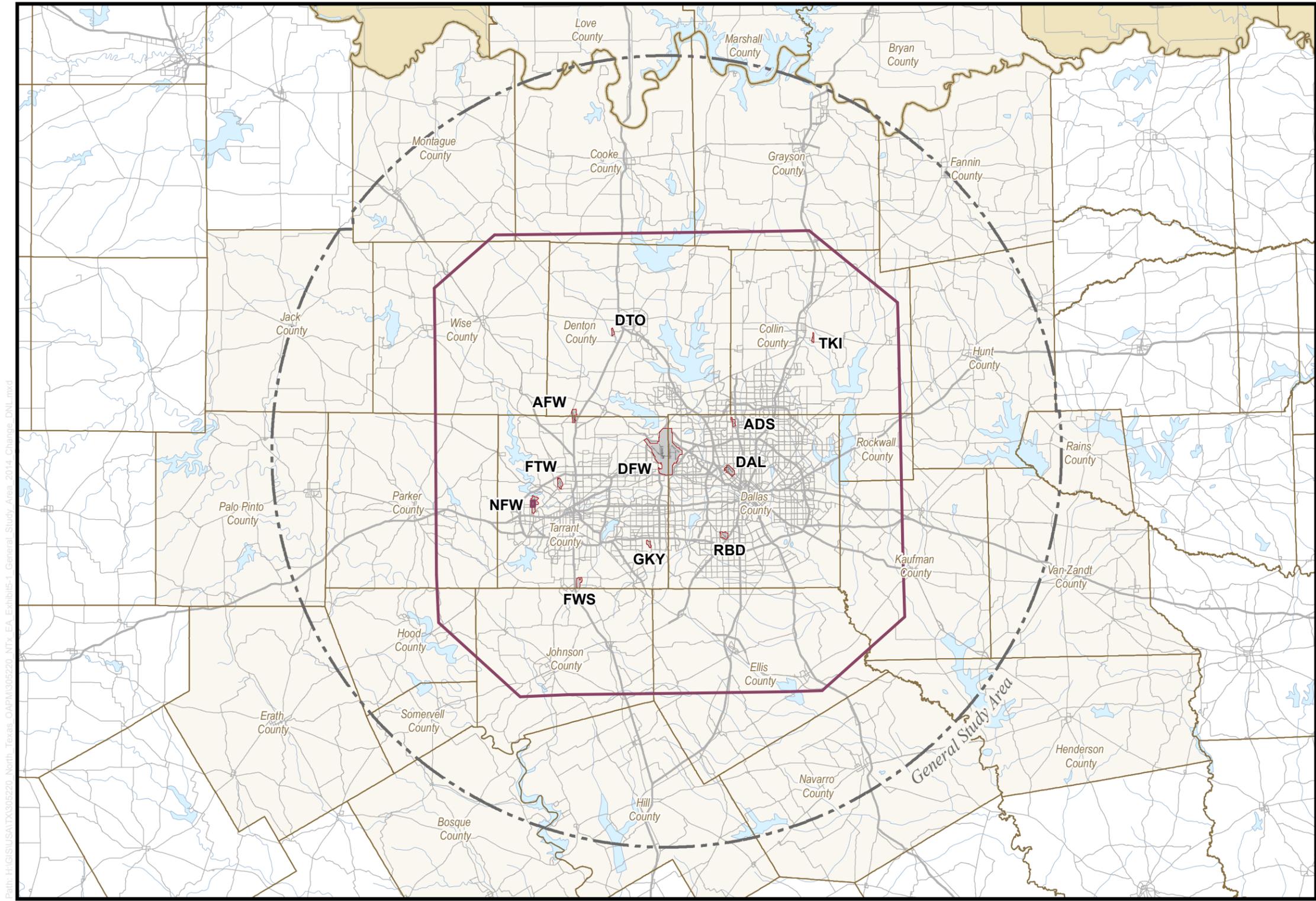
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  - FWS - Fort Worth Spinks Airport
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  - NFW - Fort Worth Naval Air Station
  - RBD - Dallas Executive Airport
  - TKI - Collin County Regional Airport at McKinney



Path: H:\GIS\USAITX\305220\_North\_Texas\_OAPM\305220\_NTx\_EA\_Exhibit4-5\_Historic\_Cultural\_Resources.mxd

Data Source: National Atlas(Lakes/Rivers), September 10, (Updated); Environmental Systems Research Institute, Inc. (State/County Boundaries, City Points, Roads, Airport Boundaries), May 03, 2012; National Atlas (Wilderness Areas), February 08, 2012; Texas Natural Resource Information System (TNRIS) (Wildlife Management Areas), February 08, 2012; US Fish & Wildlife Service (National Wildlife Refuge), June 13, 2012; United States Dept. of Agriculture (National Forest), May 07, 2012; National Park Service (National Park), February 07, 2012; TNRIS (State Parks or Forest/Local Parks), May 03, 2012; TNRIS (Department of Defense), February 08, 2012; Environmental Systems Research Institute, Inc. (Local Parks (ESRI)), May 03, 2012; National Park Service (National Register of Historic Places/Districts), July 3, 2012; Texas Historical Commission (Historic Properties), March 7, 2012; National Registry of Natural Landmarks, (NPS) May 31, 2013  
Prepared By: Harris Miller Miller & Hanson Inc., October 2012 August, 2013

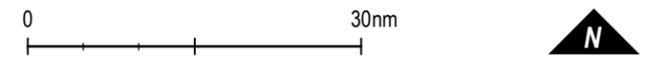




**LEGEND**

- General Study Area
  - Study Airport Boundary
  - TRACON Boundary
- 2014 Change in Noise DNL Levels**
- Noise Increases**
- 1.5 dB or greater for location with a Proposed Action DNL  $\geq$  65 dB
  - 3.0 dB or greater for location with a Proposed Action DNL  $\geq$  60 dB and  $<$  65 dB
  - 5.0 dB or greater for location with a Proposed Action DNL  $\geq$  45 dB and  $<$  60 dB
  - New to DNL 65 dB, but no 1.5 dB increase
- Noise Decrease**
- 1.5 dB for location with a No Action DNL  $\geq$  65 dB
  - 3.0 dB for location with a No Action DNL  $\geq$  60 dB and  $<$  65 dB
  - 5.0 dB for location with a No Action DNL  $\geq$  45 dB and  $<$  60 dB
  - Removed from DNL 65 dB, but no 1.5 dB decrease
- State Boundary
  - County Boundary
  - Interstate Highway
  - Secondary Roads
  - Highways
  - Water
  - River/Stream

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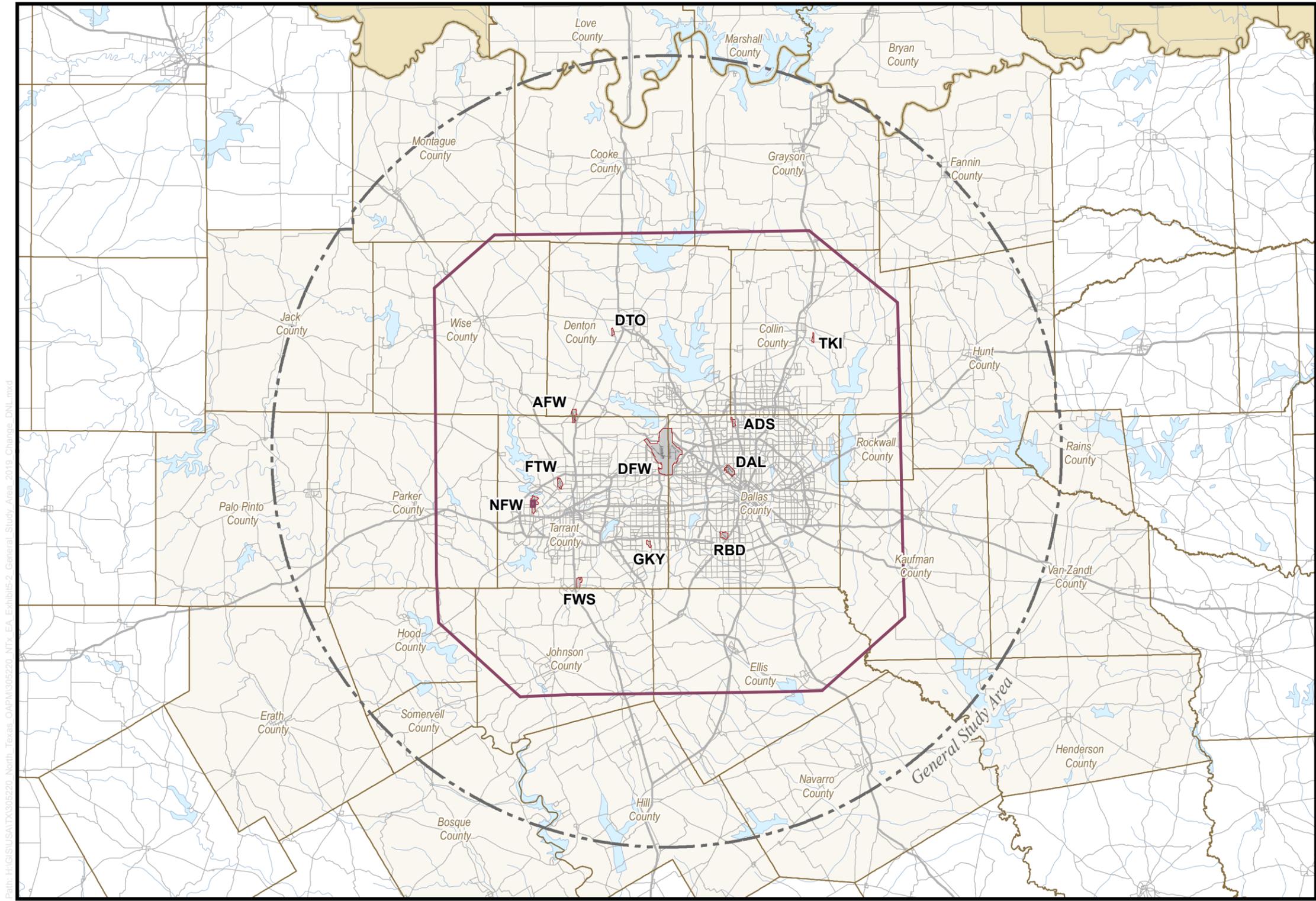


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Data Source: MITRE (TRACON Boundary), August 22, 2012; National Atlas(Lakes/Rivers), September 10, (Updated); Environmental Systems Research Institute, Inc. (State/County Boundaries, Roads, Airport Boundaries), May 03, 2012; United States Census (Census Block Centroids), July 24, 2012; Prepared By: Harris Miller Miller & Hanson Inc., October 2012 August, 2013

**2014 Change of Potential Population  
Exposed to Aircraft Noise  
Proposed Action vs. No Action**

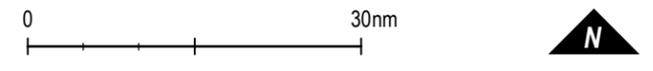




**LEGEND**

- General Study Area
  - Study Airport Boundary
  - TRACON Boundary
- 2019 Change in Noise DNL Levels**
- Noise Increases**
- 1.5 dB or greater for location with a Proposed Action DNL  $\geq$  65 dB
  - 3.0 dB or greater for location with a Proposed Action DNL  $\geq$  60 dB and  $<$  65 dB
  - 5.0 dB or greater for location with a Proposed Action DNL  $\geq$  45 dB and  $<$  60 dB
  - New to DNL 65 dB, but no 1.5 dB increase
- Noise Decrease**
- 1.5 dB for location with a No Action DNL  $\geq$  65 dB
  - 3.0 dB for location with a No Action DNL  $\geq$  60 dB and  $<$  65 dB
  - 5.0 dB for location with a No Action DNL  $\geq$  45 dB and  $<$  60 dB
  - Removed from DNL 65 dB, but no 1.5 dB decrease
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  - GKY - Arlington Municipal Airport
  - NFW - Fort Worth Naval Air Station
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Path: H:\GIS\USATX\305220\_North\_Texas\_OAPM\305220\_NTX\_EA\_Exhibit5-2\_General\_Study\_Area\_2019\_Change\_DNL.mxd

Data Source: MITRE (TRACON Boundary), August 22, 2012; National Atlas(Lakes/Rivers), September 10, (Updated); Environmental Systems Research Institute, Inc. (State/County Boundaries, Roads, Airport Boundaries), May 03, 2012; United States Census (Census Block Centroids), July 24, 2012; Prepared By: Harris Miller Miller & Hanson Inc., October 2012 August, 2013

**2019 Change of Potential Population  
Exposed to Aircraft Noise  
Proposed Action vs. No Action**



### 3.5 Corrections to Appendices

#### Appendix A

On Page A-23 and A-24, the following corrections will be made:

#### A.1.2 Comments Received From the First Announcement

<u>Commenter Name</u>	<u>Agency / Affiliation</u>	<u>Date(s)</u>	<u>Comment</u>	<u>FAA Response</u>	<u>Date(s)</u>
Malone, Patrick	National Park Service – Intermountain Region	5/24/13	NHL and NNL sites within study area, treat as noise sensitive areas, apply Airspace Circular 91-36, identified Ft. Worth Nature Center and Refuge	FAA response letter is included below.  The FAA’s analysis determined that AC91-36 would not apply to this project as AC 91-36 relates to VFR operations and recommends flying over requisite properties above 2000’. To this end, the FAA is not modifying any VFR operations, nor lowering flying altitudes above any NPS property. Please refer to section 5.4.4 <b>5.3.1</b> for more information. Additionally, Wildlife would not be adversely impacted as there are no reportable/significant impacts associated with this project. Refer to section 5.5 for more information.	5/28/13 <b>6/12/13</b>
<i>Ely, Theresa</i>	<i>National Park Service – Intermountain Region</i>	<i>7/09/13</i>	<i>Provided responses to FAA (6/25/13) request for NHL and NNL site clarification.</i>	<i>FAA requested clarification for NHL and NNL sites via letter 6/12/13</i>  <i>Response noted.</i>	<i>6/25/13</i>

On Page A-26, the following corrections will be made:

<u>Commenter Name</u>	<u>Agency / Affiliation</u>	<u>Date(s)</u>	<u>Comment</u>	<u>FAA Response</u>	<u>Date(s)</u>
Deerinwater, Dan	Bureau of Indian Affairs, Southern Plains Office	<del>No date</del> 7/15/13	Reviewed early notification package and determines there are no affected tribal lands within this portion of the study area.	No action required	7/15/13

Page A-47, the following corrections will be made to reflect early outreach letters and FAA responses omitted in the Draft EA Appendix A:

**Copies of FAA Response Letters omitted from Appendix A**

<u>Commenter Name</u>	<u>Agency/Affiliation</u>	<u>Date(s)</u>
Malone, Patrick	National Park Service – Intermountain Region	5/28/13
Ely, Theresa	National Park Service – Intermountain Region	6/25/13

**Copies of Comment Letters omitted from Appendix A**

<u>Commenter Name</u>	<u>Agency/Affiliation</u>	<u>Date(s)</u>
Deerinwater, Dan	BIA, Southern Plains Office	7/15/13
Munkres, James	Osage Tribal Historical Preservation Office	7/16/13



**Re: North Texas OAPM EA - NPS comments**   
**9-ASW-NorthTXOAPMcomment** to: Malone, Patrick

05/28/2013 10:41 AM

Cc: Cheryl Eckhardt, Cindy Felkins, Heather Germaine, "Randy Stanley", Theresa Ely, Tom Keohan, Vicki McCusker  
Bcc: dwasiuk, Laura A. Taylor, Admin-NTX

---

Mr. Malone,

Thank you for your response to the FAA's early consultation package for the North Texas OAPM EA; your response contained information about National Natural Landmarks and National Historic Landmarks in the project area. We will make sure the EA contains the information you provided and includes an environmental impact analysis of the NNL and NHL sites. I have enjoyed several visits to the Fort Worth Nature Center and Refuge since I moved to Texas.

Regarding the national schedule for transition to PBN routes and OPD procedures you mentioned in your letter, the NextGEN Implementation Plan is available at [www.faa.gov/nextgen/implementation](http://www.faa.gov/nextgen/implementation). This site contains the most recent plan, which was published in March 2012, although some of the projects and programs have been delayed by recent budget issues.

We will contact Ms. Ely of your staff with any questions about your letter and will send a copy of the draft EA to your office when it is available in September 2013.

Sincerely,

Daisy Mather  
Environmental Protection Specialist  
FAA. ATO Central Service Center  
Airspace and Procedures South Team  
Operations Support Group, AJV, C22  
2601 Meacham Blvd. (4500 Mercantile Plaza)  
Fort Worth, TX 76137  
9-ASW-NorthTXOAPMcomment  
817-321-7700 (office)  
817-321-7649 (fax)



June 25, 2013

Ms. Theresa Ely  
Soundscape and Night Sky Coordinator  
National Park Service  
Intermountain Region  
12795 W. Alameda Parkway  
Lakewood, CO 80228

**Re: FAA North Texas Optimization of Airspace and Procedures in the Metroplex (OAPM) Draft Environmental Assessment - National Natural Landmarks and National Historic Landmarks**

Dear Theresa:

It was so nice to talk with you today. I appreciate your offer to help with our response to Mr. Malone's May 24, 2013 letter regarding the FAA's early consultation package for the North Texas OAPM EA.

In response to his inquiry about the inclusion of National Natural Landmarks (NNL) and National Historic Landmarks (NHL) in the project area, we have identified a list of potential NNL and NHL locations to be included in and modeled as part of the study area.

National Natural Landmarks:

Site	Year Des.	Address	Latitude	Longitude
Dinosaur Valley State Park	1968	Glen Rose, TX 76043	32.25151	97.8122
Fort Worth Nature Center & Refuge	1980	9601 Fossil Ridge Rd., Fort Worth, TX 76135	32.84483	97.4772
Greenwood Canyon	1975	Greenwood Ln., Forestburg, TX 76239	33.51152	97.5794

National Historic Landmarks:

Site	City	State	Type	Latitude	Longitude
Dealey Plaza Historic District	Dallas	Texas	District	32.778866	96.808439
Fair Park Texas Centennial Buildings	Dallas	Texas	District	32.781401	96.763688
Fort Richardson	Jacksboro	Texas	Building	33.207109	98.163137
Highland Park Shopping Village	Highland Park	Texas	Building	32.835738	96.805609
Porter Farm	Terrell	Texas	Site	32.772912	96.277527
Rayburn Samuel T. House	Bonham	Texas	Building	33.569913	96.207512



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

Air Traffic Organization  
Central Service Center

2601 Meacham Blvd.  
Fort Worth, TX 76137

In an effort to ensure that we identify all properties of interest to the National Parks Service, we would appreciate your assistance in providing any additional locations that have not been identified above. Would you please provide information for them in the following format:

<b>Formal Name</b>	<b>City</b>	<b>State</b>	<b>Type</b>	<b>Latitude</b>	<b>Longitude</b>
--------------------	-------------	--------------	-------------	-----------------	------------------

Or, if we have correctly identified all sites of interest to the NPS within the project study area, please provide your confirmation instead.

Thank you in advance for your assistance. We would appreciate your response by July 12, 2013. If you have any questions, please feel free to contact me.

Sincerely,

DAISY

Daisy Mather  
North Texas OAPM EA Lead

**FAA Central Service Center  
Operations Support Group  
2601 Meacham Boulevard  
Fort Worth, TX 76137  
(817) 321-7700 (tel)  
(817) 321-7649 (fax)  
e-mail: 9-ASW-NorthTXOAPMcomment@faa.gov**



**UNITED STATES DEPARTMENT OF THE INTERIOR**  
**BUREAU OF INDIAN AFFAIRS**  
**SOUTHERN PLAINS REGION**  
**BRANCH OF NATURAL RESOURCES**  
**P.O. BOX 368**  
**ANADARKO, OKLAHOMA 73005**

IN REPLY REFER TO:  
NATURAL RESOURCES (405) 247-6673

JUL 15 2013

Daisy Mather, Environmental Specialist  
FAA Central Service Center  
Operations Support Group  
2601 Meacham Boulevard  
Fort Worth, TX 76137

Dear Ms. Mather:

Thank you for the opportunity to provide input for the development of an Environmental Assessment (EA) for the North Texas Optimization of Airspace and Procedures in the Metorplex (North Texas OAPM) project. We have reviewed the project summary, as well as the maps that were provided, and have determined that there are no tribal or Individual Indian trust lands under the jurisdiction of the Southern Plains Region within the study area of the EA.

We appreciate the opportunity to provide input regarding the development of the EA for the North Texas OAPM project. If any additional information is required, please contact David Anderson, Regional Environmental Scientist at 405-247-1532.

Sincerely,

A handwritten signature in blue ink, appearing to read "David Anderson".

Regional Director



## TRIBAL HISTORIC PRESERVATION OFFICE

**Date:** July 16, 2013

**RE:** FAA North Texas Optimization of Airspace and Procedures in the Metroplex (OAPM), Dallas/FW Metroplex in Oklahoma and Texas

FAA Central Service Center  
Daisy Mather  
2601 Meacham Boulevard  
Fort Worth, TX 76137

Dear Ms. Mather,

The Osage Nation Historic Preservation Office has evaluated your submission and concurs that the proposed FAA North Texas Optimization of Airspace and Procedures in the Metroplex (OAPM), Dallas/FW Metroplex in Oklahoma and Texas most likely will not adversely affect properties of cultural or sacred significance to the Osage Nation. The Osage Nation has no further concern with this project.

In accordance with the National Historic Preservation Act, (NHPA) [16 U.S.C. 470 §§ 470-470w-6] 1966, undertakings subject to the review process are referred to in S101 (d) (6) (A), which clarifies that historic properties may have religious and cultural significance to Indian tribes. Additionally, Section 106 of NHPA requires Federal agencies to consider the effects of their actions on historic properties (36 CFR Part 800) as does the National Environmental Policy Act (43 U.S.C. 4321 and 4331-35 and 40 CFR 1501.7(a) of 1969). **As a part of the scoping process the FAA Central Service Center has fulfilled NHPA and NEPA compliance by consulting with the Osage Nation Historic Preservation Office in regard to the proposed FAA North Texas Optimization of Airspace and Procedures in the Metroplex (OAPM), Dallas/FW Metroplex in Oklahoma and Texas.**

The Osage Nation has vital interests in protecting its historic and ancestral cultural resources. We do not anticipate that this project will adversely impact any cultural resources or human remains protected under the NHPA, NEPA, the Native American Graves Protection and Repatriation Act, or Osage law. **If, however, artifacts or human remains are discovered during project-related activities, we ask that activities cease immediately and the Osage Nation Historic Preservation Office be contacted.**

Should you have any questions or need any additional information please feel free to contact me at the number listed below. Thank you for consulting with the Osage Nation on this matter.

  
James Munkres  
Archaeologist I

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**Appendix B**

On page B-3, the following correction will be made to reflect an additional mailing of the Notice of Availability of the DEA:

**B.4 B.2 Receiving Parties & Draft EA Notification of Availability**

The DRAFT EA is being made available for review at local libraries and on the FAA OAPM project website to the public for 30 calendar days. Concurrent with its release, notification of the document’s availability was provided through two local newspapers: The Dallas Morning News and the Fort Worth Star-Telegram on September 30, 2013, as documented in Appendix A.

The notification of the availability of the DRAFT EA was sent to federal, state and local agencies that have jurisdictional responsibility or an interest in the study. Tables B-3 through B-8 list agencies, elected officials, tribal agencies, study airport managers, North Texas Council of Governments and Dallas City representatives, and Study Area newspapers, respectively, that were notified of the public review period.

***A second notification mailing was undertaken on October 29, 2013 to an additional 175 contacts to increase distribution at the local level around the two major airports.***

On Page B-15, Table B-8 will be added listing the recipients of the additional mailing of the Notice of Availability of the DEA:

**Table B-8 Additional Mailing to Local Agencies around Major Airports**

SAL	LAST NAME	FIRST NAME	TITLE	AGENCY /ORGANIZATION	ADDRESS 1	ADDRESS 2	ADDRESS 3
		<i>Vacant</i>	<i>City Administrator</i>	<i>City of Glen Rose</i>		<i>201 N.E. Vernon</i>	<i>Glen Rose, TX 76043</i>
<i>Mr.</i>	<i>Adams</i>	<i>Tom</i>	<i>City Manager</i>	<i>City of Pilot Point</i>		<i>102 East Main Street</i>	<i>Pilot Point, TX 76258</i>
<i>Mr.</i>	<i>Adel</i>	<i>John</i>	<i>City Administrator</i>	<i>City of Quinlan</i>		<i>104 E. Main Street</i>	<i>Quinlan, TX 75474</i>
<i>Ms.</i>	<i>Almond</i>	<i>Stacey</i>	<i>Interim Town Administrator</i>	<i>Town of Bartonville</i>		<i>1941 East Jeter Road</i>	<i>Bartonville, TX 76226</i>
<i>Mr.</i>	<i>Alsabrook</i>	<i>Carl</i>	<i>City Manager</i>	<i>City of Royse</i>		<i>Municipal Bldg, 305 N. Arch Street</i>	<i>Royse City, TX 75189</i>
<i>Ms.</i>	<i>Anderson</i>	<i>Donna</i>	<i>City Manager</i>	<i>City of Everman</i>		<i>212 North Race Street</i>	<i>Everman, TX 76140</i>
<i>Mr.</i>	<i>Barnes</i>	<i>Mark</i>	<i>City Manager</i>	<i>City of Millsap</i>		<i>208 Fannin</i>	<i>Millsap, TX 76066</i>
<i>Mr.</i>	<i>Barron</i>	<i>Ted</i>	<i>City Manager</i>	<i>City of Mesquite</i>		<i>1515 North Galloway</i>	<i>Mesquite, TX 75185</i>
<i>Ms.</i>	<i>Berghoefer</i>	<i>Oneta</i>	<i>Interim City Administrator / City Secretary</i>	<i>City of Runaway Bay</i>		<i>101 Runaway Bay Drive</i>	<i>Runaway Bay, TX 76426</i>

*Environmental Assessment for North Texas  
Optimization of Airspace and Procedures in the Metroplex*

SAL	LAST NAME	FIRST NAME	TITLE	AGENCY /ORGANIZATION	ADDRESS 1	ADDRESS 2	ADDRESS 3
Mr.	Berzina	Jim	Acting City Manager	City of Corinth		3300 Corinth Pkwy.	Corinth, TX 76208
Mr.	Blaisdell	Jerry	City Manager	City of Weatherford		303 Palo Pinto Street	Weatherford, TX 76086
Ms.	Bolyard	Karen	City Administrator	City of Sansom Park		5705 Azle Avenue	Fort Worth, TX 76114
Mr.	Borg	Derek	City Manager	City of Princeton		123 W. Princeton Drive	Princeton, TX 75407
Mr.	Bradford	Bryan	Assistant City Manager	City of Garland		200 North Fifth Street	Garland, TX 75046-9002
Ms.	Bradley	Susan	City Administrator/City Secretary	City of Krugerville		5097 Highway 377	Krugerville, TX 76227
Mr.	Brice	Michael	City Manager	City of Sanger		502 Elm Street	Sanger, TX 76266
Mr.	Brooks	Brian	City Manager	City of Forney		101 E. Main	Forney, TX 75126
Mr.	Bryant	Lawrence	Assistant City Manager	City of Azle		613 Southeast Parkway	Azle, TX 76020
Mr.	Brymer	Thomas E.	Town Manager	Town of Westlake		3 Village Circle, Ste. 202	Westlake, TX 76262
Ms.	Buchanan	Dianna	Town Administrator	Town of Lakeside		9830 Confederate Park Road	Fort Worth, TX 76108
Mr.	Buck	Travis	City Administrator	City of Grandview		304 East Criner Street	Grandview, TX 76050
Mr.	Burgess	David	Town Administrator/Police Chief	Town of Westover Hills		5824 Merrymount Road	Fort Worth, TX 76107
Mr.	Burn	Dennis	City Manager	City of Ferris		100 Town Plaza	Ferris, TX 75125
Mr.	Butler	David	City Administrator/Code Enforcement	City of McLendon-Chisholm		1248 South Highway 205	Rockwall, TX 75032
Mr.	Cabrales	John	Assistant City Manager	City of Denton		215 East McKinney	Denton, TX 76201
Mr.	Campbell	Scott	City Manager	City of Roanoke		108 S. Oak Street	Roanoke, TX 76262
Mr.	Campbell	George	City Manager	City of Denton		215 East McKinney	Denton, TX 76201
Mr.	Caruthers	Clay	Assistant City Manager	City of Hurst		1505 Precinct Line Road	Hurst, TX 76054
Mr.	Chandler	Clayton	City Manager	City of Mansfield		1200 East Broad Street	Mansfield, TX 76063
Mr.	Cheatham	Dale	City Manager	City of Burleson		141 West Renfro	Burleson, TX 76028-4296
Mr.	Clayton	Marc	City Manager	City of Commerce		1119 Alamo Street	Commerce, TX 75428
	Manager	City		City of Cockrell Hill		4125 W. Clarendon Drive	Cockrell Hill, Texas. 75211

SAL	LAST NAME	FIRST NAME	TITLE	AGENCY /ORGANIZATION	ADDRESS 1	ADDRESS 2	ADDRESS 3
Mr.	Contreras	Greg	City Manager	City of Duncanville		203 East Wheatland Road	Duncanville, TX 75138-0280
Mr.	Corn	Drew	Town Administrator	Town of Northlake		1400 FM 407	Northlake, TX 76247
Ms.	Couch	Julia	Town Manager	Town of Fairview		372 Town Place	Fairview, TX 75069
Mr.	Crowley	Rick	City Manager	City of Rockwall		385 S. Goliad	Rockwall, TX 75087
Mr.	Davis	Clint	City Manager	City of Alvarado		104 West College	Alvarado, TX 76009
Mr.	Dick	Chris	Assistant City Manager/Director of Finance	City of Midlothian		104 West Avenue E	Midlothian, TX 76065
Mr.	DiMaggio	Vince	Town Manager	Town of Sunnyvale		127 Collins Road	Sunnyvale, TX 75182
Mr.	Dittman	Jerry	Assistant City Manager	City of Mesquite		1515 North Galloway	Mesquite, TX 75185
Mr.	Dollar	William E.	City Manager	City of Garland		200 North Fifth Street	Garland, TX 75046-9002
Mr.	Ebrahim	Massoud	Interim City Manager	City of Greenville		2821 Washington	Greenville, TX 75403-1049
Ms.	Edwards	Torry	City Manager	City of Terrell		201 Nash Street	Terrell, TX 75160
Mr.	Emmons	Brandon	City Administrator	City of Bridgeport		900 Thompson Street	Bridgeport, TX 76426
Mr.	Esquivel	David	Assistant City Manager / Dir. of Public Works	City of Cleburne		10 North Robinson	Cleburne, TX 76033-0677
Ms.	Fadden	Jennifer	City Manager	City of Colleyville		100 Main Street	Colleyville, TX 76034
Mr.	Fisher	James	City Manager	City of Murphy		206 North Murphy Road	Murphy, TX 75094
Mr.	Flanigan	Jeff	City Administrator/Public Works Dir.	City of Parker		5700 East Parker Road	Parker, TX 75002
Mr.	Foreman	Mike	City Manager	City of Celina		142 N. Ohio Street	Celina, TX 75009
Mr.	Fox	Sean	City Manager	Town of Pantego		1614 South Bowen Road	Pantego, TX 76013-3215
Mr.	Fuller	Todd	City Manager	City of Red Oak		200 Lakeview Parkway	Red Oak, TX 75154
Mr.	Funderburk	Brian	Interim City Manager/Interim HR Dir.	City of Rowlett		4000 Main Street	Rowlett, TX 75088
Mr.	George	William (Billy)	City Manager	City of Sachse		3815 B Sachse Road	Sachse, TX 75048
Mr.	Glasscock	Bruce	City Manager	City of Plano		1520 Avenue K	Plano, TX 75086-0358
Mr.	Gonzalez	A.C.	Interim City Manager	City of Dallas		1500 Marilla Street	Dallas, TX 75201

SAL	LAST NAME	FIRST NAME	TITLE	AGENCY /ORGANIZATION	ADDRESS 1	ADDRESS 2	ADDRESS 3
Mr.	Gonzalez	Tomas "Tommy"	City Manager	City of Irving		825 West Irving Boulevard	Irving, TX 75015-2288
Mr.	Goodwin	Connie	Town Administrator	Town of Talty		9550 Helms Trail, Suite 500	Forney, TX 75126
Mr.	Graves	Larry	City Manager	City of Seagoville		702 North Highway 175	Seagoville, TX 75159
Mr.	Gray	Jason	City Manager	City of McKinney		222 North Tennessee Street	McKinney, TX 75070
Mr.	Greer	Gary D.	City Manager	City of Farmers Branch		City Hall Plaza, 13000 Wm Dodson Pkwy	Farmers Branch, TX 75381
Mr.	Gregory	Marvin	City Administrator	City of River Oaks		4900 River Oaks Blvd.	Fort Worth, TX 76114
Ms.	Griffith	Beverly	City Manager	City of Bedford		2000 Forest Ridge Drive	Bedford, TX 76021
Mr.	Guinn	Bill	City Administrator	City of Keene		100 North Mockingbird	Keene, TX 76059
Mr.	Hamilton	John	City Administrator	City of Boyd		100 East Rock Island Avenue	Boyd, TX 76023
Mr.	Hamon	Don	Interim City Manager	City of Balch Springs		3117 Hickory Tree Road	Balch Springs, TX 75180
Mr.	Hart	Bob	City Manager	City of Kennedale		405 Municipal Drive	Kennedale, TX 76060-0268
Mr.	Hart	Tom	City Manager	City of Grand Prairie		317 College Street	Grand Prairie, TX 75053-4045
Ms.	Hartman	Paulette	City Manager	City of Joshua		101 South Main	Joshua, TX 76058
Mr.	Hastings	Don	City Manager	City of Midlothian		104 West Avenue E	Midlothian, TX 76065
Mr.	Hawk	Curtis	City Manager	City of Richland Hills		3200 Diana Drive	Richland Hills, TX 76118
Mr.	Higgins	Tom	City Manager	City of Fort Worth		1000 Throckmorton Street	Fort Worth, TX 76102
Mr.	Hindman	Mark	City Manager	City of North Richland Hills		7301 N.E. Loop 820	North Richland Hills, TX 76182
Ms.	Hodges	Stephanie	City Administrator	City of Godley		200 W. Railroad	Godley, TX 76044
Mr.	Holden	Rick	City Manager	City of Cleburne		10 North Robinson	Cleburne, TX 76033-0677
Mr.	Howerton	Lance	City Manager	City of Mineral Wells		115 S.W. 1st Street	Mineral Wells, TX 76068
Mr.	Howerton	Steve	City Manager	City of Ennis		115 West Brown	Ennis, TX 75120
Ms.	Ipaye, CPM	Shey	City Manager	City of Forest Hill		3219 E. California Pkwy.	Forest Hill, TX 76140-7101
Ms.	Jackson	Paula	Assistant to the City Manager	City of Farmersville		205 South Main Street	Farmersville, TX 75442

SAL	LAST NAME	FIRST NAME	TITLE	AGENCY /ORGANIZATION	ADDRESS 1	ADDRESS 2	ADDRESS 3
Mr.	Jefferson	Harlan L.	Town Manager	Town of Prosper		121 W. Broadway	Prosper, TX 75078
Mr.	Jenkins	Jeff	City Manager	City of Lucas		665 Country Club	Lucas, TX 75002
Mr.	Johnson	Dan	City Manager	City of Richardson		411 West Arapaho Road	Richardson, TX 75083
Mr.	Jump	Mike	City Manager	City of Caddo Mills		2313 Main Street	Caddo Mills, TX 75135
Mr.	Kaiser	Mark	City Administrator	City of Stephenville		298 W. Washington	Stephenville, TX 76401
Ms.	Kelly	Toni	City Administrator	City of Aurora		303 Derting Road	Aurora, TX 76078
Mr.	King	Claude	City Manager	City of Lewisville		151 West Church	Lewisville, TX 75029-9002
Mr.	Krey	Mark	City Administrator	City of Springtown		102 East Second Street	Springtown, TX 76082
Mr.	Lawler	Patrick	City Administrator	City of Hudson Oaks		210 N. Lakeshore Drive	Hudson Oaks, TX 76087
Mr.	Leavitt	Michael	City Manager	City of Highland Village		1000 Highland Village Road	Highland Village, TX 75077
Mr.	Lemin	Craig	City Manager	City of Azle		613 Southeast Parkway	Azle, TX 76020
Ms.	Lewallen	Brenda	City Administrator/City Secretary	City of Hackberry		119 B-7 Maxwell Road	Frisco, TX 75034
Ms.	Lewis	Trudy	City Manager	City of Glenn Heights		1938 South Hampton	Glenn Heights, TX 75154
Mr.	Lindley	Bill	Town Administrator	Town of Highland Park		4700 Drexel Drive	Highland Park, TX 75205
Mr.	Little	Jason	City Manager	City of Melissa		3411 Barker Avenue	Melissa, TX 75454
Mr.	Livingston	Bob	City Manager	City of University Park		3800 University Boulevard	University Park, TX 75205
Mr.	Loftin	Robert	Interim City Manager	City of Crowley		201 E. Main Street	Crowley, TX 76036
Mr.	Mangum	Roger	Town Administrator/Police Chief	Town of Hickory Creek		1075 Ronald Reagan Avenue	Hickory Creek, TX 75065
Ms.	Manson	Mindy	City Manager	City of Wylie		300 Country Club Road	Wylie, TX 75098
Mr.	Martin	Leonard	City Manager	City of Carrollton		1945 E. Jackson Road	Carrollton, TX 75011-0535
Ms.	Mauldin-Robertson	Opal	City Manager	City of Lancaster		211 North Henry Street	Lancaster, TX 75146-0940
Mr.	Maurina	Tod	Assistant City Manager	City of The Colony		6800 Main Street	The Colony, TX 75056

SAL	LAST NAME	FIRST NAME	TITLE	AGENCY /ORGANIZATION	ADDRESS 1	ADDRESS 2	ADDRESS 3
Mr.	McGuire	Brett E.	City Manager	City of Lake Worth		3805 Adam Grubb	Lake Worth, TX 76135
Mr.	McKamie	Gary	City Manager	City of Euless		201 North Ector Drive	Euless, TX 76039
Mr.	McKethan	Wayne	City Manager/Director of Finance	City of Granbury		116 West Bridge Street	Granbury, TX 76048
Mr.	Miller	Tim	Assistant City Manager	City of The Colony		6800 Main Street	The Colony, TX 75056
Mr.	Mousel	Douglas	City Manager	City of Oak Point		100 Naylor Road	Oak Point, TX 75068
Mr.	Mueller	Matt	Town Manager	Town of Little Elm		100 W. Eldorado Parkway	Little Elm, TX 75068
Mr.	Muir	Tom	City Manager	City of Haltom City		5024 Broadway Avenue	Haltom City, TX 76117
Ms.	Murdock	Teri D.	City Administrator	City of Italy		101 West Main Street	Italy, TX 76651
Ms.	Nilssen	Kathryn	City Administrator	City of Pecan Hill		1094 S. Lowrance Road	Pecan Hill, TX 75154-7626
Mr.	Pfeifer	Ken	City Administrator	City of Aledo		200 Old Annetta Road	Aledo, TX 76008
Mr.	Phillips	Clay	City Manager	City of Coppell		255 Parkway Boulevard	Coppell, TX 75019
Mr.	Polasek	Steve	City Manager	City of Keller		1100 Bear Creek Pkwy.	Keller, TX 76244-0770
Mr.	Powell	Troy C.	City Manager	City of The Colony		6800 Main Street	The Colony, TX 75056
Ms.	Powell	Cyndy	City Administrator	City of Ovilla		105 Cockrell Hill Road, #2	Ovilla, TX 75154
Mr.	Purefoy	George	City Manager	City of Frisco		6101 Frisco Square Blvd.	Frisco, TX 75034
Mr.	Quin	James	City Administrator	City of Haslet		101 Main Street	Haslet, TX 76052
Ms.	Rasor	Diane	City Administrator	City of Newark		209 Hudson Street	Newark, TX 76071
Mr.	Reed	Jerry	City Administrator	City of Venus		105 U.S. 67	Venus, TX 76084
Mr.	Richardson, PhD	Tarron J.	City Manager	City of DeSoto		211 E. Pleasant Run Road, Suite A	DeSoto, TX 75115-3939
Mr.	Ristagno	Nick	Interim City Manager/Police Chief	City of Lake Dallas		212 Main Street	Lake Dallas, TX 75065
Mr.	Ritchie	Katherine	Town Administrator	Town of Cross Roads		1401 FM 424	Cross Roads, TX 76227
Ms.	Roberts	Susan	City Administrator	City of West Tawakoni		1533 East Highway 276	West Tawakoni, TX 75474
Ms.	Roberts	Tonya	City Administrator/City Secretary	City of Rice		205 East Calhoun	Rice, TX 75155

SAL	LAST NAME	FIRST NAME	TITLE	AGENCY /ORGANIZATION	ADDRESS 1	ADDRESS 2	ADDRESS 3
Mr.	Rodriguez	Philip	City Manager	City of Fate		105 Fate Main Place	Fate, TX 75132
Mr.	Rumbelow	Bruno	City Manager	City of Grapevine		200 South Main Street	Grapevine, TX 76099
Ms.	Ryan	Linda	City Manager	City of White Settlement		214 Meadow Park Drive	White Settlement, TX 76108
Mr.	Sanders	Philip	City Manager	City of Anna		101 N. Powell Parkway	Anna, TX 75409
Mr.	Seidel	Stephen	Assistant Town Manager	Town of Trophy Club		100 Municipal Drive	Trophy Club, TX 76262
Mr.	Shaffstall	Matt	City Administrator	City of Willow Park		516 Ranch House Road	Willow Park, TX 76087
Mr.	Shannon	Brett	City Manager	City of Decatur		P.O. Box 1299	Decatur, TX 76234
Mr.	Sims	Alan E.	City Manager	City of Cedar Hill		285 Uptown Blvd., Bldg. 100	Cedar Hill, TX 75104
Mr.	Slye	Mike	Town Manager	Town of Trophy Club		100 Municipal Drive	Trophy Club, TX 76262
Mr.	Snow	Curtis	City Manager	City of Kaufman		209 South Washington	Kaufman, TX 75142
Ms.	Standridge	Connie	City Manager	City of Corsicana		200 North 12th Street	Corsicana, TX 75110
Ms.	Stanford	Nan	City Manager	City of Saginaw		400 S. Saginaw Blvd.	Saginaw, TX 76179-0070
Mr.	Stathatos	Jimmy	Town Manager/CFO	Town of Flower Mound		2121 Cross Timbers Road	Flower Mound, TX 75028
Ms.	Stathatos	Ashley	City Manager	City of Justin		415 North College	Justin, TX 76247
Mr.	Stevens	Paul	City Manager	City of Waxahachie		401 S. Rogers	Waxahachie, TX 75165
Mr.	Strong	Eric	Assistant City Manager	City of Richland Hills		3200 Diana Drive	Richland Hills, TX 76118
Mr.	Thatcher	Ed	City Manager	City of Heath		200 Laurence Drive	Heath, TX 75032
Mr.	Unger	Roger	City Administrator	City of Westworth Village		311 Burton Hill Road	Westworth Village, TX 76114-4222
Mr.	Vargas	Peter H.	City Manager	City of Allen		305 Century Parkway	Allen, TX 75013
Mr.	Vick	Greg	City Manager	City of Watauga		7105 Whitley Road	Watauga, TX 76148
Mr.	Wall	L. Scott	City Manager	City of Crandall		110 South Main Street	Crandall, TX 75114
Mr.	Wayman	Andy	City Manager	City of Benbrook		911 Winscott Road	Benbrook, TX 76126
Mr.	Weegar	Allan	City Manager	City of Hurst		1505 Precinct Line Road	Hurst, TX 76054
Ms.	Welsh	Donna	Town Administrator	Town of Copper Canyon		400 Woodland Drive	Copper Canyon, TX 75077

Environmental Assessment for North Texas  
Optimization of Airspace and Procedures in the Metroplex

SAL	LAST NAME	FIRST NAME	TITLE	AGENCY /ORGANIZATION	ADDRESS 1	ADDRESS 2	ADDRESS 3
Mr.	West	Charles	Town Manager	Town of Argyle		308 Denton St.	Argyle, TX 76226
Mr.	Wheat	Denny	City Administrator	City of Wilmer		128 North Dallas Avenue	Wilmer, TX 75172
Mr.	White	Ben	City Manager	City of Farmersville		205 South Main Street	Farmersville, TX 75442
Mr.	Whitehead	Ron	City Manager	Town of Addison		5300 Belt Line Road	Addison, TX 75254
Mr.	Whitehead	James	City Administrator	City of Kemp		304 South Main Street	Kemp, TX 75143
Ms.	Whitley	Debbie	Assistant City Manager/Dir. Finance	City of Lake Worth		3805 Adam Grubb	Lake Worth, TX 76135
Ms.	Wooldridge	Nancy	Interim City Manager	City of Dublin		213 East Blackjack Street	Dublin, TX 76446
Ms.	Yelverton	Shana	City Manager	City of Southlake		1400 Main Street	Southlake, TX 76092
Mr.	Yelverton	Trey	City Manager	City of Arlington		101 W. Abram Street	Arlington, TX 76010
Mr.	Young	Doug	City Administrator	City of Palmer		113 West Jefferson	Palmer, TX 75152
Ms.	Muller	Pamela	Deputy Mayor Pro Tem	City of Southlake	Southlake City Hall	1400 Main Street, Ste 270	Southlake, TX 76092
Ms.	Payne	Lori	Executive Secretary	City of Southlake	City Manager's Office	1400 Main Street, Ste 460	Southlake, TX 76092
Mr.	Livingston	Bob	City Manager	University Park		3800 University Blvd.	University Park, TX 75205
Mr.	Adkinson	Jack	Chair	NAS Ft. Worth JRB - RCC		737 Merritt	River Oaks, TX 76114
Mr.	Skinner	Randy	Vice-Chair	NAS Ft. Worth JRB - RCC	Planning Mgr. Tarrant Co.	100 East Weatherford, Suite 401	Ft. Worth, TX 76196
Mr.	McGuire	Brett	Secretary	NAS Ft. Worth JRB - RCC	City Mgr., City of Lake Worth	3805 Adam Grubb	Lake Worth, TX 76135
Mr.	Arnold	Mike	Member	NAS Ft. Worth JRB - RCC	City of White Settlement	214 Meadow Park Dr.	White Settlement, TX 76108
Hon	Barnett, Jr.	Jim	Member	NAS Ft. Worth JRB - RCC	City of Sansom Park	5500 Buchanan St.	Fort Worth, TX 76114
Ms.	Bolyard	Karen	Member	NAS Ft. Worth JRB - RCC	City of Sansom Park	5500 Buchanan St.	Fort Worth, TX 76114
Mr.	Crews	Joe	Member	NAS Ft. Worth JRB - RCC	City of River Oaks	4650 Barbara Rd.	River Oaks, TX 76114
Mr.	Gattis	Dave	Member	NAS Ft. Worth JRB - RCC	City of Benbrook	911 Winscott Rd.	Benbrook, TX 76126
Mr.	Paine	Paul	Member	NAS Ft. Worth JRB - RCC	Fort Worth South, Inc.	1606 Mistletoe Blvd.	Fort Worth, TX 76104
Mr.	Ryan	Jim	Member	NAS Ft. Worth	City of White	214 Meadow Park Dr.	White Settlement, TX

SAL	LAST NAME	FIRST NAME	TITLE	AGENCY /ORGANIZATION	ADDRESS 1	ADDRESS 2	ADDRESS 3
				<i>JRB - RCC</i>	<i>Settlement</i>		<i>76108</i>
<i>Mr.</i>	<i>Sauma</i>	<i>Ron</i>	<i>Member</i>	<i>NAS Ft. Worth JRB - RCC</i>	<i>City of Benbrook</i>	<i>911 Winscott Rd.</i>	<i>Benbrook, TX 76126</i>
<i>Mr.</i>	<i>Shingleton</i>	<i>Dennis</i>	<i>Member</i>	<i>NAS Ft. Worth JRB - RCC</i>	<i>City of Ft. Worth</i>	<i>1000 Throckmorton</i>	<i>Fort Worth, TX 76102</i>
<i>Mr.</i>	<i>Townsend</i>	<i>Steve</i>	<i>Member</i>	<i>NAS Ft. Worth JRB - RCC</i>	<i>Tarrant Co - Precinct 4</i>	<i>6713 Telephone Rd</i>	<i>Fort Worth, TX 76135</i>
<i>Mr.</i>	<i>Unger</i>	<i>Roger</i>	<i>Member</i>	<i>NAS Ft. Worth JRB - RCC</i>	<i>City of Westworth Village</i>	<i>311 Burton Hill Rd</i>	<i>Westworth Village, TX 76114</i>
<i>Ms.</i>	<i>Whitely</i>	<i>Debbie</i>	<i>Member</i>	<i>NAS Ft. Worth JRB - RCC</i>	<i>City of Lake Worth</i>	<i>3805 Adam Grubb</i>	<i>Lake Worth, TX 76135</i>
<i>Hon</i>	<i>Yeager</i>	<i>Tony</i>	<i>Member</i>	<i>NAS Ft. Worth JRB - RCC</i>	<i>City of Westworth Village</i>	<i>311 Burton Hill Rd</i>	<i>Westworth Village, TX 76114</i>

### Appendix C

On page C-2, the following addition will be made at number 25 in the list and all subsequent entry numbers will increase by one.

**25. Historic Sites Act of 1935 (Public Law 74-292) (16 U.S.C. 461 et seq.) as amended (2012)**

### Appendix F

On page F-11, the following correction will be made in response to a National Park Service comment (email: T. Whittington Nov 20, 2013):

Type of Resource	Location						2011	dB					
	Site Name	Gridpoint Location ID	State	Area (Acres)	Latitude	Longitude		E.C.	2014	2019			
								N.A.	P.A.	Change	N.A.	P.A.	Change
National Natural <b>Historic</b> Landmark	Dealey Plaza Historic District	NNL_1_Dealey	Texas	15	32.778866	-96.808439	52.3	52.5	52.4	-0.1	53.3	53.2	-0.1

On page F-13, the following correction will be made:

Type of Resource	Location						2011	dB					
	Site Name	Gridpoint Location ID	State	Area (Acres)	Latitude	Longitude		E.C.	2014	2019			
								N.A.	P.A.	Change	N.A.	P.A.	Change
National Natural <b>Historic</b> Landmark	Fair Park Texas Centennial Buildings	NNL_2_FairPa	Texas	277	32.781401	-96.763688	53.7	54.0	54.3	0.3	54.0	54.3	0.3

On page F-14, the following correction will be made:

Type of Resource	Location						2011	dB				2019	
	Site Name	Gridpoint Location ID	State	Area (Acres)	Latitude	Longitude		E.C.	N.A.	P.A.	Change		N.A.
National Natural <b>Historic</b> Landmark	Fort Richardson	NNL_3_FortRi	Texas	380.8	33.207109	-98.163137	41.2	41.4	38.3	-3.1	41.6	38.5	-3.1

On page F-17, the following correction will be made:

Type of Resource	Location						2011	dB				2019	
	Site Name	Gridpoint Location ID	State	Area (Acres)	Latitude	Longitude		E.C.	N.A.	P.A.	Change		N.A.
National Natural <b>Historic</b> Landmark	Highland Park Shopping Village	NNL_4_Highla	Texas	10	32.835738	-96.805609	50.6	50.9	50.4	-0.5	51.8	51.3	-0.5

On page F-34, the following correction will be made:

Type of Resource	Location						2011	dB				2019	
	Site Name	Gridpoint Location ID	State	Area (Acres)	Latitude	Longitude		E.C.	N.A.	P.A.	Change		N.A.
National Natural <b>Historic</b> Landmark	Porter Farm	NNL_5_Porter	Texas	70	32.772912	-96.277527	42.6	42.8	42.8	0.0	43.1	43.2	0.1

On page F-37, the following correction will be made:

Type of Resource	Location						2011	dB					
	Site Name	Gridpoint Location ID	State	Area (Acres)	Latitude	Longitude		E.C.	N.A.	P.A.	Change	N.A.	P.A.
National Natural <b>Historic</b> Landmark	Rayburn Samuel T. House	NNL_6_Raybur	Texas	2.5	33.569913	-96.207512	30.9	31.0	26.9	-4.1	31.4	28.2	-3.2

### Appendix G

On page G-8, the following correction will be made:

Grid Point Location ID	Location						2011	dB					
	Site Name	Address	State	Area (Acres)	Latitude	Longitude		E.C.	N.A.	P.A.	Change	N.A.	P.A.
NNL_1_Dealey <b>NHL_1_Dealey</b>	Dealey Plaza Historic District	Roughly bounded by Pacific Ave., Market St., Jackson St. and right of way of Dallas Right of Way Management Company	Texas	15	32.778866	-96.808439	52.3	52.5	52.4	-0.1	53.3	53.2	-0.1

On page G-9, the following correction will be made:

Grid Point Location ID	Location						2011	dB					
	Site Name	Address	State	Area (Acres)	Latitude	Longitude		E.C.	N.A.	P.A.	Change	N.A.	P.A.
NNL_2_FairPa <b>NHL_2_FairPa</b>	Fair Park Texas Centennial Buildings	Northeast of the intersection of Perry and 2 <sup>nd</sup> Avenues	Texas	277	32.781401	-96.763688	53.7	54.0	54.3	0.3	54.0	54.3	0.3

On page G-11, the following correction will be made:

Grid Point Location ID	Location						2011 E.C.	dB					
	Site Name	Address	State	Area (Acres)	Latitude	Longitude		2014			2019		
								N.A.	P.A.	Change	N.A.	P.A.	Change
NNL_3_FortRi <b>NHL_3_FortRi</b>	Fort Richardson	S of Jacksboro on U.S. 281	Texas	380.8	33.207109	-98.163137	41.2	41.4	38.3	-3.1	41.6	38.5	-3.1

On page G-14, the following correction will be made:

Grid Point Location ID	Location						2011 E.C.	dB					
	Site Name	Address	State	Area (Acres)	Latitude	Longitude		2014			2019		
								N.A.	P.A.	Change	N.A.	P.A.	Change
NNL_4_Highla <b>NHL_4_Highla</b>	Highland Park Shopping Village	Jct. of Preston Rd. and Mockingbird Ln.	Texas	10	32.835738	-96.805609	50.6	50.9	50.4	-0.5	51.8	51.3	-0.5

On page G-24, the following corrections will be made:

Grid Point Location ID	Location						2011 E.C.	dB					
	Site Name	Address	State	Area (Acres)	Latitude	Longitude		2014			2019		
								N.A.	P.A.	Change	N.A.	P.A.	Change
NNL_5_Porter <b>NHL_5_Porter</b>	Porter Farm	2 mi. N of Terrell on FR 986	Texas	70	32.772912	-96.277527	42.6	42.8	42.8	0.0	43.1	43.2	0.1

On page G-25, the following corrections will be made:

Grid Point Location ID	Site Name	Address	Location				2011 E.C.	dB					
			State	Area (Acres)	Latitude	Longitude		2014		2019			
								N.A.	P.A.	Change	N.A.	P.A.	Change
<del>NNL_6_Raybur</del> <b>NHL_6_Raybur</b>	Rayburn Samuel T. House	1.5 mi.W of Bonham on U.S. 82	Texas	2.5	33.569913	-96.207512	30.9	31.0	26.9	-4.1	31.4	28.2	-3.2

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