

**APPENDIX Q**

**COMMENTS AND RESPONSES ON THE NOISE  
MITIGATION REPORT**

## Introduction

The New York/New Jersey/Philadelphia (NY/NJ/PHL) Metropolitan Area Airspace Redesign Project (Redesign Project) presented the Draft Environmental Impact Statement (DEIS) for public review and comment in the winter of 2006. The comments that were received on the DEIS were used to inform the selection of the Preferred Alternative. Many of these comments proposed noise mitigation strategies, which were evaluated for operational feasibility and potential for reduction of noise exposure. A Mitigated Preferred Alternative was presented to the public in April 2007, along with the results of the operational and noise analyses, for additional review and comment. This document contains the responses to the public comments on the Preferred Alternative and its mitigation.

40 CFR Section 1503.4 (Response to comments) requires that an agency preparing a Final EIS assess and consider comments both individually and collectively, and respond accordingly. The Federal Aviation Administration (FAA) has the option to provide separate responses to individual comments identified in commenter's letters or, where the volume of letters is so large or the nature of comments are similar, responses may be provided in a topical format.

This appendix to the Final EIS provides responses in topical format. Comment letters and petitions received on the Preferred Alternative and mitigation strategies totaled over 1,700. Each of the comment letters and petitions were reviewed, and many similar themes and issues were identified, resulting in 297 unique topical comments.

To assist the reader in identifying specific letters or topics, the following are included:

- A table of issues raised in the comment letters which directs the reviewer to the appropriate topic and subtopic for a response;
- Topical responses to issues raised;
- An index listing all the letters received sorted by the author; and
- Copies of letters received from elected officials, federal and state agencies, and special interest groups (in numerical order by control number).

The topical responses are ordered in 24 groupings. Those related to the Preferred Alternative and mitigation, applicable to the entire study area, appear first. General topic comments on process, modeling, quality of life and other issues are next. Airport-specific comments are found towards the end of the document. A section number has been assigned to each grouping. A representative comment for each topic and subtopic is displayed in italics, while the response appears directly below this statement. Further references to sections in the main body of the Final EIS are located within each response when appropriate.

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# **1 Comments on the Preferred Alternative**

## **1.1 Preferred Alternative**

### **1.1.1 Opposition**

**Comment:**

*Opposition to the Preferred Alternative*

**Response:**

Some variation of this statement is included in many comments received on the Mitigated Preferred Alternative. Where additional detail is given, each part is addressed by subject in the sections below. Where no additional comments are included, the section “Quality of Life” is probably the response that best addresses the correspondent’s point.

### **1.1.2 Support**

**Comment:**

*Mitigation Plans have been reviewed and discussed and found in general to appear to be best for our community.*

**Response:**

Some variation of this comment is less common. These comments are a sign that the mitigation measures, derived from public comments on the Draft EIS, were at least partially successful.

### **1.1.3 Mitigation Only**

**Comment:**

*It is worth noting that the nighttime and other noise abatement procedures described in the Report could be implemented now to alleviate noise impacts without redesigning the airspace or implementing the Preferred Alternative.*

**Response:**

It is not generally true that the noise abatement procedures in the Noise Mitigation Report can be applied to Future No Action. Reduction of departure headings is not possible, where only one heading is used. Raising arrival altitudes is not possible, where the departures above them are still capped in altitude. Only flying over water and other uninhabited areas can be done without the Preferred Alternative.

#### **1.1.4 Increased Safety**

**Comment:**

*What basis is there for concluding that air travelers and those who live under the flight paths will be safer after this plan has been implemented?*

**Response:**

In a highly simplified sense, all the changes to the airspace in the Preferred Alternative come down to opening up new possibilities to separate aircraft side-to-side or in altitude, where today they must be separated in time (by delaying one of the flights). Adding more dimensions of separation between aircraft increases safety.

#### **1.1.5 Airport Capacity**

**Comment:**

*The airspace redesign ignores the fact that Philadelphia International is at or near its maximum capacity.*

**Response:**

The fact that EWR and PHL are handling traffic near their capacity, and that LGA is handling demand that equals its capacity, is one of the facts from which the redesign began. The airspace redesign is a way to make the most efficient use of available capacity. That consideration is not so important, when there is capacity to spare.

#### **1.1.6 Traffic Increases**

**Comment:**

*The Preferred Alternative will increase air traffic at all runways, tax regional infrastructure and transportation, increase noise, and may result in the use of inexperienced pilots, poor quality aircraft, and exhausted air traffic controllers.*

**Response:**

The Preferred Alternative is not such a large change to operations that it will induce more traffic to come to New York or Philadelphia. It is intended to use current capacity more efficiently, not increase capacity.

In the summer of 2000, the slot restrictions on LGA were relaxed. The result was a huge increase in traffic, far beyond the airport's nominal capacity. At the worst point, just before the re-imposition of slot control, one quarter of all the delays in the continental US were at LGA. The events of the summer of 2000 showed that airlines will fly to New York no matter what the delay, so it is not correct to say that air traffic will increase as a result of the delay reductions from the Preferred Alternative. Concerns about reduced quality of services provided by airlines and air

traffic control are unfounded. All parties involved have safety as their top priority, regardless of the level of traffic.

### **1.1.7 Reduced Spacing**

**Comment:**

*The Preferred Alternative will result in dispersal headings; thus, allowing for closer intervals of planes at the runway threshold and raising safety concerns.*

**Response:**

Aircraft in flight can be safely separated in any dimension: forward to back; side to side; or up and down. Aircraft leaving the runway can not use vertical separation, of course. In the Future No Action alternative, side-to-side separation is not an option, so forward-to-back separation (usually measured in time, not distance) is the only choice. In the Preferred Alternative, dispersal headings give side-to-side separation, and runway rules give forward-to-back separation (which is less than the airspace requires, but still safe). When air traffic controllers have two dimensions of separation to work with, safety is at least maintained and frequently increased.

### **1.1.8 Severe Weather**

**Comment:**

*In current operations during severe weather, traffic patterns are observed to be considerably different from normal operations. How will the preferred alternative address this?*

**Response:**

Severe weather disrupts air traffic operations by making some of the existing airways too hazardous for aircraft to use. An aircraft planning to use one of those airways must find a new route, wait until the weather has passed, or, most likely, both. The Preferred Alternative increases the number of airways available to traffic. For example, the six airways of the West Gate are replaced with eight. The two airways of the North Gate are replaced with three. The South Gate, which today has two airways that are very different in function, is replaced with a pair of airways each of which can accept offloads from the other. Philadelphia, which has two departure fixes to the west, each serving two airways, has a west gate of three departure fixes, which can be used to balance loads if one airway is lost to weather. Philadelphia arrivals have a new airway that is used by traffic from the Great Lakes in good weather, but which can handle rerouted traffic from anywhere west of Chicago in severe weather. The integration of the airspace around New York City means that arrival routes need not be dedicated to a single airport. Arrival airways will be able to feed many different airports, so air traffic flow managers will have more options to reroute traffic in response to weather. See (Cooper, A. M. and Reese, J. L., September 2005, *Analysis of a Severe Weather Scenario: New York/New Jersey/Philadelphia Airspace Redesign Alternatives*, MP 05W00243, The MITRE Corporation, McLean, VA) for the results of a detailed simulation of each alternative's response to severe weather.

### **1.1.9 Weather Impacts**

#### **Comment:**

*The newly announced Airspace Flow Programs will likely further alleviate congestion at EWR. The MIT study by Evans and Clarke, entitled "A System Study of Newark International Airport" states that 68.7% of all arrival delays are weather related. From a trial of the flow programs, the FAA predicts large decreases in arrival delays due to weather. The trial and current use of these programs can give some basis for estimating the extent of delay decreases. These estimates should be evaluated in a supplemental DEIS so that the necessity of movement of the North Post now is established.*

#### **Response:**

Airspace Flow Programs are designed to facilitate access to airspace that has been blocked by severe weather. Such programs are paramount in the current airspace configuration, which has limited access points for departures and rigid, airport-specific arrival paths. The Preferred Alternative maximizes the flexibility of the air traffic management system to respond to such situations by increasing the number of access points for departures and relaxing the constraints on airport specific arrival streams. Airspace redesign and Airspace Flow Programs each reinforce the other's effectiveness.

## **1.2 Integrated Control Complex (ICC)**

### **1.2.1 Feasibility**

#### **Comment:**

*The DEIS, Noise Mitigation Report and the Operational Analysis do not address ICC implementation phasing and scheduling. It is unlikely that the FAA will be able to complete all of the technical requirements necessary to construct and implement an ICC within the Year 2011 timeframe. It is also highly unlikely that the FAA could combine the NY ARTCC and TRACON into one facility by 2011. The ICC is well above the current technical abilities of the FAA in terms of technology, personnel, and feasibility. As none of the options that are available without the ICC provide any discernable benefit, there is no need for this proposed airspace realignment, and the ICC concept should be dropped from consideration. Also, what will happen if the ICC is not built?*

#### **Response:**

Integrated control can be achieved in many ways. Some of these ways use existing technology. Others use communication, navigation, surveillance, and automation systems that are under development. Some ways will work in existing FAA facilities. Others require the construction of a new building. No decision has been made as to which facilities will ultimately control the integrated airspace, but only feasible solutions will be implemented.

### 1.2.2 Delay Impact

**Comment:**

*"The decision as to whether or not to construct a separate ICC facility has significant potential to affect the overall project design. The DEIS showed greatly differing impacts according to the inclusion or exclusion of the ICC concept. No information has been made public regarding implementation of the ICC concept without a separate facility. It is also unknown, or not publicized, what the project design without a separate ICC facility might be and how this might affect the benefits and environmental impacts. Project design, benefits, and impacts might also be affected according to the physical location of an ICC facility. Therefore: Please present the details of the proposed ICC implementation in the context of the Airspace Redesign EIS"*

**Response:**

The two variations of the Integrated Airspace Alternative were “without ICC,” which assumed that the current separation between Terminal and En Route Center is maintained, and “with ICC,” which assumed that the boundary constraints between Terminal and Center could be reduced in severity. The operational benefits of the “with ICC” variation were modeled on the basis of what would be achievable given only that relaxed constraint. No details of how air traffic control and traffic management specialists would be assigned to a particular facility were necessary. Therefore, the operational and noise analyses are valid for any choices of ICC construction that meet the requirement. Further benefits might be possible with an optimal design for the ICC, but those benefits will be attributable to the ICC, not the airspace redesign, and will appear in that EIS.

### 1.2.3 Oceanic

**Comment:**

*One significant issue inherent in the development of an ICC is where or in what facility Oceanic Control function will reside. While Oceanic Control currently resides in New York Center, the DEIS does not address this issue. Oceanic air traffic control does not use the same air traffic control hardware that is used domestically. Integration of Oceanic airspace into the ICC would not allow terminal three mile separation.*

**Response:**

Three-mile separation is a radar separation minimum. Oceanic airspace is not covered by radar, so three-mile separation is not planned for use there. No changes to oceanic airspace is included in any Alternative, so the oceanic system is not environmentally significant. (Note the distinction between oceanic and domestic over-water airspace.)

## **1.3 New Mitigation Requests**

### **1.3.1 Nighttime Flights**

**Comment:**

*During nighttime hours, when demand decreases, it might be possible to implement flight track and runway use programs that direct air traffic away from residential and other noise-sensitive areas.*

**Response:**

Off-hours noise abatement is not only possible, it is being done. All the major airports in the study area have noise abatement procedures for use at night written into their Standard Operating Procedures. All of these have been preserved or enhanced in the Mitigated Preferred Alternative.

### **1.3.2 Quieter Jet Engines**

**Comment:**

*There need to be mandates to require quieter, Stage-4 compliant aircraft, as well as additional research studying quieter jet engines.*

**Response:**

The National Aeronautics and Space Administration and many universities in the U.S. and Europe have programs to develop quieter and more efficient engines and airframes. When Congress decides that the products are reliable and effective enough, it will doubtless require Stage-4 equipage, just as it did with Stage 3.

### **1.3.3 New Runways**

**Comment:**

*Why can't new runways be constructed for JFK, LGA, HPN to handle the noise issues over Fairfield County?*

**Response:**

New runways, unlike an airspace redesign, will invite additional traffic on top of the current forecast. Since the three major airports have parallel runways, and their largest satellites have off-parallel runways with carefully-chosen directions, constructing new runways that will not require airspace over Fairfield County means changing five airports at once. This would cost tens of billions of dollars, deliver no benefits for decades, and adversely affect other communities.

## 1.4 Stewart Airport

### 1.4.1 Expansion

**Comment:**

*The PANYNJ has announced plans to take over and expand Stewart International Airport in New York State. New Jersey legislation to enable this was recently enacted. Stewart is forecast to be a major metro-area airport. The DEIS and April 6, 2007 reports fail to consider the operational and noise impacts of the expansion of Stewart Airport, and therefore improperly segment the review of foreseeable and connected changes. Please consider the operational and noise impacts of the expansion of Stewart Airport in the context of the Airspace Redesign EIS.*

**Response:**

Stewart International Airport is 50 miles north of LGA as the crow flies. That is enough distance to isolate it from the biggest changes to the airspace in the Preferred Alternative. The most important change, in fact, is a short-cut in the arrival route from the southwest, far above the ceiling of the noise study area, made possible by the increased altitudes of west-gate and north-gate departures from the New York Metropolitan Area. At low altitudes, no changes were desirable or necessary. Since Stewart is far from the other airports with long runways and has no other large airspace complex constraining it on any other side, it can expand greatly without putting stress on the Preferred Alternative.

The changes to arrival patterns on the north side of New York City will still be necessary. That cramped airspace is the reason for unused capacity at EWR, which is part of the reason EWR was the site of the worst on-time arrival performance of any major airport in the first quarter of 2007. Today's delays already point to the need for improved airspace. The expansion of Stewart International Airport is intended to deal with future growth that is expected to pile delays on top of the current level. To quote Port Authority Chairman Anthony R. Coscia, the acquisition of Stewart "is the result of that long-term vision for tackling the air traffic challenges we face in coming years." (PANYNJ Press Release 9-2007, <http://www.panynj.gov/pr/pressrelease.php3?id=908>)

## **2 Comments on General Mitigation**

### **2.1 Mitigation**

#### **2.1.1 Not Enough**

**Comment:**

*Mitigation is good but the preferred alternative is a poor choice as this alternative has the highest noise content.*

**Response:**

The Preferred Alternative is intended to deliver the greatest benefits to the safety and efficiency of the system, which tends to imply the greatest changes, and therefore the greatest impact on noise. The Mitigated Preferred Alternative is a compromise between the interests of aviators and controllers on the one hand, and airport neighbors on the other.

#### **2.1.2 Volume Restrictions**

**Comment:**

*Airports should have restricted operations to reduce noise impacts.*

**Response:**

The purpose of this airspace redesign was to accommodate the expected growth in operations, not to forbid it. Limiting traffic either by time or by total number of operations is the province of the airport proprietor, and is forbidden for airports that receive federal grants. It is outside the authority of an airspace redesign project.

#### **2.1.3 Rotating Alternatives**

**Comment:**

*The alternatives should be rotated on different days of the week to lessen impacts or should have limited implementation; thus, only two days out of the week on a different route.*

**Response:**

Rotating alternatives from day to day would require different charts for pilots, different radar screens for controllers, and different computer adaptations for every air traffic control facility in the vicinity. All the people involved would constantly have to change their procedures, which would decrease safety. However, under any single alternative, traffic is different every day. The natural changes in wind and weather disperse flights in many directions. The annual-average day, required by regulations for assessing the differences among alternatives, represents a combination of all possibilities, but there will probably never be a day exactly like that. Half of the time, the total number of flights will be less. Some days, there will be no traffic at all many locations. The

variation requested in these comments will occur naturally under the Mitigated Preferred Alternative.

#### **2.1.4 Seasonal Routing**

**Comment:**

*Reroute flight traffic during late spring, summer and early fall seasons since warm weather inhibits optimal engine climb and descent performance.*

**Response:**

The Preferred Alternative includes unrestricted climb profiles to facilitate the most expedient dispatch of departures from the area, which are the larger contributor to noise. The warmer months are the busiest time of year for air travel in the metropolitan area. Redirecting traffic during this peaked demand in anything but the most efficient strategy would result in increased delays.

#### **2.1.5 Orange County, CA**

**Comment:**

*Orange County, CA has noise abatement programs in which aircraft execute steep climbs to minimize ground noise. Is this a possibility for PHL?*

**Response:**

The noise abatement program at Orange County, CA is unique. It requires aircraft to cut their engine power back dramatically once they reach 800 feet above the airfield elevation. This carries a safety risk. When aircraft are climbing out of an airport, the safest procedure is to use high power. That way, if an engine should fail, the aircraft will have plenty of speed and altitude that the pilot can use to return to the airport safely. In practice, most airlines do not use maximum power on takeoff because a slightly lower setting increases engine life, and therefore decreases the chance that an engine will fail. The engine setting required at Orange County is even lower. It is the minimum that safety regulations permit, so there is no margin of error. The Orange County noise abatement program is older than the current regulations. It was preserved in a grandfather clause, but no new programs like Orange County's are likely to be approved.

#### **2.1.6 PHL Technology Upgrade**

**Comment:**

*Questions remain as to the FAA's intent to utilize critical technology and capture critical data. Specifically, in the final decision, the FAA should address the intent and feasibility of upgrading PHL's landing system technology to include touchdown zone lights and Category II/III ILS systems, and the process for utilizing or a justification for not using PAPI lights.*

**Response:**

This recommendation is beyond the scope of this particular Air Traffic airspace redesign project. In our discussions with FAA's Airports Division and the Philadelphia Airport Authority, the Airspace Management Program Office has indicated the interest of the community in this regard. It should be noted that visual approaches to 09R will be less necessary in the Mitigated Preferred Alternative, because the River RNAV approach will be available.

### **2.1.7 Advanced Technology**

**Comment:**

*What does the FAA mean by "advanced technology" and how will that help?*

**Response:**

Advanced technology refers to the technology onboard many of today's aircraft that allow them to pinpoint their position without relying on ground based navigational aids. This technology allows flights to fly along ground paths, such as a river or industrial corridors, previously not possible. This is called "Area Navigation" or "RNAV." An additional navigational certification, called "Required Navigation Performance" or "RNP" allows for reduced separation between aircraft in the en route environment while maintaining safety.

### **2.1.8 Noise Abatement**

**Comment:**

*Develop, implement, and enforce a system to limit the maximum instantaneous decibel level over noise-sensitive areas.*

**Response:**

Implementing noise abatement proposals like these is the responsibility of the airport proprietors.

### **2.1.9 Call Hotline**

**Comment:**

*Please provide contact information for a hotline call center for registration of noise complaints and damage.*

**Response:**

Noise complaints should be directed to the management of the local airport. Telephone numbers are available at <http://www.panynj.gov>.

### **2.1.10 Noise Monitoring**

**Comment:**

*Allocate personnel resources for Airport Noise specialists to monitor and enforce aircraft noise issues for Newark Airport.*

**Response:**

This request is outside the purview of the redesign project and should be directed to the Port Authority.

**2.1.11 Geographical Restriction**

**Comment:**

*Noise and pollution of arrivals and departures should be contained in the state where the airport is located.*

**Response:**

The United States Census Bureau defines “Combined Statistical Areas” on the basis of commuting patterns. The population in a Combined Statistical Area shares labor markets, media markets, and many other parts of the economy. Southwest Connecticut is part of the same CSA as New York, and South Jersey is part of the same CSA as Philadelphia. Airports, as they drive the local economy, spread their benefits across state lines. Environmental costs spread across state lines as well.

**2.1.12 NY/NJ Water Routing**

**Comment:**

*Traffic should be routed over the Atlantic Ocean and Long Island Sound.*

**Response:**

Twenty-four comments were received with some variation on the desire for aircraft to be routed over water. Comments were received from all over the study area. The FAA agrees that flying over water is a way to reduce noise exposure for some communities. The Mitigated Preferred Alternative makes extensive use of the technique. Unfortunately, further expansion of over-water routing is not possible. That airspace is already being used. For example, in the current system, over the Long Island Sound and below 14,000 feet can be found: LGA arrivals, HPN arrivals, JFK departures, LGA departures, EWR departures, ISP departures, FRG departures, and general aviation traffic to dozens of satellite airports. Over the water south of Long Island can be found: JFK arrivals, JFK departures, LGA arrivals, LGA departures, PHL departures, HPN departures, ISP arrivals, and general aviation traffic to satellite airports on Long Island and as far away as Massachusetts.

## 3 Comments on Documentation

### 3.1 Documentation

#### 3.1.1 Information Location

**Comment:**

*Is there a central website/location where I can find all of the material/decisions/timelines, etc...that pertain to the redesign and mitigation?*

**Response:**

All materials are available and centrally located on the FAA's website:

[http://www.faa.gov/nynjphl\\_airspace\\_redesign](http://www.faa.gov/nynjphl_airspace_redesign)

#### 3.1.2 Mailing List

**Comment:**

*Can I sign up for a mailing list on line?*

**Response:**

No. The mailing list is created through those who register at the meetings. If you provided your name and mailing address at the meeting you attended, then you will be included in any subsequent mailing.

#### 3.1.3 Lacking Detail

**Comment:**

*The public has not been given nearly enough information about the preferred alternative, and the information that has been provided is not understandable by the layman. Knowing only the number of people exposed to change in noise is insufficient for evaluation and can misinform the public concerning environmental merit. It is also necessary and more important to count the total numbers of people exposed to various absolute levels of noise. Therefore: Please provide counts of the numbers of people affected at various DNL noise levels in 5 decibel noise bands down to 45 DNL for "No Action," pre-mitigation, and after mitigation cases for the individual areas covered by the mitigations.*

**Response:**

In a study area the size of the NY/NJ/PHL area, hard copies of the noise impact maps will not be able to cover all areas in fine detail. Summary tables for all possible thresholds are likewise impractical in a printed publication. Therefore, electronic copies of the data used to make noise impact maps have been made available on the project web site. These spreadsheets can be examined at any level of detail and under any thresholds desired, for all alternatives in the Draft EIS and the Mitigated Preferred Alternative.

### **3.1.4 Incomplete**

**Comment:**

*The noise mitigation strategies are ill thought out, incomplete, and without any meaningful detail that would help the public understand the true impact.*

**Response:**

The level of detail in the EIS and its appendices accords with the process spelled out in Federal government regulations (FAA Order 1050.1E). When this level of detail is supplied, countless resources are available to help all interested parties understand the benefits and impacts of the proposed change. (<http://www.fican.org/> and <http://www.nonoise.org> are two helpful sites from very different perspectives.)

### **3.1.5 Compatible Land Use**

**Comment:**

*No where in either the DEIS or the noise mitigation report is there any mention of aviation and compatible land use.*

**Response:**

Appendix E of the Draft EIS (and the Final EIS) covers compatible land use from the point of view of an airspace redesign. The finer details of compatible land use are found in Part 150 studies.

### **3.1.6 Minimum Altitudes**

**Comment:**

*No minimum altitude restrictions have been provided.*

**Response:**

Minimum altitude restrictions are very rare. Aircraft do not generally wish to fly lower than the altitudes that give them the best fuel efficiency. Unless some safety reason applies, the aircraft will stay as high as they can. In the Mitigated Preferred Alternative, there are no minimum altitude restrictions except those that currently exist for noise abatement.

### **3.1.7 Flight Track**

**Comment:**

*Neither the DEIS nor the Noise Mitigation Report assign LGA Runway 31 departure aircraft definitive ground tracks and climb profiles making it impossible to analyze actual noise impacts for any location. What information can you provide us to evaluate the number of current flights, frequency of projected flights, altitude data and what aircraft models were used to calculate noise levels?*

**Response:**

With the exception of RNAV arrivals, aircraft in the New York TRACON do not have specific assigned ground tracks. Departure Procedures from the New York TRACON are designed to use vectors because six airports contend for the same set of departure fixes. Some of them will certainly have to be maneuvered for spacing on the jet airways. A radar vector procedure alerts pilots that they can not assume the way ahead of them is clear. The preferred alternative, with its expanded flexibility in the high-altitude structure, will reduce the need for vectoring of departures. Eventually this will make practical RNAV departure procedures all the way to the departure fixes, but until then, low altitude departure procedures followed by “thence via vectors to assigned route/fix” will be the rule. Variability of departure tracks according to aircraft performance and conflicting traffic were part of the operational and noise modeling. Details are available in Appendix E of the EIS.

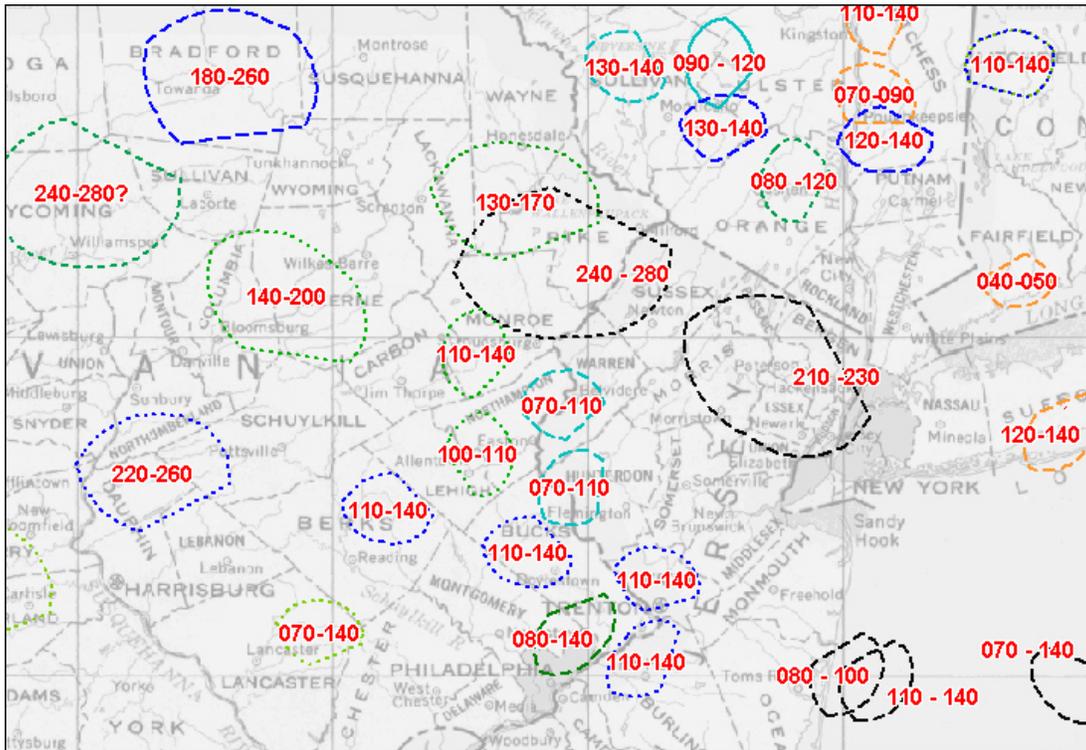
**3.1.8 Holding Patterns**

**Comment:**

*The position of holding patterns in the redesigned Airspace should be identified. ... Holding in the terminal area may be at lower altitudes so it is important from a noise analysis perspective to identify potential holding areas in the redesigned airspace.*

**Response:**

At altitudes where aircraft are audible, the holding patterns of the Preferred Alternative are not far from their current positions. The phrase “holding under terminal separation rules” does not mean that the holding patterns are moved. It means that terminal separation rules can be applied up to 23,000 feet in an integrated control complex. The locations of holding patterns are shown in the figure of this report. Blue holding patterns are for LGA arrivals, dark green for EWR, black for JFK, pale green for PHL, cyan for TEB and other EWR satellites, and orange is for HPN. Altitudes are given in red, in units of 100 feet.



### 3.1.9 Noise Impact Data

#### Comment:

Please provide noise data for Preferred Alternative, Mitigation and No Action by census block and tract.

#### Response:

Spreadsheets containing this information are available at [http://www.faa.gov/airports/airtraffic/air\\_traffic/nas\\_redesign/regional\\_guidance/eastern\\_reg/nyn\\_jphl\\_redesign/noise\\_exposure\\_tables/](http://www.faa.gov/airports/airtraffic/air_traffic/nas_redesign/regional_guidance/eastern_reg/nyn_jphl_redesign/noise_exposure_tables/).

### 3.1.10 Population Data

#### Comment:

*FAA census noise spreadsheets promulgated during 2006 showed a 2006 Union County DNL 65 population of 14,710 for the “No Action” alternative. The April 2007 spreadsheets show this same population as 13,910 – an unexplained 6% difference for the same alternative and year. The changes in modeling methodology in pages 2-3 of the April 2007 Noise Mitigation Report, do not account for this. The key point is that the FAA modeling in this situation is not sufficiently accurate to reliably determine impacts.*

**Response:**

The April 2007 spreadsheets erroneously contained population counts from a preliminary release of the 2000 census. The spreadsheets were not used in the noise modeling. The spreadsheets were generated after their respective documents so state and county identifications could be added. The population figures used in the Noise Mitigation Analysis (Appendix P) were the correct ones.

**3.1.11 Modeling Data**

**Comment:**

*Please make available the computer tools, data-sets, and related documentation used to obtain the noise and operational results. Please also make available all detailed intermediate studies behind the noise and operational results presented thus far and to be presented in the Final EIS.*

**Response:**

Computer input files do not generally provide information in a format comprehensible to the public, so they can not be considered documentation. Even after they have been loaded into the appropriate software, their significance is only clear to an expert user of the software. Several of the local governments in the study area have hired such experts; those governments have requested and been provided with the NIRS input files.

**3.1.12 Comparison Information**

**Comment:**

*Full pre-and post-mitigation data is not provided in terms of number of people affected at various noise levels for "No Action," pre-mitigation and post-mitigation for the individual areas covered by the proposed noise mitigations.*

**Response:**

This information is provided in Tables 4, 5, 8, 9, 10, 11, 13, and 15 of the Noise Mitigation Report. Point-by-point details are available in the spreadsheets of noise modeling output provided on the web site.

**3.1.13 2006 vs 2011**

**Comment:**

*Is the 2006 alternative and the 2011 alternative in the noise tables different alternatives or the same alternative projected over the 5 year period?*

**Response:**

The 2006 Integrated Airspace Alternative has only one variation, where the 2011 Integrated Airspace Alternative has two. The 2006 Alternative is the same as the 2011 Integrated Airspace

without Integrated Control Complex variation. The numbers in the noise tables are different because 2011 traffic is heavier than 2006 traffic.

### **3.1.14 Historical Data**

#### **Comment:**

*Requested noise impact data from past 12 months (for the PHL airport noise monitors).*

#### **Response:**

These data should be requested from the airport proprietor since it is the airport proprietor that collects this information. The FAA does not have them.

## **3.2 Long Term Analysis**

### **3.2.1 25 Year Projection**

#### **Comment:**

*Because of the extreme sensitivity of projected impacts to the threshold used in the FAA's analysis, the agency must closely scrutinize its assumptions regarding runway usage patterns, nature and volume of traffic, and future projections with respect to changes in these factors, to get an accurate picture of anticipated environmental impacts. Since nature and volume of traffic is allowed to change without further environmental analysis, it is necessary to consider in advance the likely effect of these changes. Please describe anticipated future changes the nature and volume of EWR Runway 4 traffic over the next 25 years and describe how this affects the impacts of the Preferred relative to the "No Action" alternative. Also, Absence of examination of future scenarios is a major deficiency of the DEIS and mitigation Reports. FAA Order 1050.1e Section 4.4g(2) requires that an EIS include projections of results to future scenarios, specifying that DNL contours, grid point, and/or change-of-exposure analysis be prepared for both current conditions and future conditions; "Future conditions both with and without (no action) the proposal and each reasonable alternative. Comparisons should be done for appropriate timeframes. Timeframes usually selected are the year of anticipated project implementation and 5 to 10 years after implementation. Additional timeframes may be desirable for particular projects." Given the extensiveness of the Airspace Redesign project and its expected lifetime, future extrapolations of 10 and 25 years following implementation should be performed.*

#### **Response:**

All of these comparisons are in the EIS. Tables ES-1 through ES-3 summarize the results. When the Airspace Redesign first began, the baseline year was 2000. The year of expected implementation was set to 2006. A projection of the noise impact for 5 years after implementation was analyzed for 2011. The requirements of FAA Order 1050.1E have been satisfied.

FAA Order 1050.1E requires comparisons for “appropriate timeframes,” usually 5 to 10 years after implementation. Since the accuracy of forecasts diminishes with time, 25-year forecasts are not generally recommended.

## **4 Comments on Process**

### **4.1 Process**

#### **4.1.1 ATC Participation**

**Comment:**

*Air Traffic Control was not consulted in the design of the Preferred Alternative.*

**Response:**

This is incorrect. All of the alternatives presented in the EIS were developed by air traffic controllers and supervisors from New York TRACON, New York Air Route Traffic Control Center, and Philadelphia TRACON. Extensive coordination of the designs were done with air traffic controllers and supervisors from Washington, Boston, Cleveland, and Indianapolis Air Route Traffic Control Centers and Newark, Teterboro, LaGuardia, Kennedy, Islip and Philadelphia Towers.

#### **4.1.2 Dual Modena**

**Comment:**

*The Dual Modena was included in the No Action Alternative, thereby segmenting a procedure that should have been identified as part of the airspace redesign plan. This resulted in not fully disclosing the cumulative impacts.*

**Response:**

The split of Philadelphia's Modena departure fix was in response to airspace congestion in 2000, not in 2006 or 2011. It is operationally independent of all the airspace changes in this Redesign. Note that the Preferred Alternative contains three westbound fixes from PHL, not two, so Dual Modena is not part of the Preferred Alternative or the Mitigated Preferred Alternative.

#### **4.1.3 Low Altitude Changes**

**Comment:**

*If the FAA changes routes for arrivals or departures below 3,000 feet, will they not have to relapse an Environmental Impact Statement?*

**Response:**

Yes. These comments and responses are part of that process.

#### **4.1.4 Pre-Decision Changes**

**Comment:**

*If the final decision has not yet been made, then why are they already implementing changes in the flight routings? Why are we experiencing so much air traffic?*

**Response:**

No changes have been implemented in flight routings. Most likely, you are experiencing more air traffic because the forecast growth in operations has already begun.

#### **4.1.5 Implementation Timeframe**

**Comment:**

*Residents also need to know if the FAA intends to implement this proposal in slow, gradual steps through the year 2011 so the surrounding communities do not feel the immediate impact.*

**Response:**

Implementation plans cannot be developed until the Record of Decision is signed, but it is clear that some parts of the Mitigated Preferred Alternative will be much easier to implement than others. Anything requiring the construction of a new facility, for example, will be among the last things to happen. Changes that can be done without infrastructure changes could begin processing right away.

#### **4.1.6 Homeland Security**

**Comment:**

*Why hasn't Homeland Security been given the opportunity to comment on the preferred alternative?*

**Response:**

All State and Federal agencies had the opportunity to comment on the Draft EIS and on the Preferred and Mitigated Alternatives. Many made comments. The Department of Homeland Security did not.

#### **4.1.7 Independent Review**

**Comment:**

*The modeling and results of the preferred alternative should be reviewed by an independent agency.*

**Response:**

The Preferred Alternative was designed by the FAA, and sent to The MITRE Corporation's Center for Advanced Aviation System Development (CAASD) for evaluation of the degree to which it met the purpose and need (DEIS, Appendix C, Figure 1-1.). CAASD is a Federally-Funded Research and Development Center, created by Congress to be an independent advisor to the FAA. The noise and environmental modeling results in the Draft EIS were reviewed by other government agencies, including the Environmental Protection Agency and the Department of the Interior. Finally, output files from the noise modeling process, as well as much of the input, were made available to local government officials who passed it for review to their own contractors.

**4.1.8 NEPA Violation**

**Comment:**

*The FAA has violated both its own NEPA-implementing orders (U.S. DOT NEPA Implementing Order 5050.4B) and the essential requirements of a full, rational, and honest environmental review of this project.*

**Response:**

This environmental impact analysis was conducted under FAA Order 1050.1E. FAA Order 5050.4B states, "Order 1050.1E describes FAA's agency-wide environmental policy and how FAA will comply with NEPA. Order 5050.4B supplements FAA Order 1050.1E by providing NEPA instructions prepared especially for proposed Federal actions to support airport development projects." This is an airspace redesign, not an airport development project, so Order 5050.4B does not apply.

**4.1.9 Cost Benefit Analysis**

**Comment:**

*FAA has failed to produce a cost benefit analysis for this project and cannot say with any degree of certainty how much the project will cost taxpayers.*

**Response:**

The airspace redesign itself is relatively low cost. The biggest cost item by far is the construction of a new facility. Since no decision has yet been made about the details of the Integrated Control Complex, the possible costs cover a wide range.

**4.1.10 Supplemental DEIS**

**Comment:**

*Please address the technical issues and flaws identified in the DEIS and promulgate updated information to be used as a basis for decision and comment.*

**Response:**

Section 210b of FAA Order 1050.1E states, “The public comment and participation process for a Draft EIS satisfies the process for requesting correction of information. Any corrections deemed appropriate will be included in the Final EIS.” The Final EIS contains the corrections to any errors found in the Draft. A “supplemental Draft EIS” is not part of the process.

**4.1.11 Decision Criteria**

**Comment:**

*What criteria were used in the EIS evaluation? What weighting factors were assigned to each criterion?*

**Response:**

The criteria are summarized in Table ES-1. Since one Alternative was overwhelmingly best, no formal weighting was used to produce a single figure of merit. “Reducing Complexity” and “Balance Controller Workload” were given the least weight, so mitigations of the Preferred Alternative metric were judged acceptable regardless of whether they reduced the improvement in those metrics.

**4.1.12 ROD Signature Authority**

**Comment:**

*Who will be signing the ROD?*

**Response:**

The Record of Decision will be signed by John McCartney, Area Director, Eastern Terminal Operations, or a superior official.

**4.1.13 Public Vote**

**Comment:**

*Decision to implement airspace redesign should be put to a vote.*

**Response:**

A plebiscite is not part of the procedures developed to implement the National Environmental Policy Act.

**4.1.14 Legal Review**

**Comment:**

*The proposed reassignment of air traffic without the legally required level of review could undo decades of hard work, public understanding and good will and is unacceptable.*

**Response:**

The New York/New Jersey/Philadelphia Airspace Redesign project has met or exceeded every requirement for review in the National Environmental Policy Act and FAA Order 1050.1E, *Environmental Impacts: Policy and Procedures*.

**4.1.15 Prejudged Outcome**

**Comment:**

*FAA has released the Report, and has announced the fact that the “Integrated Airspace with Integrated Control Complex Design” (Integrated Airspace or IA + ICC) is the Preferred Alternative to the NY/NJ/PHL Airspace Redesign Project (Project) before finalizing its Draft Environmental Impact Statement (DEIS). This sequence of events is highly irregular and suggests that the FAA has prejudged the outcome. Further efforts on the Project should have awaited the outcome of the EIS process.*

**Response:**

The identification of the Preferred Alternative must come before the Final EIS. It is typically part of the Draft EIS, but in this case the FAA decided to collect public comments before choosing a Preferred Alternative. Far from prejudging the outcome, this change to the sequence of events increased public input. The residents of the affected area know best what their concerns are, so public comments were the source of the measures applied to mitigate the impact of the Preferred Alternative. Finalizing the EIS is the next and last step in the process.

**4.1.16 Port Authority**

**Comment:**

*It is inappropriate to pre-empt the noise abatement authority of the port authority.*

**Response:**

Nothing in this process pre-empts the authority of the airport proprietors.

**4.2 Part 150**

**4.2.1 Noise Abatement**

**Comment:**

*Potential noise impacts from implementation should require FAA to fund housing noise insulation.*

**Response:**

Airport Improvement Program funding for noise abatement is available to airport authorities who conduct a Part 150 study. Under NEPA, FAA must mitigate noise impacts if the preferred Alternative results in a significant noise increase in an area. Significant is defined as a 1.5 dB

increase within the 65 DNL or greater, of which there are none in the Mitigated Preferred Alternative. The Part 150 process is a separate process which analyzes noise.

### **4.3 Day Night Average Sound Level (DNL)**

#### **4.3.1 Averages**

**Comment:**

*DNL averages are insufficient and unacceptable. When the noise level is measured on the basis of day-night averages, the noise problem is going to look less severe on paper than it really is. What is relevant is the not the average daily noise level, but the noise level at the times that a plane is overhead.*

**Response:**

The noise level at the time a plane is overhead is one part of the relevant information needed to assess the impact of aircraft noise. Other relevant factors are: how many times an aircraft passes overhead; how close to directly overhead each aircraft is flying; how much noise is audible as the aircraft approaches your location and after it passes; and whether the aircraft passes overhead during times when people are away at work or at home trying to sleep. When all these factors are accounted for, the result is a metric very much like DNL.

It is well known that DNL is unsatisfactory to many people. For almost 30 years, researchers have been trying to find a better metric, (Fidell, S., *Journal of the Acoustical Society of America*, 114 (6), 3007, December 2003) but none has been identified. (“Federal Agency Review of Selected Airport Noise Analysis Issues,” Federal Interagency Committee on Noise [FICON], August 1992).

#### **4.3.2 Flights per Hour**

**Comment:**

*In order to quantify the noise increase of 9 dB per flight we need to know the number of flights per hour does this projected increase account for and how many flights per hour there will be in the next three years.*

**Response:**

“dB per flight” is not a correct interpretation of the noise modeling output. For the reasons stated above, DNL is better than a flights-per-hour measure of noise exposure.

#### **4.3.3 NIRS Accuracy**

**Comment:**

*The FAA should state what level of accuracy the NIRS output has and the scientific basis for it.*

**Response:**

This is a good point, and the subject of ongoing research. No published sources are available with a quantitative answer.

The statutory requirement for how to do an analysis is designed to minimize random errors. DNL changes in NIRS output are required to be a comparison of two runs where the differences in the input files are tightly controlled. The annual-average day is run through NIRS with nothing changed but the three-dimensional tracks. (There was a possibility of flights changing from daytime to nighttime as delays increased, but this did not occur between Future No Action and the Preferred Alternative.) Temperatures, winds, etc. cancel out of the impact analysis. Therefore, the biggest source of error will be the definition of the annual-average day. This will be of little importance in the DNL changes, since identical traffic is used in the before and after cases, but it can affect the position of the total DNL with respect to the 45, 60, and 65 dB DNL thresholds. The most-reliable part of the annual-average day forecast is the total number of flights, which is also the most important contributor to the DNL. The least reliable part of the estimate is the engine type carrying each of the forecast flights.

For a study like this one, where the noise changes are very small in the vast majority of the study area, and most of the noise exposures are low, many of the changes will not be statistically significant. However, they have all been quoted to one-tenth of a dB (that is, 2% changes in noise energy) for the sake of consistency with earlier studies. Note that noise changes of less than 3 dB are generally not audible outside of a laboratory environment.

#### **4.3.4 Thresholds**

**Comment:**

*We also believe that the noise thresholds promulgated by the FAA are overly lenient, and that the noise impacts of the FAA promoted actions are profound. A noise change of 5 decibels is equivalent to a factor of 3.2 times increase in noise energy.*

**Response:**

It is true that 5 dB means a change noise energy by a factor of 3.2, but irrelevant. The human ear hears logarithmically. Decibels are the best measure of loudness as perceived by human observers.

#### **4.3.5 Significant Level**

**Comment:**

*Please present a sensitivity analysis showing the number of people impacted at the significant level if the trigger of 1.5 dB in the 65 DNL were to be lowered to less than 1.5 dB.*

**Response:**

Section 14.3 of Appendix A to FAA Order 1050.1E states that “A significant noise impact would occur if analysis shows that the proposed action will cause noise sensitive areas to experience an increase in noise of DNL 1.5 dB or more at or above DNL 65 dB noise exposure when compared

to the no action alternative for the same timeframe.” Until such time that this threshold level is legally altered, it is futile to analyze the change in noise impacts due to various threshold levels. However, the raw data for all of the study area is available on the FAA Redesign website: [http://www.faa.gov/nynjphl\\_airspace\\_redesign](http://www.faa.gov/nynjphl_airspace_redesign). Calculating impacts for any desired threshold is a straightforward spreadsheet exercise with this input.

#### **4.3.6 Inaccurate Reporting**

**Comment:**

*DNL values are incorrectly reported to New Canaan. For example, New Canaan currently has virtually no aircraft noise, yet FAA report shows “No Change” and “Preferred Plan” at the same DNL value.*

**Response:**

The day-night average sound level over New Canaan, under the Future No Action Alternative in 2011, would be about 32-33 dB. The correspondent is correct that these DNL levels correspond to virtually no aircraft noise. A change of 3 dB being un-noticeable outside the laboratory, most of the area will experience virtually no aircraft noise under the Preferred Alternative as well.

#### **4.3.7 Sensitivity Analysis**

**Comment:**

*Any one of the following factors could yield a 1 to 2 decibel change in the noise results. The aggregate deviation taking into account all of the factors is much larger. The FAA avoidance of significant impact is based on a fragile scenario unlikely to be realized in practice. Therefore, please present a sensitivity analysis showing the degree to which the FAA calculated noise is subject to change due to: 1) Variation in flight paths after initial heading due to controller discretion. 2) Degree of usage of each of the various demand based headings. 3) Likely change in aircraft mix and switch to larger (and noisier) aircraft over time as attempts are made to carry more passengers. 4) Traffic levels. 5) Type of navigation procedure used - vectored vs. RNAV. 6) Possible changes in runway use policy. This is especially important if a particular runway configuration is found to yield greater capacity and then used preferentially, increasing its noise. 7) Errors in the modeling methodology or models used by the FAA.*

**Response:**

The noise modeling is based on a sample of aircraft trajectories that is anything but fragile. Seventy days of radar data were aggregated to produce tracks that encompass the full range of variation in airport configuration, demand levels, fleet mix, aircraft performance, controller technique, and weather conditions. Since the random variations from day to day are included, the set of tracks is very robust. Varying any of the listed factors would mean changing an annual aggregate. This would be a major change in the modeling assumptions, which must have some systematic justification.

It is always possible that there are errors in the models or the modeling, but a sensitivity analysis of variations of all of the input parameters and model structures is neither practical nor in compliance with the regulations governing noise impact modeling.

#### **4.3.8 Worst Case Scenario**

**Comment:**

*Why aren't we provided with the DNL for all flights coming in at the lowest allowable altitude rather than the altitude range provided?*

**Response:**

The noise modeling is not intended to represent extreme, or unrealistic, scenarios. It is intended to provide a projection of the expected noise for the “average” operational day. Flight altitudes over any individual point are modeled based on the performance characteristics of the flights, the ability of the flight to climb and descend at a particular rate. It is to the advantage of the flight to remain at as high an altitude as possible for as long as possible. Modeling flights at the minimum altitude restrictions only would not provide any realistic understanding of the expected noise impact of the Preferred Alternative.

### **4.4 Multi-modal**

#### **4.4.1 Comprehensive Solution**

**Comment:**

*Why can't we adopt a more comprehensive solution utilizing multi-modal transportation solutions?*

**Response:**

Multi-modal solutions are the responsibility of regional transportation authorities. Surface transportation alternatives did not meet the stated purpose and need. Congress appropriated funds specifically for airspace redesign.

#### **4.4.2 Ignoring Option**

**Comment:**

*FAA has chosen to ignore other alternatives available to it.*

**Response:**

Congress appropriated funds specifically for an airspace redesign. (Wendell H. Ford Aviation Investment and Reform Act for the 21st Century, Section 736.) Other alternatives were not authorized under that legislation.

## **4.5 Public Meetings**

### **4.5.1 Additional Meetings**

**Comment:**

*Those who will be most affected by the redesign plan should be given a real opportunity to ask questions and express concerns in a public forum. One meeting per state is not enough. Failure to hold separate public hearings prevents many constituents who would be affected by the proposal from voicing their opinions on this matter and truly inhibits the possibility of constructive public input on FAA's decision.*

**Response:**

The public meetings were held as close as possible to the areas of significant noise increases under the Preferred Alternative, since people in those areas are most affected. Meetings with local government officials are in addition to the public meetings.

### **4.5.2 Meeting Requests**

**Comment:**

*The FAA has refused to hold a separate South Jersey meeting to ensure that the concerns of the hundreds of constituents who were refused admittance to the public hearing held in Philadelphia on May 1, 2007, are addressed. Also, please hold additional meetings in Bergen County, NJ; in Delaware County, PA; in South Jersey; in New Canaan, CT.*

**Response:**

Additional public meetings were held in Cherry Hill, NJ on June 27, 2007 and in Secaucus, NJ on June 28, 2007.

### **4.5.3 Notification**

**Comment:**

*Public meetings should have been better-publicized and more accessible.*

**Response:**

Notice of the mitigation public meetings was given in numerous local media; to all local officials; by direct mail to people who expressed interest in the pre-scoping, scoping, and Draft EIS phases of the project; and electronically to anyone who had provided an electronic mail address during earlier phases.

#### **4.5.4 Panel Session Minutes**

**Comment:**

*There was much discussion and debate of the mitigation items in the panel session. Why weren't minutes of the Question and Answer sessions kept?*

**Response:**

The major purpose of the National Environmental Policy Act is to compel Federal agencies to open their decisions for public comment. Comments are the vehicle by which citizens make their concerns known to the government. The purpose of the question and answer sessions was to facilitate discussion so that members of the public could better understand the issues so that formal comments could be constructively submitted.

#### **4.5.5 Internet Access**

**Comment:**

*At the public meeting in Woodcliff Lakes I was waiting in line to get in and assured that the video presentation would be repeated. After being ushered into a room overflowing with 1000+ people, I was informed the video would not be repeated and that anyone interested could view it on line. I do not own a computer. The government does not require Americans to have access to the internet to obtain information. The FAA should not do so either.*

**Response:**

Most public libraries provide access to the internet for their patrons. While it is not expected that everyone will have internet access in their home, it is reasonable to expect interested parties to make use of the resource the public library provides.

#### **4.5.6 Tincum Meeting**

**Comment:**

*May 1, 2007 meeting in Tincum Township Delaware was canceled after it had begun while hundreds were waiting to enter. Poor communication and confusing layout left almost all unaware of any opportunity to express an opinion or provide formal comments to the FAA in a different part of the hotel.*

**Response:**

The meeting in Tincum Township was not cancelled. Hundreds of people made comments. The FAA regrets that hundreds more were unable to be accommodated.

#### **4.5.7 Public Input**

**Comment:**

*Obtain direct and timely input from area residents most affected as to the perceptions and desires regarding the plan.*

**Response:**

The public was asked for their comments and opinions during more than 100 public meetings and several public comment periods. This document is the FAA response to those comments.

#### **4.5.8 Prejudged Outcome**

**Comment:**

*The decision has already been made and our comments are simply an attempt to placate the public into thinking their voice matters.*

**Response:**

The decision will be made when the Record of Decision is signed. Most of the mitigation included in the Mitigated Preferred Alternative came from the public through the public comment process. The voice of the public affects the decision through this channel.

### **4.6 Comment Period**

#### **4.6.1 Extension**

**Comment:**

*This program is being rushed through. The FAA reports contain very substantially changed environmental data throughout the region and describe many new procedures. A minimum of 90 days is required to assimilate and comment on all of this new information. The May 11, 2007 response deadline is unreasonable.*

**Response:**

Because public input was critical to selection and design of the mitigation measures, the FAA chose for this project to identify and mitigate the Preferred Alternative after collecting public comments on the Draft EIS. The comment period on the Draft EIS was extraordinarily long – from the December 2005 publication of the Draft until July 1, 2006. The mitigation measures chosen are small modifications of the Preferred Alternative, all based on comments received on the Draft EIS. No unexpected changes have been made in the Mitigated Preferred Alternative. The 30-day comment period on mitigation is an addition to the comment period on the Draft EIS, making 8 months in all.

## **4.6.2 Internet Submission**

### **Comment:**

*It is unreasonable for us to be restricted to submitting written comments while at the meetings. Why is there no provision for additional venues for submitting comments?*

### **Response:**

The public meetings for Mitigated Preferred Alternative were held in late April. During the month of April and through the 11<sup>th</sup> of May, the public were encouraged to submit comments at the meetings as well as on line. The public meetings held on June 27 and 28, after the formal comment period had closed, were held by special request of New Jersey's Congressmen as an addition to the original set of public meetings. At this time, the ability to accept comments on the website had already been removed. Consequently, only written comments from those attending the meetings could be accepted.

## **4.7 Next Steps**

### **4.7.1 Compliance**

#### **Comment:**

*What happens if the mitigated plan is implemented and models were wrong? Does the FAA plan to monitor the affected neighborhoods for agreement with the predicted models? What if the noise is well above the predicted levels? Are there plans to (quickly) reverse the implementation?*

#### **Response:**

FAA Order 1050E.1, paragraph 512b, states that vis-à-vis each mitigation measure, in the Record of Decision, "A monitoring and enforcement program shall be adopted and summarized where applicable for any such mitigation." These programs have not yet been developed. In the unlikely event that the noise exposures increase significantly, noise abatement will be required. There are many ways to accomplish noise abatement. Reversing the implementation of the Preferred Alternative is among the least likely.

### **4.7.2 Ensuring Mitigation**

#### **Comment:**

*If the Mitigated Preferred Alternative is chosen for implementation, how can we be sure the FAA will not revert to implementing the original preferred alternative?*

#### **Response:**

The FAA will have no reason to use the original Preferred Alternative. With one exception, only mitigation measures that did not harm efficiency or safety were used to create the Mitigated Preferred Alternative. The exception is midnight ocean routing, which, if it is formally accepted as a mitigation in the Record of Decision, will be easy to monitor.

### **4.7.3 Implementation Plan**

#### **Comment:**

*Please present a detailed implementation plan for the Preferred Alternative. Please analyze and discuss the impacts of successive individual phases. Please ensure that the halting of implementation at any phase will not cause environmental impacts not covered in the EIS.*

#### **Response:**

Until the Record of Decision has been signed, the FAA has not made a decision on what to implement. An implementation plan at this stage would be premature, and contrary to Federal regulations.

### **4.8 Other Comments**

#### **4.8.1 Air Service Demand**

##### **Comment:**

*The FAA's own forthcoming study on Air Service Demand in the NY Metro region fails to even address or consider Philadelphia International Airport.*

##### **Response:**

Air Service Demand studies are concerned with airport capacities. Philadelphia is separate from New York City at the level of airport services. Only in the airspace do the two cities interact so closely as to require an integrated study.

#### **4.8.2 EPA Compliance**

##### **Comment:**

*Please provide information on the Preferred Alternative with respect to how the Noise Control Act, Quiet Communities Act, and Clean Air Act be met.*

##### **Response:**

The Noise Control Act of 1972 and the Quiet Communities Act of 1978, although never repealed, are no longer funded. Compliance with these Acts has been subsumed into the FAA's own environmental impact process, which this EIS has followed. (See <http://www.epa.gov/history/topics/nca/index.htm> .) Compliance with the Clean Air Act is straightforward, since the effect of the Preferred Alternative is to reduce aircraft emissions.

#### **4.8.3 Compliance Monitoring**

##### **Comment:**

*Please include full descriptions of the mitigation specification and monitoring plans in the Final EIS and Record of Decision, including: 1) Designation of the agency or entity that will be long term responsible for the monitoring, and long term commitment by the agency to continue to carry*

*this role. The default agency in this case would be the FAA. 2) Specification and provision for long term funding of mitigation monitoring 3) Specification and provision for measuring and reporting on details of how well the mitigation is being executed over time and its effectiveness in meeting originally assumed noise reduction levels. Specification of protocol and response timeframes for obtaining reports by interested governmental entities and members of the public. 4) Specification of parameters and details for the mitigation such as; a) detailed specification on the assumed flight paths; b) allowed deviation from this path under which the effectiveness of the mitigation is maintained; c) specification of the allowable range of usage of demand based flight headings (i.e., how much of the time each can be used and still maintain assumed mitigation effectiveness); d) anticipated change in fleet mix and fleet volume over useful life of mitigation ; e) analysis showing that the mitigation effectiveness and goals of eliminating significant impact is maintained throughout the deviations in (b) - (d). 5) Description of contingency action and timeframes for action to be taken when outages are found in (4). Description of what action will be taken if and when it is found that mitigation effectiveness cannot reasonably be brought to the level of the originally assumed. To execute these responsibilities (comment S36), it is desirable that the responsible agency have the ability to do noise modeling to determine noise impacts from aircraft flight path and fleet mix variations and ability to assess the overall impacts of multiple outages.*

**Response:**

FAA Order 1050.1E requires a compliance monitoring plan for any specified mitigation. It is at the discretion of the FAA to include this specification in the Final EIS or the Record of Decision (ROD). With regard to this airspace redesign project, the compliance monitoring specification will be included in the ROD.

## 5 Comments on the Purpose and Need

The public raises two points regarding the purpose and need for the airspace redesign. First, that the purpose and need does not properly reflect the needs of the people who live in the affected area. Second, that the preferred alternative does not meet the stated purpose and need.

### 5.1 Purpose and Need

#### 5.1.1 Noise Reduction

**Comment:**

*This plan fails to address the real issues affecting millions of residents of the NE seaboard. The redesign process should address concerns on citizens' safety, health, education and property values. In addition, the preferred alternative is not in the public interest, because noise reduction was not included in the purpose and need.*

**Response:**

One of the principles of our system of government is that Federal agencies have limited mandates, which they may not exceed without an act of Congress. The Federal Aviation Administration's mission is "to provide the safest, most efficient aerospace system in the world."

(<http://www.faa.gov/about/mission/>) Therefore, the purpose of this airspace redesign is to increase the safety and efficiency of the airspace in the study area. The mandate of a part of the FAA can not exceed the mandate of the whole.

The National Environmental Policy Act, with its implementing regulations, defines the procedures for addressing noise and pollution concerns, of which this document is a part. The required process is to define a purpose and need consistent with the agency's mission, then design a system that meets that purpose and need, then accept public comments on the redesigned system. Public comments on environmental impacts from communities around the airports can lead the FAA to mitigate the environmental impacts to the greatest extent possible, consistent with that mission. In the same way, public comments on efficiency from airlines, airport owners, and local businesses can lead the FAA to mitigate parts of the design that they perceive to be contrary to their interests.

#### 5.1.2 Minimize Exposure

**Comment:**

*Please perform a thorough investigation of headings and departure strategies, for EWR Runway 22 south flow, including headings below 190 degrees, to determine strategies that minimize population noise exposure. As part of this, please search for strategies that minimize overall population noise exposure independent of aviation efficiency, and use the noise impacts of these as a baseline for measuring the impacts of other proposals, so that decision makers can accurately ascertain the degree to which population impact is being traded for aviation efficiency.*

*Please report the number of people exposed at various DNL levels for the sub-alternatives investigated.*

**Response:**

An airspace design whose figures of merit do not include aviation efficiency would be meaningless. If efficiency were not a factor, aircraft could be routed along any number of inefficient paths. If efficiency were completely disregarded, the airport would become useless and billions of dollars of investment would be wasted. The Ocean Routing Alternative is a mild example of the damage that could be done to the FAA's mission and to the local economy, if aviation efficiency were excluded from the purpose of the airspace redesign.

**5.1.3 Ocean Routing**

**Comment:**

*The FAA Consultant states "An ocean routing plan, proposed by the Office of the Governor of New Jersey and originally developed by the New Jersey Coalition Against Aircraft Noise, Inc. (NJCAAN), was modeled as an alternative in the New York/New Jersey/Philadelphia Draft EIS. The objective of the alternative is to reduce noise over inhabited areas rather than increase safety and efficiency of air traffic operations" (MITRE Report; page 22.). It would appear that the alternative is retained only to forestall the public outcry and not to provide any further consideration of the NJ recommendation. If noise impacts are the only reason for further considering this alternative, 'noise impacts' or 'environmental impacts' or 'public support' should be an objective and an evaluation criteria.*

**Response:**

To quote from the original ocean routing plan, "The proposed approach achieves the goal of significantly decreasing aircraft noise over New Jersey..." The plan included no analysis of operational impacts. Further treatment was necessary to fill the gap in the original proposal. Therefore, to give it fair treatment, Ocean Routing was included as an alternative and compared to other possibilities using objective criteria. Ocean Routing was found to require huge penalties to efficiency in order to keep it safe.

**5.1.4 Redesign Unnecessary**

**Comment:**

*In order to justify such a severe impact, it must be demonstrated that the proposed action is genuinely necessary. FAA has not shown such necessity.*

**Response:**

The Bureau of Transportation Statistics collects information on major airport on-time arrival performance. For the first quarter of 2007, out of their list of 32 major airports,<sup>1</sup>

- Newark was the worst, with 55% on time;
- LaGuardia was second-worst, 58% on time;
- JFK was fourth from worst, 60% on time;
- Philadelphia was fifth from worst, 65% on time.

The only airport in the bottom five that is not in this study area is Chicago-O'Hare International Airport.

Of all the factors that can cause delays, these airports have only one in common. Some are dominated by one or two carriers and others are not. Some have many foreign airlines, others have few. Some support hub-and-spoke operations and others do not. Some have very large aircraft, others have mostly smaller aircraft. Some are large, with long taxiways, others are small and cramped. At some, the traffic has grown substantially in recent years, at others it has not. The thing these airports have in common is the airspace used by their arrivals and departures. To solve the delay problem, the airspace must be addressed. That is the necessity for airspace redesign.

**5.1.5 Failure to Meet**

**Comment:**

*The Preferred Alternative fails to meet purpose and need.*

**Response:**

Table ES.1 of the EIS shows an exhaustive list of ways to measure the safety and efficiency of the airspace structure and air traffic control system. Each Alternative was evaluated using common criteria. The Preferred Alternative is clearly the best way to meet the purpose and need.

**5.1.6 Final Stages**

**Comment:**

*Noise should be the primary concern in final stages of airspace redesign.*

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<sup>1</sup> [http://www.bts.gov/programs/airline\\_information/airline\\_ontime\\_tables/2007\\_03/html/table\\_04.html](http://www.bts.gov/programs/airline_information/airline_ontime_tables/2007_03/html/table_04.html)

**Response:**

This recommendation is consistent with the requirements of the environmental impact assessment process. The vast majority of public comments on the Draft EIS concerned noise. Therefore, the mitigation of the noise impacts of the preferred alternative has been the primary concern of the redesign since the announcement of the preferred alternative.

**5.1.7 Maintain Benefits**

**Comment:**

*This overarching goal - to improve efficiency while maintaining safety - should not be lost sight of in the effort to mitigate any noise impacts.*

**Response:**

Mitigation of noise impacts was accomplished without re-instating any of the cascading delays that would be a common feature of NY/NJ/PHL operations under Future No Action. Compared to the Preferred Alternative, some flights will face increased distances, and most will burn a bit more fuel, but the FAA is required by Federal regulations to mitigate significant noise increases.

## **6 Comments on Property Values and Quality of Life**

### **6.1 Property Value**

#### **6.1.1 Economic Analysis**

**Comment:**

*The public should be provided with a full economic analysis of the preferred alternative that details the cost/benefit trade-offs of safety, health impacts, economic impacts as well as delay.*

**Response:**

Cost-benefit analysis is an aid to government decision making that works best when the costs and benefits can be denominated in dollars, and all parties involved agree about the relative importance of the various factors involved. The Preferred Alternative touches a wide variety of people and business, and there is no such agreement to date. In principle, economic theory will one day be able to provide such a common basis for discussion, but the necessary tools to understand costs and benefits to communities around airports are not yet developed enough to meet the need expressed in this comment. (See the “Quality of Life” section, below, for a description of the initial steps in this direction.) Until then, each element is kept separate, so concerned parties can make their own judgments about relative valuation.

#### **6.1.2 Impacts of Noise**

**Comment:**

*Increased air traffic will reduce property values.*

**Response:**

Many comments related to a perceived decrease in property values. Many others were concerned with the quality of life in their communities. Economic research shows that these two concerns are essentially the same. When people buy houses, they are willing to pay more for a higher quality of life. Therefore, by observing the effect of aircraft noise on prices paid for houses, it is possible to deduce the impact of aircraft noise on the many intangible factors that go into quality of life. This process is called the “Hedonic Price Method.” A wide-ranging review of hedonic price studies of aircraft noise can be found in Nelson.<sup>2</sup> A European perspective is given in

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<sup>2</sup> Nelson, Jon P., “Hedonic Property Value Studies of Transportation Noise: Aircraft and Road Traffic,” *Proceedings of the International Symposium on Hedonic Methods in Real Estate*, Geneva, Switzerland, June 2007.

Faburel *et al.*,<sup>3</sup> which has additional information about the dependence of the observed effects on time.

The conclusions of the literature surveys in references 1 and 2 are that a “noise depreciation index” exists:

- Houses exposed to increased noise decrease in sale price;
- At DNL above 65 dB, the effect is about 1% per additional dB;
- At DNL between 60 and 65 dB, the effect is about 0.5% per additional dB;
- Below 55 dB DNL, no effect has been measured.
- The effect appears to have increased in recent years, even in places where noise exposure has decreased.

However, other factors are at play in determining property values. Being close to an airport is valuable to people who travel frequently, to people who work at the airport, and to people who own or work at businesses that profit from aviation. This increases the value of houses near the airport. Researchers at the Federal Reserve bank studied the effect of distance from the airport at the same time as noise exposure.<sup>4</sup> It finds a noise depreciation consistent with other studies, but notes that proximity to the airport causes increases in price of approximately 1% for a 6% reduction in distance to the airport. On balance, a nearby airport is an amenity. Therefore, the idea that homeowners near an airport are owed compensation for the loss of value of their property is inapplicable here.

These arguments apply generally to houses near airports. Comments received on the Draft EIS and the mitigation are primarily from communities that have not had noise in the past, but are expected to have more under the Mitigated Preferred Alternative. These communities have been profiting from proximity to an airport, without paying the cost in terms of noise. Other communities have been paying the cost. The Mitigated Preferred Alternative changes the distribution of noise and decreases the total number of people exposed to noise levels above the lowest regulatory threshold. The new distribution is a net benefit to the population of the study area: though some people may see a decrease in the prices of their houses, more may expect to see an increase, as current noise penalties are removed.

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<sup>3</sup> Faburel, G., I. Maleyre, and F. Peixoto, *Dépréciation immobilière et ségrégation sociale pour cause de bruit des avions*, Centre de Recherche Université Paris XII, October 2004.

<sup>4</sup> Cohen, Jeffrey P., and Cletus C. Coughlin, September 2006, *Spatial Hedonic Models of Airport Noise, Proximity, and Housing Prices*, Working Paper 2006-026B, Research Division, Federal Reserve Bank of St. Louis.

## **6.2 Quality of Life**

### **6.2.1 Non-Noise Impacts**

**Comment:**

*Why isn't there an analytical model to determine the expected health and economic impacts beyond just noise modeling?*

**Response:**

In a project which has the effect of reducing emissions, like this one, noise is the primary way that aircraft affect the health of people around them. An integrated model is under development by a subcommittee formed by the National Academy of Sciences. This model, to be known as the Aviation Environmental Design Tool, will not be ready for several years. Until then, environmental impact analyses must be conducted using existing tools.

### **6.2.2 Contributing Elements**

**Comment:**

*Airspace redesign will negatively affect quality of life.*

**Response:**

“Quality of Life” is a complex concept. Elements contributing to quality of life derived from public comments on this airspace redesign are:

1. Aircraft noise interference with domestic life and outdoor recreation;
2. Aircraft noise interference with education;
3. Fear of aircraft crashes and falling objects;
4. Road Traffic from increased numbers of airport users;
5. Aircraft noise effects on health and sleep disturbance;
6. Air Pollution effects on health and climate change.

Category 1 includes the factors most obviously included in the price are willing to pay for a house. It has been treated in the previous section.

### **6.2.3 Education**

**Comment:**

*Overflights cause sleep deprivation in children and result in poor educational performance. There is concern about negative impact on educational facilities, both instantaneous and long term effects.*

**Response:**

Category 2, the effect of noise on students in school, is the subject of numerous comments on the Preferred Alternative and the Mitigated Preferred Alternative. Schools are included in the list of land uses incompatible with noise levels greater than 65 dB DNL. This is the area of “significant” noise increases. The Mitigated Preferred Alternative has no significant noise increases. Schools that are currently expected to be above the 65 dB DNL threshold in 2011 are, according to the Aviation Noise Abatement Policy of 1976 and FAA Order 1050.11, *Noise Control Planning*, the responsibility of airport proprietors.

**6.2.4 Safety**

**Comment:**

*A greater number of planes means a greater risk of collision or crash. There are additional concerns with regard to low flying aircraft over residential areas, with new ground paths/fanned headings, with aircraft crashing into residential areas, and with things falling off aircraft (blue ice, fluids, fuel).*

**Response:**

Category 3 combines fear of aircraft crashes in neighborhoods, and fear of objects falling off of aircraft. It can not be denied that if aircraft never fly over an area, that area will not have an aircraft fall on it. However, the risk of such an event is extraordinarily low. In 2003, the most recent year for which final data are available, the National Transportation Safety board counted 26 people in the United States who were injured by aircraft accidents.<sup>5</sup> By comparison, the National Highway Safety Administration reports that in the same year, 124,000 people who were not in cars were injured in automobile accidents.<sup>6</sup> The excellent safety record of aviation benefits neighbors as well as passengers and crews.

Category 4, increased road traffic, is not an issue for this redesign, because increased air traffic is not expected to result from the Preferred Alternative.

The last two categories, health and air pollution, are treated in separate sections in this document.

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<sup>5</sup> Annual Review of Aircraft Accident Data, U.S. General Aviation, Calendar Year 2003. NTSB/ARG-07/01, PB2007-105388, <http://www.nts.gov/publicatn/2007/arg0701.pdf> “Accidents” include objects falling from aircraft. No people on the ground were injured by airline accidents.

<sup>6</sup> NHTSA National Center for Statistics and Analysis, *Traffic Safety Facts 2003*, <http://www-nrd.nhtsa.dot.gov/Pubs/809775.PDF>

### 6.2.5 Disaster Exercises

**Comment:**

*At Virginia Beach and the NAS Oceana Naval Air Base and Port Smith Naval Air Base there are full disaster exercises. Will there be any implemented for Bergen County and its malls as they did in Virginia Beach?*

**Response:**

Disaster response exercises like this are conducted by local governments in cooperation with Defense and Homeland Security officials. No plans for such an exercise in Bergen County are known to FAA.

### 6.2.6 Structural Damage

**Comment:**

*I am concerned about structural damage to my home due to aircraft noise. Our foundations were not meant for that kind of low-flying aircraft.*

**Response:**

Low-frequency noise, which people hear and feel as a deep rumbling, is the kind that could potentially harm a structure. In 2002, the cities of Minneapolis and St. Paul, MN convened a panel on low-frequency noise. Their findings were reported by the Federal Interagency Committee on Aviation Noise.<sup>7</sup> The consensus of the Panel was that “Low-frequency aircraft noise has been identified as a cause of significant levels of rattle-related annoyance in areas near air carrier airports.” However, “Low-frequency aircraft noise (apart from that of low altitude high-speed military aircraft) poses no known risk of adverse public health effects, nor a risk of structural damage.”

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<sup>7</sup> FICAN on the Findings of the Minneapolis-St. Paul International Airport (MSP) Low-Frequency Noise (LFN) Expert Panel, [http://www.fican.org/pdf/lfn\\_expertpanel.pdf](http://www.fican.org/pdf/lfn_expertpanel.pdf)

## 7 Comments on Air Pollution

### 7.1 Air Pollution

#### 7.1.1 Quantification

**Comment:**

*Requested detailed impacts on air quality and the state implementation plan.*

**Response:**

In the Draft EIS, FAA concluded that air quality was not likely to be adversely affected by the airspace redesign, so no emissions analysis was conducted. New FAA policy dictates that such a conclusion is no longer sufficient. Therefore, an Appendix to the Final EIS contains an estimate of total fuel consumption by aircraft in the Future No Action, Preferred, and Mitigated Preferred Alternatives.

The fuel consumption analysis concluded that the Preferred Alternative leads to reduced fuel burn by aircraft because:

- Aircraft spend less time on taxiways, with engines running, waiting to depart;
- Arriving aircraft are delayed less in the air;
- Aircraft on dispersal headings fly shorter distances at low altitudes.

The total fuel consumption on the annual-average day under the Preferred Alternative is about 205 metric tons less than under the Future No Action Alternative, which translates to an annual reduction of 24.6 million gallons of fuel per year in 2011.

Noise mitigation, unfortunately, frequently implies increased air pollution. With two exceptions, noise mitigation measures increase the distance aircraft must fly, which increases their fuel consumption. The first exception is the River RNAV approach to PHL. The River RNAV approach is only used for flights from the south, for which it is a shorter ground track than the ILS approach, so it causes a net decrease in fuel consumption. The second exception is nighttime Continuous-Descent Approaches. These approaches, because they permit pilots to use lower engine power, decrease the total fuel burned by a very small amount. The Mitigated Preferred Alternative reduces fuel burn by 194 metric tons per day, again compared to the Future No Action Alternative. This translates to 23.4 million gallons of fuel per year in 2011.

#### 7.1.2 Reservoirs

**Comment:**

*Concern about our reservoirs. Is the quality of our water compromised? What about with regard to emissions, particulates, and fuel dumping? Will outdoor resources, such as playground equipment, be affected?*

**Response:**

The preferred Alternative reduces overall fuel consumption, so aircraft emissions will be correspondingly lower than if no action is taken in this redesign.

Air quality studies focused on particulate matter (commonly referred to as soot) have been conducted at Chicago O'Hare International Airport, Boston Logan International Airport, and Cincinnati/Northern Kentucky International Airport. The referenced studies have found that soot and other deposits under flight paths are more closely related to general urban pollutants, motor vehicle exhaust, and soot from burning non-aviation heavier fuels, such as fuel oil. Specifically, the studies concluded that components of soot are more the result of regional background pollution rather than jet fuel or aircraft engine exhaust. The underlying data base for aircraft particulates is not extensive and the FAA is working with the aviation community, including the Society of Automotive Engineers, the International Civil Aviation Organization, and NASA to develop methods and procedures for measuring aircraft engine particulate emissions. The primary exhaust emissions from jet aircraft engines are oxides of nitrogen, hydrocarbons, carbon monoxides, and smoke, all of which are measured during the FAA's engine certification process. Engine exhaust emission levels are measured and regulated as prescribed in 14 CFR Part 34. The regulations apply to all civil aircraft that are powered by gas turbine engines including turboprop, turbofan, and turbojet engines.

Fuel dumping occurs only when life depends on it. When fuel dumping must occur, aircraft follow set procedures prescribed by air traffic control, and aircraft are directed to altitudes at which fuel will evaporate before reaching the ground. More-modern aircraft are not even capable dumping fuel.

**7.1.3 Perceived Increases****Comment:**

*Fanned headings will increase air pollution and increase the number of illnesses.*

**Response:**

It is not necessary to mitigate airport emissions, since airport emissions decrease in the Preferred Alternative. Reducing fuel consumption is part of increasing efficiency, which was part of the initial Purpose and Need for the airspace redesign.

Since fewer pollutants are being added to the air, health impacts of air pollution will also decrease, so detailed analysis is not necessary.

**7.1.4 Greenhouse Gas****Comment:**

*Increasing traffic to these levels will increase greenhouse gas emissions.*

**Response:**

It is correct that increased traffic will emit more greenhouse gases than current traffic levels, but that is not part of the airspace redesign. The growth in traffic is forecast to occur regardless of the design of the airspace. From the point of view of greenhouse gas emissions, the Preferred Alternative is superior to keeping the current airspace design in place.

**7.1.5 Global Warming**

**Comment:**

*More overflights mean increased periods of time with windows closed and a/c running which increases CO2 output and contributes to global warming.*

**Response:**

When computing impacts on global climate change, it is important to keep relative magnitudes in mind. The hundreds of tons of fossil fuels per day that will not be burned by aircraft are much more important to the global climate than the tens of kilowatt-hours of electricity that domestic air conditioners consume.

**7.1.6 Nighttime Ocean Routing**

**Comment:**

*We are particularly concerned that some of the efficiencies identified in this exhaustive and well-documented analysis could be eroded or obviated by the introduction of noise abatement measures that would increase flying time for some aircraft. While this clearly would be inconsistent with the goal of increasing efficiency and reducing delays, it also has the less obvious potential to create another type of environmental impact -- one that was not studied in the environmental review process. Specifically, any noise mitigation measure that increases flying time also may increase fuel burn, and therefore the emissions that are produced by aircraft engines.*

**Response:**

Mitigating noise pollution almost always entails increasing aircraft emissions. The minimum-fuel path is almost always the shortest, so flying extra miles for noise abatement means burning extra fuel. Nighttime ocean routing is a compromise between two desirable goals that are mutually inconsistent.

## 8 Comments on Health

### 8.1 Health

#### 8.1.1 Impacts of Noise

**Comment:**

*Increases in noise levels will be dangerous for our community. The FAA did not consider the scientific studies regarding effects of long term exposure to noise and air pollution to humans, and therefore the selection of the preferred alternative is invalid.*

**Response:**

A survey of health studies conducted by Health Canada entitled “Noise from Civilian Aircraft in the Vicinity of Airports – Implications for Human Health”<sup>8</sup> found that aircraft noise had no impact on hypertension, ischemic heart disease, or stress hormone levels at any DNL consistent with residential land use (below 65 dB DNL).

There are no places where the Mitigated Preferred Alternative raises noise exposure of a census block from below 65 dB DNL to above.

#### 8.1.2 Hearing Loss

**Comment:**

*Concerned about hearing loss due to the fanned headings*

**Response:**

Health effects of noise are a legitimate concern, but epidemiological studies to date show that they appear only at high noise levels, which are inconsistent with residential land use. Hearing loss has not been observed at DNL less than 70 dB. In fact, the OSHA standard for hearing loss is 90 dB (instantaneous, not DNL), the equivalent of kneeling next to a gasoline-powered lawnmower for long periods of time.

#### 8.1.3 Disabilities Act

**Comment:**

*The FAA is not free to disregard the Americans with Disability Act, and there has been no study done to determine the impact on hearing disabled persons.*

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<sup>8</sup> Available through <http://joesestak.com/airport/noise-and-health/> or <http://www.hc-sc.gc.ca/rpb>.

**Response:**

The formal title of the Americans with Disabilities Act is “Equal Opportunity For Individuals With Disabilities.” Hearing-disabled people are treated no differently from any other class of person by the regulations governing environmental impact of changes to the airspace.

**8.1.4 Sleep Deprivation**

**Comment:**

*Aircraft noise causes many of us to lose sleep. In addition, overflights can cause sleep deprivation in children and result in poor educational performance.*

**Response:**

Though older standards tie sleep disturbance to indoor noise levels measurable in DNL<sup>9</sup>, more recent studies<sup>10</sup> show that single events are more important than averaged noise levels. This makes intuitive sense – waiting for the noise to pass will not work, once one has been awakened. The number of night-time departures does not increase under any alternative, and under the Mitigated Preferred Alternative, the changes to departure headings near EWR and PHL are mitigated by restricting nighttime departures to existing headings or over-water tracks. Therefore, night-time single-event noise levels will not increase in Delaware County, Union County, or Queens, and sleep should not be adversely affected by the Mitigated Preferred Alternative.

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<sup>9</sup> U.S. Environmental Protection Agency, *Information on Levels of Environmental Noise Requisite to Protect the Public Health and Welfare with an Adequate Margin of Safety*, Report 550/9-74-004, March 1974.

<sup>10</sup> Federal Interagency Committee on Aviation Noise (FICAN), *Effects of Aviation Noise on Awakenings from Sleep*, June 1997, [http://www.fican.org/pdf/Effects\\_AviationNoise\\_Sleep.pdf](http://www.fican.org/pdf/Effects_AviationNoise_Sleep.pdf)

## 9 Comments on Airlines

### 9.1 Airlines

#### 9.1.1 Focus on Profits

**Comment:**

*We believe all the benefits are going to the airlines at the expense of the impacted population.*

**Response:**

The FAA mission is, “to provide the safest, most efficient aerospace system in the world.”<sup>11</sup> True, airlines benefit from the increased efficiency. More efficient transportation benefits the entire metropolitan area. That is why cities build airports, seaports, and highways. Airlines benefit from reduced costs. Competition among airlines means that reduced operating costs turn into reduced ticket prices or other kinds of improved service to passengers. Improved service to travelers then becomes increased economic activity, which benefits local businesses and their employees.

Airline profits are not the concern of the FAA. Profit, or more often the lack of profit, is the result of the differences between costs and revenues. Airline profits played no role in the development of the Preferred Alternative.

#### 9.1.2 Required Technology

**Comment:**

*In the ROD the FAA should require airlines to take steps to transition to the associated technology.*

**Response:**

As of 2006, over 95% of the aircraft using the en route airspace in the study area were equipped for RNAV airways, arrival procedures, and departure procedures. This is sufficient to enable implementation of the Alternative.

#### 9.1.3 Re-regulation

**Comment:**

*It's time for Congress to take back the regulation of airlines and airports for the greater good. The FAA intentionally declined to consider the potential use of other existing airports with underutilized capacity to alleviate delays. Also, should airlines be made to fly outside of the very congested rush hours, book their flights with more time in between, reduce their schedules rather than changing the airspace, and/or grant a partial refund if flights are delayed?*

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<sup>11</sup> <http://www.faa.gov/about/mission/>

**Response:**

For the past 30 years, the Federal Government has been operating under a consensus that the market is a better mechanism for organizing air transportation than government mandates. In the case of air service, “airline deregulation has been a success.”<sup>12</sup> The FAA has no power to enforce any of the methods suggested in the comments. Suggestions such as a change to schedules or a refund to customers for delayed flights may be adopted by airlines as a marketing strategy, but a Federal mandate for them is unlikely to occur.

**9.1.4 Restricting Access**

**Comment:**

*Limit the use of PHL, JFK, LGA, and EWR to larger capacity aircraft and long distance flights, i.e., more than 300 miles, which air travel is best suited.*

**Response:**

A public airport is open to all. Changing access to the airport is the responsibility of the airport proprietor. The airport proprietor is unlikely to force its customers to operate in a manner that seems to them less profitable.

**9.1.5 Load Factors**

**Comment:**

*Analyze total flight volume vs. passenger load factors and increase load factors to improve efficiency.*

**Response:**

It is not within the FAA’s power to require airlines to increase the number of passengers on each flight.

**9.1.6 Congestion Pricing**

**Comment:**

*There are other such viable solutions to this issue. For example, the FAA could use traffic management in the form of congestion pricing based on demand in order to effectively manage the congested airspace before resorting to drastic measures like redesigning the airspace, which will have an adverse affect on millions of people.*

**Response:**

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<sup>12</sup> Kahn, A. E., “Airline Deregulation” in *The Concise Encyclopedia of Economics*  
<http://www.econlib.org/LIBRARY/Enc/AirlineDeregulation.html>

The Congressional Research Service recently collected a wide-ranging survey of possibilities for FAA reauthorization<sup>13</sup> that includes congestion pricing among other possibilities. The FAA does not currently have that authority, however. Airport proprietors have other options available, such as setting landing fees to limit traffic, but the economic benefits of increased air traffic are perceived to be great enough that such programs are rare.

### **9.1.7 Demand-Side Management**

#### **Comment:**

*The FAA should address in more detail the expected impacts of changes in demand side management and practical limitations on increased traffic. For example, Congress recently lifted gate slot restrictions at JFK airport, resulting in increased traffic (a 27% increase in March 2007 compared to March 2006). This has caused a sharp increase in delays and issues with respect to controller workload. There has also been a recent sharp rise in aviation "near miss" incidents in the region. These impacts should be studied. The estimated 5% capacity increase from the Airspace Redesign is small relative to the influence of demand control at JFK. This highlights the effectiveness of demand control measures as an alternative in achieving goals of the Airspace Redesign at much lower cost. The FAA should consider additional demand-side management as (1) an alternative to the Preferred Alternative and (2) a mitigation measure.*

#### **Response:**

It is incorrect to assume that the increase in delay at JFK is due to the removal of the High-Density Rule slot restrictions. A more in-depth analysis of the operations at JFK, as well as the other area airports throughout 2005 and 2006 reveals a steady growth trend. In fact, Delta, Jet Blue, and American considerably increased operations at JFK during the summer of 2006. This was customer driven, not as a result of FAA or Congressional action.

The Preferred Alternative is designed specifically with the intent to remove complexity from the airspace, reducing the possibility for "near miss" incidents.

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<sup>13</sup> Elias, B. et al., *Reauthorization of the Federal Aviation Administration: Background and Issues for Congress*, Order Code RL33698, January 2007.

## **10 Comments on Delay Reductions**

### **10.1 Delay Metrics**

#### **10.1.1 Interpretation**

**Comment:**

*Section 17.5 of the operational analysis notes that because benefits analyses for airspace redesign projects must be referred to a large common denominator, airspace redesign benefits are often on the order of a few minutes. Does this imply that because the analyses included every flight in the study area, some of which are unaffected by the project, that the estimated benefit statistics are diluted? Would the benefits appear greater if unaffected flights were removed from the common denominator?*

**Response:**

Certainly, the benefits would appear greater if the unaffected flights were removed from the common denominator. That would, however, make it impossible to decide (for example) whether a change to PHL was better for overall system performance than a change to EWR.

### **10.2 Efficiency Gains**

#### **10.2.1 Optimal Conditions Only**

**Comment:**

*In optimal conditions only a few minutes -at most- might be saved per flight.*

**Response:**

The operational simulations were conducted under normal conditions, not optimal. The distinction is important because optimal conditions can be very rare. Normal conditions arrive frequently. The 90<sup>th</sup>-percentile-day delays, in fact, will be exceeded on 36 days each year.

#### **10.2.2 Small Benefits**

**Comment:**

*Please provide an explanation of the delay benefit numbers. What is meant by “enormous economic consequences” realized by a minute or two delay reduction?*

**Response:**

The delay improvements reported in the operational analyses are not small. A study by the Logistics Management Institute in 1999 estimated that air traffic congestion nationwide could cost 46 billion dollars to the nation's economy because of increased travel time.<sup>14</sup> The nationwide change in travel time that was anticipated for 2010, converted to its equivalent in terms of the metrics used for this study, is approximately 3 minutes per flight. Fifteen to twenty percent of the traffic in the USA uses the airports in this study area, so approximately 7 to 9 billion dollars a year could be the impact from a three-minute-per-flight delay reduction. Therefore, a few minutes per flight is a large change in efficiency.

**10.2.3 Status Quo**

**Comment:**

*The best hope the Project seems to offer is that things might not get worse.*

**Response:**

Congestion will happen in any useful transportation system. If the transportation infrastructure is not filled with traffic, the money used to construct it could probably have been better spent elsewhere. If the expected traffic growth can be handled without increasing delays beyond levels observed in the past, it would be an economical and effective use of resources. In that sense, "not getting worse" is the objective of a transportation improvement, and is what this airspace redesign offers.

**10.3 Delay**

**10.3.1 Landside Operations**

**Comment:**

*Fully explore or correctly determine the real causes of delay. Delays in the area of the redesign are attributable to landside operations as opposed to airport/airspace issues.*

**Response:**

There are many ways to measure "delay." The delays referred to in these comments are those related to on-time performance. This is the definition used by the Bureau of Transportation Statistics to rank airlines, because they relate directly to the perceived experience of the passenger. It is not the definition of delay used in this study, because it includes many complicating factors that are unrelated to air traffic control. Of course, there is nothing the air traffic control system can do to prevent mechanical delays or any of the other stated causes.

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<sup>14</sup> Kostiuk, P., E Gaier, and D. Long, "The Economic Impacts of Air Traffic Congestion," *Air Traffic Control Quarterly* 7 pp. 123-145, 1999.

In these operational analyses, the definition that is best for assessing efficiency of the air traffic control system was used. Delays in these analyses are determined by comparing the length of time it takes to complete a flight, starting with the pilot's initial contact with the tower for taxi clearance, and ending when the flight leaves the runway at its destination. This definition of delay excludes all the factors not under the control of the FAA. The benefits of the Preferred Alternative are in addition to any delay reductions the airlines may be able to accomplish within their ground operations.

### **10.3.2 Severe Weather**

**Comment:**

*The Integrated Airspace will not reduce delays, which principally are caused by adverse weather conditions.*

**Response:**

All the airspace changes in the Preferred Alternative will improve operations when severe weather disrupts operations en route. Other weather-related delays, those due to low visibility at the airports, will not be affected by airspace redesigns. It should be recalled, though, that at the airports good weather is much more frequent than bad weather (70% to 30% of the hourly reports from EWR, JFK, LGA, and PHL in 2006).

It should be noted that, according to the FAA's OPSNET database, Center Volume was the cause of 86% of all delays imposed by New York Center in the first quarter of 2007. The primary purpose of this airspace redesign is to reduce that category. Only in the summer months do weather delays surpass center volume delays in importance among delays en route. (Practically all Center Volume delays are charged to the Center, not the Airport. Center Volume delays are charged to the airport only in very rare circumstances.)

### **10.3.3 Result Verification**

**Comment:**

*We understand that the FAA's preferred alternative claims to save an estimated 12 million minutes of delay annually for the four major metropolitan airports. What analysis can you provide that verifies this information?*

**Response:**

This is an extrapolation from the output of the operational analysis simulations, but in this case the simulations were driven with the annual-average demand instead of the 90<sup>th</sup> percentile demand. The delay metrics in the simulation output were multiplied by 365. Note that the 12-million minutes figure includes only normal operations. When operations are disrupted by severe weather, the preferred alternative has additional benefits compared to Future No Action.

#### **10.3.4 Flight Scheduling**

**Comment:**

*Is it not true that small capacity improvements are rapidly taken advantage of by the carriers to schedule additional flights during peak period, so reduction in delays is unlikely?*

**Response:**

It is true that whenever capacity becomes available at a desirable destination, it is rapidly put to use. Conversely, at many airports, high levels of delay make it unprofitable for airlines to schedule flights, and traffic decreases. New York is different. Delay is not so great a deterrent to traffic in the New York/New Jersey/Philadelphia area as it is in other parts of the country. In recognition of this fact, the operational analyses assumed a fixed level of traffic, regardless of delay. Since each alternative was driven with the maximum-efficiency traffic level, possible additional flights are not a factor in interpreting the output of the simulations.

#### **10.3.5 New York/New Jersey vs. Philadelphia**

**Comment:**

*PHL does not have an airspace problem. The problem is with the NY/NJ airspace. Airspace around PHL is being redesigned to benefit the NY traffic at the expense of the residents around PHL.*

**Response:**

New York and Philadelphia share airspace. It is not possible to improve New York airspace without improving Philadelphia. See Section 9.2 of Appendix C for further details.

# 11 Comments on Modeling

## 11.1 Modeling

### 11.1.1 EWR Operations

**Comment:**

*The noise modeling of EWR is incorrect. The traffic levels have been underestimated. The report says levels were estimated to increase by 25% between 2003 and 2011. Last year alone there was a 20% increase in operations at EWR.*

**Response:**

According to the FAA's Operations Network database, EWR Tower handled 448,563 instrument operations in 2006 and 440,953 operations in 2005. The increase was 1.7%.

### 11.1.2 Forecasted Traffic

**Comment:**

*Do the noise models account for forecasted traffic increases?*

**Response:**

Yes. All noise impact measurements are based on comparisons of 2006 or 2011 traffic under each Alternative.

### 11.1.3 Terrain

**Comment:**

*No ground based noise monitors were used, consequently the noise modeling inputs were flawed and outdated. In addition, the noise modeling is deficient as it does not consider the elevation and type of terrain, and is not accurate for those areas next to bodies of water because the water amplifies the noise.*

**Response:**

The noise impact routing system (NIRS) accounts for terrain elevation when computing noise. It is true that the current state of the art does not permit inclusion of reflectivity of various types of terrain.

The noise analysis was designed to ensure that the sources of systematic error (unavoidable in any study based on forecasts of the future) are minimized. DNL changes cited in the EIS are based on differences between the outputs of two computer runs, tightly controlled so that the only differences between them were those due to the Alternative under study. This way, any deviation from actual aircraft noise will cancel out when the results are subtracted. The decision supported

by the EIS is a choice among alternatives, not an absolute assessment of noise, so this method is scientifically correct.

#### **11.1.4 NIRS Validation**

**Comment:**

*Has the NIRS model been validated?*

**Response:**

Section 14.5e of FAA Order 1050.1E says, "For air traffic airspace actions where the study area is larger than the immediate vicinity of an airport, incorporates more than one airport, or includes actions above 3,000 feet AGL, noise modeling will be conducted using NIRS." No other model meets FAA standards. The software at the core of NIRS is the same engine that drives the Integrated Noise Model, which has been used for decades in validated studies. NIRS itself, though relatively new, has been used in validated studies in Chicago. The inputs and outputs of this particular use have been extensively validated with operational personnel and noise modeling experts.

#### **11.1.5 Ambient Noise**

**Comment:**

*The FAA implementation of the "Preferred Alternative" introduces large noise increases exceeding 5 decibels to the region surrounding EWR, but the FAA has avoided designating these as "significant" by failing to consider other noise that cumulatively would bring these areas above 65 DNL. The effects of the combination of aircraft noise with ambient and non-modeled aviation noise sources can bring these areas to 65 DNL and above, thereby rendering them no longer compatible for residential use. Determining the actual impacts requires detailed geographic examination of the impacted area taking into account both the modeled noise increase and the ambient noise for individual locations. without this analysis, the FAA has not determined the number of people "significantly impacted" and has not fulfilled its obligation to look at cumulative impacts of its action. Therefore, please conduct sufficient representative noise measurements over portions of the city of Elizabeth, NJ, and similar areas that will experience noise increases from the proposed implementation of the "preferred Alternative" to allow accurate determination of populations that will receive 1.5 decibel increases in total noise to reach cumulative noise levels above 65 DNL and thereby be "significantly impacted." Please determine the environmental justice status of these affected populations.*

**Response:**

Excluding ambient noise, as is required by federal regulations, tends to increase the size of noise changes measured in decibels. For example, consider a point with a DNL of 20 dB that increases by 10 dB in an alternative. If background noise was typically 30 dB DNL (still very quiet), that same increase in sound would register a 2.8 dB increase. The standards for slight, moderate, and significant noise increases are defined for modeling done in the absence of background noise. So to include other noise sources, including noise from other sources would require new regulations defining new thresholds that included background sources. The resulting standards would tend to be less sensitive to aviation changes, not more sensitive.

Health impacts (which occur only at levels far above any changes in this study) appear to be a function of the total exposure, not sudden increases above ambient.<sup>15</sup> The process used in this EIS is correct.

**11.1.6 Refinement**

**Comment:**

*The refined analyses resulted in exceedence of an FAA impact threshold at one location in the vicinity of HPN, but may not be fully sensitive to such all such situations. We continue to be concerned that further refinements in the noise methodology might identify additional exceedences of this type.*

**Response:**

The refinements of the noise analyses generally reduced the calculated noise exposures. The population point that was newly found to meet the threshold for a slight-to-moderate noise increase resulted from an ambiguity in the FAA Orders governing environmental impact policy and procedures. (Namely, when stored in a computer memory, should 45 decibels be an integer or a real number?) No analysis is perfect, so it is possible that other errors may be discovered.

**11.1.7 Mitigation Results**

**Comment:**

*Some of the mitigations may not be practically implementable or very likely be less effective than shown in modeling. Thus, overall, the noise impact results are highly questionable.*

**Response:**

All of the mitigation measures have been vetted by personnel with experience working traffic around each airport. All measures included in the Mitigated Preferred Alternative are practical, though one, midnight ocean routing, is very high in cost.

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<sup>15</sup> See for example, <http://joesestak.com/airport/noise-and-health/>

## **12 Comments on Traffic**

### **12.1 Traffic**

#### **12.1.1 PHL Departures**

**Comment:**

*Please provide number/type of aircraft that will be departing PHL between 10pm and 7am under the redesign plan.*

**Response:**

On the annual-average day in 2011, the forecast traffic used in this study has 11 departures between 10 PM and 7 AM. Six are Airbus 319 or 320; two are Boeing 737s; two are A330 widebody jets; one is a Boeing 757. All depart from the main runway.

#### **12.1.2 Danbury/Oxford**

**Comment:**

*The exclusion of DXR and OXC from the redesign study is improper. It was stated by FAA members of the redesign team that GA aircraft operation (both VFR and IFR) were excluded from the redesign study based upon Order 1050.1E. However, this order only excludes GA aircraft operations when they are below stated thresholds. DXR Part 150 Noise Compliance Program of 2006 and the OXC's draft Part 150 report clearly state that airport operations exceeded the thresholds and should have been included.*

**Response:**

At the time the baseline for the airspace redesign was constructed, the operations at Danbury Airport (DXR) and Oxford Airport (OXC) did not meet the requirements for inclusion in the traffic analysis. In any case, operations at these airports were untouched by the redesign.

#### **12.1.3 Verification of Forecast**

**Comment:**

*What underlying data is available to support the projected number of flights?*

**Response:**

Appendix B of the EIS describes the method for forecasting traffic and detailed results.

#### **12.1.4 Assumptions**

**Comment:**

*For 2006, the FAA assumed 506,985 operations per year (DEIS, Appendix B, Page 14), whereas the true number is approximately 444,258. This is a difference of 14%. Based on discussions with*

*FAA representatives at the April 25, 2007 meeting, the operations levels were not changed for the data presented in the Report. The FAA traffic assumptions were unrealistic and likely have profoundly altered the modeling results for both delays and noise.*

**Response:**

According to the FAA OPSNET database, which is the official source for operation counts, there were 489,780 instrument operations in 2006 at EWR. The forecast exceeded this number by 3.5%. This excess traffic may have led the Draft EIS to overestimate the noise exposure by 0.14 dB in DNL at each census point near EWR, an undetectably small difference.

## **12.2 Traffic Levels**

### **12.2.1 Capacity**

**Comment:**

*In 2006, EWR had among the highest delays in the country with a far lower number of operations than assumed by the FAA. Thus, the FAA assumed base traffic levels for 2006 far exceeds the demonstrated capacity capability of EWR. Furthermore, the difference of 14% between the FAA assumed versus actual capacity far exceeds FAA projected capacity gain of 5% from the proposed changes.*

**Response:**

Observed delay levels include contributions from many factors outside the study area. Therefore, the operational analysis does not compare simulated results to actual results. It compares different alternatives under the same high-traffic conditions. The comparison of capacity numbers is not relevant. The Preferred Alternative does not increase capacity.

### **12.2.2 Delay Sensitivity**

**Comment:**

*The high dependence of delays on assumed traffic levels makes it possible to greatly exaggerate the effects of throughput or capacity improvement. All that is necessary is to operate the system near capacity. If capacity is then increased by a few percent, then delays go down sharply. In real life, however, increased carrier scheduling during peak periods prevents this gain from ever being realized. In effect the study was “rigged” to create an impression of significant benefit whereas, benefits, if any, would be small.*

**Response:**

Operational benefits have been calculated on the 90<sup>th</sup> percentile forecast traffic day because two alternatives that perform similarly on days of low traffic may be very different on a high-traffic day. The FAA must design an airspace system that accommodates all traffic levels, not just the average day. Annualized metrics, such as DNL, are calculated from an annual-average day, precisely to address these concerns.

### **12.2.3 Nighttime Penalty**

#### **Comment:**

*When an airport is operated near or above capacity, small changes in attempted flow rate can result in very large increases in delays. There is a disproportionate increase in the delays for the system with lower capacity, which for the FAA's assumptions and modeling of year 2011, is the "No Action" case. The assumption of higher than realistic traffic levels can profoundly affect noise results and alternative comparisons. High delays can push aircraft into nighttime (10PM – 7AM) operation where they incur a 10 decibel penalty in the DNL calculation. This is equivalent to having each aircraft count as ten. If delays into nighttime operation are occurring in the modeling, then they could potentially severely and unduly penalize the baseline "No Action" case noise results, since, as discussed earlier, carriers adjust schedules to avoid excessive delays and nighttime operation. Please provide information on the percent of operations that are pushed into the nighttime hours due to delays for the alternatives and estimate the contribution of this effect to the modeled DNL for the various alternatives in the various mitigation localities.*

#### **Response:**

No flights are pushed into the nighttime category by any alternative except Ocean Routing. Noise modeling is done based on the annual-average day, not the 90<sup>th</sup> percentile day.

### **12.2.4 Airline Behavior**

#### **Comment:**

*When demand exceeds available capacity, carriers can switch to larger aircraft to maintain passenger flow. The failure to adjust applied system loads to likely carrier behavior was pointed out in NJCAAN's DEIS comments. FAA experts at public meetings admitted that this adjustment took place, but made no attempt to incorporate this into the modeling, except at LaGuardia Airport, where results would have become clearly unreasonable without this adjustment.*

#### **Response:**

Recent history does not support the general assertion that airlines expand the size of aircraft serving an airport when delays become large. Instead, many airlines have been expanding point-to-point service using smaller aircraft to more destinations, because passengers prefer non-stop flights. LaGuardia is an exception, not just because of capacity limits, but because the application of the High Density Rule at LGA caused the traffic to be skewed this way for many years. The gauge of the aircraft at LGA was forecast to increase, because the baseline had so many small aircraft in it. Proper modeling technique does not support adjustment of the traffic forecast in the absence of some demographic or technological driving force.

### 12.2.5 Excluded Operations

**Comment:**

*The FAA did not include all of the traffic that is provided air traffic control services, which resulted in an inflated benefit. When the FAA's Consultant removes a large portion of the traffic from the equation they are able to insert operations from the 8 modeled airports and show that the Proposed Action results in an operational benefit. The use of incomplete and inaccurate modeling data invalidates the conclusions.*

**Response:**

In the preceding comments, an inflated traffic forecast is cited as a source of inflated benefit estimates. In this comment, removing traffic is cited as a source of inflated benefit estimates. The traffic excluded from the study falls into three categories: VFR flights not affected by the structure of the air traffic control system (see below); military flights for which delay is not a meaningful metric, and overflight traffic that was included parametrically in the airspace analysis (see Section A of Appendix C).

### 12.2.6 Historical Data

**Comment:**

*What was the air traffic volume in the study area when the airspace system was originally designed in the 1960s and what is the current air traffic volume in the study area?*

**Response:**

The number of aircraft operations per year, according to the Port Authority of New York and New Jersey, has more than doubled since 1960. Data for Philadelphia International Airport were unobtainable.

	<b>JFK</b>	<b>LGA</b>	<b>EWR</b>
1960	248,686	191,736	163,378
2006	378,410	399,827	446,166

## 12.3 VFR Traffic

### 12.3.1 Exclusion from Modeling

**Comment:**

*The impacts of Visual Flight Rules (VFR), over-flights and military air traffic are not addressed in the DEIS, Noise Mitigation Report, and the Operational Analysis. These omissions are inconsistent with the Purpose and Need statement that "the Airspace Redesign is needed to accommodate growth while maintaining safety and mitigating delays, and to accommodate change in the types of aircraft using the system (e.g., smaller aircraft, more jet aircraft)." In*

*addition, the FAA excluded traffic from 119 area airports, and only considered instrument operations from 21 airports in its noise modeling of the proposed Airspace Redesign.*

**Response:**

Overflights were included in the operational analysis. (See Appendix A of the Operational Analysis, which is Appendix C of the EIS.) They are irrelevant to the environmental analysis because they are all far above the ground, typically 20,000 feet and above.

Military flights will not be affected by anything in the Preferred Alternative; to include them in the noise analysis would be to increase the background level of noise, and thereby diminish the relative changes due to the Alternatives.

The small airports excluded from the study are dominated by propeller-driven aircraft operating under Visual Flight Rules (VFR). This airspace redesign is a redesign of the Instrument Flight Rule (IFR) system. VFR traffic, by definition, is not under the control of air traffic controllers. It is not obliged to use the IFR system in the baseline or in any of the alternatives. Therefore, changes in Jet Airways, Standard Terminal Approach Routes, or Instrument Departure Procedures will not cause any change in VFR flight patterns. The only part of an airspace redesign that can affect VFR flight patterns is a redefinition of Class B or Class C airspace boundaries. No such boundary changes are part of the Preferred Alternative.

The mitigation report focuses on airport-by-airport mitigation measures, but once a particular measure was defined, it was incorporated into the full-powered noise model to determine its benefits. The results quoted include the cumulative effect of all modeled airports.

### **12.3.2 Safety**

**Comment:**

*What measures will the FAA take to assure the safety of small aircraft flying below the imposed new ceiling?*

**Response:**

This is only of concern if arrival altitudes are being lowered, which would push down the ceiling for VFR traffic. The Mitigated Preferred Alternative contains no changes of this sort.

### **12.3.3 Post 9/11 Forecast**

**Comment:**

*The DEIS Year 2000 baseline does not reflect post -9/11 aviation conditions and fleet mix and air traffic activity in Years 2006 and 2007. Any conclusions derived from using the 2000 baseline will not accurately reflect the benefits or impacts of the Proposed Airspace Redesign Alternative.*

**Response:**

The baseline does not reflect post-9/11 conditions, but the 2006 and 2011 forecasts do. Most of the changes in the system since 2011 were predictable well in advance – the effect of the disaster was to (briefly) slow down growth and speed up the changes in aircraft types. By 2006, the predictions and the reality were well-aligned. See Appendix B of the Operational Analysis (Appendix C of the EIS) for further details.

**12.3.4 Additive Impacts**

**Comment:**

*Concerned about the additive impact of surrounding alternative modes of transportation with the air traffic impacts, specifically trains, trucks, and cars.*

**Response:**

This airspace redesign does not foresee any increases in the number of flights due to the redesign, so road and rail traffic is not likely to increase as a result. Increases in road and rail traffic for other reasons are outside the scope of this study, and must be held constant when comparing alternatives.

**12.4 Modeling Traffic**

**12.4.1 En Route Separation**

**Comment:**

*The FAA has based their delay savings on the fact that the en route controller will accept traffic from the terminal area separated only by altitude. However, in addressing the ocean routing in the MITRE report, they state that the en route controller will require at least 5 miles of in-trail separation and will result in an average of 8 to 10 miles in trail. Thus, the assumption of what is acceptable to the en route controller is optimistic and delays will be higher than forecast. As such all of the FAA Consultant's projections regarding delay reduction are invalid.*

**Response:**

Altitude separation over the departure fixes in the Preferred Alternative is possible because these volumes are reserved for departures, some of which are merging into an overhead stream, others of which are not. The air traffic control job is can be shared between controllers, with the lower-altitude controller working traffic from nearby airports, and the higher-altitude controller working traffic that has had longer to climb. The greatest failing of the Ocean Routing Alternative is that it proposes flying departures through arrival airspace, mixing climbing and descending aircraft at the same altitudes, so this division of labor is not possible. Combine this with the fact that EWR and JFK departures do not form themselves into two neat altitude strata on the south side of New York City, and all possibilities for separating aircraft are quickly eliminated, except longitudinal separation. The delay estimates are valid.

#### **12.4.2 Terminal Volume**

**Comment:**

*According to data contained in OPSNET, which is the FAA official source for delays, EWR has significantly more Terminal Volume delays than the other facilities in the Study Area. In fact, Terminal Volume delays at EWR have approximately doubled each year since CY 2003 and are 275% higher than LGA which experiences the next highest number of Terminal Volume delays. This would indicate that the Traffic Management Unit (TMU) which oversees the NY/NJ/PHL area does not manage delays equitably between EWR, JFK, TEB, LGA, and PHL. Since the airports do not have individually segregated departure flows and departure gates are shared between the NY/NJ airports, there is nothing to indicate that adding two additional departure heading will appreciably improve departure delays.*

**Response:**

Newark has more traffic than any other airport under the New York TRACON. As has been pointed out, delays increase rapidly with increasing traffic levels. Therefore, an equitable allocation of places in the line of aircraft on each jet airway will cause much higher delays at Newark than at any other airport.

## **13 Comments on Environmental Justice**

### **13.1 Environmental Justice**

#### **13.1.1 Post Mitigation**

**Comment:**

*The FAA has not addressed the environmental justice claims.*

**Response:**

Information on outreach to environmental justice communities is provided in Section 4.2.2.1 of the EIS.

Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Population and Low Income Populations*, and the accompanying Presidential Memorandum, and Order DOT 5610.2, *Environmental Justice in Minority and Low-Income Population*, require the FAA to identify and address disproportionately high and adverse human health or environmental impacts on low-income and minority populations in the communities potentially impacted by the Proposed Action. The environmental justice analysis completed for the DEIS examined areas where there were significant noise impacts to determine whether these impacts were disproportionately borne by minority or low-income communities. After mitigation, there are no significant noise impacts, so the requirements of environmental justice have been met.

#### **13.1.2 Elizabeth**

**Comment:**

*In examining the area south of EWR for environmental justice impacts, the FAA examined only areas of Elizabeth, NJ surrounding EWR as comparative populations and has argued that all of this area is minority and that therefore there is no alternative that avoids environmental justice impacts. However, this argument is erroneous in that: 1) the FAA failed to note that there are large vacant and non-residential areas to the south of EWR in which there are few, if any, human residents at all of any ethnic background and in which alternatives flight paths to the east of those examined might impact fewer residents independent of environmental justice status; 2) the FAA did not consider more easterly alternative flight paths that might impact populations outside the city of Elizabeth and did not include those populations in its comparison base. Thus the range of alternatives examined was unduly limited and the environmental justice examination inadequate. Therefore; please perform an environmental justice analysis of the EWR south flow changes that includes more easterly initial departure paths including those below 190 down to 175 degrees. Please consider areas of low residential population density as part of the overall analysis to minimize impacts. Please consider more easterly initial flight paths as alternatives and consider more easterly populations outside of Union County as part of the comparison base. Please consider the variation in the factors affecting noise calculations, the effect of changes over time,*

*and cumulative impacts of other noise in the affected region. Please do a thorough search for alternatives and procedures that minimize or eliminate environmental justice impacts.*

**Response:**

It has been a longstanding policy of the FAA to avoid shifting noise from one community to another solely for noise abatement purposes. Headings east of 190 adversely impact Staten Island, and there is no safety or efficiency gain to justify the increased noise exposure. It has been a longstanding policy of the FAA to avoid shifting noise from one community to another solely for noise abatement purposes. Headings east of 190 adversely impact Staten Island, and there is no safety or efficiency gain to justify the increased noise exposure.

## **14 Comments on Parks, Wildlife, and Historic Areas**

### **14.1 DOT Section 4(f)**

#### **14.1.1 Orange County**

**Comment:**

*There is general concern about the impact to natural wildlife. The Warwick area is home to an Audubon preserve and the noise impacts will be detrimental to both the birds as well as visitors to the preserve.*

**Response:**

The Mitigated Preferred Alternative reduces noise exposure (compared to Future No Action) by as much as 4 dB DNL in some parts of Orange County.

#### **14.1.2 Sandy Hook**

**Comment:**

*The ocean routing mitigation threatens nesting of various endangered species within the Sandy Hook unit of the National Park Services Gateway national recreation area.*

**Response:**

EWR departures on the night-time ocean route will typically be from 9,000 to 10,000 feet as they cross Sandy Hook. This is far above the altitudes at which birds are endangered by aircraft.

#### **14.1.3 John Heinz National Wildlife Refuge**

**Comment:**

*The proposed mitigation measures completely omit any suggestion of mitigation on the impacts to the John Heinz National Wildlife Refuge.*

**Response:**

The Mitigated Preferred Alternative no longer uses right turns off Runway 27L at Philadelphia. The remaining headings do not turn aircraft towards the wildlife refuge.

#### **14.1.4 Historic Sites**

**Comment:**

*The proposed reroutes will create a noise nuisance to cultural resources which are on the national register for historic sites.*

**Response:**

The FAA completed analysis for DOT Section 4(f) properties, historic/cultural resources, and wildlife as described in separate sections within the EIS. Please see Sections 4.4, 4.5, and 4.7.

**14.1.5 National Park Service**

**Comment:**

*Overall, the Noise Mitigation Report and Operational Analysis of Mitigation of the NY/NJ/PHL Airspace Redesign do not address National Park Service (NPS) concerns related to noise analysis and methodology as previously outlined in the U.S. Department of the Interior comments on the DEIS.*

**Response:**

Additional analysis was completed for the properties of concern and is included in the Final EIS.

**14.1.6 Rockefeller State Park Preserve**

**Comment:**

*We feel that the FAA's "mitigated proposed alternative" for the changes to the departure routes from the Westchester County Airport (HPN) will have significant adverse impacts on one of our facilities, Rockefeller State Park Preserve, located in Tarrytown, New York. We specifically request that the FAA review the regulation located in Section 4f of the Department of Transportation Act 49 U.S.C303 that requires that aircraft routing decisions resulting in serious noise impacts on protected parkland be examined to determine if there are no prudent and feasible alternatives to use of airspace over parkland.*

**Response:**

There is no increase in aircraft overflying the park due to the Mitigated Preferred Alternative. The change to departure procedures between the Preferred Alternative and the Mitigated Preferred Alternative restores a track on which aircraft fly today. In the interest of eliminating the impact of the Preferred Alternative on noise in residential neighborhoods to the north, the reduction of park overflights anticipated in the Preferred Alternative has been cut back. Changing a procedure that has not yet been decided (or flown) is not forbidden by regulation.

## **15 Comments on Continuous-Descent Approaches**

### **15.1 CDAs**

#### **15.1.1 Support**

**Comment:**

*We support the development of CDA for use at nighttime or in situations where it is technically feasible.*

**Response:**

CDAs are one of the few procedures that benefit all stakeholders: pilots, airlines, air traffic controllers, and neighbors of the airport.

#### **15.1.2 Feasibility**

**Comment:**

*While a CDA may result in a lower power setting during the initial descent phase, subsequent descent phases performed at lower altitudes, will require power adjustments and "level-offs" to comply with controller arrival clearances. CDA approaches will not result in continuous minimum power settings throughout approach and landing.*

**Response:**

Continuous-descent approaches in the Mitigated Preferred Alternative are confined to night-time hours, after the last bank of departures has left the destination airport. This avoids the need to tunnel departures beneath the arriving traffic. At night-time hours, the total arrival demand is low enough that vectoring is usually not necessary. When vectoring is necessary, there is always a non-CDA arrival flow that can be maneuvered. Though unforeseen circumstances may affect any given flight, the evidence indicates that the continuous-descent procedure will be effective in the limited circumstances where it is being applied. For details, see the chapter on continuous-descent arrivals in the Operational Analysis of Mitigation Appendix to the EIS.

#### **15.1.3 Proof**

**Comment:**

*There are continuing concerns that Continuous Descent Approach (CDA) is a strategy which remains untested and may not be feasible in the New Jersey airspace. Please make available all data in regard to these calculations so that it can be held up to public scrutiny.*

**Response:**

CDA are feasible by default. Absent conflicting traffic, any aircraft is capable of descending smoothly to a runway. Therefore, the process of establishing feasibility of CDA is a process of identifying constraints that forbid their use. Appendix O contains the details of the operational modeling that identified places and times where CDA are feasible.

**15.1.4 Garden City**

**Comment:**

*The Village of Garden City request that the proposed plan provide mitigation to include a method for implementation of a continuous descent approach for both ILS and VOR arrivals on Runways 22L and 22R prior to the final approval of the program.*

**Response:**

Creation of such an approach is not currently possible, due to the proximity of LGA departure airspace and the need for the highest possible capacity at the airport. A night-time implementation may be possible in the future, as the state of the technology and safety regulations evolve.

**15.1.5 Detailed Analysis**

**Comment:**

*The April reports claim that CDA would introduce noise benefits. However, no detailed analysis was presented to support this claim, application scenarios were not described other than generally, and gains were not quantified. If benefits are to be claimed from CDA, then a clear definition of usage and gain should be supplied.*

**Response:**

Detailed analyses of CDA are cited in the “Continuous-Descent Approaches” chapter of Appendix O. CDA have been universally demonstrated to reduce noise in cases where no other change to the airspace is being made. Further demonstration of a well-known fact is unnecessary here.

**15.1.6 Noise Screening**

**Comment:**

*Furthermore, it was assumed that CDA would be beneficial and so this procedure was adopted without noise screening, contrary to the process used for other mitigation measures.*

**Response:**

Noise screening is used to choose, from a set of operationally-equivalent ground tracks, the one which causes the least noise exposure in nearby communities. A CDA does not fit this description. CDA begin with a fixed ground track, chosen for best operational benefits, and reduces the noise exposure by means of a more-efficient descent profile.

## 16 Comments on Aircraft Navigation

### 16.1 Area Navigation

#### 16.1.1 Support

**Comment:**

*RNAV and pilot navigation procedures would have a positive operational impact on air traffic control issues and community noise mitigation issues.*

**Response:**

Hundreds of RNAV departure procedures, arrival routes, and airways are the heart of the Preferred Alternative.

#### 16.1.2 Pilot Navigation

**Comment:**

*Any charted "Pilot Navigation" departure procedure confines aircraft to specific ground tracks and altitudes. The associated routes and climb profiles can be specifically adapted to circumnavigate both adjacent airspace boundaries and conflicting departure procedures from nearby airports. So, not just RNAV reduces workload.*

**Response:**

Now that RNAV equipage is over 95% in the New York area, Pilot Navigation Departure Procedures are effectively obsolete.

#### 16.1.3 Noise Concentration

**Comment:**

*Please identify the geographic areas where flight path concentration produced by RNAV may cause problems. Please describe the planned solutions in areas where problems occur.*

**Response:**

The Mitigated Preferred Alternative does not envision RNAV procedures in most places where noise is an issue. In most cases, RNAV is used to concentrate traffic over non-residential areas. Where no such areas are available, current procedures will be maintained, in order to avoid noise increases.

The one exception is northwest of HPN, where the mitigation to avoid a slight-to-moderate noise increase near Pleasantville is enabled through an RNAV route overlying the current procedure. It has no important impacts.

#### **16.1.4 Realistic Dispersion**

**Comment:**

*The Report does not specify how realistic horizontal and vertical spreading of flight paths is generated from the assumed model tracks and what validation has been performed of these paths for operation in the immediate vicinity of the airport. Please describe the methodology for achieving a realistic distribution of flight paths in the modeling in the vicinity of the airport and describe actions to ensure that the distribution of noise from these truly and accurately represents the likely real situation.*

**Response:**

Where conventional navigation is planned, the dispersion of aircraft tracks around their nominal path has been obtained from current radar data. Radar tracks are bundled according to common flight plans and aircraft types. A “backbone” is extracted from the geometric center of the bundle, and the statistical distribution of the tracks around the backbone is recorded for input to NIRS. This applies in the immediate vicinity of the airport. Where RNAV is applied, usually at higher altitudes, the spreading of flight paths is obtained from analysis of radar tracks with similar geometries at other airports where RNAV has been implemented.<sup>16</sup>

#### **16.1.5 Sensitivity Analysis**

**Comment:**

*Please explore the sensitivity of the modeled noise results to the gradual introduction of RNAV at EWR by exploring likely future scenarios and paths so that the public can be assured the proposed Preferred Alternative plus mitigations will not generate impacts beyond those presented in the Mitigation Report.*

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<sup>16</sup> See, for example, R. Mayer, “Departure Efficiency Benefits of Terminal RNAV Operations at Dallas-Ft. Worth International Airport,” *Proceedings of the 6<sup>th</sup> AIAA Aviation Technology, Integration and Operations Conference*, Wichita, KS, September 2006.

**Response:**

A quantitative answer to this question would require years of computer processing time, and even more data preparation time, but a qualitative answer is sufficient to provide insight. RNAV will primarily be useful for arrivals, and then from cruise altitude down to the downwind leg of the approach. Under the Mitigated Preferred Alternative at EWR, this means 8,000 feet and above. Once the aircraft start descending from their downwind leg, each will have vectors chosen by air traffic control for maximum throughput, the same as under current operations. The gradual implementation of RNAV arrival procedures will only have very small effects on the slight noise increases reported in this study. RNAV departures, as mentioned above, will only be used to concentrate traffic over non-residential areas. An intermediate stage, when not all procedures have yet been implemented, will have impacts partway between Future No Action and the Mitigated Preferred Alternative. Incomplete implementation will not generate impacts beyond those cited for full implementation in the EIS.

## **17 Comments on Connecticut Concerns**

### **17.1 Impacts on Connecticut**

#### **17.1.1 Disproportionate Burden**

**Comment:**

*Connecticut is now being asked to take all the burdens associated with the New York airports but not really getting any of the benefits, such as revenues that the airports generate and jobs.*

**Response:**

The New York Metropolitan Area is a major cultural, industrial, commercial, communications, and transportation hub. The economy and the quality of life in southern Connecticut benefit greatly from its proximity to New York City. New York City is not far away in any geographic or social sense. Connecticut does not receive revenue from New York airports, but that is a matter for discussion between the respective States.

#### **17.1.2 LGA Traffic Shift**

**Comment:**

*Since the new north arrival post will have adverse impacts on Fairfield Co., ..., the FAA is required to consider a reasonable alternative such as Future No Action, which would avoid the adverse environmental consequences.*

**Response:**

This study contains such an alternative, called Future No Action. It was rejected on the grounds that it did not meet the purpose and need for the airspace redesign. It would also expose more people to aircraft noise above 45 dB DNL than the Mitigated Preferred Alternative, and force aircraft to burn tens of millions of gallons of extra fuel per year. Future No Action has adverse environmental consequences, as well.

#### **17.1.3 North Arrival Post**

**Comment:**

*An Energy Budget is required for All alternatives. The preferred alternative requires 3.7 miles addition flight path at lower and therefore less efficient flight altitudes. Multiply this by the several hundred thousand aircraft per year and you have a very large amount of additional jet fuel needed. This must be disclosed and discussed according to environmental law. 40 CFR 1502.16(e) states that the EIS shall include "(e) Energy requirements and conservation potential of various alternatives and mitigation measures." When the additional energy requirements together with the diminished advantages of the Preferred alternative under adverse weather are fully considered, the justification for movement of the North Gate may not be established.*

**Response:**

The additional distance flown is more than offset by the reduced flying time. The net effect is a substantial reduction in fuel consumption in the Preferred Alternative, most of which remains in the Mitigated Preferred Alternative. Details are in Appendix R.

**17.1.4 Traffic Growth**

**Comment:**

*Traffic over Darien/Stamford, CT has increased considerably.*

**Response:**

Most of the correspondents who made these comments have already recognized the reality of growth in air traffic in the New York Area. More growth is coming; this airspace redesign is intended to handle it safely and efficiently.

**17.2 Altitudes over Connecticut**

**17.2.1 Fairfield County**

**Comment:**

*We have been told that the new air traffic pattern would allow commercial jets landing at LaGuardia to come in lower on arrival over Fairfield County. We understand that current ceiling is 10,000 feet and that the new Integrated Airspace Alternative would lower the operational altitude for these arrivals to 6,000 feet or lower. Reduction of aircraft altitude is contrary to widespread public recommendations taken during the project's Scoping period and should have been outright dismissed by the FAA. We currently have a large number of Westchester county Airport arrivals operating at 3000 feet over our area. Does this mean that the altitude of all other aircraft will be lowered? If so, the impact on our small communities will be even worse. The FAA apparently did not take this into consideration in its modeling since smaller aircraft principally fly under VFR rules.*

**Response:**

Arrival altitudes over Fairfield County are not planned to be lowered in the Preferred Alternative. Altitudes lower than 10,000 feet can be seen because the aircraft are descending to the airports, as they do today.

**17.2.2 Stamford**

**Comment:**

*Why can't we raise the altitudes of LGA arrivals over Stamford, along with the altitudes of the traffic above them.*

**Response:**

By the time an arrival to LGA Runway 22 is over Stamford, CT, it is about to turn onto its final approach to the runway. At this critical stage of flight, the aircraft is trying to intercept the narrow beams of radio navigation aids (the Instrument Landing System). This uses all the maneuverability of the aircraft. There are no degrees of freedom left to meet any other requirements. LDA arrivals can be higher because of the higher slope designed into that approach. The preferred alternative anticipates greater use of the LDA approach.

**17.2.3 Descent Angles**

**Comment:**

*Increase descent angles.*

**Response:**

The ILS to Runway 22 has a standard 3-degree glide slope. The LDA approach has a descent angle of 3.6 degrees, much steeper than the standard. This is acceptable because LGA serves very few of the heavy jets that can not descend so sharply. Raising the angle further would be counter-productive, since it would exclude even more aircraft from using it. The ILS approach needs to keep a smaller descent angle for safety reasons – it must be there as a last resort for aircraft near their maximum landing weight, or in very hot weather.

**17.3 LGA Routings Impacts**

**17.3.1 Danbury Airport**

**Comment:**

*The lowering of the ceiling for smaller planes from nearby Danbury airport because of the proposed plan will have further negative impacts on the region.*

**Response:**

No lower altitudes are expected for Danbury arrivals and departures as a result of the Preferred Alternative. In fact, arrivals to LaGuardia that now fly to the west of Danbury Municipal Airport (DXR) will be directed to the east in the preferred alternative. Currently about 80% of IFR traffic out of Danbury flies to the south or west. (Numbers from a survey of radar tracks from the FAA's Aircraft Situation Display to Industry for April 2007.) The large jets overhead currently constrain the altitude of DXR flights on the west side of the airport. In the preferred alternative will place fewer constraints on DXR flights.

### **17.3.2 Fairfield County**

#### **Comment:**

*We understand that the number of flights over Fairfield County will double from a combination of the increased number of small private airplanes and the new commercial carriers. Residents should know when over-flights might increase by a factor of even two or three as a result of proposed changes to evaluate and offer comment on these changes. In addition, the direct impact of ground level noise created by GA aircraft under altitude restrictions from the new North Arrival Post must be evaluated.*

#### **Response:**

There are two classes of small, private aircraft. Those that fly under Instrument Flight Rules, under positive control from the air traffic control facilities, are included in the traffic growth forecasts that were used in the operational and environmental analyses. The aircraft operating under Visual Flight Rules are not included. Since they are not required to fly on airways or on standard departure or arrival procedures, the difference between the Future No Action and Preferred Alternatives is irrelevant to them.

The new commercial flights over Fairfield County will be arriving at LaGuardia, descending out of 9,000 feet. These lead to very low noise levels, even after the increase. Federal Government regulations specify public information and public comment processes; these processes have been followed.

## **17.4 Connecticut Noise Mitigation**

### **17.4.1 Lack Of**

#### **Comment:**

*We are disappointed that the FAA has not developed any noise mitigation strategies, despite the wide swath of land over the 4th Congressional District that will be adversely impacted by planes at altitudes that appear to go as low as 4,000 feet in the southern portion of the district.*

#### **Response:**

The changes in flight paths over the north end of the 4<sup>th</sup> Congressional District in the Preferred Alternative result in very low noise exposures. In the southern end of the district, where the flights are lowest, the Preferred-Alternative tracks are not very different from current tracks (DEIS Appendix E, attachment C-75). An aircraft at 4,000 feet is about to turn onto its final approach to the runway, so there is very little that can safely be done to change its flight path.

### **17.4.2 Non-Residential Areas**

#### **Comment:**

*No attempt has been made to use unpopulated land, industrial zones, major highways or large water bodies in CT for mitigating noise impact.*

**Response:**

Unfortunately, there is very little unpopulated land in southwestern Connecticut to fly over. Even industrial zones have neighborhoods nearby. Major highways do not run toward the airports. The Long Island Sound was used to the greatest extent possible.

## **17.5 Impacts on Connecticut**

### **17.5.1 HPN Departures**

**Comment:**

*The Noise Mitigation Report released on April 6th shows that departures from Westchester County Airport that used to be routed to the [West] will now make a right turn and climb over Fairfield County. What will be the specific routes and altitudes of these northbound departures from White Plains.*

**Response:**

Westchester County departures from Runway 34 begin by flying the current noise abatement procedure. The procedure is completed at 3500 feet. From there, the departure procedure is a continuous climb turning through about 220 degrees. The specific route and altitude will depend on aircraft weight, air temperature, and the wind, but most aircraft will typically be climbing through 10,000 feet as they pass east of the airport and complete their turn.

## 18 Comments on Newark Airport

### 18.1 EWR 22 Departures

#### 18.1.1 Noise Increases

**Comment:**

*The noise mitigation does not satisfactorily address the noise concerns for the [Elizabeth, NJ] residents who will experience a noise increase of 10 to 20 DNL.*

**Response:**

No census block in Elizabeth, or anywhere in Union County, showed a DNL increase of 10 dB or more under the Preferred Alternative.

#### 18.1.2 Capacity

**Comment:**

*The most optimistic estimated capacity improvement from the proposed changes would gain no more than two to three aircraft per hour over the current EWR departure capacity of about 60 aircraft per hour, this being limited to the busiest periods, while subjecting tens of thousands of residents to increased noise and reduced safety to obtain a small increase in airport throughput*

**Response:**

The redesign is not intended to increase capacity. It increases the sustainability of high throughput operations. These high-throughput operations are the times at which high delays occur, so they have the most beneficial impact. (See Section 10.) Because the redesign reduces the complexity of the airspace, safety is enhanced, not reduced.

#### 18.1.3 No Mitigation

**Comment:**

*Although there is a Mitigated Preferred Alternative offered for JFK and LGA airports, there appears to be no demonstration of a Newark Liberty International Airport Mitigated Preferred Alternative.*

**Response:**

Newark, since it was the site of the most radical changes to the airspace, was the site of most of the noise mitigation efforts. See Sections 7-11 and 16 of the Operational Analysis of Mitigation Appendix, and pages 14-25 of the Noise Mitigation Report.

## **18.2 EWR 22 Headings**

### **18.2.1 Limited Mitigation**

**Comment:**

*The region surrounding Newark Liberty International Airport (EWR) is heavily noise impacted and stands out as one that will be profoundly negatively impacted by the proposed changes. The mitigation studies have been unduly limited and not devoted adequate attention to finding strategies for minimizing these noise impacts. Also, the range of headings and alternatives investigated is not documented in the FAA reports on the mitigation.*

**Response:**

The range of possible headings from Runway 22R is bounded on the counter-clockwise side by the boundary of the airspaces used for LaGuardia arrivals and departures (220 degrees) and on the clockwise side by the need to maintain 15 degrees divergence from aircraft departing Runway 29 (273 degrees).

### **18.2.2 Headings East of 190**

**Comment:**

*If the mitigated departure plan calling for three departure tracks at 220 degrees (runway heading), 240 and 260 degrees is adequate, then three routes could be achieved with headings of 190 degrees (the heading currently used), 205 and 220 degrees, adding them in an east to west order when needed. Moving further to the east to add additional tracks or to widen the separation to 20 degrees, headings of 180, 200 and 220 could be used. Such routes would take the aircraft away, not towards, the densely populated areas located southwest of the airport. The FAA should provide detailed information with supporting data on why such routing alternatives are not possible.*

**Response:**

Three nautical miles east of Newark Runway 22L is the boundary with the airspace used for LaGuardia arrivals. It lies along a 220-degree heading, parallel to 04R/22L at EWR and 04/22 at LGA. To guarantee safe separation from LGA traffic, a Newark departure must turn away from that line, to a heading greater than 220 degrees, before it can climb above 2,500 feet. (LGA arrivals, on their side, must stay above 3,500 feet until they turn away from the line to descend.)

Consider a hypothetical situation in which an aircraft directed to a 190 heading was followed by an aircraft on a 205 heading. The first aircraft departs. About one minute after its wheels leave the ground, it passes 2,000 feet and begins to turn away from the line, to a 221 heading. The second departure leaves as soon as the first is airborne, which puts it just a minute behind. At the instant the second aircraft's wheels leave the runway, there is one aircraft in front and on the left bearing 221 degrees, and another just behind it on the right bearing 205 degrees. These aircraft are on a collision course, with only seconds of space to spare. Should any unforeseen situation

arise, such as an engine failure or a sudden shift in the wind, the two aircraft would be in danger. This is not a safe airspace design. That set of headings can not be used without additional separation off the runway, which means they are no better than a single heading.

The same logic applies to the second set of headings. From the point of view of air traffic control, all headings less than 220 are effectively a single heading. A single heading has no safety or efficiency benefits.

### **18.2.3 Altitude Shelf**

#### **Comment:**

*Please investigate the use of initial departure headings of 190 degrees or less in conjunction with an altitude shelf to avoid LaGuardia arrivals as a method for reducing noise impacts.*

#### **Response:**

The current operation actually has more flexibility for air traffic control than this proposal. Decreasing flexibility would not help safety or efficiency.

### **18.2.4 Left Turns**

#### **Comment:**

*Why can't the FAA make left turns for eastbound traffic off Runway 22?*

#### **Response:**

Turning east toward destinations to the east would be desirable. However, EWR is the westernmost of the four big New York City airports. For EWR departures to turn left, other controllers would have to create synchronized gaps in the streams of LGA arrivals, JFK arrivals, and JFK departures. This can not be done safely without severe penalties to the efficiencies of the other two airports.

### **18.2.5 Staten Island**

#### **Comment:**

*190 degree noise abatement maneuver is intended to lessen the noise burden on Staten Island and results in an increase in noise in Elizabeth.*

#### **Response:**

This is exactly the reverse of the situation. Staten Island residents and officials object to the 190 heading; Elizabeth residents prefer it.

## 18.2.6 New Jersey vs. Staten Island

### Comment:

*The FAA's routing change at that time unfairly shifted the burden of airplane traffic over the City of Elizabeth. In fact, that 190 degree noise abatement maneuver which intended to lessen airplane noise over Staten Island, had the opposite effect on the City of Elizabeth. The City of Elizabeth continues to suffer the negative impact of this alternative at all times throughout the day and night; however, there is no air traffic being sent over Staten Island. Even the industrial areas of Staten Island are not impacted. How can this lack of noise distribution be adequately justified when more than 125,000 residents have to bear the brunt of this disturbance? Other comments include: New Jersey benefits at the expense of Staten Island. New headings move aircraft from unpopulated areas to densely populated areas. Staten Island is ignored by mitigation document. Opposed to fanned headings that place aircraft over Westfield.*

### Response:

This set of comments shows the central problem with considering noise in the design of departure procedures. Flying a different track does not reduce noise. It only moves the noise to a different place, and one community's benefit is another's penalty. The headings in the Mitigated Preferred Alternative were chosen to minimize the total population exposed to noise above statutory thresholds, as long as efficiency was not harmed. Whenever possible, flight paths were chosen to over fly non-residential areas

## 18.3 EWR Flexible Headings

### 18.3.1 Increased Capacity

#### Comment:

*Please provide additional details on the capacity benefits anticipated from the proposed fanning change. Please inform as to the number of peak hours per average and 90% day that the increased departure capacity would apply and provide estimates as to the increase in total departure capacity. Please include the assumptions behind the assumed departure capacity such as aircraft sequencing, and the likelihood of achievement in a busy environment such as EWR.*

#### Response:

There are no capacity benefits to this redesign. The FAA Airport Capacity Benchmark Study shows that EWR does not currently operate at capacity.<sup>17</sup> The Preferred Alternative is intended to enable throughputs that come closer to the capacity. In all alternatives, Future No Action, Preferred, and Mitigated Preferred, the aircraft were assumed to line up for departure on 22R at

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<sup>17</sup> FAA, *Airport Capacity Benchmark Report 2004*,  
[http://www.faa.gov/events/benchmarks/DOWNLOAD/pdf/EWR\\_2004.pdf](http://www.faa.gov/events/benchmarks/DOWNLOAD/pdf/EWR_2004.pdf)

three runway entrances, as they do today. The tower launched whichever of the three aircraft could go with the smallest separation behind the previous departures, including dependencies with the other runways.

In the simulation of the annual-average day in 2011, the 260 heading was open for use from 7:00 to 8:15, 11:20 to 12:00, 18:30 to 18:45, 19:20 to 19:35, and 20:00 to 21:30. (All times local.) In the simulation of the 90<sup>th</sup>-percentile day in 2011, the 260 heading was open for use from 7:00 to 9:00, 11:20 to 12:00, 17:00 to 19:30, and 20:00 to 21:45.

### **18.3.2 Comparable Application**

#### **Comment:**

*Please provide information regarding previous experience with demand based traffic headings, such as are being proposed in the mitigation, at busy airports comparable to EWR to allow assessment of the likely controller compliance and success of the new procedures.*

#### **Response:**

Most airports use demand-triggered headings. When traffic is low, the tower controller will give simple clearances. When departures start to back up, headings are issued so that no capacity is wasted. The system is perfectly functional all over the country. This demand-based heading proposal is a noise-abatement procedure. As such, it is less burdensome than the current 190 heading. The Mitigated Preferred Alternative is a compromise between the current, costly procedures and the efficiency of fully-flexible headings. Almost all of the efficiency is obtained for air traffic controllers and users of the airspace, with no significant noise increases.

### **18.3.3 Controller Compliance**

#### **Comment:**

*Please investigate the sensitivity to controller compliance by providing data as to noise impacts for the designated headings if controllers left the highest demand headings in place from the start of the morning high demand period until the nighttime shift to the low demand 190 heading.*

#### **Response:**

This would be another study. Creating it would take a level of effort comparable to another Alternative. However, intermediate results from the mitigation analysis provide some insight into what the answer would be. At the census block closest to City Hall in Elizabeth, NJ, the Preferred Alternative DNL was 61.3 dB. With only nighttime ocean routing, the DNL was 60.5 dB. When the 190 heading at low traffic times during the day is included, the DNL is 58.9 dB. (This is very close to the requested situation.) Flexible use of the third heading reduces the DNL to 58.3 dB.

### 18.3.4 ATC Complexity

#### **Comment:**

*Demand triggered headings cause complexity and complexity reduces throughput. Please describe the demand-based heading scenario and criteria modeled in further detail, and describe a typical and 90% day, number of times and approximate hours headings would be switched, length of time and controller effort to switch headings, and portion of time on each set of headings so that the public can better understand the mitigation strategy, [its] likely effectiveness, and the likelihood [it will] be followed over time.*

#### **Response:**

Within each air traffic control facility is a group called the Traffic Management Unit. The job of the TMU is to identify traffic and weather situations that require changes from the basic operating procedures, and coordinate those changes among the facilities involved. The third heading will be another of the set of familiar coordinations.

The decision to use the third heading will be made by the TMU in Newark Tower. The Tower TMU will coordinate with the TMU in the TRACON (at first) or the Integrated Control Complex (eventually). If there is no reason at higher altitudes that the third heading would cause congestion (for example, thunderstorms further down the jet airway that caused another facility to restrict the ICC), the ICC TMU will agree to the third heading, and the Tower will clear departing aircraft accordingly.

The TMU is working continuously to optimize the flows of traffic, so communications like this will not be a change from their current work flow. The TMU is staffed with people and communications gear sufficient to handle a major disruptive weather pattern. During good weather, the TMU is not very busy. The third heading is useful when weather is good, so it adds workload to the least-complex times. The third heading will improve throughput, because it does not add workload to the peak times.

Controller compliance is built in to the procedure: Two headings are the most-common operation on an average or lower-traffic day. Three headings is the exception. Therefore, switching the third heading is in the interest of the tower controllers, because they need to clear their taxiways. The ICC will be most willing to agree to a request for a specific number of flights, not an open-ended permission for use of the third heading. The coordination call to the ICC will involve a request to send (for example) 10 aircraft on the third heading in the next hour. After the agreed number of flights has launched, the operation will revert to two headings until the next coordination call. This type of coordination is common today between towers and TRACONs in severe volume or weather conditions. It is also common between en route centers, when traffic must be rerouted to relieve over-crowded fixes, so there is every reason to think it will work just as well here.

### **18.3.5 Specified Triggers**

#### **Comment:**

*The FAA reports do not indicate the specific traffic demand levels that would signal an increase or a decrease in the number of headings used at any one time, but rather rely on controller judgment, discretion, and experience as to the definition of low, medium or high traffic volumes that would generate a change in the number of headings utilized and therefore the number of households impacted by the new over-flights.*

#### **Response:**

Appendix O, “Operational Analysis of Mitigation” and Appendix P, “Noise Mitigation Report” establish that demand-triggered headings can mitigate noise in a way that preserves efficiency. The specific departure queue lengths were not specified because the simulations could not include countless details of taxi operations. To write the threshold into the EIS before field trials (or human-in-the-loop simulations) can be performed assumes that the real world will contain no complicating factors. This would be imprudent. Reliance on “controller judgment, discretion, and experience” has produced the safest, most efficient air traffic control system in the world. There is no reason that it can’t produce noise mitigation as well.

### **18.3.6 Benefits in Practice**

#### **Comment:**

*The modeled routes paths and strategy have been likely finely tuned to show minimized impacts, and portray a situation that is impossible to achieve in practice.*

#### **Response:**

The modeled headings have been optimized to minimize the number of people impacted, as Appendix P describes. They are certainly possible, because it is no harder to clear an aircraft on a 239-degree heading than to clear it on a 240-degree heading. The number of aircraft in the departure queue at which the number of headings changes is an integer, not very suitable to fine tuning. As described above, demand-triggered headings will be well within the range of situations handled today.

### **18.3.7 Headings Selection**

#### **Comment:**

*It is likely that the FAA used its ROMA tool to computer assist its exploration of routing alternatives to determine a precise set of routes that would lower the DNL 65 affected population to just below threshold to avoid the need to address impacts to the environmental justice protected population residing in the vicinity of EWR. However, the demand controlled heading strategy and controller discretion in routing introduce high variability rendering the FAA results unlikely to be achieved in practice.*

**Response:**

The tools available to noise modelers do not work that way. The flexible usage of headings was determined on efficiency grounds. Comments on the Draft EIS informed the FAA that the 260 heading was the most annoying to communities around the airport. Operational simulations calculated the minimum usage of the 260 heading consistent with maintaining throughput. Once the resulting usage of each heading was known, the precise headings for minimum noise exposure were obtained from the ROMA tool.

**18.3.8 Vs. Static Headings**

**Comment:**

*Don't use static headings because they could restrict future growth of the airport by creating a pattern that will constrain future operations.*

**Response:**

This is exactly why the demand-triggered heading procedure has been adopted as a mitigation measure, in lieu of using specific headings at specific times of day.

**18.3.9 Equitable Distribution**

**Comment:**

*Disperse arrival and departure headings to more equitably distribute noise impact.*

**Response:**

The Mitigated Preferred Alternative distributes aircraft over headings to minimize noise exposure while maintaining throughput. It is a longstanding policy of the FAA to avoid shifting noise from one community to another solely for noise abatement purposes. That said, however, it is inefficient use of airspace when aircraft bound for different places are concentrated on a single track. Distributing departing flights over a wide area is more efficient, and consistent with the purpose and need for the airspace redesign.

**18.3.10 Impact on Elizabeth City**

**Comment:**

*The "mitigations" proposed in this study would have aircraft flying directly over Elizabeth immediately after takeoff. We have previously estimated this will result in sound level increases on the order of 15 dBA from over-flying aircraft. Please eliminate EWR fanning from the Integrated Airspace proposal.*

**Response:**

It is possible that single-event noise levels may increase by as much as 15 dBA. DNL, which regulations require for noise impact assessment, does not. The FAA recognizes that this is a concern to some residents of Elizabeth. However, the single heading off EWR Runway 22R is the worst constraint on the efficiency of aviation in the New York Metropolitan Area. EWR was the worst-delayed airport in the United States in the first quarter of 2007. This is arguably the worst problem in the nation's airspace.

**18.3.11 Modeled Flight Tracks**

**Comment:**

*It should also be noted that the proposed headings are "initial headings" that can be changed at the discretion of the controller. There is no specified requirement for aircraft to fly the initial heading to a point or altitude before turning. This can result in aircraft being placed over areas different than those modeled and invalidate the noise modeling results.*

**Response:**

Departure headings are issued by the tower. The aircraft proceeds on that heading until the pilot makes radio contact with Departure Control. At that point the aircraft turns, because it is rare for the departure heading to line up exactly with the desired route of flight. The noise modeling takes this into account. Each departure procedure is modeled with a large set of tracks that cover the variations in wind, temperature, aircraft performance, airspace congestion, and other variables.

**18.3.12 Cost/Benefit**

**Comment:**

*Please explain the basis for any decision that the benefits of the proposed fanning change outweigh the enormous environmental impacts.*

**Response:**

After mitigation, the environmental impacts are not enormous. There are no significant noise increases, and aircraft emissions decrease.

**18.4 Nighttime Ocean Routing**

**18.4.1 Noise Impacts**

**Comment:**

*Various comments about nighttime routing include:*

*We support the use of night-time ocean routing and ask that you explore further whether, with modifications, ocean routing could be used more extensively. (Westfield, NJ)*

*Of the four alternatives being considered, the FAA has determined the Ocean Routing model does not meet operational or design needs. Unfortunately, the FAA has made the puzzling decision that ocean routing can instead be used as a noise mitigation strategy. As indicated by the FAA as far back as 2005, ocean routing does not reduce delays or meet system demand, nor does it improve user access, expedite arrivals and departures or increase flexibility. Routing aircraft over 150 miles out of their way when it doesn't produce any noise benefits is environmentally irresponsible.*

*Oceanic routes in and out of Newark airport would disproportionately affect the quality of life on Staten Island, hampering Island residents with the lion's share of airplane noise for the entire region.*

*In the alternative, the existing air traffic patterns which disperse the direction of nighttime Newark departures should remain in place, rather than concentrate this impact on the Middletown/northern Monmouth County coastal region.*

**Response:**

These comments are representative of a large set. They show the dilemma: about 175,000 people near Elizabeth, NJ would be adversely affected by the Preferred Alternative; about 127,000 people in Staten Island would see noise decreases. With Mitigation, much of this impact is undone, the increases as well as the decreases. The difference is that the noise decreases from mitigation go to people who are significantly affected. Noise increases from mitigation affect people at much lower overall exposure. Ocean routing (of any flight not going overseas) is very expensive to the users of the airspace and annoying to residents of the areas near the new route. But the FAA is obliged to mitigate significant noise increases, and this way of doing it has the least deleterious effects.

**18.4.2 Elizabeth vs. Jersey Shore**

**Comment:**

*Moving noise from Elizabeth to Jersey shore is unacceptable.*

**Response:**

Nighttime ocean routing mitigates significant increases in noise in and near Elizabeth, NJ. The corresponding noise on the Jersey shore does not meet any regulatory thresholds for reporting or mitigation.

**18.4.3 Noise Transfer**

**Comment:**

*Transferring aircraft noise from one populated area of the state to another is not an acceptable alternative*

**Response:**

This is a sentiment that has been voiced by many during this process. The mitigations that were recommended for the Preferred Alternative only include those strategies that minimize the overall affected population. It has been a longstanding policy of the FAA to avoid shifting noise from one community to another solely for noise abatement purposes.

**18.4.4 Increased Fuel Costs****Comment:**

*Regarding Section 8 of the “Operational Analysis of Mitigation of the NY/NJ/PHL Airspace Redesign” concerning the EWR Night-time Ocean Routing, we believe that this routing would cause a significant operational burden to UPS. The additional 7.4 minutes of flight time (as estimated by the FAA) required for each of our departures that would be required to fly the procedure would generate considerable costs as well as the potential for significant down-line disruption to our network. The proposed routing would impact a total of 19 of the most critical flights in our system each week (under UPS’ current operating schedule) approximately 50% of the time, based on current runway utilization. Variable costs of the additional flight time alone are conservatively estimated at \$450,000 to \$500,000 per year based on a \$2.11 per gallon fuel cost. True cost of the additional flight time would be much higher were we to consider fixed ownership costs. The down-line impact cost to our network is not precisely estimatable at this time, but suffice it to say that shipments out of New York for our customers are of significant economic importance. In addition, the FAA has found that redirecting night traffic from Newark over Staten Island would cost \$300 million a year in fuel costs alone. That cost will be passed along to the already overstressed air travel consumer. The cost of nighttime ocean routing does not justify the implementation of this mitigation strategy.*

**Response:**

Midnight ocean routing prevents significant noise increases southwest of EWR, but it is expensive.

**18.4.5 Operational Impacts****Comment:**

*We disagree with the FAA on the operational impacts of the nighttime oceanic routing. Both LGA and JFK airport are very busy in the hours between 10:30pm and midnight. These airports generate over 100 operations during this time period, and interaction with EWR departures flying the oceanic routing will increase traffic complexity and controller workload, both of which have potential to significantly delay aircraft. Delays at this time are often exacerbated due to historically lower FAA staffing levels, and crew time requirements are also at critical levels. We think the FAA needs to look at actual summer schedules and determine the potential of this procedure to produce large delays.*

**Response:**

The night-time ocean routing mitigation begins after the last heavy departure push at EWR. Thus, the delays are limited to individual flights. The cascading delays that occurred during the daytime simulations of the Ocean Routing Alternative (see Appendix C of the EIS) do not occur at night, and the operational penalties will be manageable.

In the good-weather, high-capacity simulations that determine the relative merits of airspace alternatives, the night-time procedure begins around 10:30 PM local time. On summer days, when demand is high and schedules are disrupted by weather, it may not begin until later. Certainly its use is not envisioned when departure queues are backing up on the taxiways. Lower staffing levels should not be a problem – these will be nightly procedures, and staffing decisions will take them into account.

**18.4.6 EWR 04 Departures****Comment:**

*NJCAAN is very pleased that the FAA has explored and recommended ocean routing for south flow nighttime operation of EWR. This played a role in achieving the noise mitigation currently projected by the FAA. Further use of ocean routing should make possible additional noise benefits. An example would be placing some but not all of the traffic on the ocean routes to avoid delays. Please examine operational changes that might make full or partial ocean routes feasible for 24-hour operation. Also, the FAA documents are silent on why northern departure ocean routes were not included in the investigation. Please examine possible partial daytime or nighttime use of ocean routes for northern departures as a noise mitigation strategy. Please also investigate this in conjunction with a Hudson River path.*

**Response:**

There is no available ocean for EWR departures on the north side to use. Not even the original ocean routing submission from the New Jersey Citizens for Environmental Research had a proposal for Runway 04L departures. Expansion of ocean routing to more hours of the day will cause large, cascading delays that are contradictory to the purpose and need for this redesign. From the point of view of noise exposure, this kind of routing would increase noise over much more densely populated areas of New Jersey and New York.

**18.4.7 Separation****Comment:**

*NJCAAN appreciates the exploration of ocean routes using RNAV. In Section 9 of the Operational Report, MITRE concluded that Ocean Routes utilizing RNAV would not reduce the close to five mile separation standard requirement due to right angle turns. However, MITRE did not modify this procedure to improve its operational performance as it did with nighttime Ocean Routes analyzed in Section 8 of that report. The use of more gradual turns, such as the FAA used in nighttime ocean routing, or possibly other changes might resolve aircraft separation issues.*

*Please explore possible procedural changes that might make further use of ocean routing feasible using RNAV*

**Response:**

In the night-time ocean routing mitigation, the two right-angle turns are replaced with a 180-degree turn, which is even less efficient. This track would cause even higher delays if it were used during the day. However, the track is used only after the departure pushes are over. At night there are naturally long intervals between departures, so the increased separation carries no delay penalty.

**18.4.8 Sandy Hook**

**Comment:**

*How will the nighttime ocean routing from EWR be kept over water and away from Sandy Hook?*

**Response:**

Nighttime ocean routing is intended to begin after arrival traffic to LGA and JFK has dropped off. That late at night, aircraft can climb unimpeded so they cross Sandy Hook nearly 10,000 feet above ground level. Aircraft will climb on an RNAV departure procedure, so deviations from the centerline of the procedure will be small.

**18.5 EWR 04L Departures**

**18.5.1 Fanning**

**Comment:**

*The “fanning” of north flow departures within the IA + ICC alternative substantially increases noise impacts. The mitigation document rejected several strategies that may have improved this. We are disappointed that no mitigations were offered. Further investigation or better explanation is needed of the reason for dropping some options.*

**Response:**

It is not correct to say that the addition of a second heading off EWR Runway 04L substantially increases noise impacts. The quantitative answers can be seen in the Essex County NIRS output spreadsheet, which show that only 1555 census blocks out of 6633 have a noise increase of 1 dB DNL or more. 2800 of the census blocks actually see a decrease in DNL, even without mitigation. This is obvious, when one considers that the second heading is only usable when no TEB traffic is in that airspace – the noise of a Newark departure can be heard only when the noise of a TEB arrival can not.

### 18.5.2 Capacity Gains

**Comment:**

*Please describe in detail the capacity gain from the fanning of Runway 4 departures, covering the circumstances and assumptions for achieving these gains, likelihood of assumptions being met, number of hours in an typical and 90th percentile day such gains would be achieved, and the total average increase in Runway 4 departure capacity.*

**Response:**

Once again, there are no capacity benefits to this redesign. The FAA Airport Capacity Benchmark Study shows that EWR does not currently operate at capacity. The Preferred Alternative is intended to enable throughputs that come closer to the capacity.<sup>18</sup> It is not possible to estimate the usage of the second heading on any given day, since the usage of the heading is decided on a case-by-case basis. It can not be a standard procedure as the headings off 22R can be. On an annual basis, it is estimated that 10% of the time that EWR is departing Runway 04R, TEB traffic will permit use of the second heading. If every day were the same, that would imply that the second heading would be used about 45 minutes a day (16 busy hours, times 45% departing 04R, times 10%). This estimate is consistent with the methodology of noise analysis, but it is unlikely to describe any particular day of operations.

### 18.5.3 Projected Future Use

**Comment:**

*NJCAAN's understanding is that the initial implementation of "fanning" will utilize it to a lesser extent than is ultimately planned. We thus have concerns regarding the assumed versus ultimate scenarios. Please provide details on, including the percentage of use of EWR Runway 4 "fanning," that were utilized in the noise modeling. Please describe projected future changes in policy for Runway 4 "fanning," including projected usage increase as new procedures currently being actively considered are implemented. Please provide updated population impacts taking into account these projections*

**Response:**

Every new procedure is brought in slowly to maintain safety and build pilot and controller familiarity. Other than that, though, there is no assumption of partial use in the operational or noise analyses. The impacts in the Noise Mitigation Report (Appendix P) are appropriate to address this concern.

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<sup>18</sup> *Ibid.*

#### **18.5.4 Meadowlands Corridor**

**Comment:**

*The FAA rejected keeping Runway 4 departure traffic over the Meadowlands Corridor due to operational conflicts with LaGuardia Airport departures. However, it offered no explanation as to why this procedure is not feasible. The procedure is commonly used for Runway 4 traffic heading north out of Newark Airport and would appear also to work for noise abatement purposes. The communities in Essex County are heavily impacted by aircraft noise from north flow Newark departures and deserve full consideration of procedures that could offer noise mitigation. Therefore: Please describe in detail why keeping Runway 4 departures over the Meadowlands Corridor currently can be used for operational benefits but cannot be used for noise abatement benefits. Please also specify the conflict with LaGuardia traffic and why this traffic cannot be adjusted. Please explore partial implementation, including use at night only, if full implementation is not feasible.*

**Response:**

The southern part of the Meadowlands corridor is used by EWR departures. It is how aircraft departing EWR stay safely clear of the final approach to TEB Runway 06. If the flights continue on this heading, however, they will quickly come into conflict with LGA arrivals. To prevent this, the aircraft turn west once they reach 2,500 feet. The northbound traffic to which the comment refers does not include jets. Propeller-driven aircraft have different needs for airspace from jets, so they can be kept low as they continue north. In general, jets are turned west or east, even those bound directly north (to Albany, for example).

#### **18.5.5 Altitude Shelf**

**Comment:**

*The allocation of an airspace “shelf” to avoid conflicts with LaGuardia traffic was discussed In Section 3.3 for south flow departures. This could also facilitate the implementation of noise mitigation for northerly departures Please explore the allocation of an airspace altitude “shelf” for northerly departures with airspace below this shelf allocated EWR, as a means of avoiding conflicts with LaGuardia traffic. Please explore noise mitigation options that might be feasible after establishment of such a shelf.*

**Response:**

As in the case of southwest departures, the current operation actually has more flexibility for air traffic control than this proposal. Decreasing flexibility would not help safety or efficiency.

### **18.5.6 Hudson River Routing**

#### **Comment:**

*The Hudson River procedure described in Section 11 of the “Operational Analysis” report could be adapted for noise abatement purposes. This procedure affects Runway 4 departures, and could provide noise relief for communities in Essex County, particularly Newark, which currently experience some of the highest aircraft noise in New Jersey, as southbound aircraft would not track over Newark as they do under the current procedure. This procedure warrants detailed consideration. Please explore full, partial and night-time implementation of Hudson River routes as a noise abatement measure.*

#### **Response:**

The airspace to the northeast of EWR is very cramped. There is no good option for changing flight paths to mitigate noise in that area. As mentioned above, turning the aircraft toward the Hudson River will fly aircraft over a more densely-populated area of New Jersey than the area under the proposed track.

### **18.5.7 PANYNJ Suggestion**

#### **Comment:**

*Several options for turning EWR north flow departures to the east were explored in the Report but rejected based on conflicts and sequencing issues with LaGuardia traffic. However, these were done in the context of the current airspace operation and boundaries. The PANYNJ comments promoting this investigation are based on substantial experience with the surrounding airspace. In view of the continuing interest in this option, further investigation is warranted and additional details to need to be made public as to the detailed nature of the investigation and results. Thus: Please fully and thoroughly explore expanding EWR airspace to the east to achieve operational and noise abatement benefits. As part of this, please examine procedures which run arrivals and departures along the Hudson corridor. Please also examine possible sequencing of LaGuardia arrivals over Long Island Sound. Please make public the routing options explored and the detailed results of the investigation.*

#### **Response:**

The exploration of turning EWR north flow departures to the east and routing them down the Hudson was explored in the context of the Preferred Alternative design. Crossing flows and altitude restrictions were examined in this future context. Essentially, the reason that ocean routing can not be expanded is that the airspace over the ocean is already being used for other traffic.

### **18.5.8 Essex County**

#### **Comment:**

*Please introduce new mitigation to alleviate noise in southwest Essex County.*

**Response:**

Southwest Essex County has no noise impact due to the Mitigated Preferred Alternative. Changes there are small fractions of a decibel, some positive, some negative.

## **18.6 EWR 29 Departures**

### **18.6.1 Runway Usage**

**Comment:**

*Request mitigation for increased use of Runway 29.*

**Response:**

An important part of the benefits of the Preferred Alternative come from using both parallel runways at EWR for arrivals at peak arrival times. During these times, it will be necessary to use 29 for departures to a greater extent than in the Future No Action Alternative. This has noise benefits as well as penalties – if all the growth in departures was forced to use Runway 22R or 04L, the departure pushes would run later at night, increasing the DNL at the ends of those runways. Runway 29 use is effectively capped, however. The airspace it shares with Teterboro, Morristown and Caldwell airports is sufficiently complex that using it at full capacity is virtually never possible, and miles-in-trail restrictions are always in place for 29 departures.

## **18.7 EWR Arrivals**

### **18.7.1 Middlesex County**

**Comment:**

*Why can't we raise the arrival altitudes in Middlesex Co. as part of the mitigation?*

**Response:**

There are three kinds of arrivals over Middlesex County. Arrivals north are descending to turn on to the final approach course to Runway 04R. These aircraft will be less noisy because their downwind altitude has been raised. Arrivals from the southwest are on a short path to the runway, so changing their altitudes at busy times is not possible. At night, however, these aircraft will be on a continuous-descent approach, which reduces noise even if it does not raise the altitude by very much. The third group is made of the flights coming from McGuire AFB control and Philadelphia TRACON. These are at low altitudes because separating them from the main flows in any other way would require so much coordination among five facilities (two TRACONs, two Centers, and an Air Force Base) that system capacity would be reduced.

### **18.7.2 Sonic Booms**

**Comment:**

*Aircraft noise associated with aircraft right turns heading into EWR result in sonic booms with decibels registering at 90 dB.*

**Response:**

Sonic booms are caused by supersonic aircraft, and they are typically 120 – 200 dB. No such civilian aircraft operate at EWR. Military jets are capable of creating a sonic boom, but they do not do so over populated areas.

**18.7.3 Raised Downwind**

**Comment:**

*Raising the altitudes of EWR arrival procedures will have a positive effect on noise mitigation efforts. However, arriving aircraft must still be sequenced on final approach through controller use of speed control, altitude assignment/level off, and radar vectors. It could be misleading to expect that simply raising the altitudes of arriving aircraft would greatly mitigate against noise produced by arriving aircraft.*

**Response:**

The reduction in noise exposure north and west of EWR is primarily due to the raised downwind altitude. Compare Figures 12 and 13 in the Noise Mitigation Report, Appendix P. Higher downwind altitudes to EWR are a direct result of expedited departures at higher altitudes. Along with the emissions analysis and continuous-descent approaches, they show that improved efficiency is not always at odds with environmental sensitivity.

**18.7.4 Dual Arrivals**

**Comment:**

*Dual arrivals at EWR may be not operative during late afternoons due to thunderstorms and mornings due to overcast so that a substantial percentage of the delay savings projected will not in fact materialize for the airspace redesign. It appears that most of the delay savings in the redesign come from the reduced aircraft separation rules which are diminished if not completely overcome by adverse weather conditions.*

**Response:**

The majority of the delay savings at EWR in the Preferred Alternative are the result of diverging headings. The benefits of diverging headings remain in adverse weather conditions. A discussion of how the Preferred Alternative reduces the delays experienced during severe weather events is included in the Final EIS.

**18.7.5 Political**

**Comment:**

*It appears that traffic has been moved out of northwest New Jersey. Was this a political decision?*

**Response:**

All rerouting of traffic in the Preferred Alternative was done for reasons of safety and efficiency. Changes to routing in the Mitigated Preferred Alternative were done to mitigate significant, slight, or moderate noise increases.

**18.7.6 Time of Day Restrictions**

**Comment:**

*Institute strict procedures for times and altitudes when downwind arrival flights are permitted.*

**Response:**

The downwind path serves approximately half of the arrivals to EWR. When the wind is from the south, any flight arriving from the south must fly a downwind leg. When the wind is from the north, any flight arriving from the north must fly a downwind leg. Restricting use of the downwind leg by times is impossible, because the wind changes unpredictably. The altitudes on the downwind path have been raised as part of the mitigation of the Preferred Alternative.

**18.7.7 Concorde**

**Comment:**

*Eliminate rerouting of any Concorde, cargo, or military aircraft; they can continue their previous flight pattern.*

**Response:**

The Concorde no longer is flying. Military aircraft were untouched by the redesign. They will continue in their present operations. From the point of view of air traffic control, cargo aircraft are indistinguishable from passenger aircraft. (Many aircraft carry both passengers and cargo, in fact.) They cannot be separated out and maintain their present assigned routing while the whole of the airspace around them changes. As many of the cargo aircraft into EWR operate during the nighttime hours, there is opportunity to mitigate their impact with the application of continuous descent approach procedures.

**18.7.8 V213 Traffic**

**Comment:**

*We urge the FAA to consider routing the V213 traffic over I-87.*

**Response:**

The Preferred Alternative moved the centerline of the southbound EWR arrival flow about 15 miles east of the current V213. Aircraft are not all aligned on this track; a band ten miles wide will pick up about two thirds of the flights. The centerline of the new path is not exactly parallel, but is typically within 6 miles of the New York State Thruway. The No-Action noise level in the areas under the new flow, where noise increases, are about 35 dB DNL. That is similar to living

near a busy two-lane road. The Preferred-Alternative noise level in the area of Ulster County from which the V213 traffic was moved is about 10 dB DNL (that is the total, not the change), which is so low that we may conclude that most noise audible in the area will come from sources other than aircraft. This noise redistribution matches well with the comments received in the scoping and Draft EIS phases of the study, so no changes were made to the Preferred Alternative in Ulster County for the mitigation phase.

There are many flows crossing in that area. Assigning each flow its own altitude is the most efficient way to ensure safety. If the EWR arrivals were raised, some other flow would have to be lowered, which would not reduce noise exposure.

### **18.7.9 Catskills/Shawangunks**

#### **Comment:**

*Major jet arrivals from Newark and Westchester airports with flight altitudes as low as 7,000 feet should not be routed over the public, protected parklands of the Catskills and Shawangunks. In order to protect the airspace of the Catskills and Shawangunks, planes should be kept as high as possible for as long as possible when approaching metropolitan airports.*

#### **Response:**

Air carriers and the residents of the communities below them agree that higher altitudes are desirable. Newark arrivals have been kept as high as possible in this area. The constraint that makes higher altitudes impossible is the presence of departures above them. Departures are generally louder than arrivals, so this is the best way to organize traffic from all points of view.

### **18.7.10 Opposition to Reroutes**

#### **Comment:**

*Please do not increase air traffic over Bergen County and Woodcliff Lake or other areas of the Pascack Valley.*

#### **Response:**

The changed arrival paths to EWR in the Preferred Alternative that affect Bergen County, NJ and Rockland County, NY have been needed for years. The short final approach segment to EWR is one of the most important limits on the airport's arrival efficiency. The paths proposed in the Preferred Alternative undo that limit. To reduce the impact these paths have on county residents, the Mitigated Preferred Alternative raises the downwind leg of the arrivals from the south, which means that aircraft with better descent performance are higher. At night, aircraft from the northwest are descending more smoothly on their continuous-descent approaches, so their engines will be quieter. These mitigations improve the noise exposure in Bergen and Rockland Counties substantially, compared to the Preferred Alternative.

### **18.7.11 Widen Corridor**

**Comment:**

*This is a political rather than an engineering solution to the redesign problem. It appears that flights are being concentrated to minimize disturbance and minimize property value diminishing and consequently minimize public opposition. These flights are all in a corridor that is about 3 miles wide. Why can't the flights be spread out over a 20-30 mile corridor and minimize the impact on any one community?*

**Response:**

The vectoring area for EWR arrivals that lies partially over the Pascack Valley is about 16 miles wide. The airspace on either side of the vectoring area is being utilized by aircraft to and from other airports. There is no room for further lateral expansion.

### **18.7.12 Woodcliff Lakes**

**Comment:**

*Please raise the altitudes of flights arriving to EWR Runway 22 and over Woodcliff Lakes by 2000 feet.*

**Response:**

Flights arriving to EWR and crossing over Woodcliff Lakes are in their final descent to the airport. Raising the altitude of these flights would not provide them sufficient space to descend to the airport safely. Figure 47 in Appendix O, Operational Analysis of Mitigation, shows the altitudes aircraft would prefer to occupy, if there were no constraints due to air traffic control. These altitudes are typically only about 600 feet higher than the procedure in the mitigation.

### **18.7.13 Pascack Environmental**

**Comment:**

*I was informed in the public meeting by the panel that an environmental study for the Pascack Valley was not done and was not required in order to pass the proposal.*

**Response:**

The environmental study was done for the study area as a whole. Noise impacts were determined for individual census blocks. The Preferred Alternative caused no significant impacts in any other environmental impact category (See Table ES-4).

### **18.7.14 Warwick, NY**

**Comment:**

*Please raise arrival altitudes over Warwick, NY by 5,000 feet, not just 1,000 feet.)*

**Response:**

It is not possible to raise arrival altitudes more. As aircraft approach the runway, their vertical profile is tightly constrained. Adding 5,000 feet to the altitude would exceed the ability of most aircraft to descend. In addition, departures from other airports are in the airspace above the arrivals. Keeping an airspace design safe, if it has such head-to-head conflicts built in, would require enormous spaces between aircraft, so it would not be efficient.

**18.7.15 Avoid Warwick, NY**

**Comment:**

*Fly over lower elevation areas [to the east of Warwick, NY].*

**Response:**

The airspace above Warwick, NY is a vectoring area, so each aircraft will be following its own track. There will not be a precise line of aircraft on approach. The dispersion of tracks in that area will be several tens of miles. Many of those aircraft will fly over lower-elevation areas.

**18.7.16 Traffic over Montvale**

**Comment:**

*Currently we have EWR traffic over Montvale only when flights are rerouted for bad weather, will we now get them all the time?*

**Response:**

EWR traffic over Montvale is arriving on Runway 22L/R. This is the case approximately 55% of the time. The other 45% of the time, traffic will seem similar to the Future No Action Alternative.

**18.7.17 Bergen County Mitigation**

**Comment:**

*The FAA falsely portrayed mitigation of airplane noise in Northern Bergen County under its approved alternative airspace design for this area.*

**Response:**

The Mitigated Preferred Figures 12 and 13 of the Noise Mitigation Report show the effect of changes to EWR arrival procedures that have a favorable effect on noise exposure in Bergen County.

**18.7.18 Indian Point**

**Comment:**

*Concern that concentration and movement east of EWR flight tracks will be dangerous as they are closer to the Indian Point power plant.*

**Response:**

There are no restrictions to IFR flights in the vicinity of nuclear power plants. Aircraft flying over a nuclear power plant do not pose a significant risk of explosion or radiation release. The containment vessel of a nuclear reactor is designed to stand up to a runaway nuclear reaction. Compared to that, the concentration of energy in an aircraft is small.

## **18.8 EWR Airport**

### **18.8.1 Departure Queues**

**Comment:**

*The FAA states “At geographically small, cramped airports like EWR, long departure queues can have considerable negative consequences for efficient operations.” They then go on to illustrate how departure queues will be reduced through the Proposed Action. However, while the institution of additional departure headings may reduce the number of aircraft in the departure queue, long departure queues will still exist at EWR after airspace redesign is implemented and ground operations will continue to be constrained. Airspace redesign will have little to no positive impact on EWR ground operations.*

**Response:**

It is a well-established result of mathematical queueing theory that decreasing service time leads to shorter queues waiting for any kind of service. The Operational Analysis of Mitigation in Appendix O shows simulation results that demonstrate how decreasing the time needed between consecutive departures decreases the lengths of the queues waiting for the runway.

### **18.8.2 Hudson River Routing**

**Comment:**

*Use Hudson River routing for noise abatement.*

**Response:**

This was considered as a possible mitigation measure. It was rejected because the negative effects of moving other traffic out of the way were greater than its benefits. See the “Operational Analysis of Mitigation” Appendix of the EIS for further information.

## **19 Comments on Teterboro Airport**

### **19.1 TEB Airport**

#### **19.1.1 Request Noise Mitigation**

**Comment:**

*No mitigation has been included for TEB.*

**Response:**

No changes to TEB traffic caused noise increases requiring mitigation. TEB is the fifth-busiest airport in the study area, and it is used only by smaller, less-noisy aircraft. Moving TEB traffic has less impact on noise exposure than moving air carrier traffic flows to the larger airports. Where airspace was available for mitigation of noise impacts, TEB traffic was the last choice for flows to move into it.

#### **19.1.2 Altitudes**

**Comment:**

*Is there any way to measure the height of the aircraft going into Teterboro? I was told it was 300 feet for each mile from the airport. My guess is that we are 10 miles away. Can you make them fly at that height and not start their decent over my home?*

**Response:**

No changes to TEB traffic caused noise increases requiring mitigation. TEB is the fifth-busiest airport in the study area, and it is used only by smaller, less-noisy aircraft. Moving TEB traffic has less impact on noise exposure than moving air carrier traffic flows to the larger airports. Where airspace was available for mitigation of noise impacts, TEB traffic was the last choice for flows to move into it.

#### **19.1.3 Map Display**

**Comment:**

*TEB flight tracks were not displayed on the maps in the public meetings.*

**Response:**

No changes to TEB traffic caused noise increases requiring mitigation. TEB is the fifth-busiest airport in the study area, and it is used only by smaller, less-noisy aircraft. Moving TEB traffic has less impact on noise exposure than moving air carrier traffic flows to the larger airports. Where airspace was available for mitigation of noise impacts, TEB traffic was the last choice for flows to move into it.

#### **19.1.4 Modeling**

**Comment:**

*Were projected traffic levels for Teterboro included in the noise modeling?*

**Response:**

Yes. The projected traffic levels for Teterboro are discussed in Section 1.3, “Aviation Demand Forecasts,” of the FEIS.

## **20 Comments on John F. Kennedy Airport**

### **20.1 JFK Airport**

#### **20.1.1 Runway 22 Arrivals**

**Comment:**

*Please consider reduced use of ILS to Runway 22 at JFK. Also, the FAA should study whether the location of its radar beacons at the border of Floral Park and New Hyde Park results in a disproportionate amount of air traffic and noise due to the over utilization and reliance upon computer-aided guidance systems instead of the VOR method of approach.*

**Response:**

The highest-capacity runway configuration at JFK uses the VOR-DME approach to Runway 22L, and that approach minimizes interference with LGA traffic as well. Air traffic control has an interest in using the VOR-DME approach, and avoiding the ILS, as much as possible. However, wind conditions frequently make it necessary to use the ILS approach.

#### **20.1.2 Prospect Park**

**Comment:**

*Please raise the altitudes of flights over Prospect Park.*

**Response:**

Prospect Park is very close to the runway end. This area is tightly constrained by Manhattan skyscrapers and LGA traffic as well. Aircraft have very little spare maneuvering capability in this area, so raising altitudes there is not possible.

#### **20.1.3 Monmouth County**

**Comment:**

*It appears that the preferred alternative does not include anything that would mitigate or reduce the adverse impacts already existing and resulting from the volume of JFK arrivals through the Middletown area at low altitudes...the FAA should address this deficiency and problem, and consider alternatives that would reduce the number of JFK arrivals over Middletown and Sandy Hook.*

**Response:**

The Mitigated Preferred Alternative did not include any mitigation in this area, because the Preferred Alternative did not cause any noise changes that are reportable under current regulations. However, the questions are not about mitigating the Preferred Alternative, but about improving the current situation. The Preferred Alternative caused more decreases of noise than increases in Monmouth County. RNAV arrival procedures to JFK Runway 13L over the water

should cause aircraft to remain closer to their nominal paths in a place where southward deviations are common. Other RNAV procedures should reduce the frequency of southwestern deviations on approach to Runways 04L/R. Last, though departures were not mentioned in these comments, Robbinsville is currently the major departure fix for JFK. It will be much less used under the Preferred Alternative.

#### **20.1.4 Negative Impacts**

**Comment:**

*Proposed rerouting of JFK arrivals will have a negative impact on air and sound pollution.*

**Response:**

Detailed modeling of noise exposure due to JFK arrivals showed no negative impact. Air pollution due to fuel consumption by aircraft will decrease, as the total time aircraft spend running their engines will decrease.

#### **20.1.5 Helicopters**

**Comment:**

*Please move the helicopter path away from Floral Park. They should follow the LIE rather than the railroad.*

**Response:**

The Long Island Expressway is a valuable visual aid for navigation. It is used extensively in current operations. This is not changed in the Preferred Alternative. Note that helicopters fly both east and west, so for safety, each flow of traffic stays to the right of the centerline of the Expressway, just as cars do. This may have given the impression that the aircraft was piloted according to other landmarks.

#### **20.1.6 Lack of Mitigation**

**Comment:**

*Why wasn't any mitigation selected for JFK?*

**Response:**

The Preferred Alternative did not cause any actionable changes in noise exposure, so there were no changes to mitigate. One proposal to mitigate current noise exposure, moving arrivals to 22L/R over the Long Island Expressway, was considered but rejected for reasons of safety.

### **20.1.7 Ocean Routing**

**Comment:**

*I strongly recommend more departure headings from Kennedy (night and day) which would go over the ocean.*

**Response:**

Existing procedures for JFK specify noise abatement headings and altitudes. Changing them will not reduce noise exposure.

## **21 Comments on LaGuardia Airport**

### **21.1 LGA Airport**

#### **21.1.1 Queens**

**Comment:**

*The proposed mitigation tactics will not provide Queens with much relief.*

**Response:**

Airspace redesign can not do much to change noise patterns in Queens. The loudest aircraft are on the ground, or on final approach.

#### **21.1.2 Flight Restriction**

**Comment:**

*We would like fewer flights and at higher altitudes.*

**Response:**

The number of slots at LGA is set by the government, but flying in and out of LGA is so convenient for a such a large number of people, and therefore so profitable for the airlines, that reduced traffic is unlikely.

Queens is very close to the runways. Maximum altitudes over Queens are dictated by aircraft performance, and can not be changed upwards by an airspace redesign.

#### **21.1.3 Sound Departures**

**Comment:**

*We understand LGA Runway 4 take off heading up the Sound has been removed. We would like to verify this has been eliminated.*

**Response:**

The current departure procedure off Runway 04 is to fly a 055 heading once the aircraft has reached 600 feet of altitude. The Preferred Alternative turns aircraft sooner to improve the first morning departure push and reduce fuel consumption. This caused no reportable noise exposure changes.

#### **21.1.4 Runway Usage**

**Comment:**

*The arrivals and departures from Runway 13 at LaGuardia are causing maximum noise to the residents whereas your report on noise mitigation is silent in this aspect. We are disappointed*

*about this lack of effort in this direction by the FAA. We reiterate again that mitigation efforts should continue.*

**Response:**

Current noise abatement procedures for LGA direct controllers to use a list of approved night-time runway configurations. Landing on 22 and departing from 31 is the preferred configuration. The second-choice arrival runway is 13. Landing 31 is not on the list, nor is departing from 13. The airport has very short runways, and winds and weather may dictate a particular configuration, but this list is used whenever safety permits.

Arriving Runway 31 is a low-capacity configuration at LGA, and it causes delays to mount rapidly. Controllers have no interest in landing on 31 when other choices are safe to use.

### **21.1.5 R31 Departures**

**Comment:**

*Once the three headings option is available as a delay reducing tool, its use will expand outside the morning timeframe, and will ultimately be at the discretion of ATC.*

**Response:**

The three-heading option reduces delay only when the number of aircraft waiting to depart is much greater than the number of arrivals approaching the airport. There is no operational benefit to using the third heading at any time when equal numbers of arrivals and departures are scheduled, which is the case for 23 hours of the day at LGA today and in all forecasts of future traffic. The only reason air traffic controllers use additional headings is when it expedites traffic, so it is unlikely that the third heading will be used much more than it was in the study.

## **21.2 LGA 22 LDA Approach**

### **21.2.1 Exclusion**

**Comment:**

*LDA has been excluded as an option.*

**Response:**

This is incorrect. The LDA procedure to Runway 22 at LaGuardia was analyzed for increased use. Details of this analysis can be found in Appendix O of the FEIS.

### **21.2.2 Aircraft Category**

**Comment:**

*The LDA at LGA contains no written restrictions on the approach plate for any category of aircraft, therefore any contention that the approach cannot be used by Large or Heavy aircraft is untrue.*

**Response:**

The United States Standard for Terminal Instrument Procedures (8260.3B) states that a 3.6-degree descent angle is only an acceptable standard for Class C aircraft (e.g., business jets) or smaller. Larger aircraft may accept a procedure with a steeper descent, but they are likely not to accept it, depending on winds, aircraft weight, crew training, or other reasons.

**21.2.3 Angle of Descent**

**Comment:**

*It is unclear where the consultant found data that supports their claim that the approach to Runway 22 is designed with a 3.6 degree angle of descent. Our research reveals a descent angle on the final segment of the approach within legal limits. The descent gradient does not exceed the maximum descent gradient for large of heavy Category C and D aircraft. There is no specific Glide Path Angle published for this approach.*

**Response:**

The Instrument Approach Procedures Chart published by the National Aeronautical Charting Office designates a final approach angle of 3.60 degrees, with a warning that the vertical glide slope indicator (part of the ILS) angle is not coincident with the descent angle.

**21.2.4 Flight Crews**

**Comment:**

*The contention that flight crews may not be qualified to fly the LDA approach is like saying that some licensed automobile drivers can't drive on roundabouts. They may not want to drive on one, but there is no law that prohibits it. Also, there should be no further constraints on big jets using the LDA.*

**Response:**

LDA approaches are fairly rare. Most airports do not have them. It is highly probable that some crews will be unfamiliar with the LDA procedure, and for safety reasons will require to use the ILS approach. ILS approaches are universal.

**21.2.5 JFK Interaction**

**Comment:**

*LDA-22 arrival does not conflict with JFK ILS-22. Whitestone climb is proof.*

**Response:**

According to FAA Order N90-7110.1, when JFK arrivals are using the ILS approach, the Whitestone climb shall not be used for LGA RWY 13 departures. Though the Whitestone Climb is preferred for reasons of efficiency and noise abatement, there is insufficient space between the LGA ILS-22 and JFK ILS-22 courses for a stream of departing aircraft. The assertion that there is

no conflict between the approach courses also neglects the portions of flights where aircraft turn on to the ILS, which are clearly inconsistent. To lift the dependency between the LGA and JFK approaches to their respective runways 22, a new type of procedure must be developed with much tighter Required Navigation Performance. Safety criteria for this kind of approach have not been developed. Until then, about half of the flights arriving on LGA Runway 22 will still require the ILS.

#### **21.2.6 Final Turn Sequence**

**Comment:**

*Flights looping from up the Hudson River shall pull south over the Sound before lining up with Runway 22, thus eliminating the final turn sequence over our communities.*

**Response:**

When LGA is departing Runway 31, this is part of the anticipated procedure. When LGA is departing 13, arrivals must stay to the west of LGA as they descend toward the base leg, so this will not be possible.

#### **21.2.7 R04 Departures**

**Comment:**

*We understand LGA Runway 4 take off heading up the Sound has been removed. We would like to verify this has been eliminated.*

**Response:**

No changes to departures from Runway 04 have been made between the Preferred Alternative and the Mitigated Preferred Alternative.

#### **21.2.8 RNAV**

**Comment:**

*Please provide information on altitudes, noise impacts and implementation timing of the RNAV procedures.*

**Response:**

The altitudes of the RNAV procedures in this vicinity will not differ in any important way from the non-RNAV procedures. Their noise impacts are included in the Final EIS, with finer detail available from the NIRS output spreadsheets on the project web site. Nothing definite can be said about the timing of the implementation before the FAA has made its decision and the Record of Decision has been signed.

### **21.2.9 Support**

**Comment:**

*Supports increased use of the LDA to LGA Runway 22 and request immediate implementation.*

**Response:**

Nothing may be implemented before the Record of Decision is signed. Once the formal decision has been made, nothing else impedes use of the LDA.

## **22 Comments on Islip Airport**

### **22.1 Islip Airport**

#### **22.1.1 Impact on FINS**

**Comment:**

*We are concerned that, as drafted, the proposal would concentrate traffic precisely over the most heavily populated part of Fire Island, as well as over a large, heavily populated mainland area, in preference to the current pattern.*

**Response:**

Fire Island occupies a wide area, seen from Long Island MacArthur Airport. It is impossible to avoid the whole island without subjecting even more people to more noise, and it is not FAA policy to move aircraft from over one community to over another for noise abatement. Since aircraft do and must fly over Fire Island, the only question is whether to fly over the towns, over the wilderness area, or both. The Mitigated Preferred Alternative, for reasons of efficiency, flies more over the towns than over the National Seashore. The proposed aircraft routing does not raise noise anywhere on Fire Island by more than 1 dB DNL, which is not typically audible in an inhabited area.

## **23 Comments on Westchester County Airport**

### **23.1 HPN Airport**

#### **23.1.1 Modeling**

**Comment:**

*There is no evidence that any operational or procedural analysis was performed for HPN in the preferred alternative.*

**Response:**

This is incorrect. HPN is one of the eight airports modeled both for operational efficiency and environmental impact. There was no mention of HPN departures in Section 4.1.4.2 of the Draft EIS because at the time no reportable noise changes were identified. As a result of the revised noise modeling, a slight change was identified and HPN departures are included in that section of the Final EIS.

#### **23.1.2 Clarification**

**Comment:**

*Documentation related to the proposed mitigation of HPN departures is confusing. The MITRE report and NMR appear to contradict each other with respect to the flight path assumptions. The MITRE report shows the proposed RNAV path exiting the county through its northern boundary, east of the Hudson River and east of the "IAICC Design Paths" (i.e., the paths for the unmitigated preferred alternative). However, the NMR shows the tracks for the mitigated case over the river and west of the unmitigated tracks.*

**Response:**

The graphical representation in the MITRE report is intended to be schematic only, not exact. The operational impact of adjusting this flow was evaluated and determined to be feasible within given boundaries. The noise modeling evaluated the possible flight paths within those boundaries and identified the path that would result in minimizing the noise impacts. The graphic in the Noise Mitigation Report shows the centroid of the distribution of paths the flights will follow. The distribution itself is more than 10 miles wide, broadening at higher altitudes.

#### **23.1.3 Modeling Error**

**Comment:**

*The area almost directly under the extended centerline of (HPN's) Runway 16/34, to the southeast of the airport, encompasses one analysis location where the NMR data indicate the DNL would increase by 2.8 dB, compared to the 2011 No Action Alternative, and, result in an aircraft-related DNL of 64.9 dB. Therefore, the change in exposure at this location would be within tenths of a decibel of creating a significant impact. This is the same point, and almost the same values, that*

*we identified in our June 8, 2006 memorandum. FAA responses to our previous memorandum indicated that this change in noise is due to a modeling anomaly rather than the proposed action. We also note that there is a region where noise decreases continuing south east on Runway 16/34 centerline. This indicates that whatever the cause may be, it is likely associated with arrivals rather than departures. The DEIS and NMR do not suggest any reason why there should be noise change in that area. This change in exposure on the brink of significance clearly merits more detailed analysis and documentation of the causative factors. The FAA should investigate additional locations in this area to identify locations of potentially significant or light to moderate impact. If this is a modeling anomaly, it should be corrected or, if it cannot be corrected because of limitations of the model, needs to be fully documented. Our (HMMH) review of information provided by the FAA suggests that there may still be a terrain-related "modeling anomaly" in the HPN environs (and potentially around other study airports). We recommend further FAA investigation into it. If that investigation indicates the modeling anomaly has been corrected and the noise estimates are correct, it is possible that analyses using a more tightly spaced grid in this area could reveal increases in exposure above impact assessment criteria.*

**Response:**

As a result of comments submitted as part of the Draft EIS process has prompted further refinement of the noise. One modeling refinement focuses on how NIRS v6.0c.3 handles multiple airports with differing airfield and runway elevations in a large study area. NIRS relates all aircraft flight profiles to the NIRS Study Center elevation, which was set at 22 feet (LGA's elevation) for this project. At the same time, the model uses USGS terrain data to place the population centroids (or grid points) at the correct ground elevation throughout the study area. The result is that for flights using airports at higher elevations, the model flies the aircraft too close to the ground on initial climb or final approach, as the aircraft altitude (measured with respect to Mean Sea Level) passes through the field elevation.

A small-scale reanalysis was conducted to determine the effect of correcting the elevation for the airports in the study area further from sea level. See Part E.3 of Appendix E for details. Correcting the aircraft altitudes compared to ground level tends to reduce noise values at the critical point where this phenomenon occurs. Many of the "near-threshold" concerns that have been expressed, particularly near the 60 or 65 DNL levels, were reduced or eliminated. Specifically, the point that was identified near the threshold of significance (from the spreadsheets published on the Airspace Redesign web site) changed from a noise exposure of 64.9 DNL (due to a change of 2.8 DNL) to a corrected noise exposure of 60.0 DNL (due to a change of 0.4 DNL) in the sensitivity analysis. There is no important operational change in this area, so only an unnoticeable change was observed in the corrected noise analysis.

**23.1.4 Mitigation Impacts**

**Comment:**

*These changes (mitigation) will double the number of flights in a narrower flight path, thus concentrating noise pollution impacts, including upon a state nature preserve.*

**Response:**

The change to departure procedures between the Preferred Alternative and the Mitigated Preferred Alternative restores a track on which aircraft fly today. There is no increase in park overflights due to the Mitigated Preferred Alternative. In the interest of eliminating the impact of the Preferred Alternative on noise in residential neighborhoods to the north, the reduction of park overflights anticipated in the Preferred Alternative has been cut back.

**23.1.5 RNAV Feasibility**

**Comment:**

*How great is the uncertainty related to the effectiveness of the RNAV proposal for HPN? Also, how strong a commitment will the Final EIS make to an RNAV procedure?*

**Response:**

The Operational Analysis of Mitigation determined the feasibility and efficiency of each suggestion from the public. The results of the operational analysis were input to the noise analysis, so the noise analysis had not yet begun. At the time the operational analysis was completed, it was not known whether any particular measure would successfully mitigate noise impacts. Proper engineering practice is not to assume the results before the study is complete. Therefore, “it may be possible” was the correct phrase. Now that the noise analysis is complete, there is no uncertainty. “How strong a commitment” is not a well-defined term in this context. The RNAV procedure will be included in the new airspace design. Procedures may be used or not for any given flight as a safe, orderly, and efficient flow of traffic requires, depending on many factors in the operating environment.

**23.1.6 RNAV Impact Assessment**

**Comment:**

*When will the FAA perform any environmental assessment required to implement that procedure (RNAV) and will it be incorporated into the Final EIS?*

**Response:**

There is almost no uncertainty. Only a few types of aircraft need the extra precision in order to avoid the affected census block. Environmental assessment is part of the procedure for developing a new procedure, which will be followed for all changes when implementation begins. Note that the proposed RNAV procedure is consistent with the current noise abatement departure procedure.

**23.1.7 RNAV Equipage**

**Comment:**

*What percent of the departures from HPN are RNAV capable?*

**Response:**

According to the FAA's Aircraft Situation Display to Industry database of IFR flight plans filed in 2006, 96% of HPN departures were equipped for RNAV.

**23.1.8 RNAV Dispersion**

**Comment:**

*The NMR tracks, and the NIRS data, show a relatively high degree of dispersion for both the mitigated and unmitigated cases; this is inconsistent with the tendency of the RNAV procedures to reduce dispersion. It is reasonable to model dispersion even in the mitigated case, because not all aircraft and pilots are capable of flying RNAV procedures. However the documentation should include an analysis of which aircraft can and will likely fly the RNAV procedure and separate plots of the tracks that will be flown by the RNAV and non-RNAV departures.*

**Response:**

RNAV departures were used only where (1) the tracks would not concentrate over inhabited areas; (2) departures are not being merged with other flows over a fix; and (3) design criteria (sharpness of turns, for example) permit the departure to be contained within the available volume. Where any of these is not true, conventional vectored procedures were assumed. The result is a predominance of vectored procedures, except where explicitly noted.

**23.1.9 Approach Overlap**

**Comment:**

*Regarding the Sound Visual Approach (arrivals to HPN's Runway 34), the overlap of dispersion between the proposed action and the no action may provide opportunity to keep aircraft closer to their existing location.*

**Response:**

The current noise abatement procedure to HPN Runway 34 will be kept in place in the Preferred Alternative.

**23.1.10 Departure Path**

**Comment:**

*The "simplest departure path" may not be the best or most effective path.*

**Response:**

Airspace designs must build in means of safe operation in the event of equipment failure. When controllers can not communicate with pilots, or an aircraft does not properly execute a maneuver, the simplest paths are indeed the best.

## 24 Comments on Philadelphia Airport

### 24.1 PHL Airport

#### 24.1.1 Delaware County Impacts

**Comment:**

*What is the estimated average noise exposure range for Delaware County in 2011 if no action were taken compared to the estimated average noise exposure range for Delaware County in 2011 under the Preferred Alternative with mitigation?*

**Response:**

The distribution of noise is changing in a complicated way, but there are no significant increases. The census block with the highest noise exposure sees a higher DNL. The noise exposure of the median census block decreases, but again not by a significant amount. Here is a table that shows some other descriptive statistics:

	DNL	
	Future No Action	Integrated Airspace with Mitigation
Highest noise exposure:	66.1	67.3
99% of residents experience noise below	57.8	57.4
90% of residents experience noise below	49.3	51...
50% of residents experience noise below	43.8	43.2

#### 24.1.2 Terminal Volume Delays

**Comment:**

*Because Terminal volume delays account for only 4.5% of total delays at PHL, any potential reduction in Terminal Delays would have only minimal impact on total delays, and delay times, and would be vastly outweighed by the harm to a substantial number of people who would be newly exposed to increased aircraft noise if the proposed airspace redesign were implemented.*

**Response:**

This comment refers to delays charged to PHL in the FAA's OPSNET database. The delay problems that this airspace redesign attempts to address will appear in that database as a Center Volume delay charged to New York Center (ZNY), which are the primary problem, and once that has been relieved by the changes to the high altitude structure, subsequent delay reductions will come from the Runway category charged to PHL. In the first quarter of 2007, Center Volume delays were 86% of all delays caused by ZNY. (Center weather delays occur in the summer.) Runway delays were 16% of all delays charged to PHL in the same period, the largest single category after weather.

**24.1.3 Airport Area Residents**

**Comment:**

*You are impacting PHL airport residents in a negative manner while lessening the impact for others.*

**Response:**

In some cases, mitigation was more successful than in others. Around PHL, the problem of departure airspace is so great and constraints on possible solutions so tight that, while all significant noise increases were mitigated, slight-to-moderate increases remained in some communities.

**24.1.4 Additional Mitigation**

**Comment:**

*Why were there more driving forces for noise mitigation for Newark and JFK than for Philadelphia? For example, departing over waterways, reducing headings over communities, altered descent patterns are now being undone in Philadelphia.*

**Response:**

The current restriction that PHL departures must fly down a single heading over the river is being undone. The other measures mentioned are being proposed for PHL, not undone.

**24.1.5 Airport Governance**

**Comment:**

*A regional airport authority would help relieve the burden of air traffic concentrated at PHL and would coordinate the operation of PHL, Lehigh Valley International Airport, and other airports in Southeastern Pennsylvania. This bill has received bipartisan support, and I hope that the FAA will similarly embrace this effort to improve the efficiency of air travel without harming the communities in Delaware County. Also, Philadelphia encourages airport growth and does not share the revenue with Delaware Co, which bears the brunt of the impacts.*

**Response:**

These are political matters within the Commonwealth of Pennsylvania. The FAA has no jurisdiction here.

## **24.2 PHL Arrivals**

### **24.2.1 Parallel Arrivals**

**Comment:**

*Visual approaches reduce delay when they are performed simultaneously to parallel runways. However, use of parallel runways for arrivals at PHL would place some arriving aircraft over land rather than over the river, and visual approaches to a single runway would require greater spacing between arrivals and would not reduce delays at PHL.*

**Response:**

There is no anticipated change in the frequency with which PHL will use approaches to both parallel runways, nor is there any increase in visual approaches in the Mitigated Preferred Alternative.

### **24.2.2 Noise Impacts**

**Comment:**

*Flights from aircraft coming from PA cross every 5-7 minutes with an increase of 9 dB to a 48 dB level. Why isn't this mitigated?*

**Response:**

Mitigation is required for significant increases in noise. Where slight to moderate noise increases could be mitigated, they were. The Mitigated Preferred Alternative did reduce the DNL in this area by about 1 dB compared to the Preferred Alternative, but crossing traffic constraints did not permit more improvement.

### **24.2.3 Lack of Mitigation**

**Comment:**

*I have been told by FAA representatives that PHL airport has not adopted arrival noise abatement procedures but could not explain why. I have also been told by FAA representatives that the last consideration of air traffic controllers is noise abatement on approaching flights. Our residential area is 10 miles out from the airport and flights are arriving 2.5 minutes apart at 2000 feet, dropping landing gear and using reverse thrust, as early as 5:30 am and as late as 10:30 pm. It is unacceptable that the FAA is unwilling to adopt and enforce noise abatement procedures under the current circumstances, let alone with expanded air traffic facilities. Other airports have adopted such procedures and they are enforced by the FAA through the ATC directives. Why is there no mitigation for the arrivals to PHL's Runway 27?*

**Response:**

The safest approach to an airport is the instrument landing system (ILS). Ten miles out from the runway, the glide slope of the instrument landing system is just under 2,800 feet above ground level. Aircraft must approach this radio beam from beneath, to make sure that the pilot intercepts it correctly to touch the runway at the right point. The FAA will not compromise safety for noise mitigation, and forcing an aircraft to use something other than the ILS when the pilot needs it would reduce safety. Under good conditions, when weather, traffic, air crew training, and aircraft weight permit, other approaches are possible. The FAA recognizes this concern. Air traffic controller training for the new airspace design will include a section on the desirability of using noise-sensitive approach and departure procedures.

**24.2.4 Reduced Spacing**

**Comment:**

*I'm pretty sure that they have decreased the amount of space required between planes over the last several years. The preferred alternative will further compound the increased frequency we experience.*

**Response:**

There has been no change in the separation needed between aircraft on approach to PHL. There has been an increase in the total traffic, which may have inspired these comments. The preferred alternative makes no changes to daytime low-altitude arrival operations into PHL. At night, continuous-descent arrivals should offer some reductions in noise exposure.

**24.2.5 Impact Maps**

**Comment:**

*Camden County, NJ is right underneath the approaches to the runway at PHL and yet I don't see any impact maps for us. Why was only the small area of Gloucester County evaluated?*

**Response:**

The whole study area was evaluated. Detailed impact maps were only generated for areas that experienced a noise increase above one of the statutory thresholds. Camden County sees noise increases in some parts and noise decreases in others, but none is large enough to reach even the "slight-to-moderate" threshold.

**24.2.6 Collingswood, New Jersey**

**Comment:**

*Flights arriving to Runway 27 should be kept at 3,000 feet while over Collingswood, NJ.*

**Response:**

The center of Collingswood is less than eight miles from the runway end. That implies a four-degree angle of descent to the runway, which is too steep for large aircraft. See the chapter on glide slope angles in Appendix O, “Operational Analysis of Mitigation” for further details.

### **24.3 PHL River Approach**

#### **24.3.1 State of Delaware**

**Comment:**

*Please drop the river approach and keep all traffic out of/north of the Delaware state line.*

**Response:**

The RNAV river approach is intended for traffic from the south. These flights currently fly over Delaware on their way to the ILS. Using the river should reduce noise exposure in communities north of the Wilmington/New Castle Airport. In New Castle County, this analysis estimates that 78% of residents will experience reduced noise under the Mitigated Preferred Alternative, some as much as 5 dB DNL less than Future No Action. 2 dB is not generally considered an audible increase.

#### **24.3.2 RNAV Interruption**

**Comment:**

*Air traffic controllers will frequently interrupt RNAV arrivals by issuing radar vectors to sequence and ensure adequate separation between arriving aircraft, placing arrival aircraft over populated areas.*

**Response:**

When safety requires, it is certainly possible for an aircraft to be taken off its RNAV approach. However, the River approach will reduce noise exposure even if it is used by less than 100% of eligible traffic. The noise modeling was based on the best available estimates of the percentage of traffic that would use the River RNAV approach.

### **24.4 PHL Departure Headings**

#### **24.4.1 River Departure Only**

**Comment:**

*The Noise Mitigation Report also presents a plan for using a single over-river route for PHL nighttime departures. The same or similar, single over-river departure route could be used for daytime departures as well, simply by making procedural changes that can be implemented without redesigning airspace or constructing an ICC facility.*

**Response:**

This is similar to the current operation. Such a requirement diminishes the efficiency of the airport at PHL, and has contributed to PHL's historically high departure delays. Relaxing this requirement is one of the biggest potential sources for improving the efficiency of the air traffic control system around PHL, so it was included in the Preferred Alternative.

**24.4.2 Tank Farms**

**Comment:**

*We are all concerned with directing flights over the tank farms along the river in the area of Gibbstown, NJ.*

**Response:**

Tank farms can be found near almost all major airports. Industrial areas like a tank farm are preferred for aircraft departure headings, because no one lives there. Aviation accidents are extremely rare, but aircraft noise happens every flight.

**24.4.3 Time of Day Restrictions**

**Comment:**

*Please consider limiting the use of new flight paths to Monday through Friday 6 a.m. to 9 a.m. and from 3 p.m. to 7 pm - no weekends, no holidays.*

**Response:**

Philadelphia has heavy departure banks at most hours of the day, and the times have changed several times in the past year. A time-of-day heading assignment would quickly be obsolete and counter-productive.

**24.4.4 RNAV Support**

**Comment:**

*As an alternative to the existing radar vector procedure at PHL, an Area Navigation (RNAV) or Pilot Navigation departure procedure would confine departing aircraft to specific altitudes and narrow ground tracks which could be designed to overly less populated areas.*

**Response:**

This is one of the primary means by which mitigation was accomplished. Hundreds of different combinations of departure headings were assessed, and the triplet with the least total noise exposure was chosen for the Mitigated Preferred Alternative. The possibilities were not restricted to those flyable with older navigation systems.

#### **24.4.5 Increased Departure Volume**

**Comment:**

*If PHL cannot handle the traffic demand that exists today, why is the FAA trying to increase the volume of departures from PHL?*

**Response:**

PHL departures are frequently delayed because of high-altitude congestion in New York Center. Relieving that congestion will reduce departure delays from PHL. When departure delays are reduced, departures do not back up on the taxiways, so arrivals become more efficient as well.

Of course, the FAA is not trying to increase the total volume of departures. Given that the volume will arrive, the FAA is trying to reduce the wasted capacity at the airport.

#### **24.4.6 Equitable Distribution**

**Comment:**

*Disperse arrival and departure headings to more equitably distribute noise impact.*

**Response:**

The Mitigated Preferred Alternative distributes aircraft over headings to minimize noise exposure while maintaining throughput. It has been a longstanding policy of the FAA to avoid shifting noise from one community to another solely for noise abatement purposes. That said, however, it is inefficient use of airspace when aircraft bound for different places are concentrated on a single track. Distributing departing flights over a wide area is more efficient, and consistent with the purpose and need for the airspace redesign.

### **24.5 Trenton Airport**

#### **24.5.1 Altitude Restrictions**

**Comment:**

*We would like the FAA to reconsider our request to remove current altitude restrictions on departures from Runway 6/24 at Trenton-Mercer Airport (TTN).*

**Response:**

As before, the climb restriction may be waived case by case, but a standard procedure could impede EWR and LGA operations.

#### **24.5.2 Runway 24 ILS**

**Comment:**

*We request that the FAA review our previous request for installation of an Instrument Landing system (ILS) on Runway 24.*

**Response:**

Installation of an ILS is outside the purview of this study. The study is focused on airspace management, not airport equipment improvements.

**24.5.3 CDAs**

**Comment:**

*TTN would like to be considered for the possible use of [Continuous] Descent Approaches at our facility.*

**Response:**

Trenton Mercer Airport would be subject to the same constraints on CDA as Philadelphia. At night, after the departures are gone, CDA would be possible for equipped aircraft.

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Abinanti, Thomas J.	6727	Comment Period	Extension	4.6.1
		HPN Airport	Mitigation Impacts	23.1.4
		Public Meetings	Meeting Requests	4.5.2
Abou-Daoud, Joseph and Theresa	7844	Air Pollution	Perceived Increases	7.1.3
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Safety	6.2.4
Air Transport Association of America, Inc.	7455	Air Pollution	Nighttime Ocean Routing	7.1.6
		CDAs	Support	15.1.1
		EWR Flexible Headings	Vs. Static Headings	18.3.8
		Purpose and Need	Maintain Benefits	5.1.7
Alfieri, Michael, Esq.	6736	LGA Airport	Sound Departures	21.1.3
		Next Steps	Compliance	4.7.1
		Preferred Alternative	Traffic Increases	1.1.6
Andrews, U.S. Representative Robert	6866	Efficiency Gains	Optimal Conditions Only	10.2.1
		Preferred Alternative	Opposition	1.1.1
		Process	Cost Benefit Analysis	4.1.9
		Public Meetings	Meeting Requests	4.5.2
		Purpose and Need	Failure to Meet	5.1.5
			Noise Reduction	5.1.1
Quality of Life	Contributing Elements	6.2.2		
Andrews, U.S. Representative Robert and Senator Frank Lautenberg and Senator Robert Menendez	7004	Nighttime Ocean Routing	Noise Impacts	18.4.1
		Property Value	Impacts of Noise	6.1.2
		Public Meetings	Additional Meetings	4.5.1
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			Public Input	4.5.7
		Quality of Life	Contributing Elements	6.2.2

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Artese, Perry (Council of the Borough of Ridley Park)	6007	PHL Departure Headings	River Departure Only	24.4.1
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Basile, Deborah	7616	Air Pollution	Reservoirs	7.1.2
		DNL	Averages	4.3.1
		Public Meetings	Public Input	4.5.7
		Quality of Life	Contributing Elements	6.2.2
Bee, Mayor Peter A.	6726	CDAs	Garden City	15.1.4
		Preferred Alternative	Reduced Spacing	1.1.7
			Traffic Increases	1.1.6
Bergen County Board of Chosen Freeholders	7325	EWR Arrivals	Bergen County Mitigation	18.7.17
		TEB Airport	Request Noise Mitigation	19.1.1
Blumenthal, Richard, Attorney General, State of Connecticut	7003	Altitudes Over CT	Descent Angles	17.2.3
		Documentation	Flight Track	3.1.7
			Minimum Altitudes	3.1.6
		HPN Airport	Modeling	23.1.1
New Mitigation	Nighttime Flights	1.3.1		
Blundo, Mayor Joseph	7622	Preferred Alternative	Opposition	1.1.1
			Reduced Spacing	1.1.7
		Quality of Life	Contributing Elements	6.2.2
Board of Commissioners, Nether Providence Township, Delaware Co, PA	6737	4(f)	John Heinz National Wildlife Refuge	14.1.3
		Delay	Landside Operations	10.3.1
			Severe Weather	10.3.2
		DNL	Averages	4.3.1
		Preferred Alternative	Reduced Spacing	1.1.7
			Traffic Increases	1.1.6
		Property Value	Impacts of Noise	6.1.2
Purpose and Need	Redesign Unnecessary	5.1.4		

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		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Bollwage, Mayor J. Christian (City of Elizabeth)	6905	Documentation	Modeling Data	3.1.11
		Efficiency Gains	Small Benefits	10.2.2
		Environmental Justice	Post Mitigation	13.1.1
		EWR 22 Departures	No Mitigation	18.1.3
			Noise Increases	18.1.1
		EWR 22 Headings	NJ vs. Staten Island	18.2.6
		EWR Airport	Hudson River Routing	18.8.2
		Health	Impacts of Noise	8.1.1
		ICC	Feasibility	1.2.1
		Mitigation	Not Enough	2.1.1
		Quality of Life	Contributing Elements	6.2.2
Safety	6.2.4			
Cardinale, Senator Gerald	7882	Air Pollution	Reservoirs	7.1.2
		Part 150	Noise Abatement	4.2.1
		Property Value	Impacts of Noise	6.1.2
		Purpose and Need	Noise Reduction	5.1.1
		Quality of Life	Contributing Elements	6.2.2
			Disaster Exercises	6.2.5
CEO Council for Growth	6538	Preferred Alternative	Support	1.1.2
Cook, Mayor Donald A.	6003	Delay	Landside Operations	10.3.1
		Health	Impacts of Noise	8.1.1
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Safety	6.2.4
Dotson, Isaac L. III (Yeadon Borough Council)	6008	Air Pollution	Perceived Increases	7.1.3
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4

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Flatto, First Selectman Kenneth A.	6728	Air Pollution	Perceived Increases	7.1.3
		Quality of Life	Contributing Elements	6.2.2
Francis, Linda	7667	VFR Traffic	Post 9/11 Forecast	12.3.3
Friends of the Rockefeller State Park Preserve, Inc	6009	4(f)	Rockefeller State Park Preserve	14.1.6
Garrett, U.S. Representative Scott	7006	CDA's	Proof	15.1.3
		Documentation	Modeling Data	3.1.11
		Public Meetings	Meeting Requests	4.5.2
		Purpose and Need	Final Stages	5.1.6
Giovannitti, Councilman Vincent	6714	Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Gonzales, Peter	7855	Airlines	Re-regulation	9.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Nighttime Ocean Routing	Noise Impacts	18.4.1
Gruver, Ms., Vice President of New Canaan Environmental Group	6965	Air Pollution	Perceived Increases	7.1.3
		Impacts on CT	Disproportionate Burden	17.1.1
		Quality of Life	Contributing Elements	6.2.2
Safety	6.2.4			
Hanlon, Sonja	7611	Air Pollution	Perceived Increases	7.1.3
			Reservoirs	7.1.2
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Harris Miller Miller and Hanson Inc. (HMMH)	7590	4(f)	Rockefeller State Park Preserve	14.1.6
		Documentation	Comparison Information	3.1.12
		HPN Airport	Approach Overlap	23.1.9
			Clarification	23.1.2
			Modeling Error	23.1.3

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			RNAV Equippage	23.1.7
			RNAV Feasibility	23.1.5
			RNAV Impact Assessment	23.1.6
Heinemann, Lynda and Howley, Joanne	7551	Airlines	Focus on Profits	9.1.1
		Preferred Alternative	Reduced Spacing	1.1.7
		Public Meetings	Public Input	4.5.7
		Purpose and Need	Noise Reduction	5.1.1
		Quality of Life	Contributing Elements	6.2.2
Hlinziker, Hans	7636	EWR Arrivals	Woodcliff Lakes	18.7.12
		Multi-modal	Comprehensive Solution	4.4.1
Kelty, Eugene T., Jr (Community Board 7, Borough of Queens)	6724	Airlines	Restricting Access	9.1.4
		LGA Airport	Queens	21.1.1
			Runway Usage	21.1.4
		Modeling	Terrain	11.1.3
		Quality of Life	Contributing Elements	6.2.2
Safety	6.2.4			
Kroposki, Michael, Esq.	6735	Air Pollution	Quantification	7.1.1
		Comment Period	Extension	4.6.1
		DNL	NIRS Accuracy	4.3.3
		Documentation	Modeling Data	3.1.11
		Impacts on CT	LGA Traffic Shift	17.1.2
		LGA Routings Impacts	Fairfield County	17.3.2
		Stewart Airport	Expansion	1.4.1
		Traffic	Danbury/Oxford	12.1.2
Lampkin, Kendall	6904	JFK Airport	Lack of Mitigation	20.1.6

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Wayne, Town-Village Aircraft Safety and Noise Abatement Committee		Part 150	Noise Abatement	4.2.1
Lash, First Selectman James A. (Town of Greenwich) and Neville, First Selectwoman Judy (Town of New Canaan)	6739	Airlines	Congestion Pricing	9.1.6
		Altitudes Over CT	Fairfield County	17.2.1
			Stamford	17.2.2
		Area Navigation	Noise Concentration	16.1.3
			Pilot Navigation	16.1.2
			Support	16.1.1
		CDAs	Feasibility	15.1.2
		Delay	Flight Scheduling	10.3.4
			Result Verification	10.3.3
			Severe Weather	10.3.2
		DNL	Thresholds	4.3.4
		Documentation	Flight Track	3.1.7
		HPN Airport	Departure Path	23.1.10
			Modeling	23.1.1
			RNAV Feasibility	23.1.5
		ICC	Feasibility	1.2.1
		Impacts on CT	HPN Departures	17.5.1
		LGA 22 LDA Approach	Aircraft Category	21.2.2
			Angle of Descent	21.2.3
			Flight Crews	21.2.4
			JFK Interaction	21.2.5
		LGA Airport	R31 Departures	21.1.5
		LGA Routings Impacts	Fairfield County	17.3.2
Preferred Alternative	Opposition	1.1.1		
	Traffic Increases	1.1.6		
Process	Implementation Timeframe	4.1.5		
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		Purpose and Need	Noise Reduction	5.1.1
		Quality of Life	Contributing Elements	6.2.2
		Traffic	Verification of Forecast	12.1.3
		VFR Traffic	Exclusion From Modeling	12.3.1
			Post 9/11 Forecast	12.3.3
			Safety	12.3.2
Lautenberg, Senator Frank and Menendez, Senator Robert	6000	Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
		Quality of Life	Contributing Elements	6.2.2
Lentz, State Representative Bryan	6723	Airlines	Re-regulation	9.1.3
		Comment Period	Extension	4.6.1
		Efficiency Gains	Optimal Conditions Only	10.2.1
			Small Benefits	10.2.2
		Other Comments	Air Service Demand	4.8.1
		PHL Airport	Airport Governance	24.1.5
		Preferred Alternative	Airport Capacity	1.1.5
			Reduced Spacing	1.1.7
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Lowey, U.S. Representative Nita M.	6867	Area Navigation	Support	16.1.1
		LGA 22 LDA Approach	Support	21.2.9
Marconi, First Selectman Rudy	6864	4(f)	Historic Sites	14.1.4
		Stewart Airport	Expansion	1.4.1
Marshall, Helen M.	6733	Air Pollution	Quantification	7.1.1

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(President, Borough of Queens)		CDAs	Support	15.1.1
		DNL	Averages	4.3.1
		Efficiency Gains	Status Quo	10.2.3
		Environmental Justice	Post Mitigation	13.1.1
		Health	Sleep Deprivation	8.1.4
		LGA Airport	Queens	21.1.1
		Mitigation	Noise Abatement	2.1.8
			NY/NJ Water Routing	2.1.12
			Volume Restrictions	2.1.2
		New Mitigation	Nighttime Flights	1.3.1
			Quieter Jet Engines	1.3.2
		Part 150	Noise Abatement	4.2.1
		Preferred Alternative	Increased Safety	1.1.4
		Public Meetings	Notification	4.5.3
Purpose and Need	Noise Reduction	5.1.1		
Quality of Life	Education	6.2.3		
McBlain, John P. (County Solicitor, Delaware Co, PA)	6732	CDAs	Feasibility	15.1.2
		Delay	Severe Weather	10.3.2
		Documentation	Flight Track	3.1.7
		EWR 22 Headings	Headings East of 190	18.2.2
		ICC	Feasibility	1.2.1
			Oceanic	1.2.3
		Modeling	Terrain	11.1.3
		PHL Airport	Terminal Volume Delays	24.1.2
		PHL Arrivals	Parallel Arrivals	24.2.1
		PHL Departure Headings	River Departure Only	24.4.1
			RNAV Support	24.4.4
		PHL River Approach	RNAV Interruption	24.3.2
Public Meetings	Tinimum Meeting	4.5.6		

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		VFR Traffic	Exclusion From Modeling	12.3.1
			Post 9/11 Forecast	12.3.3
McMahon, Councilman Michael	6952	Nighttime Ocean Routing	Noise Impacts	18.4.1
		Preferred Alternative	Support	1.1.2
Millman, Deputy Mayor Lance	7869	Airlines	Focus on Profits	9.1.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Minner, Governor Ruth Ann; Biden, Senator Joseph R.; Carper, Senator Thomas R.; Castle, U.S. Representative Michael N.	6002	Air Pollution	Quantification	7.1.1
		Airlines	Required Technology	9.1.2
		Documentation	Historical Data	3.1.14
		Mitigation	PHL Technology Upgrade	2.1.6
		PHL Departure Headings	River Departure Only	24.4.1
		Preferred Alternative	Support	1.1.2
		Traffic	PHL Departures	12.1.1
Molinaro, James P., President, Borough of Staten Island	6738	EWR 22 Headings	NJ vs. Staten Island	18.2.6
		Mitigation	Geographical Restriction	2.1.11
		Nighttime Ocean Routing	Noise Impacts	18.4.1
Muchetti, Rebecca, Chairman Planning and Zoning Commission	6794	LGA Routings Impacts	Danbury Airport	17.3.1
		Modeling	Ambient Noise	11.1.5
		Purpose and Need	Noise Reduction	5.1.1
		Quality of Life	Contributing Elements	6.2.2
		Stewart Airport	Expansion	1.4.1
National Park	7000	4(f)	National Park Service	14.1.5

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Service (Northeast Region)			Sandy Hook	14.1.2
		Nighttime Ocean Routing	Sandy Hook	18.4.8
Neville, First Selectman Judy	6004	Altitudes Over CT	Fairfield County	17.2.1
		Delay	Flight Scheduling	10.3.4
			Result Verification	10.3.3
			Severe Weather	10.3.2
		DNL	Thresholds	4.3.4
		Impacts on CT	HPN Departures	17.5.1
		LGA Routings Impacts	Fairfield County	17.3.2
		Preferred Alternative	Traffic Increases	1.1.6
		Process	Implementation Timeframe	4.1.5
			Low Altitude Changes	4.1.3
		Purpose and Need	Noise Reduction	5.1.1
		Quality of Life	Contributing Elements	6.2.2
		Traffic	Verification of Forecast	12.1.3
		VFR Traffic	Exclusion From Modeling	12.3.1
			Post 9/11 Forecast	12.3.3
Safety	12.3.2			
New Jersey Coalition Against Aircraft Noise (NJCAAN)	6730	Area Navigation	Noise Concentration	16.1.3
			Realistic Dispersion	16.1.4
			Sensitivity Analysis	16.1.5
	CDAs	Detailed Analysis	15.1.5	
		Feasibility	15.1.2	
	Comment Period	Extension	4.6.1	
	Delay	Severe Weather	10.3.2	
Documentation	Lacking Detail	3.1.3		

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			Modeling Data	3.1.11
			Population Data	3.1.10
		Efficiency Gains	Small Benefits	10.2.2
		Environmental Justice	Post Mitigation	13.1.1
		EWR 04L Departures	Altitude Shelf	18.5.5
			Capacity Gains	18.5.2
			Fanning	18.5.1
			Hudson River Routing	18.5.6
			Meadowlands Corridor	18.5.4
			PANYNJ Suggestion	18.5.7
			Projected Future Use	18.5.3
		EWR 22 Headings	Altitude Shelf	18.2.3
			Headings East of 190	18.2.2
			Limited Mitigation	18.2.1
		EWR Airport	Departure Queues	18.8.1
		EWR Arrivals	Raised Downwind	18.7.3
		EWR Flexible Headings	ATC Complexity	18.3.4
			Benefits in Practice	18.3.6
			Comparable Application	18.3.2
			Controller Compliance	18.3.3
			Cost/Benefit	18.3.12
			Headings Selection	18.3.7
			Increased Capacity	18.3.1
			Modeled Flight Tracks	18.3.11
			Specified Triggers	18.3.5
		ICC	Delay Impact	1.2.2
			Feasibility	1.2.1
			Oceanic	1.2.3
		Long Term Analysis	25 Year Projection	3.2.1
		Modeling	Mitigation Results	11.1.7
		Modeling	En Route Separation	12.4.1

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		Traffic	Terminal Volume	12.4.2
		Next Steps	Implementation Plan	4.7.3
		Nighttime Ocean Routing	EWR 04 Departures	18.4.6
			Noise Impacts	18.4.1
			Separation	18.4.7
		Preferred Alternative	Mitigation Only	1.1.3
		Process	Prejudged Outcome	4.1.15
			Supplemental DEIS	4.1.10
		Purpose and Need	Minimize Exposure	5.1.2
			Ocean Routing	5.1.3
		Quality of Life	Safety	6.2.4
		Stewart Airport	Expansion	1.4.1
		Traffic	Assumptions	12.1.4
		Traffic Levels	Airline Behavior	12.2.4
			Capacity	12.2.1
			Delay Sensitivity	12.2.2
			Excluded Operations	12.2.5
Nighttime Penalty	12.2.3			
New Jersey Coalition Against Aircraft Noise (NJCAAN) (Supplemental)	7580	4(f)	National Park Service	14.1.5
		Airlines	Demand-side Management	9.1.7
		Delay	Landside Operations	10.3.1
		DNL	Sensitivity Analysis	4.3.7
			Significance Level	4.3.5
		Environmental Justice	Elizabeth	13.1.2
		Long Term Analysis	25 Year Projection	3.2.1
		Modeling	Ambient Noise	11.1.5
		Other Comments	Compliance Monitoring	4.8.3
		Preferred Alternative	Traffic Increases	1.1.6
Traffic Levels	Delay Sensitivity	12.2.2		

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New Jersey Noise Control Council	7334	Comment Period	Extension	4.6.1
		Documentation	Compatible Land Use	3.1.5
		Efficiency Gains	Small Benefits	10.2.2
		Environmental Justice	Post Mitigation	13.1.1
		EWR 22 Headings	Headings East of 190	18.2.2
			Limited Mitigation	18.2.1
			NJ vs. Staten Island	18.2.6
		Health	Impacts of Noise	8.1.1
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Education	6.2.3			
Safety	6.2.4			
New York State Office of Parks, Recreation and Historic Preservation	6868	4(f)	Rockefeller State Park Preserve	14.1.6
Philadelphia International Airport	7336	PHL Departure Headings	Equitable Distribution	24.4.6
			River Departure Only	24.4.1
			RNAV Support	24.4.4
Pileggi, State Senator Cominic F. (PA)	7009	Efficiency Gains	Small Benefits	10.2.2
		Quality of Life	Contributing Elements	6.2.2
Platt, Mayor Bernie	7501	Preferred Alternative	Opposition	1.1.1
		Process	Cost Benefit Analysis	4.1.9
Posillico, Mario (Village Administrator of Saltaire)	6725	Islip Airport	Impact on FINS	22.1.1
Poveromo, Rose Marie, President, United Community Civic Association	6903	Air Pollution	Quantification	7.1.1
		Airlines	Focus on Profits	9.1.1
		DNL	Thresholds	4.3.4
		Preferred Alternative	Opposition	1.1.1
			Traffic Increases	1.1.6

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		Quality of Life	Contributing Elements	6.2.2
Prober, Bud and Lawrence, Beth	7631	Air Pollution	Perceived Increases	7.1.3
		Documentation	Lacking Detail	3.1.3
		EWR Arrivals	Political	18.7.5
			Widen Corridor	18.7.11
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Safety	6.2.4			
Ripston, Barbara	7606	EWR Arrivals	Opposition to Reroutes	18.7.10
		Public Meetings	Meeting Requests	4.5.2
			Public Input	4.5.7
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Rosenblatt, Robert	7856	Airlines	Re-regulation	9.1.3
		EWR Airport	Hudson River Routing	18.8.2
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Nighttime Ocean Routing	Noise Impacts	18.4.1
Russell Caoustics, LLC (for the City of Elizabeth)	6731	DNL	Averages	4.3.1
		Documentation	Comparison Information	3.1.12
		EWR 22 Headings	Headings East of 190	18.2.2
			Left Turns	18.2.4
		EWR Flexible Headings	Impact on Elizabeth City	18.3.10
Nighttime Ocean Routing	Noise Impacts	18.4.1		
Saxton, U.S. Representative Jim	7005	Nighttime Ocean Routing	Noise Impacts	18.4.1
			Noise Transfer	18.4.3
Scharfenberger, Mayor Gerard P., Ph.D.	6865	Airlines	Re-regulation	9.1.3
		JFK Airport	Lack of Mitigation	20.1.6
			Monmouth County	20.1.3
		Nighttime Ocean Routing	Noise Impacts	18.4.1

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		Quality of Life	Contributing Elements	6.2.2
Schubert, Dennis	7840	Airlines	Focus on Profits	9.1.1
		Efficiency Gains	Small Benefits	10.2.2
		Preferred Alternative	Opposition	1.1.1
Schumer, U.S. Senator Charles E.	7082	Nighttime Ocean Routing	Increased Fuel Costs	18.4.4
			Noise Impacts	18.4.1
			Operational Impacts	18.4.5
Shays, Congressman Christopher	6001	Airlines	Congestion Pricing	9.1.6
		Altitudes Over CT	Stamford	17.2.2
		Documentation	Flight Track	3.1.7
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
	7008	Altitudes Over CT	Stamford	17.2.2
		CT Noise Mitigation	Non-Residential Areas	17.4.2
		Documentation	Minimum Altitudes	3.1.6
		LGA 22 LDA Approach	Exclusion	21.2.1
		Preferred Alternative	Opposition	1.1.1
		Purpose and Need	Noise Reduction	5.1.1
	Skiba, Councilwoman Carol J.	6906	DNL	Averages
Quality of Life			Education	6.2.3
Skibitsky, Mayor Andrew K., Town of Westfield, NJ	6795	Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR 22 Headings	NJ vs. Staten Island	18.2.6
		EWR Flexible Headings	ATC Complexity	18.3.4
			Impact on Elizabeth City	18.3.10

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		Nighttime Ocean Routing	Noise Impacts	18.4.1
		Quality of Life	Contributing Elements	6.2.2
Spano, Andrew J., County Executive (Westchester Co)	6740	Comment Period	Extension	4.6.1
		Documentation	Comparison Information	3.1.12
			Lacking Detail	3.1.3
			Modeling Data	3.1.11
			Noise Impact Data	3.1.9
		HPN Airport	RNAV Equipage	23.1.7
			RNAV Feasibility	23.1.5
			RNAV Impact Assessment	23.1.6
		Modeling	Refinement	11.1.6
			Terrain	11.1.3
		Preferred Alternative	Opposition	1.1.1
		Process	Legal Review	4.1.14
			Supplemental DEIS	4.1.10
Public Meetings	Additional Meetings	4.5.1		
Specter, U.S. Senator Arlen	7007	Delay Metrics	Interpretation	10.1.1
		Efficiency Gains	Small Benefits	10.2.2
		PHL Airport	Delaware County Impacts	24.1.1
		Process	ATC Participation	4.1.1
		Traffic Levels	Historical Data	12.2.6
Stamford Board of Representatives	6005	Impacts on CT	LGA Traffic Shift	17.1.2
		LGA Routings Impacts	Fairfield County	17.3.2
		Property Value	Economic Analysis	6.1.1
Stoddard, Gerard (Fire Island Association, Inc)	6006	Islip Airport	Impact on FINS	22.1.1
Stull, Tim, UPS Air	7473	Nighttime	Increased Fuel Costs	18.4.4

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Traffic Systems		Ocean Routing	Operational Impacts	18.4.5
The Port Authority of NY and NJ	7407	Air Pollution	Nighttime Ocean Routing	7.1.6
		EWR 22 Headings	Limited Mitigation	18.2.1
		EWR Flexible Headings	ATC Complexity	18.3.4
		LGA 22 LDA Approach	Support	21.2.9
		Nighttime Ocean Routing	Noise Impacts	18.4.1
			Operational Impacts	18.4.5
		Purpose and Need	Noise Reduction	5.1.1
Township Committee of the Township of Cranford	7345	Air Pollution	Perceived Increases	7.1.3
		Efficiency Gains	Small Benefits	10.2.2
		EWR 22 Headings	Headings East of 190	18.2.2
		Modeling	EWR Operations	11.1.1
			Terrain	11.1.3
		Preferred Alternative	Opposition	1.1.1
			Reduced Spacing	1.1.7
		Process	Port Authority	4.1.16
		Property Value	Impacts of Noise	6.1.2
		Purpose and Need	Noise Reduction	5.1.1
		Quality of Life	Contributing Elements	6.2.2
TEB Airport	Request Noise Mitigation	19.1.1		
Ulster County Legislature	7329	EWR Arrivals	Catskills/Shawangunks	18.7.9
			V213 Traffic	18.7.8
Ulsterites Fight Overflight Noise	7160	DNL	Averages	4.3.1
		Health	Hearing Loss	8.1.2
Watson, Director Aaron (Mercer Co. DOT)	6729	Trenton Airport	Altitude Restrictions	24.5.1
			CDAs	24.5.3
			Runway 24 ILS	24.5.2

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Withers, Patrick	7744	Air Pollution	Perceived Increases	7.1.3
		Efficiency Gains	Small Benefits	10.2.2
		EWR 22 Headings	Limited Mitigation	18.2.1
		Health	Impacts of Noise	8.1.1
		Public Meetings	Additional Meetings	4.5.1
			Public Input	4.5.7
		Quality of Life	Contributing Elements	6.2.2

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Abad, Hedy	6630	Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
	6635	Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Abolofia, Barbara	6701	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Adams, Carolee	6173	Comment Period	Extension	4.6.1
		Efficiency Gains	Small Benefits	10.2.2
		Nighttime Ocean Routing	Noise Impacts	18.4.1
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
			Meeting Requests	4.5.2
	Quality of Life	Contributing Elements	6.2.2	
7853	Preferred Alternative	Opposition	1.1.1	
Adams, Charles	7189	CDAs	Feasibility	15.1.2
		Comment Period	Extension	4.6.1
		Documentation	Lacking Detail	3.1.3
		Efficiency Gains	Small Benefits	10.2.2
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1

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		Quality of Life	Contributing Elements	6.2.2
Adams, Helene	7525	New Mitigation	Quieter Jet Engines	1.3.2
Adams, Rae	6166	Comment Period	Extension	4.6.1
		DNL	Averages	4.3.1
		Documentation	Comparison Information	3.1.12
			Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Quality of Life	Contributing Elements	6.2.2		
Adinolfi, Isabel	6095	Preferred Alternative	Opposition	1.1.1
Adler, Karen	6762	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Aferiat, Dah	7706	Efficiency Gains	Small Benefits	10.2.2
		EWR Arrivals	Opposition to Reroutes	18.7.10
Aguilera, Eileen	7202	Preferred Alternative	Opposition	1.1.1
Albano, Kathleen	6673	EWR Flexible Headings	Equitable Distribution	18.3.9
Alberta, Gina	6605	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3

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		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Alburger, Elizabeth	6778	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Alestra, Eliane	7519	Air Pollution	Perceived Increases	7.1.3
		Property Value	Impacts of Noise	6.1.2
		VFR Traffic	Additive Impacts	12.3.4
Alter, Ed	7372	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Amadio, Donald	7502	Airlines	Re-regulation	9.1.3
		Efficiency Gains	Small Benefits	10.2.2
		PHL Airport	Airport Governance	24.1.5
		Preferred Alternative	Opposition	1.1.1
Amos, Julie	7332	Altitudes Over CT	Fairfield County	17.2.1
		Preferred Alternative	Opposition	1.1.1
		VFR Traffic	Additive Impacts	12.3.4
Anastasio, Peter	6554	Mitigation	NY/NJ Water Routing	2.1.12
		Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2

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		Quality of Life	Safety	6.2.4
Anderson, Matthew and Kelli	6137	Air Pollution	Perceived Increases	7.1.3
		Preferred Alternative	Opposition	1.1.1
Andrews	6930	Documentation	Lacking Detail	3.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Part 150	Noise Abatement	4.2.1
		Property Value	Impacts of Noise	6.1.2
		Public Meetings	Prejudged Outcome	4.5.8
		Quality of Life	Contributing Elements	6.2.2
	Education		6.2.3	
	6949	Airlines	Congestion Pricing	9.1.6
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Andrews, Kathleen	6598	Delay	Landside Operations	10.3.1
		Documentation	Lacking Detail	3.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Andrews, Robert	7010	Preferred Alternative	Opposition	1.1.1
Annese, Lynn	6664	Comment Period	Extension	4.6.1
		Efficiency Gains	Small Benefits	10.2.2
		Preferred Alternative	Opposition	1.1.1
		Purpose and Need	Noise Reduction	5.1.1
Anonymous	7678	EWR Arrivals	Widen Corridor	18.7.11

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		Preferred Alternative	Opposition	1.1.1
Anonymous	7743	Preferred Alternative	Opposition	1.1.1
Ant, Joan	6083	Efficiency Gains	Small Benefits	10.2.2
		PHL Departure Headings	River Departure Only	24.4.1
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Safety	6.2.4			
Anteb, Albert	7675	Documentation	Lacking Detail	3.1.3
		Public Meetings	Notification	4.5.3
		Quality of Life	Contributing Elements	6.2.2
Antonini, Dominic	6552	Preferred Alternative	Opposition	1.1.1
Antonini, Vicki	6136	Preferred Alternative	Opposition	1.1.1
Aquaviva, John	6482	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Armstrong, Earl	6780	PHL Departure Headings	River Departure Only	24.4.1
Aronson, Howard	6869	JFK Airport	Monmouth County	20.1.3
Artese, Perry	7143	Airlines	Re-regulation	9.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Health	Impacts of Noise	8.1.1
		Property Value	Economic Analysis	6.1.1

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		Public Meetings	Tinimum Meeting	4.5.6
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Asam	6938	Airlines	Focus on Profits	9.1.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		PHL Airport	Airport Governance	24.1.5
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Ashfield, Adrian	6764	Delay	Landside Operations	10.3.1
			NY/NJ vs. PHL	10.3.5
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Audino, Diane	6371	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Avery, Erin	6564	4F	Historic Sites	14.1.4
		JFK Airport	Monmouth County	20.1.3
		Quality of Life	Contributing Elements	6.2.2
Ayers, Alice	6113	Preferred Alternative	Opposition	1.1.1
Azar, Issa	7307	Comment Period	Extension	4.6.1

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Babcock, Sarah	7283	4F	Orange County	14.1.1
		JFK Airport	Monmouth County	20.1.3
		Nighttime Ocean Routing	Noise Impacts	18.4.1
		Quality of Life	Contributing Elements	6.2.2
Babcock, Victoria	7285	4F	Orange County	14.1.1
		JFK Airport	Monmouth County	20.1.3
		Nighttime Ocean Routing	Noise Impacts	18.4.1
		Quality of Life	Contributing Elements	6.2.2
Babcock, William	7284	4F	Orange County	14.1.1
		JFK Airport	Monmouth County	20.1.3
		Nighttime Ocean Routing	Noise Impacts	18.4.1
		Quality of Life	Contributing Elements	6.2.2
Babiak, Marjorie	6772	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Education	6.2.3
Safety	6.2.4			
Babiak, Marjorie	6459	Air Pollution	Perceived Increases	7.1.3

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Bachman, Nancy	7633	Preferred Alternative	Reduced Spacing	1.1.7
		Quality of Life	Contributing Elements	6.2.2
Badway, Elizabeth	6251	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Badway, Ernest	7388	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Bae, J. L.	7600	Air Pollution	Perceived Increases	7.1.3
			Quantification	7.1.1
		CDAs	Support	15.1.1
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR 22 Headings	NJ vs. Staten Island	18.2.6
		EWR Airport	Hudson River Routing	18.8.2
		EWR Arrivals	Concorde	18.7.7
Opposition to Reroutes	18.7.10			

Commentor	Letter Number	Topic	Subtopic	Response Code
			Sonic Booms	18.7.2
			Time of Day Restrictions	18.7.6
		EWR Flexible Headings	Equitable Distribution	18.3.9
		Health	Hearing Loss	8.1.2
			Impacts of Noise	8.1.1
		Mitigation	Call Hotline	2.1.9
			Noise Monitoring	2.1.10
			NY/NJ Water Routing	2.1.12
			Seasonal Routing	2.1.4
			Volume Restrictions	2.1.2
		Part 150	Noise Abatement	4.2.1
		PHL Arrivals	Noise Impacts	24.2.2
		Property Value	Economic Analysis	6.1.1
			Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Education	6.2.3
			Structural Damage	6.2.6
Bae, Jay	6572	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Bae, Jean	6573	Comment Period	Extension	4.6.1

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Bae, Kyung Mi	7468	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Baer	6916	EWR Arrivals	Opposition to Reroutes	18.7.10
Baer, Florence and Gary	6325	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Education	6.2.3
Baer, Lynne	6394	Delay	NY/NJ vs. PHL	10.3.5
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
Bagley, Lynn	6570	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
Bahoritsch, Marion	6168	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Bahrs	6951	Preferred Alternative	Opposition	1.1.1
Bailey, Amanda	6642	Air Pollution	Perceived Increases	7.1.3
		Efficiency Gains	Small Benefits	10.2.2
		Part 150	Noise Abatement	4.2.1
		Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Safety	6.2.4			
Baird, William	6500	Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
Baker, Colleen	6425	Airlines	Re-regulation	9.1.3
		PHL Departure Headings	Time of Day Restrictions	24.4.3
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Balbo, Carol	6243	Efficiency Gains	Small Benefits	10.2.2
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
			Safety	6.2.4
Baldwin, Laura	6467	Air Pollution	Perceived Increases	7.1.3
		Efficiency Gains	Optimal Conditions Only	10.2.1
		Quality of Life	Contributing Elements	6.2.2
Banigan, Gail	6443	Health	Impacts of Noise	8.1.1
		Impacts on CT	LGA Traffic Shift	17.1.2
Banker, Teela	7655	Air Pollution	Perceived Increases	7.1.3
		EWR 22 Headings	NJ vs. Staten Island	18.2.6
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Safety	6.2.4			
Banovic, David	6270	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Banovic, Eric	6271	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Banovic, Michael	6272	Comment Period	Extension	4.6.1

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Banovic, Mr. and Mrs. John	6274	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Barbagallo, Stephanie	7216	Air Pollution	Perceived Increases	7.1.3
		Delay	Landside Operations	10.3.1
			NY/NJ vs. PHL	10.3.5
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Health	Impacts of Noise	8.1.1
		Quality of Life	Contributing Elements	6.2.2
Safety	6.2.4			
Barber, Sharon	6804	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
Barclay, Suzanne	7566	Air Pollution	Quantification	7.1.1
		Public Meetings	Notification	4.5.3
Bardes, Mark	6677	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Barker, Ed	6651	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Education	6.2.3
Barker, Susan	6662	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Barker, Terry	6661	Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Education	6.2.3
Barnett, Kristy	6849	Preferred Alternative	Opposition	1.1.1
Barnett, Tara	7219	JFK Airport	Monmouth County	20.1.3
		Nighttime Ocean Routing	Noise Impacts	18.4.1
		Quality of Life	Contributing Elements	6.2.2
Bartholf, Danielle	6463	EWR Arrivals	Opposition to Reroutes	18.7.10

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
Basu, Neil	7125	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Basu, Rahul	7127	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Basu, Sharon	7128	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Bates	6944	Delay	Landside Operations	10.3.1
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Education	6.2.3
Bates, Bob	6032	4F	Orange County	14.1.1
		Efficiency Gains	Optimal Conditions Only	10.2.1

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Education	6.2.3
Battisti, Dee	7338	Airlines	Congestion Pricing	9.1.6
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Safety	6.2.4
Battle	6922	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Baudisch, Danny	6156	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Baudisch, Rich	6157	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
	Purpose and Need	Noise Reduction	5.1.1	
	7158	Comment Period	Extension	4.6.1

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Documentation	Modeling Data	3.1.11
		Public Meetings	Additional Meetings	4.5.1
	7415	Delay	Severe Weather	10.3.2
		Efficiency Gains	Small Benefits	10.2.2
		Preferred Alternative	Opposition	1.1.1
		Property Value	Economic Analysis	6.1.1
	7421	Documentation	Incomplete	3.1.4
		Efficiency Gains	Small Benefits	10.2.2
		Multi-modal	Ignoring Option	4.4.2
		Preferred Alternative	Opposition	1.1.1
Public Meetings		Additional Meetings	4.5.1	
Baudisch, Tammy	6158	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Bay	6967	Preferred Alternative	Opposition	1.1.1
Beatini, Diane	6533	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Beckerman, Drew	7154	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Beckerman, Lisa	7156	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Beckerman, Neil	7155	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Bedrosian, Adelle	6031	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Safety	6.2.4
Behnke, Lora	7175	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Beiman, Larry	7874	Property Value	Impacts of Noise	6.1.2

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Public Meetings	Additional Meetings	4.5.1
Beinlich, Carolyn	6391	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Bell, Rick	6899	Preferred Alternative	Opposition	1.1.1
Belnick, Lauren	6362	EWR Arrivals	Traffic Over Montvale	18.7.16
		Nighttime Ocean Routing	Noise Impacts	18.4.1
		Preferred Alternative	Opposition	1.1.1
		Purpose and Need	Noise Reduction	5.1.1
		Quality of Life	Contributing Elements	6.2.2
Belthoff, Beth	7278	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Belva, Rob	7541	EWR Arrivals	Opposition to Reroutes	18.7.10
Belzer, Robert	7159	Comment Period	Extension	4.6.1
		Documentation	Modeling Data	3.1.11
		Public Meetings	Additional Meetings	4.5.1
	7821	Preferred Alternative	Opposition	1.1.1
Benante, Charles	7846	Process	Public Vote	4.1.13
		Quality of Life	Contributing Elements	6.2.2
Benante, Janet	7886	Preferred Alternative	Opposition	1.1.1

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
Bender, Ginny and Larry	7441	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Benditt	6946	EWR Arrivals	Opposition to Reroutes	18.7.10
		Multi-modal	Comprehensive Solution	4.4.1
		Property Value	Impacts of Noise	6.1.2
Benigno, Paige	7178	JFK Airport	Monmouth County	20.1.3
		Nighttime Ocean Routing	Noise Impacts	18.4.1
		Quality of Life	Contributing Elements	6.2.2
Bennett, Mary	6498	Airlines	Congestion Pricing	9.1.6
		Quality of Life	Contributing Elements	6.2.2
Benon, Maureen	6857	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Bera, Jacqueline	6263	Delay	Landside Operations	10.3.1
			Severe Weather	10.3.2
		EWR Arrivals	Opposition to Reroutes	18.7.10
Berenson, Ronald	7854	Airlines	Focus on Profits	9.1.1

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Safety	6.2.4
Berfer, Elaine	6531	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Berfer, J.	6530	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Berg, Roni	6334	Preferred Alternative	Opposition	1.1.1
Bergen Co. Resident	6879	Comment Period	Extension	4.6.1
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Berger, Steve	7817	Efficiency Gains	Optimal Conditions Only	10.2.1
			Small Benefits	10.2.2
		EWR 04L Departures	Hudson River Routing	18.5.6
		Process	Homeland Security	4.1.6
		Purpose and Need	Noise Reduction	5.1.1

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Quality of Life	Contributing Elements	6.2.2
Berman, Michael	7516	EWR Flexible Headings	ATC Complexity	18.3.4
		Public Meetings	Prejudged Outcome	4.5.8
Bernstein	6956	Air Pollution	Perceived Increases	7.1.3
		Delay	Severe Weather	10.3.2
		Documentation	Lacking Detail	3.1.3
Betsy, Walter	7857	Documentation	Lacking Detail	3.1.3
		Process	Homeland Security	4.1.6
Betzler, Christopher	7232	Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Bevan, Robert	6410	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Bezilla	6909	EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Biggs, James	6784	EWR Arrivals	Opposition to Reroutes	18.7.10
		PHL Airport	Airport Governance	24.1.5
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Bittle, Cynthia	6747	Air Pollution	Perceived Increases	7.1.3
		Delay	Severe Weather	10.3.2
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Economic Analysis	6.1.1

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
			Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Blair, Kathy	6648	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Blair, Steve	6398	Documentation	Flight Track	3.1.7
	6399	Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
	6442	Documentation	Comparison Information	3.1.12
			Flight Track	3.1.7
			Lacking Detail	3.1.3
Blane, Nancy	7583	EWR Arrivals	Opposition to Reroutes	18.7.10
		Preferred Alternative	Opposition	1.1.1
Bloom, Euphrosyne	6526	Documentation	2006 vs. 2011	3.1.13
		EWR Arrivals	V213 Traffic	18.7.8
	6543	EWR Arrivals	V213 Traffic	18.7.8
		Quality of Life	Contributing Elements	6.2.2
Bobo, Adaria	6698	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
Bodner, Michelle	7341	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Boggio, Marc	6370	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Bogle, James	7311	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Boland, Beatrice	6107	Preferred Alternative	Opposition	1.1.1
Boland, Matthew	7552	Airlines	Focus on Profits	9.1.1
		Preferred Alternative	Opposition	1.1.1
Boland, Richard	6438	Airlines	Re-regulation	9.1.3
		PHL Departure Headings	Time of Day Restrictions	24.4.3
		Property Value	Impacts of Noise	6.1.2

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Bolyai, Annette	6150	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Bongiorno, Susan	6197	Preferred Alternative	Opposition	1.1.1
Bono, Jennifer	6308	Nighttime Ocean Routing	Noise Impacts	18.4.1
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Bonura, Cynthia	7275	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Boonin, Nicholas	7801	4F	Historic Sites	14.1.4
		Airlines	Re-regulation	9.1.3
		PHL Airport	Airport Governance	24.1.5
Borden, Jay	6115	Quality of Life	Contributing Elements	6.2.2
Borio, Edward	6457	Air Pollution	Perceived Increases	7.1.3

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Boucher, Toni	6114	Preferred Alternative	Opposition	1.1.1
Bourcier, Cammy	6295	Preferred Alternative	Opposition	1.1.1
Bowen, Connie	6888	Air Pollution	Perceived Increases	7.1.3
		Airlines	Congestion Pricing	9.1.6
		Delay	Severe Weather	10.3.2
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
Bowen, Kayla	6840	Preferred Alternative	Opposition	1.1.1
Bowers, Jack and Gretchen	6193	Air Pollution	Perceived Increases	7.1.3
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Boyle, Patti	7682	Airlines	Focus on Profits	9.1.1
		Quality of Life	Contributing Elements	6.2.2
Boyle, Tracy	6131	JFK Airport	Monmouth County	20.1.3
		Nighttime Ocean Routing	Noise Impacts	18.4.1
		Quality of Life	Contributing Elements	6.2.2
Bradford, Benjamin	6248	JFK Airport	Negative Impacts	20.1.4
		Preferred Alternative	Opposition	1.1.1
Bradley, James	6374	Air Pollution	Perceived Increases	7.1.3

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Braff, Ivone	6345	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Braham, Emily	7340	Air Pollution	Perceived Increases	7.1.3
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Health	Impacts of Noise	8.1.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Braham, Jason	7257	Delay	Landside Operations	10.3.1
			Severe Weather	10.3.2
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Health	Impacts of Noise	8.1.1
		Property Value	Economic Analysis	6.1.1
			Impacts of Noise	6.1.2
		Public Meetings	Prejudged Outcome	4.5.8
Quality of Life	Contributing Elements	6.2.2		

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
			Safety	6.2.4
Bramell, William and Terri	6645	Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
Brandis, Patty	7374	Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Bray, John	6011	PHL Departure Headings	River Departure Only	24.4.1
	7804	Airlines	Re-regulation	9.1.3
Breen, Irene	6785	Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Breen, Melissa	6125	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Brennan, Daniel	7822	CDAs	Detailed Analysis	15.1.5
			Feasibility	15.1.2
			Proof	15.1.3
		Documentation	Incomplete	3.1.4
			Lacking Detail	3.1.3
Briedenweg, June	6860	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Briggs	6950	Airlines	Focus on Profits	9.1.1
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
Broadman, Allen	7102	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Broadman, Debra	6593	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
	Purpose and Need	Noise Reduction	5.1.1	
	7100	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
Preferred Alternative		Opposition	1.1.1	

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Brooks, Douglas	6853	Preferred Alternative	Opposition	1.1.1
Brosius, Betty	6588	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Brossy	6966	Altitudes Over CT	Stamford	17.2.2
Brown, Judy	7118	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Brown, Stefani	7227	Air Pollution	Perceived Increases	7.1.3
Brownell, Catherine	6246	Airlines	Re-regulation	9.1.3
		Documentation	Lacking Detail	3.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Safety	6.2.4			
Bruni, Nick	6041	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Safety	6.2.4

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
Buldo, Dawn	6171	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Bulik, Albert	6020	Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
Bulik, Lou Anne	6055	Delay	NY/NJ vs. PHL	10.3.5
		Documentation	Flight Track	3.1.7
		Efficiency Gains	Optimal Conditions Only	10.2.1
	6069	Preferred Alternative	Opposition	1.1.1
	6671	Air Pollution	Perceived Increases	7.1.3
		Delay	Landside Operations	10.3.1
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Education	6.2.3
Safety	6.2.4			
Buonanno, Kristine	6381	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
Public Meetings	Additional Meetings	4.5.1		

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Purpose and Need	Noise Reduction	5.1.1
Buonocore, Frank	6625	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
	Purpose and Need	Noise Reduction	5.1.1	
	7639	EWR Arrivals	Opposition to Reroutes	18.7.10
Burge, Eileen G.	7582	Public Meetings	Additional Meetings	4.5.1
			Internet Access	4.5.5
			Public Input	4.5.7
			Tinimum Meeting	4.5.6
Burke, Carolyn	6571	Quality of Life	Safety	6.2.4
Burns, Laura	6562	JFK Airport	Monmouth County	20.1.3
		Quality of Life	Contributing Elements	6.2.2
Bush, Ralph	6793	4F	Orange County	14.1.1
		Air Pollution	Perceived Increases	7.1.3
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Public Meetings	Tinimum Meeting	4.5.6
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Butler, G	6175	Air Pollution	Perceived Increases	7.1.3

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
Butler, Herb	7435	Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Buxbaum	6954	Preferred Alternative	Opposition	1.1.1
Buzza, Richard	6353	Delay	Landside Operations	10.3.1
			Severe Weather	10.3.2
		Efficiency Gains	Small Benefits	10.2.2
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Prejudged Outcome	4.5.8
Bynum	6920	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
Cacace, Richard	7736	Modeling	Forecasted Traffic	11.1.2
Cadigan, Judith	7451	Airlines	Re-regulation	9.1.3
Caggiano, Nicholas	6423	Airlines	Re-regulation	9.1.3
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Cahill, William Kelly	6033	Preferred Alternative	Opposition	1.1.1
Cairo, Johanna	7864	EWR Arrivals	Opposition to Reroutes	18.7.10
			Pascack Environmental	18.7.13
		Preferred Alternative	Opposition	1.1.1
Calce, Lena	6585	EWR Arrivals	Opposition to Reroutes	18.7.10

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Quality of Life	Contributing Elements	6.2.2
Caldwell, Danny	6843	Preferred Alternative	Opposition	1.1.1
Calhoun, Maryann	6369	Air Pollution	Perceived Increases	7.1.3
		Airlines	Focus on Profits	9.1.1
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Safety	6.2.4			
Callahan, Debra	6584	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Campbell, Stephanie	6411	Quality of Life	Contributing Elements	6.2.2
Canney, Jacqui	6356	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Cantor, Geri	6575	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Cantwell, James	6220	Air Pollution	Perceived Increases	7.1.3
		Airlines	Focus on Profits	9.1.1
		Delay	Landside Operations	10.3.1
			NY/NJ vs. PHL	10.3.5
			Severe Weather	10.3.2
		DNL	Averages	4.3.1
		Documentation	Lacking Detail	3.1.3
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Process	ATC Participation	4.1.1
		Property Value	Impacts of Noise	6.1.2
		Public Meetings	Prejudged Outcome	4.5.8
			Tinimum Meeting	4.5.6
		Quality of Life	Contributing Elements	6.2.2
Education	6.2.3			
Safety	6.2.4			
Carbutt, Beth	6094	Air Pollution	Perceived Increases	7.1.3
		Efficiency Gains	Small Benefits	10.2.2
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
			Education	6.2.3

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
			Safety	6.2.4
Carey, Rosemary Dreger	7732	EWR Arrivals	Opposition to Reroutes	18.7.10
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Carlsen, James	7727	Documentation	Modeling Data	3.1.11
		Nighttime Ocean Routing	Noise Impacts	18.4.1
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Notification	4.5.3
Carlson, Lawrence	7716	Air Pollution	Perceived Increases	7.1.3
		EWR Airport	Hudson River Routing	18.8.2
		Preferred Alternative	Opposition	1.1.1
			Reduced Spacing	1.1.7
Carpenter, Mark	7210	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Carroll, Bridget	6446	Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Carroll, Michael	6349	Air Pollution	Perceived Increases	7.1.3
		Delay	NY/NJ vs. PHL	10.3.5
		Efficiency Gains	Optimal Conditions Only	10.2.1

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		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Carter, Loretta	7555	Efficiency Gains	Small Benefits	10.2.2
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Carty, Colleen	6066	Preferred Alternative	Opposition	1.1.1
Carullo, Frank	6613	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Carzo, Kathleen	6439	Airlines	Focus on Profits	9.1.1
			Re-regulation	9.1.3
		Delay	Landside Operations	10.3.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Casadonte, Joseph	6484	Airlines	Re-regulation	9.1.3
		PHL Departure Headings	Time of Day Restrictions	24.4.3
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Casey, Dawn	6544	EWR Arrivals	Opposition to Reroutes	18.7.10

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Quality of Life	Safety	6.2.4
Cashin, Kevin	6164	Preferred Alternative	Opposition	1.1.1
Cashwell, Bob	6850	Preferred Alternative	Opposition	1.1.1
Catanzoro, Patricia	7572	Property Value	Impacts of Noise	6.1.2
Cattelona, Alison	7262	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Centola, Merrick	6085	Preferred Alternative	Opposition	1.1.1
		Quality of Life	Safety	6.2.4
Cervini, Susan	6636	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Chadkin, Jason	6550	JFK Airport	Runway 22 Arrivals	20.1.1
Chambers, Audra	7373	Health	Impacts of Noise	8.1.1
		Public Meetings	Minimum Meeting	4.5.6
Chapman, Debra	6167	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Chapman, MaryAnn and Ed	6851	Preferred Alternative	Opposition	1.1.1
Charney, Lynn	7657	Air Pollution	Perceived Increases	7.1.3
			Reservoirs	7.1.2
		Documentation	Lacking Detail	3.1.3
		Public Meetings	Panel Session Minutes	4.5.4
			Prejudged Outcome	4.5.8
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Stewart Airport	Expansion	1.4.1		
Chartier	6941	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Chartier, Jennifer	6099	Preferred Alternative	Opposition	1.1.1
		Public Meetings	Tinimum Meeting	4.5.6
		Quality of Life	Contributing Elements	6.2.2
Education	6.2.3			
Chartier, Mary Jane and Norman	6017	Air Pollution	Perceived Increases	7.1.3
		Efficiency Gains	Small Benefits	10.2.2
		Health	Impacts of Noise	8.1.1
		Property Value	Impacts of Noise	6.1.2
Chas, Felice	6858	Comment Period	Extension	4.6.1

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Chelius, Jim	7535	PHL Arrivals	Impact Maps	24.2.5
Chernin, Marshall	6151	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Chernin, Tammy	6152	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Cheung, Jennifer	7220	Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Chiellini	7176	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7

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			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Ciconte, June	6553	Airlines	Focus on Profits	9.1.1
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
Ciliberto, Janine	6249	Preferred Alternative	Opposition	1.1.1
		Quality of Life	Safety	6.2.4
Cimenera, John	6359	Delay	Landside Operations	10.3.1
			Severe Weather	10.3.2
		EWR Arrivals	Opposition to Reroutes	18.7.10
Cirino, Franklin	7721	Documentation	Flight Track	3.1.7
Ciuppa, David	6180	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Cividini, Gretchen	7364	EWR Arrivals	Opposition to Reroutes	18.7.10
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Clark, Christina and Michael	6296	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2

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Clark, John	6706	Preferred Alternative	Opposition	1.1.1
Clarke, Mary	7131	Airlines	Congestion Pricing	9.1.6
			Focus on Profits	9.1.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Clarke, Patricia	7479	EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
Cleary, Bill	6409	Preferred Alternative	Opposition	1.1.1
Clohersy, Noreen	7563	Air Pollution	Perceived Increases	7.1.3
		Efficiency Gains	Optimal Conditions Only	10.2.1
		Quality of Life	Contributing Elements	6.2.2
Cluett, Scott	7434	Preferred Alternative	Opposition	1.1.1
		Process	Pre-Decision Changes	4.1.4
Cocker, Geraldine	7529	Public Meetings	Prejudged Outcome	4.5.8
	7810	Preferred Alternative	Opposition	1.1.1
Coffoeld, Cathi	6218	JFK Airport	Monmouth County	20.1.3
		Nighttime Ocean Routing	Noise Impacts	18.4.1
		Quality of Life	Contributing Elements	6.2.2
Coffoeld, Don	6219	JFK Airport	Monmouth County	20.1.3
		Nighttime Ocean Routing	Noise Impacts	18.4.1
		Quality of Life	Contributing Elements	6.2.2
Cohen, Harlan	6188	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3

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		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Collier, Andrea	7707	EWR Arrivals	Opposition to Reroutes	18.7.10
		Nighttime Ocean Routing	Noise Impacts	18.4.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Collins, Bonnie	7141	EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Collins, Patricia	7106	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Collins, Richard	6129	Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Colman, Christopher	6674	JFK Airport	Monmouth County	20.1.3
		Nighttime Ocean Routing	Sandy Hook	18.4.8
		VFR Traffic	Exclusion From Modeling	12.3.1
Comunale, Jarren	7647	Delay	Landside Operations	10.3.1
		Efficiency Gains	Small Benefits	10.2.2
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4

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Concerned Citizen	6852	Preferred Alternative	Opposition	1.1.1
Connelly, Susan and Jay	7391	Air Pollution	Perceived Increases	7.1.3
		Delay	Severe Weather	10.3.2
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Conrad	6947	Air Pollution	Perceived Increases	7.1.3
		Airlines	Re-regulation	9.1.3
		Multi-modal	Comprehensive Solution	4.4.1
		Part 150	Noise Abatement	4.2.1
		Quality of Life	Safety	6.2.4
Conrad, Albert	6768	Preferred Alternative	Opposition	1.1.1
Conroy, Paula	6525	Preferred Alternative	Opposition	1.1.1
		Quality of Life	Safety	6.2.4
Consiglio, John	6521	Impacts on CT	Disproportionate Burden	17.1.1
Constantino, Dorothy	6752	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Contino, Fred	7384	Preferred Alternative	Opposition	1.1.1

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Contratto, Kathy	7186	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Cook, Donald	6063	Preferred Alternative	Opposition	1.1.1
Cook, Karen Ann	6320	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Process	Pre-Decision Changes	4.1.4
		Property Value	Impacts of Noise	6.1.2
Cooney, Cathi	7526	Airlines	Focus on Profits	9.1.1
Cooney, Cathie	7806	Delay	Landside Operations	10.3.1
		Documentation	Lacking Detail	3.1.3
		PHL Arrivals	Impact Maps	24.2.5
			Reduced Spacing	24.2.4
		Property Value	Impacts of Noise	6.1.2
Cooper, Andrew	7593	Air Pollution	Perceived Increases	7.1.3
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Cooper, Laura	7719	Airlines	Focus on Profits	9.1.1
		Preferred Alternative	Opposition	1.1.1
Coppens, Anita	6074	Preferred Alternative	Opposition	1.1.1
	6749	EWR Arrivals	Opposition to Reroutes	18.7.10

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		Quality of Life	Contributing Elements	6.2.2
Coppens, Helen	6748	Airlines	Focus on Profits	9.1.1
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Process	Pre-Decision Changes	4.1.4
			Public Vote	4.1.13
Quality of Life	Contributing Elements	6.2.2		
Coppens, Joseph	6779	Delay	Landside Operations	10.3.1
			Severe Weather	10.3.2
		Efficiency Gains	Small Benefits	10.2.2
		Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
Quality of Life	Contributing Elements	6.2.2		
Cornell, Edward	7885	Public Meetings	Prejudged Outcome	4.5.8
Cosenza, Cesare	6405	Airlines	Congestion Pricing	9.1.6
		Delay	Landside Operations	10.3.1
		Multi-modal	Comprehensive Solution	4.4.1
		Public Meetings	Meeting Requests	4.5.2
Cosgrove, Susan	6515	PHL Arrivals	Collingswood, NJ	24.2.6
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Cosimo, Edward	6155	4F	Historic Sites	14.1.4
		JFK Airport	Monmouth County	20.1.3
		Nighttime Ocean Routing	Noise Impacts	18.4.1

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		Quality of Life	Contributing Elements	6.2.2
Coslett, Edward	7419	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Coslett, Judith	7418	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Coslett, Wendy	7422	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Costa, Nick	6483	Airlines	Re-regulation	9.1.3
		PHL Departure Headings	Time of Day Restrictions	24.4.3
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Coulombe, Joseph	6417	PHL Arrivals	Collingswood, NJ	24.2.6
Coulter, Virginia	7226	Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Covello, Michelle	7695	Airlines	Congestion Pricing	9.1.6
			Re-regulation	9.1.3
		Mitigation	Volume Restrictions	2.1.2
Cox, Valerie	6468	Public Meetings	Public Input	4.5.7
Coyle, Kevin	6641	Comment Period	Extension	4.6.1

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		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Cozzi, Jill	6542	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Cozzi, Juliet	6859	JFK Airport	Monmouth County	20.1.3
		Nighttime Ocean Routing	Noise Impacts	18.4.1
	7333	JFK Airport	Monmouth County	20.1.3
		Nighttime Ocean Routing	Noise Impacts	18.4.1
			Sandy Hook	18.4.8
Quality of Life	Contributing Elements	6.2.2		
Cozzi, Stephen	7389	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Creed, Charles	6154	4F	Historic Sites	14.1.4

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		Nighttime Ocean Routing	Noise Impacts	18.4.1
		Quality of Life	Contributing Elements	6.2.2
Cresci, Paul	6502	Preferred Alternative	Opposition	1.1.1
			Traffic Increases	1.1.6
		Purpose and Need	Noise Reduction	5.1.1
			Redesign Unnecessary	5.1.4
Cresson, Charles	7496	EWR Arrivals	Opposition to Reroutes	18.7.10
		Multi-modal	Comprehensive Solution	4.4.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Cron, Ana Janet	7321	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Cronwell, Emalee	7180	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Crouch, Andrew	7443	Airlines	Congestion Pricing	9.1.6

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		EWR Arrivals	Opposition to Reroutes	18.7.10
		Public Meetings	Prejudged Outcome	4.5.8
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Cullinan, Kathleen	6628	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Cunniffe, Bernard	6312	Air Pollution	Perceived Increases	7.1.3
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Curtis, Nancy	6253	Preferred Alternative	Opposition	1.1.1
Dalaker, Kari	7114	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
	Purpose and Need	Noise Reduction	5.1.1	
	7685	Air Pollution	Perceived Increases	7.1.3
	Property Value	Impacts of Noise	6.1.2	

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		Quality of Life	Contributing Elements	6.2.2
Daly, Eileen	6366	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Damato, Thomas	6259	Efficiency Gains	Small Benefits	10.2.2
		Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
D'Amore, Jason	7139	LGA 22 LDA Approach	Support	21.2.9
Davidson, Kent	6319	EWR Arrivals	Opposition to Reroutes	18.7.10
Davis	6927	Documentation	Lacking Detail	3.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
Davis, Carmel	7406	Airlines	Congestion Pricing	9.1.6
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Day, Kathleen	7480	Airlines	Re-regulation	9.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Public Meetings	Prejudged Outcome	4.5.8
		Quality of Life	Contributing Elements	6.2.2

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DeAngelis, Angelina	7144	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
DeCamp, Matthew and Lisa	7436	Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Degenaars, Belle	6223	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
DeGeorge, John	6303	Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
DeGeorge, Penny	6305	Preferred Alternative	Opposition	1.1.1
DeGiovanni, K.	7274	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
DeGrasa, Peggy and	6814	Air Pollution	Perceived Increases	7.1.3

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Russell		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Delaware County Resident	6809	Airlines	Re-regulation	9.1.3
		Delay	Landside Operations	10.3.1
		Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Dell, Margaret	7556	Air Pollution	Perceived Increases	7.1.3
DelVacchio, Anthony	6435	Airlines	Re-regulation	9.1.3
		PHL Departure Headings	Time of Day Restrictions	24.4.3
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
DelVacchio, Ralph	6486	Airlines	Re-regulation	9.1.3
		PHL Departure Headings	Time of Day Restrictions	24.4.3
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
DeMeo, Gina	6501	EWR Arrivals	Opposition to Reroutes	18.7.10
Denning, Susan	6402	Air Pollution	Perceived Increases	7.1.3
		Efficiency Gains	Optimal Conditions Only	10.2.1

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		Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Deppen, Mary	7477	Air Pollution	Perceived Increases	7.1.3
		Airlines	Re-regulation	9.1.3
		Delay	Landside Operations	10.3.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Public Meetings	Tinimum Meeting	4.5.6
		Quality of Life	Contributing Elements	6.2.2
			Education	6.2.3
Safety	6.2.4			
DeRemigio, Lynne	6873	Efficiency Gains	Small Benefits	10.2.2
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Derienzo, Dorothy	7217	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Derow, Ken	6300	Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
DeSimone, Judith	6690	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Destej, Alfred	7705	Quality of Life	Safety	6.2.4
		Traffic	Verification of Forecast	12.1.3
Destro, Jill and Joe	6192	Air Pollution	Perceived Increases	7.1.3
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Dethlepsen, Marliesa	7621	Nighttime Ocean Routing	Noise Impacts	18.4.1
Devaney, Tim	6036	Preferred Alternative	Opposition	1.1.1
Devereaux, Kathryn	7445	Preferred Alternative	Opposition	1.1.1
Devine, Erick	6574	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
DiAntonio, James	6204	Preferred Alternative	Opposition	1.1.1
DiBella, Flo	6354	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7

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			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Diccianni, Kim	6711	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Dickerson, Janet	6340	Preferred Alternative	Opposition	1.1.1
DiCostanzo, Daniel	6311	Mitigation	NY/NJ Water Routing	2.1.12
DiGiambattista, Bridgett	6196	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
Dimaio, Paula	6037	Documentation	Lacking Detail	3.1.3
Dimaio, Victor	6377	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Safety	6.2.4
DiMario, Lynn	6327	EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
DiMenna, Joseph	6382	Delay	Landside Operations	10.3.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
DiNome, Cyndi	7620	Quality of Life	Contributing Elements	6.2.2

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
DiNome, Steve	7614	Airlines	Focus on Profits	9.1.1
		Public Meetings	Public Input	4.5.7
		Quality of Life	Contributing Elements	6.2.2
Diogo, Maria	7890	Airlines	Required Technology	9.1.2
		Area Navigation	Support	16.1.1
		Mitigation	Advanced Technology	2.1.7
DiPalma, Frank	6667	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
DiRienzo, Joseph	7642	EWR Arrivals	Opposition to Reroutes	18.7.10
		Purpose and Need	Noise Reduction	5.1.1
		Quality of Life	Safety	6.2.4
		Traffic	Verification of Forecast	12.1.3
DiSalvo, Jerry	6268	Air Pollution	Perceived Increases	7.1.3
		Airlines	Focus on Profits	9.1.1
		Efficiency Gains	Small Benefits	10.2.2
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
DiTecco, Fred	7366	EWR Arrivals	Opposition to Reroutes	18.7.10
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
Dolan, Christine	6687	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Donaldson, Brian	7702	Property Value	Impacts of Noise	6.1.2
Donato, Stephen	7399	Airlines	Congestion Pricing	9.1.6
		Process	Dual Modena	4.1.2
Donnelly, Kathleen	7369	JFK Airport	Lack of Mitigation	20.1.6
Donoghue, John	6126	Efficiency Gains	Small Benefits	10.2.2
		Preferred Alternative	Opposition	1.1.1
Donohoe, Denis	6817	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Donohue, D and P	7168	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
Donovan, Julie and Chris	6194	Air Pollution	Perceived Increases	7.1.3
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Dontas, Kim	7271	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Dooley, William and Maureen	6579	JFK Airport	Monmouth County	20.1.3
			Ocean Routing	20.1.7
		Nighttime Ocean Routing	Noise Impacts	18.4.1
			Sandy Hook	18.4.8
Dooman, Mary	7236	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Dooman, Russell	7554	Airlines	Congestion Pricing	9.1.6
			Focus on Profits	9.1.1
		EWR Flexible Headings	Equitable Distribution	18.3.9
		Quality of Life	Contributing Elements	6.2.2

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
Doosey, Alice	7222	Air Pollution	Perceived Increases	7.1.3
Dougherty, George	7256	Efficiency Gains	Optimal Conditions Only	10.2.1
		Environmental Justice	Post Mitigation	13.1.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Dougherty, Geri	6803	Delay	Landside Operations	10.3.1
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Safety	6.2.4
Dougherty, Joseph	7510	Airlines	Re-regulation	9.1.3
	7521	Airlines	Re-regulation	9.1.3
Dougherty, Patricia	6102	Preferred Alternative	Opposition	1.1.1
Douglas, David	6666	Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Douglas, Elizabeth	6670	Air Pollution	Perceived Increases	7.1.3
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Douglas, Rebecca	6669	EWR Arrivals	Opposition to Reroutes	18.7.10
Douglas, Tompkins and Judith	7077	Air Pollution	Perceived Increases	7.1.3
		Airlines	Focus on Profits	9.1.1
		Preferred Alternative	Reduced Spacing	1.1.7
		Purpose and Need	Noise Reduction	5.1.1
Doyle, Mary	7252	EWR Arrivals	Opposition to Reroutes	18.7.10

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Doyle, Rita	6884	Preferred Alternative	Opposition	1.1.1
		Quality of Life	Safety	6.2.4
Dresner, Helen	7377	Preferred Alternative	Opposition	1.1.1
Dressel, Richard	6597	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Drew, James	6264	Quality of Life	Contributing Elements	6.2.2
Drummond, Mark	6244	Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Dudley, Kimberley	6838	Preferred Alternative	Opposition	1.1.1
Duerr, Mary	6563	Airlines	Focus on Profits	9.1.1
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Education	6.2.3			
Dunn, Catherine	7308	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Dunn, Paula	6452	Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
D'Urso, Michael	6434	Impacts on CT	Traffic Growth	17.1.4
		LGA Routings Impacts	Fairfield County	17.3.2
Dutterer, Carol	6462	EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Duva, Joseph	7507	Airlines	Re-regulation	9.1.3
		Preferred Alternative	Opposition	1.1.1
Dzilna, Erita	7830	Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Ebeling, Ashlea	7300	Altitudes Over CT	Fairfield County	17.2.1
		Preferred Alternative	Opposition	1.1.1
Eberle, Hank	6016	EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Edelman, Henry	6595	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Edward Bole, Karl	6792	Mitigation	Noise Abatement	2.1.8
Eilinger, Fred	7709	Delay	Landside Operations	10.3.1
Einstein, Hope	6503	Impacts on CT	Traffic Growth	17.1.4
Eisenhart, Maryann	7239	Air Pollution	Perceived Increases	7.1.3
		Preferred Alternative	Opposition	1.1.1
Elderhorst, Paul	6539	Air Pollution	Perceived Increases	7.1.3
		JFK Airport	Monmouth County	20.1.3
		Quality of Life	Contributing Elements	6.2.2
Elefther, George	6699	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Ember, Laszlo	7737	Nighttime Ocean Routing	Noise Impacts	18.4.1
		Preferred Alternative	Opposition	1.1.1
		Purpose and Need	Redesign Unnecessary	5.1.4
Ember, Teresa	7564	Air Pollution	Perceived Increases	7.1.3
		Health	Impacts of Noise	8.1.1
		Nighttime Ocean Routing	Noise Impacts	18.4.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
			Education	6.2.3
			Safety	6.2.4
			Structural Damage	6.2.6
Entrup, Alexandra	7485	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Entrup, Christopher	7489	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Entrup, Diane	7491	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Entrup, Stephanie	7486	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Entrup, Thomas Jr.	7488	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Entrup, Tina	7487	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Erdman, Andrew	7306	EWR Arrivals	Opposition to Reroutes	18.7.10
		Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Erdman, Diane	7302	EWR Arrivals	Opposition to Reroutes	18.7.10
		Mitigation	NY/NJ Water Routing	2.1.12
		Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
Erdman, Patricia	6813	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Esham, Marion	6776	Preferred Alternative	Opposition	1.1.1
		Quality of Life	Structural Damage	6.2.6
Esposito, Patricia	6718	Preferred Alternative	Opposition	1.1.1
Essig, Ellyn	7876	Public Meetings	Prejudged Outcome	4.5.8
Essington Resident	6845	Preferred Alternative	Opposition	1.1.1
Essmerrn, Sharon	7674	Air Pollution	Perceived Increases	7.1.3
Est, CL	6413	Preferred Alternative	Opposition	1.1.1
Eunson, Andy	7215	Property Value	Economic Analysis	6.1.1
Eunson, Ger	7235	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Evan, Raima	7438	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
			Contributing Elements	6.2.2
		Quality of Life	Safety	6.2.4
Evans, Mary	6801	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1

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		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Evans, Melanie	6512	Preferred Alternative	Opposition	1.1.1
		VFR Traffic	Additive Impacts	12.3.4
Eves, William	6130	Air Pollution	Quantification	7.1.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Health	Impacts of Noise	8.1.1
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Ewing, Susan	6620	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Fabiani, Anna	7518	Air Pollution	Perceived Increases	7.1.3
		Health	Impacts of Noise	8.1.1
		PHL Departure Headings	Tank Farms	24.4.2
		Quality of Life	Contributing Elements	6.2.2
Faggiola, Margaret	6089	Efficiency Gains	Small Benefits	10.2.2
		PHL Departure Headings	River Departure Only	24.4.1
		Preferred Alternative	Opposition	1.1.1
Faggiolo, Alphonso	6079	Preferred Alternative	Opposition	1.1.1
Fahet, MaryAnn	7711	Documentation	Flight Track	3.1.7

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Fahey, William	7699	EWR Arrivals	Opposition to Reroutes	18.7.10
Fahnestock, Andrea	6185	JFK Airport	Monmouth County	20.1.3
		Nighttime Ocean Routing	Noise Impacts	18.4.1
		Quality of Life	Contributing Elements	6.2.2
Falato, Connie	6683	Airlines	Re-regulation	9.1.3
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Falcone, Carole	6035	4F	Orange County	14.1.1
		Air Pollution	Perceived Increases	7.1.3
		Delay	Severe Weather	10.3.2
		DNL	Averages	4.3.1
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Falcone, Paul	6023	Preferred Alternative	Opposition	1.1.1
Falconer, Harry	6299	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Falk, Michael	6169	Preferred Alternative	Opposition	1.1.1

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Fante, Eric	6087	Preferred Alternative	Opposition	1.1.1
Fante, Vera	6086	Preferred Alternative	Opposition	1.1.1
Farrell, Patrick	7512	Preferred Alternative	Opposition	1.1.1
		Process	Pre-Decision Changes	4.1.4
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Farrelly, George	6012	Preferred Alternative	Opposition	1.1.1
Farrow, Leonilda	7303	4F	Orange County	14.1.1
		JFK Airport	Monmouth County	20.1.3
Fasciocco, Rose	6756	Airlines	Re-regulation	9.1.3
		Delay	Landside Operations	10.3.1
		Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Safety	6.2.4			
Faustino, Rita	6837	Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Favre, Joan	7126	Preferred Alternative	Opposition	1.1.1
	7877	Preferred Alternative	Opposition	1.1.1
Fawthorp, John	7330	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Fazekas, Robert	6862	Comment Period	Extension	4.6.1

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		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Fazio, Susan	6830	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Felberbaum, Michael	7310	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Feldman, Warren	7437	Preferred Alternative	Opposition	1.1.1
Fenwick, Francis	7734	Air Pollution	Perceived Increases	7.1.3
			Reservoirs	7.1.2
		Documentation	Lacking Detail	3.1.3
		Mitigation	Volume Restrictions	2.1.2
		Property Value	Impacts of Noise	6.1.2
		Public Meetings	Panel Session Minutes	4.5.4

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		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Ferez, Julie	6589	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Fernandes, Elizabeth	7875	Airlines	Re-regulation	9.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Public Meetings	Panel Session Minutes	4.5.4
		Quality of Life	Safety	6.2.4
Ferrara, Diane	7850	Airlines	Focus on Profits	9.1.1
		Delay	Landside Operations	10.3.1
			Severe Weather	10.3.2
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Multi-modal	Comprehensive Solution	4.4.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Ferrara, Joseph	6266	Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Ferreira, Dorothy	7386	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1

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		Purpose and Need	Noise Reduction	5.1.1
Ferruzzi, Donna	7238	Air Pollution	Perceived Increases	7.1.3
		Delay	Severe Weather	10.3.2
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Fetter, Nicholas	6839	Preferred Alternative	Opposition	1.1.1
Filosa, JoAnn	6629	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Finan, Anne	6472	Preferred Alternative	Opposition	1.1.1
Finkler, Marilyn	6228	Preferred Alternative	Opposition	1.1.1
Finnegan, Rose	6256	Efficiency Gains	Small Benefits	10.2.2
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
Fisher, Barbara	6104	PHL Departure Headings	Equitable Distribution	24.4.6
	6492	PHL River Approach	State of Delaware	24.3.1
Fitzgerald, James	6052	Documentation	Lacking Detail	3.1.3
		PHL Airport	Additional Mitigation	24.1.4
Flannery, Patrick and	7632	Airlines	Focus on Profits	9.1.1

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Lorraine		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Flatley, Catherine	6426	Airlines	Re-regulation	9.1.3
		PHL Departure Headings	Time of Day Restrictions	24.4.3
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Flemer, Sally	7150	Preferred Alternative	Opposition	1.1.1
Fliegel, Dee	6386	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Flynn, John	6432	Airlines	Focus on Profits	9.1.1
			Re-regulation	9.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Fogarty, John	6481	Quality of Life	Contributing Elements	6.2.2
Foley, Gail	7690	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Preferred Alternative	Opposition	1.1.1

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		Public Meetings	Notification	4.5.3
		Quality of Life	Contributing Elements	6.2.2
Foley, Patricia	6827	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Formica, Audrey	7497	Airlines	Re-regulation	9.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		PHL Airport	Airport Governance	24.1.5
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Safety	6.2.4			
Forsch, Patricia	7670	Airlines	Focus on Profits	9.1.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
Fowler, Elton	6487	Mitigation	NY/NJ Water Routing	2.1.12
		Preferred Alternative	Opposition	1.1.1
Francis	6902	4F	Orange County	14.1.1
		EWR Arrivals	Avoid Warwick, NY	18.7.15
			Warwick, NY	18.7.14
Francis, Linda	6117	4F	Orange County	14.1.1
		Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Avoid Warwick, NY	18.7.15

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
			Warwick, NY	18.7.14
		Modeling	Terrain	11.1.3
	7133	Documentation	Lacking Detail	3.1.3
		EWR Arrivals	Avoid Warwick, NY	18.7.15
			Opposition to Reroutes	18.7.10
			Warwick, NY	18.7.14
		Modeling	EWR Operations	11.1.1
Public Meetings	Prejudged Outcome	4.5.8		
Frangos, Arlene	6390	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Frangos, George	6388	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Frank, Rosalia	6721	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
Preferred Alternative	Opposition	1.1.1		

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Frankel, Herb	6262	Efficiency Gains	Small Benefits	10.2.2
		Mitigation	NY/NJ Water Routing	2.1.12
		Preferred Alternative	Opposition	1.1.1
Frankenfield, Bob	6842	Preferred Alternative	Opposition	1.1.1
Franklin, Christine	6198	EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Fraser, Joan	6401	Preferred Alternative	Opposition	1.1.1
Frawley, Sigrid	7575	Nighttime Ocean Routing	Noise Impacts	18.4.1
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
	7902	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Freas, Bill	6456	Preferred Alternative	Opposition	1.1.1
French, Patrick	6027	Process	Public Vote	4.1.13
Friedberg, Debra	7282	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3

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		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Friedman, Anna	7671	Preferred Alternative	Opposition	1.1.1
Fromme, Samantha	7297	Air Pollution	Perceived Increases	7.1.3
		Airlines	Focus on Profits	9.1.1
		Delay	Landside Operations	10.3.1
		Documentation	Lacking Detail	3.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Public Meetings	Prejudged Outcome	4.5.8
			Tinimum Meeting	4.5.6
		Quality of Life	Contributing Elements	6.2.2
Safety	6.2.4			
Froschle, Alison	6316	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Education	6.2.3
Froschle, Tom	6317	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Furlong, Maryann	6103	Preferred Alternative	Opposition	1.1.1
Fusek, John	7428	Air Pollution	Quantification	7.1.1
		Documentation	Flight Track	3.1.7
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2

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		Stewart Airport	Expansion	1.4.1
Galante, Michael	6881	Preferred Alternative	Opposition	1.1.1
Gallagher	6923	Documentation	Lacking Detail	3.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
Gallagher, Gerald	7337	4F	Orange County	14.1.1
		Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Education	6.2.3			
Gallagher, Susan	7413	Airlines	Congestion Pricing	9.1.6
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Gallagher, Suzanne	6392	EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Ganin, Barbara	7578	Airlines	Focus on Profits	9.1.1
			Re-regulation	9.1.3
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Garand, Barbara	6603	Documentation	Flight Track	3.1.7
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Notification	4.5.3

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	6604	Quality of Life	Contributing Elements	6.2.2
		Comment Period	Extension	4.6.1
		Documentation	Comparison Information	3.1.12
			Flight Track	3.1.7
		Preferred Alternative	Opposition	1.1.1
	Quality of Life	Contributing Elements	6.2.2	
	6634	Preferred Alternative	Opposition	1.1.1
Garcia, Gloria	7414	EWR 22 Headings	Left Turns	18.2.4
Gardner, Gladys	6824	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Garippa	6961	LGA Airport	Flight Restriction	21.1.2
		New Mitigation	Quieter Jet Engines	1.3.2
		Property Value	Impacts of Noise	6.1.2
Garnett, Elizabeth	7376	EWR Arrivals	Opposition to Reroutes	18.7.10
Garrison, Bobbi	6474	Airlines	Re-regulation	9.1.3
		PHL Departure Headings	Time of Day Restrictions	24.4.3
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Safety	6.2.4			
Garrison, Lorraine	6479	Airlines	Re-regulation	9.1.3

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		PHL Departure Headings	Time of Day Restrictions	24.4.3
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Garza, Enriquez Hildebrando	7429	4F	Orange County	14.1.1
		Air Pollution	Perceived Increases	7.1.3
		Delay	Landside Operations	10.3.1
			Severe Weather	10.3.2
		DNL	Averages	4.3.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Multi-modal	Comprehensive Solution	4.4.1
		Property Value	Impacts of Noise	6.1.2
		Public Meetings	Prejudged Outcome	4.5.8
			Tinimum Meeting	4.5.6
Quality of Life	Contributing Elements	6.2.2		
	Safety	6.2.4		
Garza, Kathryn	6289	Air Pollution	Perceived Increases	7.1.3
		Airlines	Re-regulation	9.1.3
		Delay	Landside Operations	10.3.1
		Multi-modal	Comprehensive Solution	4.4.1
		Preferred Alternative	Opposition	1.1.1
		Process	ATC Participation	4.1.1
		Property Value	Impacts of Noise	6.1.2
		Public Meetings	Public Input	4.5.7

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Quality of Life	Contributing Elements	6.2.2
			Non-Noise Impacts	6.2.1
			Safety	6.2.4
Garza, Michelle	7470	4F	Orange County	14.1.1
		Air Pollution	Perceived Increases	7.1.3
		Airlines	Re-regulation	9.1.3
		Delay	Landside Operations	10.3.1
			Severe Weather	10.3.2
		DNL	Averages	4.3.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Multi-modal	Comprehensive Solution	4.4.1
		Property Value	Impacts of Noise	6.1.2
		Public Meetings	Tinimum Meeting	4.5.6
		Quality of Life	Contributing Elements	6.2.2
Safety	6.2.4			
Gates, Jane	7656	Air Pollution	Perceived Increases	7.1.3
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Gates, Leigh	7733	DNL	Averages	4.3.1
		Preferred Alternative	Opposition	1.1.1
Gaudet, Alison	6898	Air Pollution	Global Warming	7.1.5
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Process	Pre-Decision Changes	4.1.4
		Property Value	Impacts of Noise	6.1.2

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		Quality of Life	Contributing Elements	6.2.2
			Education	6.2.3
			Safety	6.2.4
Gaudet, Michael	6314	Air Pollution	Global Warming	7.1.5
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Process	Pre-Decision Changes	4.1.4
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Education	6.2.3
Safety	6.2.4			
Gaudet, Mike	6280	Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Geary, Patricia	6567	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Geerlof, Sharon	7242	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
Public Meetings	Additional Meetings	4.5.1		

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Purpose and Need	Noise Reduction	5.1.1
Geitz, Anne	7442	Preferred Alternative	Opposition	1.1.1
Geitz, Robert	7444	Preferred Alternative	Opposition	1.1.1
Gelfand, Michael	6496	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Gentempo, Jack	6880	Preferred Alternative	Opposition	1.1.1
Gentile, Louis	7612	Nighttime Ocean Routing	Noise Impacts	18.4.1
George, Linda	7250	Air Pollution	Perceived Increases	7.1.3
		Airlines	Focus on Profits	9.1.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Georgia, Sue	6551	Airlines	Focus on Profits	9.1.1
		Health	Impacts of Noise	8.1.1
		Preferred Alternative	Opposition	1.1.1
Geskes, Paul	6376	EWR Arrivals	Opposition to Reroutes	18.7.10
Getty, Mary Lou	6364	Preferred Alternative	Opposition	1.1.1
Gheduzzi, Elizabeth	6755	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1

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		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Gheduzzi, Mark	6761	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Ghiraldini, Sophie	7324	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Giammanco, Angelo	7666	Nighttime Ocean Routing	Noise Impacts	18.4.1
Giancarlo, Melissa	7304	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Gianninoto, Wendy	7132	Preferred Alternative	Opposition	1.1.1
Giannone, Ray	6412	EWR Arrivals	Opposition to Reroutes	18.7.10
		Mitigation	Orange County, CA	2.1.5

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Gibbs, Maureen	7723	Quality of Life	Contributing Elements	6.2.2
Gibson, Deirdre	7478	Airlines	Congestion Pricing	9.1.6
		Delay	Landside Operations	10.3.1
		DNL	Averages	4.3.1
		Multi-modal	Comprehensive Solution	4.4.1
		Public Meetings	Prejudged Outcome	4.5.8
			Tinimum Meeting	4.5.6
Quality of Life	Contributing Elements	6.2.2		
Gill, Brian	7363	JFK Airport	Monmouth County	20.1.3
			Ocean Routing	20.1.7
		Nighttime Ocean Routing	Noise Impacts	18.4.1
			Sandy Hook	18.4.8
		Quality of Life	Contributing Elements	6.2.2
Gilmore, Barbara	7149	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Gionfriddo	6918	Delay	Landside Operations	10.3.1
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
Glance, Donna	6420	Airlines	Re-regulation	9.1.3

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		PHL Departure Headings	Time of Day Restrictions	24.4.3
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Glace, Joe	6407	Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
	6419	Preferred Alternative	Opposition	1.1.1
Glace, Joseph	6767	Preferred Alternative	Opposition	1.1.1
	7352	Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
Glace, Lindsay	6897	Airlines	Re-regulation	9.1.3
		PHL Departure Headings	Time of Day Restrictions	24.4.3
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Glancey, Gail and John	6754	Airlines	Re-regulation	9.1.3
		Delay	Landside Operations	10.3.1
		Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Gleeson, John	7264	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7

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			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Gleeson, Susan	6404	Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Glembocki, Edward	7119	DNL	Averages	4.3.1
		Documentation	Lacking Detail	3.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
Glostein, Crystal	6347	Air Pollution	Perceived Increases	7.1.3
		Efficiency Gains	Small Benefits	10.2.2
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Goff, J Edward	6323	Delay	Severe Weather	10.3.2
		DNL	Averages	4.3.1
		Efficiency Gains	Small Benefits	10.2.2
		PHL Departure Headings	Increased Departure Volume	24.4.5
			River Departure Only	24.4.1
		Preferred Alternative	Opposition	1.1.1
		Process	ATC Participation	4.1.1
Goff, Lyn	6395	EWR Arrivals	Opposition to Reroutes	18.7.10
Goldberg, Ellen and Douglas	6760	Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10

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		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Goldberg, Fran	6713	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Goldfarb, Maxine	7728	EWR Arrivals	Opposition to Reroutes	18.7.10
Goldstein, Ian	7842	Airlines	Re-regulation	9.1.3
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Goldtarb, Marvin	7587	EWR Arrivals	Opposition to Reroutes	18.7.10
Gonzales	6908	New Mitigation	Quieter Jet Engines	1.3.2
		Property Value	Impacts of Noise	6.1.2
Gotthardt, J	6201	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Grace, Cybil	7291	Air Pollution	Perceived Increases	7.1.3
		Efficiency Gains	Small Benefits	10.2.2
		Preferred Alternative	Opposition	1.1.1

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		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Graizzaro, Doreen	7630	Documentation	Flight Track	3.1.7
Graizzaro, Gary	7234	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Granet, Robin	7730	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Granowitz, Jack	7594	New Mitigation	Quieter Jet Engines	1.3.2
		Nighttime Ocean Routing	Noise Impacts	18.4.1
		Quality of Life	Contributing Elements	6.2.2
Granowitz, Sheila	7641	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Nighttime Ocean Routing	Noise Impacts	18.4.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Gray, Kevin	6133	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1

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		Purpose and Need	Noise Reduction	5.1.1
Gray, Susan	6163	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Grbic, Zoran	6285	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Green, Carlton	6022	Preferred Alternative	Opposition	1.1.1
Greenberg, Bob	7136	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Greenberg, Jonathan	7847	Preferred Alternative	Opposition	1.1.1
Greenberg, Joyce	6639	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3

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		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Greene	6911	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
		VFR Traffic	Additive Impacts	12.3.4
Greene, M	6453	Air Pollution	Perceived Increases	7.1.3
		DNL	Averages	4.3.1
		Modeling	Terrain	11.1.3
		VFR Traffic	Additive Impacts	12.3.4
Greiff, Lorraine	6105	Preferred Alternative	Opposition	1.1.1
Griffin, Dennis	7205	Preferred Alternative	Opposition	1.1.1
Griffin, Grace	7540	TEB Airport	Map Display	19.1.3
Griffin, Kathleen	7207	Documentation	Lacking Detail	3.1.3
		Efficiency Gains	Small Benefits	10.2.2
		Mitigation	NY/NJ Water Routing	2.1.12
		Preferred Alternative	Opposition	1.1.1
		Process	Homeland Security	4.1.6
Griffin, Maureen	7201	Process	Public Vote	4.1.13
Grogan, Cindy	6607	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Purpose and Need	Noise Reduction	5.1.1
Grogan, Richard	6819	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Groh, Andrew	6685	Preferred Alternative	Opposition	1.1.1
	7543	Airlines	Focus on Profits	9.1.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
Gronek, Gerald	6183	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Groner, Douglas	7318	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Grouleff, Patricia	6444	Preferred Alternative	Opposition	1.1.1
Groves, Maureen	7225	4F	Orange County	14.1.1

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		Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Education	6.2.3
Grubb, Melissa	6861	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Gruber, Peter	6451	Delay	Landside Operations	10.3.1
			NY/NJ vs. PHL	10.3.5
			Severe Weather	10.3.2
		DNL	Averages	4.3.1
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
Process	ATC Participation	4.1.1		
Grueter, Joseph	6601	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Gruver, Lily	6477	Preferred Alternative	Opposition	1.1.1
Guillemain, Catherine	6854	Comment Period	Extension	4.6.1

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		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Guiney, Colleen	6895	Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Education	6.2.3
Safety	6.2.4			
Gulden, Joyce	6870	JFK Airport	Ocean Routing	20.1.7
		Nighttime Ocean Routing	Sandy Hook	18.4.8
Gumbaz, Ronald	6676	DNL	Averages	4.3.1
		JFK Airport	Ocean Routing	20.1.7
		Nighttime Ocean Routing	Noise Impacts	18.4.1
			Sandy Hook	18.4.8
Quality of Life	Contributing Elements	6.2.2		
Haberfield, Jill	6566	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Hadges, Beverly	6273	Comment Period	Extension	4.6.1

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		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Hades, Connie	6275	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Hagerty	6774	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Haggerty, John	7472	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Haines, Larry	6433	Airlines	Re-regulation	9.1.3
		PHL Departure Headings	Time of Day Restrictions	24.4.3
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Hairgove, David	7508	Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2

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Hall, Burton	7740	Air Pollution	Reservoirs	7.1.2
		Efficiency Gains	Small Benefits	10.2.2
		Quality of Life	Safety	6.2.4
Hameyer, Susan	6602	Air Pollution	Perceived Increases	7.1.3
		Airlines	Restricting Access	9.1.4
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
	Safety		6.2.4	
6811	Preferred Alternative	Opposition	1.1.1	
Han, Yon	6609	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Hanley, Richard	7599	Documentation	Incomplete	3.1.4
			Lacking Detail	3.1.3
		Public Meetings	Notification	4.5.3
		Quality of Life	Contributing Elements	6.2.2
Hanlon, Sonja	6504	Air Pollution	Quantification	7.1.1
Hansen, Carl	7637	Airlines	Focus on Profits	9.1.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Purpose and Need	Final Stages	5.1.6
			Noise Reduction	5.1.1

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Quality of Life	Contributing Elements	6.2.2
Hanson, Scott	7686	Mitigation	Volume Restrictions	2.1.2
		Preferred Alternative	Opposition	1.1.1
		Purpose and Need	Noise Reduction	5.1.1
Harada, Melanie	7121	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Harada, Richard	6655	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Harnwell, Natasha Davis	7403	Quality of Life	Contributing Elements	6.2.2
Harnwell, Wendy	7404	Airlines	Re-regulation	9.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Harper	6915	Public Meetings	Prejudged Outcome	4.5.8
	6934	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Safety	6.2.4
Harper, Martha	6227	Preferred Alternative	Opposition	1.1.1

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Harris, David	7669	DNL	Averages	4.3.1
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
	7871	DNL	Averages	4.3.1
Harris, Sandra	7522	Quality of Life	Contributing Elements	6.2.2
	7800	PHL Arrivals	Reduced Spacing	24.2.4
Harris, Warren	7712	EWR Arrivals	Opposition to Reroutes	18.7.10
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Safety	6.2.4			
Harrison, Donna	6322	Air Pollution	Perceived Increases	7.1.3
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
Hart, A	6508	Airlines	Congestion Pricing	9.1.6
Hartung, John	6078	Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Harvey	6919	PHL Departure Headings	Equitable Distribution	24.4.6
Harvey, Harriet	7206	Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Hauck, Linda	7454	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Hayden, Jill	7553	DNL	Averages	4.3.1
		Preferred Alternative	Opposition	1.1.1
Hayed, Thomas	6030	Preferred Alternative	Opposition	1.1.1

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Hedges, Shirley	6352	Efficiency Gains	Small Benefits	10.2.2
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Heine, Sybil	6541	JFK Airport	Monmouth County	20.1.3
		Nighttime Ocean Routing	Noise Impacts	18.4.1
		Quality of Life	Contributing Elements	6.2.2
Heinemann, Lynda	7161	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Heinz, Robert	6686	Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Hemphil, Michael	6018	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
Hemphill	6932	EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Henke, Maryann	7538	Air Pollution	Perceived Increases	7.1.3
		Health	Impacts of Noise	8.1.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Henke, Richard	7194	Preferred Alternative	Opposition	1.1.1

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	7539	EWR Arrivals	Opposition to Reroutes	18.7.10
		TEB Airport	Altitudes	19.1.2
Henning, Richard	7309	Airlines	Re-regulation	9.1.3
		Efficiency Gains	Small Benefits	10.2.2
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Henrich, Ralf	7859	Mitigation	Orange County, CA	2.1.5
Henry, Diane	7392	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Henry, Eileen	6025	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Henry, Kevin	6281	EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Herbert, Janet	7410	Delay	Landside Operations	10.3.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4

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Hermance, Kenneth	6237	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Hermance, Sally Ann	6236	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Herrera, Karen	6599	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Herzberger, Eileen	6365	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		

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Herzberger, Rick	6367	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Hickey, William	7110	Airlines	Congestion Pricing	9.1.6
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Safety	6.2.4			
Hicks, Jennifer	7463	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Education	6.2.3
Himes, Rhonda	7120	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Hoder, Jane	7577	Airlines	Re-regulation	9.1.3
		DNL	Averages	4.3.1

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		Documentation	Lacking Detail	3.1.3
		Efficiency Gains	Small Benefits	10.2.2
Hoder, Joseph	7574	EWR Arrivals	Opposition to Reroutes	18.7.10
		Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Hodgdon, Cathy	7803	Preferred Alternative	Opposition	1.1.1
Hoey, Jocelyn	7447	Preferred Alternative	Opposition	1.1.1
		Purpose and Need	Noise Reduction	5.1.1
Hoffman, Debora	6148	Airlines	Focus on Profits	9.1.1
		Efficiency Gains	Small Benefits	10.2.2
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Health	Impacts of Noise	8.1.1
		Quality of Life	Safety	6.2.4
Hoffman, Edward	7433	Comment Period	Extension	4.6.1
			Flight Track	3.1.7
		Documentation	Lacking Detail	3.1.3
			Preferred Alternative	Opposition
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Hoffman, Jeff	7365	Preferred Alternative	Opposition	1.1.1
Hoffman, Kenneth	6654	Documentation	Lacking Detail	3.1.3
		Public Meetings	Additional Meetings	4.5.1
Hoffman, Lynda	7432	Comment Period	Extension	4.6.1

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		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Hogan, Leanne	6719	Preferred Alternative	Opposition	1.1.1
Holefelder, Janice	6746	Airlines	Focus on Profits	9.1.1
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Safety	6.2.4			
Holek, Melissa	6346	Airlines	Congestion Pricing	9.1.6
Hollenbach, Charles	6788	EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Safety	6.2.4
Holloran, Linda	6247	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Safety	6.2.4
Holm, Karen	6010	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		

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	6351	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Holmes	6962	Preferred Alternative	Opposition	1.1.1
Holmes, Karen	7117	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Horninger, Gary	6134	Delay	Landside Operations	10.3.1
		Efficiency Gains	Small Benefits	10.2.2
Hosbach, Horace	6276	Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Safety	6.2.4
Hosbach, John	6062	Efficiency Gains	Small Benefits	10.2.2
		Preferred Alternative	Opposition	1.1.1
	6298	Documentation	Flight Track	3.1.7
		Efficiency Gains	Small Benefits	10.2.2
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
Host, Christian	7368	Airlines	Congestion Pricing	9.1.6
		EWR Arrivals	Opposition to Reroutes	18.7.10
		PHL Airport	Airport Governance	24.1.5
Howley, Joanne	7190	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
	Purpose and Need	Noise Reduction	5.1.1	
	7548	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Hoyt, Richard	7231	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Huemmler, Andrew	7224	Airlines	Congestion Pricing	9.1.6
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Hugel, Edward	6202	Preferred Alternative	Opposition	1.1.1
Hugh, Kathy	7860	EWR Arrivals	Opposition to Reroutes	18.7.10

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Nighttime Ocean Routing	Noise Impacts	18.4.1
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
			Notification	4.5.3
		Quality of Life	Contributing Elements	6.2.2
Hunsberger, Luke	7495	EWR Arrivals	V213 Traffic	18.7.8
Hunt, Kara	6447	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Hunt, Linda	7228	Preferred Alternative	Opposition	1.1.1
			Reduced Spacing	1.1.7
Hunt, Patrick	6448	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Hurban, Helga	6458	Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Hurle, Roni	6331	Comment Period	Extension	4.6.1

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Huss, Brian	6092	Airlines	Re-regulation	9.1.3
		Efficiency Gains	Small Benefits	10.2.2
		Preferred Alternative	Opposition	1.1.1
Ingersol, Regina	7416	Airlines	Re-regulation	9.1.3
		Delay	Landside Operations	10.3.1
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Jablin, Stacey	7305	Preferred Alternative	Opposition	1.1.1
Jackson, Cheryl	6269	Preferred Alternative	Opposition	1.1.1
Jacobs, Mary	7662	EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Janosky, Lawrence	7267	Comment Period	Extension	4.6.1
			Documentation	Flight Track
		Lacking Detail		3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Janovic, Mark	6384	Comment Period	Extension	4.6.1

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Janowsky, Eileen	7836	Preferred Alternative	Opposition	1.1.1
Jaretsky, Todd	6618	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Jenkins, Charles	7420	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Jenkins, Torrey	7424	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Jigarjian, Richard	7839	Airlines	Re-regulation	9.1.3
		Delay	Severe Weather	10.3.2
Jigartian, Ruhars	7659	Delay	Severe Weather	10.3.2
		Health	Impacts of Noise	8.1.1
		Mitigation	Volume Restrictions	2.1.2
		Quality of Life	Contributing Elements	6.2.2

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
			Safety	6.2.4
Jo Hartung, Bobbi	6073	Preferred Alternative	Opposition	1.1.1
Jochims, James	6077	Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Johnson, Harwood	7188	DNL	Averages	4.3.1
		Documentation	Lacking Detail	3.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Purpose and Need	Noise Reduction	5.1.1
Johnson, James	6318	Efficiency Gains	Small Benefits	10.2.2
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Jones, Bonita	6506	Impacts on CT	Disproportionate Burden	17.1.1
			Traffic Growth	17.1.4
		Mitigation	NY/NJ Water Routing	2.1.12
		Preferred Alternative	Opposition	1.1.1
Jones, Bridget	6212	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Jones, Virginia	6081	Air Pollution	Perceived Increases	7.1.3

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Jorn	6957	Comment Period	Extension	4.6.1
		Efficiency Gains	Small Benefits	10.2.2
		EWR 29 Departures	Runway Usage	18.6.1
		EWR Flexible Headings	Equitable Distribution	18.3.9
		Nighttime Ocean Routing	Noise Impacts	18.4.1
		Preferred Alternative	Opposition	1.1.1
		Process	Port Authority	4.1.16
		Public Meetings	Additional Meetings	4.5.1
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Judka, JoLynn	7177	Efficiency Gains	Small Benefits	10.2.2
		Preferred Alternative	Opposition	1.1.1
		Process	Pre-Decision Changes	4.1.4
		Property Value	Impacts of Noise	6.1.2
		Public Meetings	Prejudged Outcome	4.5.8
		Quality of Life	Contributing Elements	6.2.2
Kahn, Leonard	6203	Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Kaiden, Jon	6615	Airlines	Congestion Pricing	9.1.6
		Preferred Alternative	Opposition	1.1.1

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Quality of Life	Contributing Elements	6.2.2
Kain, Paul	7505	EWR Flexible Headings	Equitable Distribution	18.3.9
Kalaigian, Hovanes	6680	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Kalaigian, John	6678	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Kalaigian, Seda	6679	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Kallin, Marla	7831	EWR Arrivals	Opposition to Reroutes	18.7.10
		Preferred Alternative	Opposition	1.1.1
Kallin, Michael	7832	Airlines	Focus on Profits	9.1.1
		Quality of Life	Contributing Elements	6.2.2

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
Kalnas, Judith	6549	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Kampmann	6964	LGA Airport	Queens	21.1.1
Kampmann, Neils	7827	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Notification	4.5.3			
Kane, Brian	6896	DNL	Averages	4.3.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Kane, Peter	6429	Airlines	Re-regulation	9.1.3
		PHL Departure Headings	Time of Day Restrictions	24.4.3
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Kantowitz, Amy	6590	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
Kaplin, Heather	6702	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Kasperavich, Edward	6745	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Kasperavich, Susan	6744	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Kaufmann, Robert	7626	Preferred Alternative	Opposition	1.1.1
		Quality of Life	Safety	6.2.4
Kautzmann, Kevin	6199	Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Kavanagh, David	6466	Airlines	Re-regulation	9.1.3
		PHL Departure Headings	Time of Day Restrictions	24.4.3

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Kazigian, Charlotte	7609	Air Pollution	Perceived Increases	7.1.3
		Airlines	Focus on Profits	9.1.1
		Quality of Life	Contributing Elements	6.2.2
Kellner, Robert	6643	4F	Historic Sites	14.1.4
			Orange County	14.1.1
		Air Pollution	Perceived Increases	7.1.3
		Nighttime Ocean Routing	Noise Impacts	18.4.1
Kelly, James	7335	Air Pollution	Global Warming	7.1.5
			Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
	Quality of Life	Contributing Elements	6.2.2	
		Education	6.2.3	
	7722	Documentation	Flight Track	3.1.7
Kelly, Lorraine	7714	EWR Arrivals	Opposition to Reroutes	18.7.10
Kenna, Tom	7464	JFK Airport	Helicopters	20.1.5
			Runway 22 Arrivals	20.1.1
Kent, Patricia	6872	Public Meetings	Additional Meetings	4.5.1
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Keppert, Christine	7834	EWR Arrivals	Indian Point	18.7.18
			Opposition to Reroutes	18.7.10

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
			Widen Corridor	18.7.11
		Quality of Life	Safety	6.2.4
Kerin, Michael	6393	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Kerins, Thomas	6363	Documentation	Flight Track	3.1.7
		EWR Arrivals	Opposition to Reroutes	18.7.10
Kern, Anne	7456	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Kern, David	7457	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Kern, Jason	6577	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Kevin,	6796	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Kiel, Carl	7888	Air Pollution	Reservoirs	7.1.2
		Part 150	Noise Abatement	4.2.1
		Quality of Life	Contributing Elements	6.2.2
Kildea, Cathy	6431	Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Kimball, James	7348	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
	Purpose and Need	Noise Reduction	5.1.1	
	7677	EWR Arrivals	Opposition to Reroutes	18.7.10

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Kimball, Maura	7347	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Kincham, John	7514	Airlines	Re-regulation	9.1.3
King, Bill	7504	Documentation	Information Location	3.1.1
			Lacking Detail	3.1.3
			Mailing List	3.1.2
		Modeling	Forecasted Traffic	11.1.2
King, Elaine	6068	Delay	Severe Weather	10.3.2
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
King, James	7450	Delay	Severe Weather	10.3.2
		Efficiency Gains	Optimal Conditions Only	10.2.1
King, Janine	7387	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
King, Julia	6059	Preferred Alternative	Opposition	1.1.1
	6790	Air Pollution	Perceived Increases	7.1.3
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
King, Larry	6038	Efficiency Gains	Small Benefits	10.2.2
		Property Value	Impacts of Noise	6.1.2
King, Richard	6708	4F	Historic Sites	14.1.4
			Sandy Hook	14.1.2
Kinni, Dana	6638	Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Kintsche, Janice	6568	Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Health	Impacts of Noise	8.1.1
		Quality of Life	Contributing Elements	6.2.2
Kirk, Debra	7367	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
Kirwin, Ellen	6519	Preferred Alternative	Opposition	1.1.1
Klag, Fred	7199	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Klagholz, Donna	7237	Delay	Landside Operations	10.3.1
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Safety	6.2.4
Klaiss, Andrea	7344	Preferred Alternative	Opposition	1.1.1
Klas, Nicole	7171	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Klecanda, Robert	7379	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
Klein, Michael	6406	Preferred Alternative	Opposition	1.1.1
Klepp, Maura	7811	Purpose and Need	Noise Reduction	5.1.1
Kloorfain, Michael	7203	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Kloorfain, Robin	7204	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Knetzger, Diane	6471	Preferred Alternative	Opposition	1.1.1
Ko, Catherine	6516	Airlines	Congestion Pricing	9.1.6
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Kobel, Pamela	7255	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
Kocherky, Debbie	7601	Efficiency Gains	Small Benefits	10.2.2
Kochur, Robert	6257	Efficiency Gains	Small Benefits	10.2.2
		Multi-modal	Comprehensive Solution	4.4.1
		Nighttime Ocean Routing	Noise Impacts	18.4.1
		Preferred Alternative	Opposition	1.1.1
Koethe, Marie	7458	Quality of Life	Contributing Elements	6.2.2
Kogstad, Rolf	6123	Altitudes Over CT	Stamford	17.2.2
Kolaci, Kathryn	6350	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Kolai, Brian	7708	Nighttime Ocean Routing	Noise Impacts	18.4.1
Kopko, J.	7223	Airlines	Congestion Pricing	9.1.6
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Kopko, John J.	6265	Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
Korchork, John	7346	Mitigation	NY/NJ Water Routing	2.1.12
		Preferred Alternative	Opposition	1.1.1
Kostyk, Kimberly	6051	Preferred Alternative	Opposition	1.1.1
Kovner, Faye	7162	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Kozaitis, Bessie	6389	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Krantz, Barry and Leah	6619	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Kraus, Gary	6781	Airlines	Re-regulation	9.1.3
Krause	6958	Nighttime Ocean Routing	Noise Impacts	18.4.1
Krazit, Madeline	7196	Comment Period	Extension	4.6.1

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		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Kriete, Regina	6283	Airlines	Focus on Profits	9.1.1
		Efficiency Gains	Small Benefits	10.2.2
		Preferred Alternative	Opposition	1.1.1
Kroll, Paula	6112	Preferred Alternative	Opposition	1.1.1
Kronfeld, Sheryl	7381	Public Meetings	Additional Meetings	4.5.1
Kronfeld, Suzanne	6343	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Kroposki, Michael	6688	Preferred Alternative	Opposition	1.1.1
	6689	Preferred Alternative	Opposition	1.1.1
	6692	Preferred Alternative	Opposition	1.1.1
Kroposki, Michael Esq.	7700	Airlines	Congestion Pricing	9.1.6
		Delay	Severe Weather	10.3.2
		EWR Arrivals	Dual Arrivals	18.7.4
		Impacts on CT	North Arrival Post	17.1.3
		Preferred Alternative	Weather Impacts	1.1.9

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Stewart Airport	Expansion	1.4.1
Kuehlke, Deb	6297	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Kugelmann, Joan	7258	JFK Airport	Monmouth County	20.1.3
		Quality of Life	Contributing Elements	6.2.2
Kuperberg, Mark	7402	Airlines	Focus on Profits	9.1.1
			Re-regulation	9.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
Kurasz, Diane	6878	Air Pollution	Perceived Increases	7.1.3
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Kurtzke, Charles	6333	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Kurtzke, Kathy	6646	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3

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		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Kuzigian, Michael	7672	EWR Arrivals	Opposition to Reroutes	18.7.10
Labovitch, Andrew	7115	Preferred Alternative	Opposition	1.1.1
Lacroce, Brian	7579	DNL	Worst Case Scenario	4.3.8
		Documentation	Lacking Detail	3.1.3
			Modeling Data	3.1.11
Lagrosa, J. and W.	7440	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Laino, Judy and Al	7165	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Lal, Amrita	6026	Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Lambert-Cole, Karen	7565	Airlines	Focus on Profits	9.1.1

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Lamonica, Fred	7603	Airlines	Re-regulation	9.1.3
		Nighttime Ocean Routing	Noise Impacts	18.4.1
Lamont, Rebecca	7361	EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
Lanctot, Dexter and Kathie	7146	4F	Orange County	14.1.1
		Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Education	6.2.3			
Landgraf, John	7809	PHL Arrivals	Lack of Mitigation	24.2.3
Landgraf, Shirley	7527	EWR Flexible Headings	Equitable Distribution	18.3.9
		Public Meetings	Meeting Requests	4.5.2
Landt, Mark	6240	Preferred Alternative	Opposition	1.1.1
Lane, Rosaleen	6186	Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Langjhar	6901	JFK Airport	Lack of Mitigation	20.1.6
Langschultz, Joseph	7140	Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Lapinski, Christine	6290	Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Lavis, Arthur	7872	EWR Arrivals	Opposition to Reroutes	18.7.10
		Nighttime Ocean Routing	Noise Impacts	18.4.1
Lavis, Carol	7668	Nighttime Ocean Routing	Noise Impacts	18.4.1

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Lawson, Ann	7296	EWR Arrivals	Opposition to Reroutes	18.7.10
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Laxer, Marc	6250	Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Leach, W	6116	LGA Routings Impacts	Fairfield County	17.3.2
Leach, William	6517	Impacts on CT	Traffic Growth	17.1.4
		Preferred Alternative	Opposition	1.1.1
Leavens, Susan	7693	Air Pollution	Reservoirs	7.1.2
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Public Meetings	Notification	4.5.3
		Quality of Life	Safety	6.2.4
LeCompte, Walter	6445	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Lederer, Matthew	7696	Comment Period	Extension	4.6.1
		Public Meetings	Prejudged Outcome	4.5.8
Lee, David	7269	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3

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		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Lehman, Kathleen	6797	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Lehmann, Eric	6753	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Lehotsky, Vincent	6277	Preferred Alternative	Opposition	1.1.1
Leibowitz, Steven	7820	Air Pollution	Reservoirs	7.1.2
		EWR 04L Departures	Hudson River Routing	18.5.6
		Nighttime Ocean Routing	EWR 04 Departures	18.4.6
Lemoine, Jim and Karen	6561	JFK Airport	Monmouth County	20.1.3
		Nighttime Ocean Routing	Noise Impacts	18.4.1
		Quality of Life	Contributing Elements	6.2.2
Lemon, Mary	7080	Preferred Alternative	Opposition	1.1.1
	7245	Air Pollution	Perceived Increases	7.1.3

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Airlines	Re-regulation	9.1.3
		Delay	Landside Operations	10.3.1
		Multi-modal	Comprehensive Solution	4.4.1
		Preferred Alternative	Opposition	1.1.1
		Process	ATC Participation	4.1.1
		Property Value	Impacts of Noise	6.1.2
		Public Meetings	Public Input	4.5.7
		Quality of Life	Contributing Elements	6.2.2
			Non-Noise Impacts	6.2.1
Safety	6.2.4			
Lenrow, Kathi	7676	DNL	Averages	4.3.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Leoine, Catherine	7735	Air Pollution	Perceived Increases	7.1.3
		Airlines	Focus on Profits	9.1.1
		Documentation	Lacking Detail	3.1.3
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Leonard	6907	Preferred Alternative	Opposition	1.1.1
Levi, Alan	7405	EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Levi, Daniel	7401	EWR Arrivals	Opposition to Reroutes	18.7.10

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		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Levine, Rachael	7660	Air Pollution	Perceived Increases	7.1.3
		Documentation	Lacking Detail	3.1.3
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Levine, Robert	7701	Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Levinson, Allen and Leslie	7866	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Levinson, Matthew	7113	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
	Purpose and Need	Noise Reduction	5.1.1	
	7280	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
Public Meetings		Additional Meetings	4.5.1	
Purpose and Need	Noise Reduction	5.1.1		
Levinson, Tamara	6231	Preferred Alternative	Opposition	1.1.1
	7111	Comment Period	Extension	4.6.1

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		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Levy, M. and M.	7163	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Lewis, John	6802	EWR Flexible Headings	Equitable Distribution	18.3.9
		JFK Airport	Monmouth County	20.1.3
		Nighttime Ocean Routing	Noise Impacts	18.4.1
			Sandy Hook	18.4.8
		Quality of Life	Contributing Elements	6.2.2
Ley, Janine	7837	Air Pollution	Reservoirs	7.1.2
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Safety	6.2.4
Lichtstein, Sheila	6153	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
Public Meetings	Additional Meetings	4.5.1		

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Purpose and Need	Noise Reduction	5.1.1
Lieberman, Laurie	7715	Process	Pre-Decision Changes	4.1.4
Liebeskind, Susan	6138	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
	Purpose and Need	Noise Reduction	5.1.1	
	6800	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
Public Meetings		Additional Meetings	4.5.1	
Purpose and Need	Noise Reduction	5.1.1		
Lightop III, George	6014	PHL River Approach	State of Delaware	24.3.1
		Preferred Alternative	Opposition	1.1.1
Lilly, Kathryn	7375	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Linetiki, Justin	7718	Health	Impacts of Noise	8.1.1
		Preferred Alternative	Opposition	1.1.1
Linetski, Olga	7720	Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Litman, Shari	6368	Comment Period	Extension	4.6.1

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		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Loeffler, Lawrence	7893	Documentation	Lacking Detail	3.1.3
		Quality of Life	Contributing Elements	6.2.2
Long, Gina	7218	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Lord, Edna	7208	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Lorenz, Steph	7249	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
Public Meetings	Additional Meetings	4.5.1		

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Purpose and Need	Noise Reduction	5.1.1
Lostumbo, Maureen and Donald	6822	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Louch, Marguerite	6766	Preferred Alternative	Opposition	1.1.1
Loucks, Robert	6044	Multi-modal	Comprehensive Solution	4.4.1
Loughlin, Michael	7326	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Loughlin, Tara	7425	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Loveless, Shirley	6560	Air Pollution	Quantification	7.1.1
		Airlines	Re-regulation	9.1.3
		DNL	Averages	4.3.1

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		Documentation	Compatible Land Use	3.1.5
		Modeling	Terrain	11.1.3
		Preferred Alternative	Opposition	1.1.1
		Process	Low Altitude Changes	4.1.3
			NEPA Violation	4.1.8
Quality of Life	Contributing Elements	6.2.2		
Lucas, Kent	7359	EWR Arrivals	Opposition to Reroutes	18.7.10
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Lukievics, J.	6532	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Lupardo, Joan	7571	Documentation	Lacking Detail	3.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Preferred Alternative	Opposition	1.1.1
Lustig, Kathleen	7617	Property Value	Impacts of Noise	6.1.2
Lutz, Cecilia	6789	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
M, Michael	7584	EWR Arrivals	Opposition to Reroutes	18.7.10
		Preferred Alternative	Opposition	1.1.1
Macchione, Doreen	6191	Comment Period	Extension	4.6.1

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		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
MacDonald, Carolyn	7301	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Mack, Joseph	6159	Preferred Alternative	Opposition	1.1.1
Mackay, Tara	7544	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Pascack Environmental	18.7.13
		Quality of Life	Contributing Elements	6.2.2
Mactas, Lisa	6650	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Maddren, Chari	7498	Air Pollution	Perceived Increases	7.1.3
		DNL	Averages	4.3.1
		Efficiency Gains	Optimal Conditions Only	10.2.1

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		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Economic Analysis	6.1.1
		Quality of Life	Contributing Elements	6.2.2
Magasiny, Susan	6414	Preferred Alternative	Opposition	1.1.1
Maguire, Eileen	7261	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Mahncke, Randall	6348	Nighttime Ocean Routing	Noise Impacts	18.4.1
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Mahoney, Dorothy and Daniel	6292	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Maiese	6921	EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Mainelli, Roy	7895	EWR Arrivals	Opposition to Reroutes	18.7.10
		Preferred Alternative	Opposition	1.1.1
Mainescu, George	6653	DNL	Flights per Hour	4.3.2
		Efficiency Gains	Small Benefits	10.2.2
		Mitigation	NY/NJ Water Routing	2.1.12
		Preferred Alternative	Opposition	1.1.1

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		Quality of Life	Contributing Elements	6.2.2
Mairead, Clifford	7122	JFK Airport	Monmouth County	20.1.3
		Nighttime Ocean Routing	Noise Impacts	18.4.1
		Quality of Life	Contributing Elements	6.2.2
Maise, Gary	6088	PHL Departure Headings	Tank Farms	24.4.2
		Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Malecki, Cheryl	6511	Public Meetings	Notification	4.5.3
		Quality of Life	Contributing Elements	6.2.2
Malkin, Kenneth	7862	Documentation	Information Location	3.1.1
Malley, Gerri	6235	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Malley, Juliet	6279	Preferred Alternative	Opposition	1.1.1
Malloy	6937	Air Pollution	Perceived Increases	7.1.3
		Documentation	Lacking Detail	3.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		PHL Airport	Airport Governance	24.1.5
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Malloy, Barbara and Joseph	6758	Comment Period	Extension	4.6.1
			Flight Track	3.1.7
		Documentation	Lacking Detail	3.1.3

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Malloy, Chad	6578	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
	Purpose and Need	Noise Reduction	5.1.1	
	7638	EWR Arrivals	Opposition to Reroutes	18.7.10
Preferred Alternative		Opposition	1.1.1	
Maloney, Shelly	6357	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Manis, Barbara	7692	Airlines	Focus on Profits	9.1.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Nighttime Ocean Routing	Noise Impacts	18.4.1
		Quality of Life	Contributing Elements	6.2.2
Manning, Elaine	6098	Preferred Alternative	Opposition	1.1.1
March, Gregory	6358	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Marcin, Ginny	7802	DNL	Averages	4.3.1
		PHL Arrivals	Lack of Mitigation	24.2.3
Marco, Carole	6823	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Marcus, Elizabeth	7561	4F	Orange County	14.1.1
		Documentation	Lacking Detail	3.1.3
		Public Meetings	Additional Meetings	4.5.1
		Quality of Life	Contributing Elements	6.2.2
Marcus, Julius	6493	Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Margulies, Donna	7244	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
Margulies, Wayne	6616	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Marini, Richard	7460	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Marro, BJ	6015	Air Pollution	Perceived Increases	7.1.3
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Marshall, Robert	7532	PHL Arrivals	Lack of Mitigation	24.2.3
Marsigliano, Jill	6623	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Marsigliano, Joe	6624	Comment Period	Extension	4.6.1

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Marsigliano, Mary	6622	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Marsigliano, Matt	6621	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Marson, Geraldine	7461	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Marson, Keith	7462	Comment Period	Extension	4.6.1

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Martel, Jill	7212	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Martin, Barbara	7317	Efficiency Gains	Small Benefits	10.2.2
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
	Safety		6.2.4	
	7741	Air Pollution	Perceived Increases	7.1.3
		Efficiency Gains	Small Benefits	10.2.2
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Martin, Kathleen	7393	4F	Orange County	14.1.1
		Air Pollution	Global Warming	7.1.5
			Perceived Increases	7.1.3

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Education	6.2.3
Martz, Geraldine	6288	Preferred Alternative	Opposition	1.1.1
Mastowski, Ellen	7277	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Matalon, Lisa	6885	Efficiency Gains	Small Benefits	10.2.2
		Mitigation	NY/NJ Water Routing	2.1.12
		Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
		Public Meetings	Additional Meetings	4.5.1
		Quality of Life	Contributing Elements	6.2.2
	7892	DNL	Averages	4.3.1
		Public Meetings	Notification	4.5.3
Mathis, Thomas	6874	Preferred Alternative	Opposition	1.1.1
Mattessich, Dina	7170	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
Public Meetings	Additional Meetings	4.5.1		

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Purpose and Need	Noise Reduction	5.1.1
Mattessich, Dino	7169	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Mattus, Jeffrey	7610	Multi-modal	Comprehensive Solution	4.4.1
		Stewart Airport	Expansion	1.4.1
Mauthe, Elizabeth	6176	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Mayer, A.	7589	Airlines	Focus on Profits	9.1.1
		Public Meetings	Panel Session Minutes	4.5.4
Mayo, Anita	6301	Efficiency Gains	Small Benefits	10.2.2
		Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Mazur, William	6807	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
McAndren, Patrick	7515	Delay	Severe Weather	10.3.2
		Efficiency Gains	Small Benefits	10.2.2
		Preferred Alternative	Reduced Spacing	1.1.7
		Quality of Life	Contributing Elements	6.2.2
			Education	6.2.3
McAndrew, Patrick	6096	Delay	Severe Weather	10.3.2
		Public Meetings	Tinimum Meeting	4.5.6
McAndrew, Suzanne	6084	Efficiency Gains	Small Benefits	10.2.2
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Tinimum Meeting	4.5.6
		Quality of Life	Contributing Elements	6.2.2
McAree, Jim	7841	Airlines	Focus on Profits	9.1.1
		New Mitigation	Quieter Jet Engines	1.3.2
McBride, Joan	6876	Mitigation	NY/NJ Water Routing	2.1.12
		Preferred Alternative	Opposition	1.1.1
McCann, Cynthia	6397	Delay	Severe Weather	10.3.2
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Public Meetings	Tinimum Meeting	4.5.6
McCarron, Beth	6480	Airlines	Re-regulation	9.1.3

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		PHL Departure Headings	Time of Day Restrictions	24.4.3
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
McCarry, Frank	7109	EWR Arrivals	Opposition to Reroutes	18.7.10
		Process	Pre-Decision Changes	4.1.4
		Public Meetings	Tinimum Meeting	4.5.6
McCarthy, Lisa	6469	Airlines	Congestion Pricing	9.1.6
		Preferred Alternative	Opposition	1.1.1
McCormick, Martin	6415	Documentation	Flight Track	3.1.7
McCullough, Rose Marie	7448	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
McDonough, Robert	7172	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
McEnery, Dennis	6569	JFK Airport	Helicopters	20.1.5
			Runway 22 Arrivals	20.1.1

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Next Steps	Compliance	4.7.1
		Part 150	Noise Abatement	4.2.1
		VFR Traffic	Additive Impacts	12.3.4
McErlean, Michael	6675	EWR Arrivals	Opposition to Reroutes	18.7.10
McEvoy, Christina	6215	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
McGann, Kevin	6608	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
McGavin, Jeanne	7323	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
McGee, Barbara	6200	PHL Departure Headings	River Departure Only	24.4.1
McGlue, Michael	6828	Comment Period	Extension	4.6.1

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		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
McGovern, Kathleen	7173	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
McGowan, Carol	6072	Preferred Alternative	Opposition	1.1.1
	6149	Preferred Alternative	Opposition	1.1.1
McHenry, Dave	6455	Preferred Alternative	Opposition	1.1.1
McHugh, Madeline	7370	4F	Orange County	14.1.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Public Meetings	Prejudged Outcome	4.5.8
		Quality of Life	Safety	6.2.4
McKee, Francis	7503	Documentation	Lacking Detail	3.1.3
		Efficiency Gains	Optimal Conditions Only	10.2.1
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
McKee, Kim	6886	Preferred Alternative	Opposition	1.1.1
McKenna, Tom	7273	Comment Period	Extension	4.6.1

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
	7562	CDAs	Proof	15.1.3
Mckinney, Cherylene	6705	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
McLean, John	7560	EWR Arrivals	Opposition to Reroutes	18.7.10
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
McLearie, Donna	7254	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
McNamee, Patricia	7182	EWR Arrivals	Opposition to Reroutes	18.7.10
McNeil, Charles	6106	Preferred Alternative	Opposition	1.1.1
McNeille, Jeanette	6791	Air Pollution	Perceived Increases	7.1.3

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Airlines	Focus on Profits	9.1.1
			Re-regulation	9.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Economic Analysis	6.1.1
		Quality of Life	Contributing Elements	6.2.2
McNichol, Chris	6328	Preferred Alternative	Opposition	1.1.1
McOmber, Adrienne	6694	JFK Airport	Monmouth County	20.1.3
		Nighttime Ocean Routing	Noise Impacts	18.4.1
		Quality of Life	Contributing Elements	6.2.2
McOmber, Christian	6697	JFK Airport	Monmouth County	20.1.3
		Nighttime Ocean Routing	Noise Impacts	18.4.1
		Quality of Life	Contributing Elements	6.2.2
McOmber, Kelly	6696	JFK Airport	Monmouth County	20.1.3
		Nighttime Ocean Routing	Noise Impacts	18.4.1
		Quality of Life	Contributing Elements	6.2.2
McOmber, Richard	6695	JFK Airport	Monmouth County	20.1.3
		Nighttime Ocean Routing	Noise Impacts	18.4.1
		Quality of Life	Contributing Elements	6.2.2
Meads, Michael and Bernadette	7524	New Mitigation	Quieter Jet Engines	1.3.2
Mee, Arthur	7511	Quality of Life	Contributing Elements	6.2.2
Meehan, Robert	7179	Comment Period	Extension	4.6.1
		Preferred Alternative	Opposition	1.1.1
			Support	1.1.2

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Meisel, Bruce	7581	Airlines	Re-regulation	9.1.3
	7813	Airlines	Re-regulation	9.1.3
		Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
Melconian, Alan	6693	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Melin, Karen	6808	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Meltz, Deborah	7423	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Meltz, Harold Bernadette	6786	Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Mercer, Michael	6812	Comment Period	Extension	4.6.1

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Merton, Carol	6427	Airlines	Re-regulation	9.1.3
		PHL Departure Headings	Time of Day Restrictions	24.4.3
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Safety	6.2.4			
Metz, Rosemary	7138	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Meyer, Alfred	6887	EWR Arrivals	Opposition to Reroutes	18.7.10
		Modeling	Forecasted Traffic	11.1.2
			NIRS Validation	11.1.4
Meyer, Diane	7569	Efficiency Gains	Small Benefits	10.2.2
		Part 150	Noise Abatement	4.2.1
		Public Meetings	Panel Session Minutes	4.5.4
		Quality of Life	Safety	6.2.4
Meyer, Karen	6826	Comment Period	Extension	4.6.1

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		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Meyer, Ralph	7568	EWR Arrivals	Political	18.7.5
		Preferred Alternative	Traffic Increases	1.1.6
		Public Meetings	Panel Session Minutes	4.5.4
		Stewart Airport	Expansion	1.4.1
Michaels, Nancy	7240	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Michales, Delilah	7476	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Michales, Thomas	7395	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3

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		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Michele, Coulombe	6416	PHL Arrivals	Collingswood, NJ	24.2.6
Michelman, Marvin	7867	Air Pollution	Quantification	7.1.1
Mickiewicz, Gary	7652	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Middleton, Kathy	6293	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Middleton, Paul	6291	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Miguel, Angel	7624	Preferred Alternative	Opposition	1.1.1
		Public Meetings	Notification	4.5.3
		Quality of Life	Contributing Elements	6.2.2
Miguel, Diana	7691	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Milillo, Nicola	7629	DNL	Averages	4.3.1
Miller	6931	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Miller, Craig Sr.	6556	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7

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			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Miller, Jacki	7446	Airlines	Re-regulation	9.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Miller, Janet	7634	EWR Arrivals	Opposition to Reroutes	18.7.10
Miller, Judith	6580	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Miller, Ken	6464	EWR Arrivals	Opposition to Reroutes	18.7.10
Miller, Richard	6408	EWR Arrivals	Middlesex County	18.7.1
		Preferred Alternative	Opposition	1.1.1
Miller, Robert W.	6581	Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Mills, Christopher	6042	Efficiency Gains	Small Benefits	10.2.2
Milone, Louis	7390	Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2

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		Quality of Life	Contributing Elements	6.2.2
Miner, Robert	7884	DNL	Averages	4.3.1
		Documentation	Lacking Detail	3.1.3
Miner, Virginia	7870	EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Minnick, Howard	7826	EWR Arrivals	Opposition to Reroutes	18.7.10
			Traffic Over Montvale	18.7.16
Minniti, Frank	6720	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Minot, Rhonda	7833	Air Pollution	Perceived Increases	7.1.3
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Mirman	6940	Quality of Life	Safety	6.2.4
Mitsch, Greg	6547	JFK Airport	Monmouth County	20.1.3
		Nighttime Ocean Routing	Noise Impacts	18.4.1
		Quality of Life	Contributing Elements	6.2.2
Mitsch, Jacqueline	6548	JFK Airport	Monmouth County	20.1.3
		Quality of Life	Contributing Elements	6.2.2
Moallen, Eli	7546	Airlines	Focus on Profits	9.1.1
		Property Value	Impacts of Noise	6.1.2
		Public Meetings	Additional Meetings	4.5.1
		Quality of Life	Contributing Elements	6.2.2

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Mogar, Adina	6668	Preferred Alternative	Opposition	1.1.1
Mohollen, Theresa	6894	Preferred Alternative	Opposition	1.1.1
Mohr, Richard	6600	Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Moldau, Jim	7608	Public Meetings	Panel Session Minutes	4.5.4
Moldow, Jim	7615	Airlines	Load Factors	9.1.5
		New Mitigation	Quieter Jet Engines	1.3.2
		Nighttime Ocean Routing	Noise Impacts	18.4.1
Molesan, Jonathan	7679	EWR Arrivals	Opposition to Reroutes	18.7.10
		Public Meetings	Panel Session Minutes	4.5.4
Molesan, Linda	7680	EWR Arrivals	Opposition to Reroutes	18.7.10
		Public Meetings	Notification	4.5.3
Molesan, Wayne	7605	Multi-modal	Ignoring Option	4.4.2
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Monahan, Patrick and Andrea	7808	Property Value	Impacts of Noise	6.1.2
Montagno, Kenneth	6147	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Montanez, Jennifer	7112	Comment Period	Extension	4.6.1

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		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Montemore, Carol	6216	Efficiency Gains	Small Benefits	10.2.2
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Education	6.2.3
Safety	6.2.4			
Moore	6945	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Moran, Bridget	6217	Air Pollution	Perceived Increases	7.1.3
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Morgan, E. E.	7824	Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Morina, Lisa	6387	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		PHL Airport	Airport Governance	24.1.5
		Quality of Life	Contributing Elements	6.2.2
Morris, Kristina	7351	EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2

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		Quality of Life	Contributing Elements	6.2.2
Morrison, Barbara	6757	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Morriss, Casey	7426	EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Morrone, David	6229	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Morrow, Peter	7863	Preferred Alternative	Opposition	1.1.1
Moses, Helen	6777	PHL Departure Headings	River Departure Only	24.4.1
		Preferred Alternative	Opposition	1.1.1
Mulholland, Sara Ann	6770	Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Mundhenk, Laura	6141	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
Public Meetings	Additional Meetings	4.5.1		

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	7684	Purpose and Need	Noise Reduction	5.1.1
		Airlines	Focus on Profits	9.1.1
		Public Meetings	Notification	4.5.3
Munsell, Kelly	6342	Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Munsell, Robert	6330	Efficiency Gains	Small Benefits	10.2.2
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Safety	6.2.4
Murphy, Diane	6329	Air Pollution	Perceived Increases	7.1.3
		Efficiency Gains	Small Benefits	10.2.2
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Safety	6.2.4			
Murphy, Heather	6534	Comment Period	Extension	4.6.1
			Documentation	Flight Track
		Lacking Detail		3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Murphy, Kris	6132	JFK Airport	Monmouth County	20.1.3
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Murray, Abby	6510	PHL Arrivals	Collingswood, NJ	24.2.6

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		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Murtagh, Liane	7698	Airlines	Focus on Profits	9.1.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Najjar, Ellen	6665	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Naugle	6936	Airlines	Re-regulation	9.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Public Meetings	Prejudged Outcome	4.5.8
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Naugle, Maripat King	6047	Airlines	Re-regulation	9.1.3
		Delay	Severe Weather	10.3.2
		DNL	Averages	4.3.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Multi-modal	Comprehensive Solution	4.4.1
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Naumowich, Steve	7319	Air Pollution	Perceived Increases	7.1.3

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		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Navazio	6948	Airlines	Focus on Profits	9.1.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Safety	6.2.4			
Need, Daniel	6091	Process	Public Vote	4.1.13
		Quality of Life	Safety	6.2.4
Neid, Robin	6056	Air Pollution	Perceived Increases	7.1.3
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Process	Public Vote	4.1.13
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Safety	6.2.4
Nenoff, Jordan	6576	Air Pollution	Perceived Increases	7.1.3
		EWR 22 Headings	NJ vs. Staten Island	18.2.6
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Mitigation	NY/NJ Water Routing	2.1.12
		Quality of Life	Contributing Elements	6.2.2
Nevazio	6928	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Safety	6.2.4
	6929	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Newcomer, Charisse	7509	Property Value	Impacts of Noise	6.1.2

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		Quality of Life	Contributing Elements	6.2.2
Newell, John	7640	EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Newman, Christine	6587	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Newman, Craig	6586	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Newman, Gary	7818	Comment Period	Extension	4.6.1
Newton, Linda	6682	Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
Nicholas, Gunther	7394	Mitigation	NY/NJ Water Routing	2.1.12
Nichols, Phyllis	6855	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
Preferred Alternative	Opposition	1.1.1		

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		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Nicholson, Diann	6703	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Nicholson, Jeffrey	6177	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Niederauer, Joan	7570	EWR Arrivals	Opposition to Reroutes	18.7.10
		Preferred Alternative	Opposition	1.1.1
			Reduced Spacing	1.1.7
		Property Value	Impacts of Noise	6.1.2
Niederauer, William	7567	Public Meetings	Panel Session Minutes	4.5.4
			Prejudged Outcome	4.5.8
Noller, Carolyn	6261	Air Pollution	Perceived Increases	7.1.3
		Efficiency Gains	Small Benefits	10.2.2
		Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2

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		Quality of Life	Contributing Elements	6.2.2
	7880	Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Noller, Walter	7838	Process	Homeland Security	4.1.6
		Property Value	Impacts of Noise	6.1.2
Nonwark, Ed	7646	Public Meetings	Notification	4.5.3
			Prejudged Outcome	4.5.8
Norcia, Ernest	6555	Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Economic Analysis	6.1.1
			Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Education	6.2.3
			Safety	6.2.4
Norek, Edward	6021	Efficiency Gains	Small Benefits	10.2.2
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Novack, Stacey	7649	Airlines	Re-regulation	9.1.3
		Quality of Life	Education	6.2.3
Nowak, Pawel	6230	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1

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		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Nugent, Janice	6722	Air Pollution	Perceived Increases	7.1.3
Nugent, Linda	6717	Preferred Alternative	Opposition	1.1.1
Nunberg, Maria	7281	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Nunes, Robert	7724	DNL	Averages	4.3.1
		Documentation	Lacking Detail	3.1.3
		Process	Decision Criteria	4.1.11
		Quality of Life	Contributing Elements	6.2.2
Oakes, Eric	7883	Preferred Alternative	Opposition	1.1.1
Oakes, James	6071	Preferred Alternative	Opposition	1.1.1
Oakford, Eileen	6513	Impacts on CT	Traffic Growth	17.1.4
		Preferred Alternative	Opposition	1.1.1
		VFR Traffic	Additive Impacts	12.3.4
O'Brien, F and H	7151	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
Public Meetings	Additional Meetings	4.5.1		

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		Purpose and Need	Noise Reduction	5.1.1
O'Brien, Kevin	7843	EWR Airport	Hudson River Routing	18.8.2
	7861	Airlines	Focus on Profits	9.1.1
		Efficiency Gains	Optimal Conditions Only	10.2.1
		Part 150	Noise Abatement	4.2.1
		Quality of Life	Education	6.2.3
O'Donnell	6917	EWR Arrivals	Opposition to Reroutes	18.7.10
	6939	Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
O'Kane, Patricia	6440	Airlines	Re-regulation	9.1.3
		PHL Departure Headings	Time of Day Restrictions	24.4.3
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
O'Keefe, Thomas	6179	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Onderdonk, Keith	7475	Preferred Alternative	Opposition	1.1.1
Onderdonk, Paula	7474	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7

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			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
O'Neill, Maryellen	6424	Preferred Alternative	Opposition	1.1.1
Oppenheim, Sally	6422	Airlines	Re-regulation	9.1.3
		PHL Departure Headings	Time of Day Restrictions	24.4.3
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Safety	6.2.4			
O'Shields, Cheryl	6421	Airlines	Re-regulation	9.1.3
		PHL Departure Headings	Time of Day Restrictions	24.4.3
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Oskwarek, Maria	6707	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
O'Toole, Brian	6206	Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Otto, Nicole	7452	EWR Arrivals	Opposition to Reroutes	18.7.10

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		Quality of Life	Safety	6.2.4
Otto, Rich and Barbara	7191	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Otto, Richard	7710	Nighttime Ocean Routing	Noise Impacts	18.4.1
Pagano, Tammy	7697	EWR Arrivals	Opposition to Reroutes	18.7.10
		Preferred Alternative	Opposition	1.1.1
Palfrey, Anne Marie	6143	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Palfrey, Erik	6142	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Palkimas, Patricia	6242	Impacts on CT	HPN Departures	17.5.1
		Mitigation	NY/NJ Water Routing	2.1.12

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Palmay, Jean M.	7430	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Pantalone, Margaret	6057	Efficiency Gains	Small Benefits	10.2.2
		Preferred Alternative	Opposition	1.1.1
Parker, Dortheann	6140	Air Pollution	Perceived Increases	7.1.3
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
Paterson, Geoffrey	6029	Airlines	Focus on Profits	9.1.1
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Patterson, Geoffrey	6380	Efficiency Gains	Small Benefits	10.2.2
		Multi-modal	Comprehensive Solution	4.4.1
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Patti, Kathleen	6649	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1

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		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Pattinson, Brianna	6835	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Pawlowski, Stephen	6310	Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Safety	6.2.4
Pearlman, Deborah	6355	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Peck, Robert	7192	EWR Arrivals	Opposition to Reroutes	18.7.10
Peel, Jeanette	7105	EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Peeler, Judy	6891	Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Peles, John	6178	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
Public Meetings	Additional Meetings	4.5.1		

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		Purpose and Need	Noise Reduction	5.1.1
Pelly, Steven	7483	Preferred Alternative	Opposition	1.1.1
Pepe, Rosalie	6309	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Perdiue, John	6436	Impacts on CT	LGA Traffic Shift	17.1.2
		Mitigation	NY/NJ Water Routing	2.1.12
Personnette, R.	7198	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Personnette, Robert	7350	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Peters	6926	EWR Arrivals	Opposition to Reroutes	18.7.10
		Process	Pre-Decision Changes	4.1.4
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Petkus, Wendy	6816	Air Pollution	Perceived Increases	7.1.3

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		Airlines	Focus on Profits	9.1.1
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Education	6.2.3
			Safety	6.2.4
Petro, Jean	7339	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Petrunchio, George	7316	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Petta, Janice	6522	EWR Arrivals	Raised Downwind	18.7.3
		EWR Flexible Headings	Equitable Distribution	18.3.9
		New Mitigation	Quieter Jet Engines	1.3.2
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2

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Phillips, Gloria	6135	EWR Arrivals	Opposition to Reroutes	18.7.10
		Health	Impacts of Noise	8.1.1
		Quality of Life	Contributing Elements	6.2.2
PHL	6061	Preferred Alternative	Opposition	1.1.1
Piccard, Carrie	7466	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
			Contributing Elements	6.2.2
			Quality of Life	Education
Safety	6.2.4			
Piccione, Vincent	6771	Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Picciotto, Vince	7124	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Pierangeli, Daneen	6437	EWR Arrivals	Opposition to Reroutes	18.7.10
Pierce, Eric	7492	Air Pollution	Perceived Increases	7.1.3
		Airlines	Re-regulation	9.1.3
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10

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		Quality of Life	Contributing Elements	6.2.2
			Education	6.2.3
			Safety	6.2.4
Pierce, Patricia	7411	Documentation	Lacking Detail	3.1.3
		Mitigation	Geographical Restriction	2.1.11
		Process	Homeland Security	4.1.6
		Public Meetings	Meeting Requests	4.5.2
			Notification	4.5.3
Pierlott, Therese	6583	Air Pollution	Perceived Increases	7.1.3
		Delay	NY/NJ vs. PHL	10.3.5
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Health	Impacts of Noise	8.1.1
		Property Value	Economic Analysis	6.1.1
		Public Meetings	Prejudged Outcome	4.5.8
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Pietrowicz, Janice	6101	Preferred Alternative	Opposition	1.1.1
Pike, Harvey	6734	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Safety	6.2.4
Pikovski, Vlad	7183	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1

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		Purpose and Need	Noise Reduction	5.1.1
Pinizzotto, Russell and Geraldine	6224	Preferred Alternative	Opposition	1.1.1
Piombino, Nicholas	6491	JFK Airport	Prospect Park	20.1.2
		Preferred Alternative	Opposition	1.1.1
Piperno, Robert	6494	EWR Flexible Headings	Equitable Distribution	18.3.9
		PHL Departure Headings	River Departure Only	24.4.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Safety	6.2.4			
Pitkofsky, Lori	6160	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
	Purpose and Need	Noise Reduction	5.1.1	
7585	EWR Arrivals	Opposition to Reroutes	18.7.10	
Pitkofsky, Robert	6195	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
	Purpose and Need	Noise Reduction	5.1.1	
7586	EWR Arrivals	Opposition to Reroutes	18.7.10	

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		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Pitts, Sandy and Jerry	6871	Efficiency Gains	Small Benefits	10.2.2
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Meeting Requests	4.5.2
		Quality of Life	Contributing Elements	6.2.2
Piwovar	6933	Documentation	Lacking Detail	3.1.3
Place, Harvey	6750	Airlines	Restricting Access	9.1.4
		Multi-modal	Comprehensive Solution	4.4.1
Plasker, Jordan	7878	Multi-modal	Comprehensive Solution	4.4.1
		Nighttime Ocean Routing	Noise Impacts	18.4.1
		Quality of Life	Contributing Elements	6.2.2
Platt, John	6294	EWR Arrivals	Opposition to Reroutes	18.7.10
		PHL Departure Headings	Time of Day Restrictions	24.4.3
		Quality of Life	Contributing Elements	6.2.2
Plover, James T.	6241	Airlines	Focus on Profits	9.1.1
		Documentation	Lacking Detail	3.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Plummer, Thomas	7279	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2

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			Safety	6.2.4
Pohlig	6925	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Pohlig, Geraldine	6076	EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Polifroni, Dan	7694	Efficiency Gains	Small Benefits	10.2.2
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Polifroni, Dar	7687	Airlines	Re-regulation	9.1.3
		Efficiency Gains	Small Benefits	10.2.2
		EWR Arrivals	Opposition to Reroutes	18.7.10
Pollock	6910	4F	Historic Sites	14.1.4
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Polyniak, Joseph	7645	Airlines	Focus on Profits	9.1.1
		Efficiency Gains	Small Benefits	10.2.2
Poole, Jeffrey and Colleen	6741	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
Public Meetings	Additional Meetings	4.5.1		

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		Purpose and Need	Noise Reduction	5.1.1
Port, Jacqueline	6660	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Porth, Deborah	7104	Air Pollution	Perceived Increases	7.1.3
		Documentation	Lacking Detail	3.1.3
		Public Meetings	Additional Meetings	4.5.1
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Porth, Richard	7214	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Ports, Robert	6118	Mitigation	NY/NJ Water Routing	2.1.12
Potter, Thomas	6054	Preferred Alternative	Opposition	1.1.1
Powell, Theresa	6385	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
Preferred Alternative	Opposition	1.1.1		

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		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Powers, Kevin	6715	Mitigation	NY/NJ Water Routing	2.1.12
		Multi-modal	Comprehensive Solution	4.4.1
Powley, Aaron	6815	Preferred Alternative	Opposition	1.1.1
Prado, S	6232	Nighttime Ocean Routing	Noise Impacts	18.4.1
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Presti, Suzanne	6546	JFK Airport	Monmouth County	20.1.3
		Nighttime Ocean Routing	Noise Impacts	18.4.1
		Quality of Life	Contributing Elements	6.2.2
Preston, Laurie	7482	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Priess, Lucinda	6540	Mitigation	NY/NJ Water Routing	2.1.12
Primavera, Louis	6067	Preferred Alternative	Opposition	1.1.1
Prospect Park Resident	6848	Preferred Alternative	Opposition	1.1.1
Prown, Pete	7233	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Pruyn, Margaret A.	6596	JFK Airport	Helicopters	20.1.5

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			Runway 22 Arrivals	20.1.1
Puhak	6959	Public Meetings	Additional Meetings	4.5.1
		Quality of Life	Contributing Elements	6.2.2
Purpura, Elissa	6093	Preferred Alternative	Opposition	1.1.1
		Quality of Life	Safety	6.2.4
Purpura, Rob	6080	Preferred Alternative	Opposition	1.1.1
Pursiano, Jeanne	6825	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Putignano, Rich	7688	Documentation	Lacking Detail	3.1.3
		Mitigation	Volume Restrictions	2.1.2
	7823	Documentation	Lacking Detail	3.1.3
		Quality of Life	Contributing Elements	6.2.2
Quagliariello, Peter	7116	Documentation	Lacking Detail	3.1.3
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Quigley, Eileen	7371	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1

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		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Quindlen, Mary Ellen	6763	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Quinn, Maureen	6820	Air Pollution	Perceived Increases	7.1.3
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Education	6.2.3			
Rabin, Beth and Aaron	6372	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Rack, Lucrezia	6490	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Radesky, Sandra	6181	Impacts on CT	HPN Departures	17.5.1
			LGA Traffic Shift	17.1.2

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Rafferty, Kate	7195	EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Randon, Pamela	6528	Comment Period	Extension	4.6.1
		Mitigation	NY/NJ Water Routing	2.1.12
		Property Value	Impacts of Noise	6.1.2
Raspanti, Jennifer	7382	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Raup, Whiteside Debbie	6324	Air Pollution	Perceived Increases	7.1.3
		Delay	Severe Weather	10.3.2
		Documentation	Lacking Detail	3.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Economic Analysis	6.1.1
			Impacts of Noise	6.1.2
		Public Meetings	Prejudged Outcome	4.5.8
		Quality of Life	Contributing Elements	6.2.2
Safety	6.2.4			
Rausa, Rich	7145	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3

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		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Rayer, Kevin	6704	Preferred Alternative	Opposition	1.1.1
Re, Eleanor	6799	JFK Airport	Runway 22 Arrivals	20.1.1
Reed, Edward	6460	Efficiency Gains	Small Benefits	10.2.2
		Preferred Alternative	Opposition	1.1.1
Regen, Claire and Mort	6877	Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Reik, Linda	7868	Nighttime Ocean Routing	Noise Impacts	18.4.1
Reilly, Annamarie	7152	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Reineke, B	6286	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Reinhard, Deborah	7197	JFK Airport	Monmouth County	20.1.3
		Quality of Life	Contributing Elements	6.2.2

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Renegar, Hollis and Robert	7439	Air Pollution	Perceived Increases	7.1.3
		Delay	Severe Weather	10.3.2
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Education	6.2.3			
Reppolo, Lovis	7725	Air Pollution	Perceived Increases	7.1.3
		Documentation	Lacking Detail	3.1.3
		Efficiency Gains	Optimal Conditions Only	10.2.1
		Nighttime Ocean Routing	EWR 04 Departures	18.4.6
		Quality of Life	Contributing Elements	6.2.2
Safety	6.2.4			
Resident, Glenolden	6836	Preferred Alternative	Opposition	1.1.1
Resnick, Lois	6632	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Ressa, Maria	6582	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
Public Meetings	Additional Meetings	4.5.1		

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		Purpose and Need	Noise Reduction	5.1.1
Reutershan, John and Cynthia	7355	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Reyneke, Kobus	6617	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Reynolds, Christopher	7229	Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Reynolds, Jennifer	7187	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Rhodes, M	6182	Preferred Alternative	Opposition	1.1.1
Rhodes, Michael	6307	Delay	Severe Weather	10.3.2
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Rhone, Carr	6302	Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Riccardo, Alfred	7747	Multi-modal	Comprehensive Solution	4.4.1
Riccardo, Carol	7746	Quality of Life	Education	6.2.3
Ricci, Mark	6454	Preferred Alternative	Opposition	1.1.1
Richards, Michael	7865	Nighttime Ocean Routing	Noise Impacts	18.4.1
		Quality of Life	Contributing Elements	6.2.2
Rickenbach, Gail	7427	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Education	6.2.3
			Safety	6.2.4
Ries, Coby	7537	Public Meetings	Notification	4.5.3
Righter, John	6039	Preferred Alternative	Opposition	1.1.1
Riley, Angela	7148	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Riley, John	7147	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Riley, Kelly	6418	Preferred Alternative	Opposition	1.1.1
Riordan, Jacqueline	7661	Documentation	Comparison Information	3.1.12
			Lacking Detail	3.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Nighttime Ocean Routing	Noise Impacts	18.4.1
	7726	Comment Period	Internet Submission	4.6.2
		Documentation	Information Location	3.1.1
			Lacking Detail	3.1.3
		Property Value	Impacts of Noise	6.1.2
Quality of Life	Contributing Elements	6.2.2		
	Safety	6.2.4		
Riots, Gary	6829	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Riotto, Gary	7184	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Rizkalla, Marissa	6139	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Rizzo, Pamela	7270	EWR Arrivals	Opposition to Reroutes	18.7.10
		PHL Airport	Airport Governance	24.1.5
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Rizzone, Marietta	7153	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		EWR Flexible Headings	Equitable Distribution	18.3.9
		Multi-modal	Comprehensive Solution	4.4.1
		Quality of Life	Contributing Elements	6.2.2
Rizzuto, Max	7591	Quality of Life	Education	6.2.3
Robinson	6960	Efficiency Gains	Small Benefits	10.2.2
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Robinson, David	6559	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Robinson, Kara	6558	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Robinson, Taylor	6557	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Roche, Carolyn	7268	Preferred Alternative	Opposition	1.1.1
Roche, Chris	7137	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Rockcliff, Michael	6122	Preferred Alternative	Opposition	1.1.1

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
Rocklin, Robert	7643	Air Pollution	Perceived Increases	7.1.3
		Nighttime Ocean Routing	Noise Impacts	18.4.1
		Preferred Alternative	Opposition	1.1.1
			Reduced Spacing	1.1.7
Quality of Life	Contributing Elements	6.2.2		
Rodgers, Danielle	7288	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Roelandt, Martha	6610	Air Pollution	Perceived Increases	7.1.3
		Airlines	Focus on Profits	9.1.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Health	Impacts of Noise	8.1.1
		Property Value	Economic Analysis	6.1.1
			Impacts of Noise	6.1.2
		Quality of Life	Education	6.2.3
Safety	6.2.4			
Romanski, Walter	7602	Preferred Alternative	Opposition	1.1.1
		Purpose and Need	Noise Reduction	5.1.1
Rombach, Chris	6565	Air Pollution	Perceived Increases	7.1.3
		Documentation	Flight Track	3.1.7
		EWR Arrivals	Opposition to Reroutes	18.7.10
Roper, Lisa	7142	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Rophstein, Steven	7354	Comment Period	Extension	4.6.1

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Rosalia, Jennifer	7103	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Rosas, Roger	7739	EWR Arrivals	Opposition to Reroutes	18.7.10
Rosen, Ally	6337	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Rosen, Daniel	6338	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
Rosen, David	6336	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Rosen, Josh	6335	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Rosen, Tina	6339	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Rosenblat, Joanie	6637	Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Rosenthal, Lynn	6672	EWR Arrivals	Opposition to Reroutes	18.7.10
		Public Meetings	Tinimum Meeting	4.5.6
		Quality of Life	Contributing Elements	6.2.2
Ross, Hilary	6128	EWR Arrivals	Opposition to Reroutes	18.7.10

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Ross, Lou	7816	Documentation	Lacking Detail	3.1.3
Ross, Richard	7135	Air Pollution	Global Warming	7.1.5
			Perceived Increases	7.1.3
		Airlines	Focus on Profits	9.1.1
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Health	Impacts of Noise	8.1.1
		Quality of Life	Contributing Elements	6.2.2
			Education	6.2.3
Safety	6.2.4			
Ross, Shelley	6252	Air Pollution	Perceived Increases	7.1.3
		Efficiency Gains	Small Benefits	10.2.2
		Preferred Alternative	Opposition	1.1.1
	7078	Air Pollution	Perceived Increases	7.1.3
		Efficiency Gains	Small Benefits	10.2.2
		Quality of Life	Non-Noise Impacts	6.2.1
Rossi, Rosalie	7513	PHL Departure Headings	Tank Farms	24.4.2
		Quality of Life	Contributing Elements	6.2.2
Routei, Adolph	7729	Air Pollution	Perceived Increases	7.1.3
		Airlines	Focus on Profits	9.1.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Preferred Alternative	Reduced Spacing	1.1.7

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Quality of Life	Contributing Elements	6.2.2
Rowe, Beatriz	6509	Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Rowles	6942	EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
Rowles, Kathy	6082	Efficiency Gains	Small Benefits	10.2.2
		Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Rowles, Lawrence	6043	EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
Rudley, Frank	6019	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Other Comments	EPA Compliance	4.8.2
		Part 150	Noise Abatement	4.2.1
		Preferred Alternative	Severe Weather	1.1.8
Russell, CS	6100	Air Pollution	Perceived Increases	7.1.3
		Mitigation	NY/NJ Water Routing	2.1.12
		Quality of Life	Contributing Elements	6.2.2
Russo, John	7835	Airlines	Focus on Profits	9.1.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Rycenga, Anita	6883	VFR Traffic	Additive Impacts	12.3.4

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
Ryen, Paula	7533	Public Meetings	Prejudged Outcome	4.5.8
S. Klaif, Diane	7745	Airlines	Re-regulation	9.1.3
			Restricting Access	9.1.4
		EWR 22 Departures	Capacity	18.1.2
		EWR 22 Headings	NJ vs. Staten Island	18.2.6
		Process	Cost Benefit Analysis	4.1.9
		Quality of Life	Contributing Elements	6.2.2
S., Sophia	7534	Airlines	Re-regulation	9.1.3
Saccente, Nancy	7230	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Saccoccia, Diane	6710	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Sachau, Barbara	6527	Comment Period	Extension	4.6.1
		Documentation	Noise Impact Data	3.1.9
		EWR 04L Departures	Hudson River Routing	18.5.6
		EWR 22 Headings	Headings East of 190	18.2.2

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		EWR 29 Departures	Runway Usage	18.6.1
		EWR Airport	Hudson River Routing	18.8.2
		EWR Flexible Headings	ATC Complexity	18.3.4
		Nighttime Ocean Routing	EWR 04 Departures	18.4.6
		TEB Airport	Request Noise Mitigation	19.1.1
Salera, David	7287	Air Pollution	Perceived Increases	7.1.3
		Airlines	Congestion Pricing	9.1.6
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Salsberg, Andrea	7247	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Samani, Elizabeth	7265	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Samani, Elizabeth and Peter	6831	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Samitt, Gayle	6165	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Sammartino, Darren	6127	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Sandler, Cynthia	7331	Comment Period	Extension	4.6.1
		Mitigation	NY/NJ Water Routing	2.1.12
		Preferred Alternative	Opposition	1.1.1
			Support	1.1.2
Sandt, Axelle	7213	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1

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		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Sandt, Robert	6473	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Sanet, Brian	7851	Air Pollution	Quantification	7.1.1
		Airlines	Focus on Profits	9.1.1
			Re-regulation	9.1.3
		Preferred Alternative	Opposition	1.1.1
Sanet, Elaine	7894	Air Pollution	Reservoirs	7.1.2
		Airlines	Focus on Profits	9.1.1
			Re-regulation	9.1.3
		New Mitigation	New Runways	1.3.3
		Purpose and Need	Noise Reduction	5.1.1
		Quality of Life	Safety	6.2.4
Santo, Timothy	7320	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
Sapanara, Ginna	7174	Preferred Alternative	Opposition	1.1.1
Sass, Priscilla	7251	Delay	Severe Weather	10.3.2
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Public Meetings	Prejudged Outcome	4.5.8
Sauer, Greg	6821	Preferred Alternative	Opposition	1.1.1
Saul, Madeline J	6174	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Saul, Robert J	6172	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Saxe, Brock	6282	Documentation	Lacking Detail	3.1.3
		Impacts on CT	LGA Traffic Shift	17.1.2
Saxon, James Jr.	7481	Airlines	Re-regulation	9.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
Scanlan, Cathy	7484	Delay	Landside Operations	10.3.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Education	6.2.3
			Safety	6.2.4
Scanlan, Joseph	7299	Delay	Landside Operations	10.3.1
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Process	ROD Signature Authority	4.1.12
		Property Value	Impacts of Noise	6.1.2
Scatena, Laura	6210	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Scatena, Paul	6211	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Schad, Virginia	6341	Delay	Landside Operations	10.3.1
			Severe Weather	10.3.2
		Documentation	Lacking Detail	3.1.3

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		EWR Arrivals	Opposition to Reroutes	18.7.10
		Public Meetings	Minimum Meeting	4.5.6
Scharfenberger, Gerard P.	7356	Preferred Alternative	Opposition	1.1.1
Schbert	6953	Mitigation	Volume Restrictions	2.1.2
Scheider, Mark	6110	Preferred Alternative	Opposition	1.1.1
Schestok, Linda	6205	Air Pollution	Perceived Increases	7.1.3
		Airlines	Re-regulation	9.1.3
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Part 150	Noise Abatement	4.2.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Schiavone, Donna	7328	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Schilling, Erick	6592	Preferred Alternative	Opposition	1.1.1
Schmidt, Donna	6213	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
	6759	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Schnaldt, Richard	7547	Air Pollution	Perceived Increases	7.1.3
		Nighttime Ocean Routing	Noise Impacts	18.4.1
Schneider, Lorraine	6187	Preferred Alternative	Opposition	1.1.1
		Purpose and Need	Noise Reduction	5.1.1
Schneider, Tim	6162	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Schobert, Catherine	6497	Preferred Alternative	Opposition	1.1.1
	7738	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Nighttime Ocean Routing	Noise Impacts	18.4.1
		Property Value	Impacts of Noise	6.1.2
Schobert, Chris	7259	Comment Period	Extension	4.6.1

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		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Scholze, Michelle	7266	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Schreiber, Carol Anne	6306	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Schreiber, Lisa	7625	Comment Period	Extension	4.6.1
		Property Value	Impacts of Noise	6.1.2
		Public Meetings	Meeting Requests	4.5.2
		Quality of Life	Contributing Elements	6.2.2
Schroeder, Al	6535	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
Public Meetings	Additional Meetings	4.5.1		

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		Purpose and Need	Noise Reduction	5.1.1
Schroeder, Elaine	6536	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Schroeder, Thomas	6537	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Schultz, Paul	7889	DNL	Averages	4.3.1
		Documentation	Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
Schumm, Karl	6315	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Safety	6.2.4
Schwartz, Jay	6373	Preferred Alternative	Opposition	1.1.1
Schwarz, Dorothy	6184	Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Scott, Frank	6267	Comment Period	Extension	4.6.1

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		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Scott, Linda	6313	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Process	Pre-Decision Changes	4.1.4
		Public Meetings	Tinimum Meeting	4.5.6
		Quality of Life	Safety	6.2.4
Scott, Sharon	6278	Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Scully, Lorna	7362	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Sealy, James	6798	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
Public Meetings	Additional Meetings	4.5.1		

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		Purpose and Need	Noise Reduction	5.1.1
Seco, Catherine	7378	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Seibel, Carolyn	7828	EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Safety	6.2.4
Seibel, Peter	7829	EWR Arrivals	Opposition to Reroutes	18.7.10
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Safety	6.2.4
Seiff, Joanne	7211	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Semenuk, Geoff	6208	Airlines	Re-regulation	9.1.3
		Delay	Severe Weather	10.3.2
		Efficiency Gains	Small Benefits	10.2.2
		PHL Departure Headings	River Departure Only	24.4.1
		Preferred Alternative	Opposition	1.1.1

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		Quality of Life	Safety	6.2.4
Serlani, Cathryn	7598	Public Meetings	Prejudged Outcome	4.5.8
Shapiro, Jared	7293	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Sharkey, Serina	7353	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Shea, Kevin	7805	Preferred Alternative	Opposition	1.1.1
Sheinbaum, Stuart	6656	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Sheinker, Jennifer	7654	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Shemeluk, Michael	6818	Preferred Alternative	Opposition	1.1.1

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Shereck, Barry	7604	Preferred Alternative	Opposition	1.1.1
Sheridan, Jake	6847	Preferred Alternative	Opposition	1.1.1
Sherman, George and Pamela	6856	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Shill, Richard	7209	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Shivey	6924	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Shlufman, Daniel	6144	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Shockley	6913	Delay	Landside Operations	10.3.1
		Documentation	Flight Track	3.1.7

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		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Next Steps	Ensuring Mitigation	4.7.2
Shockley, John	6034	Efficiency Gains	Small Benefits	10.2.2
Shockley, Linda	6046	Delay	Severe Weather	10.3.2
		Efficiency Gains	Small Benefits	10.2.2
	6060	Next Steps	Ensuring Mitigation	4.7.2
	6222	Delay	Landside Operations	10.3.1
Shore, Elizabeth	6712	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Shull, Jennifer	6258	Preferred Alternative	Opposition	1.1.1
Shull, Karen	6659	Airlines	Re-regulation	9.1.3
		DNL	Averages	4.3.1
		Documentation	Lacking Detail	3.1.3
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Modeling	NIRS Validation	11.1.4
			Terrain	11.1.3
		Next Steps	Compliance	4.7.1
VFR Traffic	Additive Impacts	12.3.4		
Sica, Noreen	7887	Air Pollution	Perceived Increases	7.1.3
		Airlines	Focus on Profits	9.1.1
		Comment Period	Extension	4.6.1

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		Property Value	Impacts of Noise	6.1.2
		Purpose and Need	Redesign Unnecessary	5.1.4
Sicilia, Kathy	6207	Preferred Alternative	Opposition	1.1.1
Siedzikowski, William	6769	Preferred Alternative	Opposition	1.1.1
Siegl, Bertram	7635	Health	Disabilities Act	8.1.3
Silcher, Christina	6627	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Silverman, Alisa and Keith	7313	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Silvestro, Alex	6890	Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Simon, Roberta	6361	Preferred Alternative	Opposition	1.1.1
Simonson, Grace	7807	PHL Arrivals	Collingswood, NJ	24.2.6
			Lack of Mitigation	24.2.3
Simpson, Donald	6245	Airlines	Re-regulation	9.1.3

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		Documentation	Lacking Detail	3.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Simpson, George	6476	Quality of Life	Contributing Elements	6.2.2
Singer, Frederick	7879	Comment Period	Extension	4.6.1
		Documentation	Lacking Detail	3.1.3
Siri, Deana	6507	PHL Arrivals	Collingswood, NJ	24.2.6
Sisson, Amy	7400	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Safety	6.2.4			
Sizemore, Diane	6875	Preferred Alternative	Opposition	1.1.1
Skibin, Laura	6344	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Skibinski, Richard	7517	Property Value	Impacts of Noise	6.1.2
Sloane, E	7001	Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2

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		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Sloane, Eric and Carolyn	7002	Preferred Alternative	Opposition	1.1.1
Smeen, Michael	7157	Preferred Alternative	Opposition	1.1.1
Smith	6914	EWR Arrivals	Opposition to Reroutes	18.7.10
		Public Meetings	Prejudged Outcome	4.5.8
		Quality of Life	Safety	6.2.4
Smith, Chet	7613	Documentation	Lacking Detail	3.1.3
Smith, GERALYN	6612	Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Smith, John and Anne Marie	6889	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Smith, Kelly	7327	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Smith, Linda	6332	Documentation	Lacking Detail	3.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Smith, Maury	7459	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Education	6.2.3

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Smith, Ruth	6360	Airlines	Re-regulation	9.1.3
		Quality of Life	Safety	6.2.4
Smith, Susan	6403	Preferred Alternative	Opposition	1.1.1
	6700	Preferred Alternative	Opposition	1.1.1
Smitheman, William	6375	EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Smolen, James	7881	Airlines	Focus on Profits	9.1.1
		Efficiency Gains	Optimal Conditions Only	10.2.1
		Mitigation	NY/NJ Water Routing	2.1.12
		Nighttime Ocean Routing	EWR 04 Departures	18.4.6
		Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
		Purpose and Need	Noise Reduction	5.1.1
Smythe, Susan	6145	Airlines	Re-regulation	9.1.3
		Documentation	Lacking Detail	3.1.3
		Efficiency Gains	Small Benefits	10.2.2
		EWR Arrivals	Opposition to Reroutes	18.7.10
Snedeker, Jacqui	6383	Preferred Alternative	Opposition	1.1.1
		Purpose and Need	Noise Reduction	5.1.1
Snyde, David	7576	Air Pollution	Quantification	7.1.1
		Airlines	Re-regulation	9.1.3
		Property Value	Impacts of Noise	6.1.2
		Public Meetings	Additional Meetings	4.5.1

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		Quality of Life	Contributing Elements	6.2.2
		Stewart Airport	Expansion	1.4.1
	7852	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Preferred Alternative	Opposition	1.1.1
Sobkowicz, Janet	7713	Area Navigation	Support	16.1.1
		Efficiency Gains	Small Benefits	10.2.2
		Preferred Alternative	Reduced Spacing	1.1.7
		Quality of Life	Safety	6.2.4
	7814	Mitigation	Advanced Technology	2.1.7
		Modeling	Ambient Noise	11.1.5
		Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
		TEB Airport	Modeling	19.1.4
Soh, Deborah	7185	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Sokol, Brian	6120	Preferred Alternative	Opposition	1.1.1
Sokol, Kim	6121	Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2

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Sokoloff, Madeleine	7891	Public Meetings	Additional Meetings	4.5.1
		Quality of Life	Safety	6.2.4
Sommer, Jennifer	6478	Efficiency Gains	Small Benefits	10.2.2
		Mitigation	Rotating Alternatives	2.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Notification	4.5.3
Sonnenschein, Lotte	7588	Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Soranno, Denise	7130	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Soto, Anthony	6097	Preferred Alternative	Opposition	1.1.1
Souflis, Sharon	7221	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Southard, Maureen	7181	Preferred Alternative	Opposition	1.1.1
Spadaccini, Joanne	7272	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7

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			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Spano, Andrew	7490	Preferred Alternative	Opposition	1.1.1
Specht, Maryann	6326	Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Multi-modal	Comprehensive Solution	4.4.1
		Quality of Life	Safety	6.2.4
Specter, Craig	7819	Efficiency Gains	Optimal Conditions Only	10.2.1
			Small Benefits	10.2.2
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Speer, Whitney	6644	Preferred Alternative	Opposition	1.1.1
		Purpose and Need	Noise Reduction	5.1.1
Sperber, Steven	7651	Air Pollution	Reservoirs	7.1.2
		Quality of Life	Safety	6.2.4
	7901	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Spicwack, Nettie	6111	Preferred Alternative	Opposition	1.1.1
Spielman	6943	Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4

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Spies, Chad	7559	Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Public Meetings	Notification	4.5.3
Spirig, Barbara	7167	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Spitale, Frank and Christine	6190	Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Spiwack, Nettie	6523	Mitigation	Rotating Alternatives	2.1.3
		Modeling	NIRS Validation	11.1.4
Sprague, John	7849	DNL	Worst Case Scenario	4.3.8
Squillace, Gino	6841	Preferred Alternative	Opposition	1.1.1
Stachle, Diane	6050	Health	Hearing Loss	8.1.2
		Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Education	6.2.3
Structural Damage	6.2.6			
Stackpole, Deborah	6742	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7

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			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Stackpole, Mark	6743	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Staehle, Diane	6465	Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
	6893	Efficiency Gains	Small Benefits	10.2.2
		PHL Departure Headings	River Departure Only	24.4.1
		Preferred Alternative	Opposition	1.1.1
Stanley, Kirk	6806	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Stanley, Patricia	6805	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7

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			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Staples, Susan	6209	EWR Arrivals	V213 Traffic	18.7.8
		Preferred Alternative	Opposition	1.1.1
	6863	Preferred Alternative	Opposition	1.1.1
Starzi, Tom	6846	Preferred Alternative	Opposition	1.1.1
Staudt, Joanne	7108	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Stavola, Thomas	7292	Documentation	Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Public Input	4.5.7
		Quality of Life	Education	6.2.3
Stein, D.	7471	Process	Independent Review	4.1.7
			Public Vote	4.1.13
Stephony, Mary Jane	6260	Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Steuer, Michael	7523	PHL Departure Headings	River Departure Only	24.4.1

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		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Stevens, Douglas	6520	Preferred Alternative	Opposition	1.1.1
Steward, John	7542	EWR Arrivals	Widen Corridor	18.7.11
Stewart, Grace	6239	Efficiency Gains	Small Benefits	10.2.2
		Preferred Alternative	Opposition	1.1.1
Stewart, Mark	6161	4F	Historic Sites	14.1.4
		Nighttime Ocean Routing	Noise Impacts	18.4.1
		Quality of Life	Contributing Elements	6.2.2
Stewart, Suzanne	7081	Preferred Alternative	Opposition	1.1.1
Stief, Christine	6691	Air Pollution	Perceived Increases	7.1.3
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Health	Impacts of Noise	8.1.1
		Public Meetings	Minimum Meeting	4.5.6
		Quality of Life	Contributing Elements	6.2.2
Stieglitz, Jennie	6495	Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
	6529	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
Stowe, Karen	6640	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Stowe, Richard	7342	Air Pollution	Greenhouse Gas	7.1.4
		Multi-modal	Comprehensive Solution	4.4.1
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Strabone, James	7107	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Sudal, Pat	7607	Documentation	Lacking Detail	3.1.3
		Public Meetings	Notification	4.5.3
Suell	6955	Documentation	Lacking Detail	3.1.3
		EWR 04L Departures	Essex County	18.5.8
		EWR Flexible Headings	ATC Complexity	18.3.4
		Modeling	EWR Operations	11.1.1
		Nighttime Ocean Routing	Noise Impacts	18.4.1
Sulecki, Denise	6396	Efficiency Gains	Small Benefits	10.2.2
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Public Meetings	Prejudged Outcome	4.5.8
		Quality of Life	Safety	6.2.4

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
Sullivan, Barbara	6146	Quality of Life	Contributing Elements	6.2.2
Sullivan, Heather	6430	Airlines	Re-regulation	9.1.3
		PHL Departure Headings	Time of Day Restrictions	24.4.3
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Safety	6.2.4			
Sullivan, Janet	7312	Preferred Alternative	Opposition	1.1.1
Sullivan, John	6773	Preferred Alternative	Opposition	1.1.1
Sullivan, Sandra	6321	Delay	Landside Operations	10.3.1
		Documentation	Lacking Detail	3.1.3
		Public Meetings	Timinum Meeting	4.5.6
Sullivan, Thomas	7276	Airlines	Congestion Pricing	9.1.6
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Preferred Alternative	Opposition	1.1.1
			Traffic Increases	1.1.6
		Quality of Life	Contributing Elements	6.2.2
Safety	6.2.4			
Summers, Allan	7134	DNL	Averages	4.3.1
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Safety	6.2.4			
Surkis, William	7453	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10

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		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Surovy, Randall	7848	DNL	Worst Case Scenario	4.3.8
Sutich, John	7900	Nighttime Ocean Routing	Noise Impacts	18.4.1
Sutton, Jonathan	7396	Airlines	Focus on Profits	9.1.1
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Sutton, Karen	7397	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Swankie, Nina	7558	EWR Arrivals	Opposition to Reroutes	18.7.10
Swanson, Keith	7648	Public Meetings	Public Input	4.5.7
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Swanson, Linda	6663	Air Pollution	Perceived Increases	7.1.3
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
	Safety		6.2.4	
		7573	Purpose and Need	Noise Reduction
Sweeney, Mary	6716	4F	Orange County	14.1.1
		Nighttime Ocean Routing	Noise Impacts	18.4.1
		Quality of Life	Contributing Elements	6.2.2
Sweeton, Michael	7825	4F	Orange County	14.1.1
		Modeling	Terrain	11.1.3

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		Quality of Life	Contributing Elements	6.2.2
Swickline, Jonathan	6119	Preferred Alternative	Opposition	1.1.1
Sykes, Dawn	7248	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Sykes, Kevin	7246	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Szabo, Julia	7398	EWR Arrivals	V213 Traffic	18.7.8
Taddie, Frank	6287	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Safety	6.2.4			
Tannariello, Andrew	7681	EWR Arrivals	Opposition to Reroutes	18.7.10
Tannariello, Dianne	7673	Air Pollution	Perceived Increases	7.1.3
		Quality of Life	Contributing Elements	6.2.2
			Education	6.2.3
Taormina, Diana	6189	EWR Arrivals	Opposition to Reroutes	18.7.10

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		Quality of Life	Contributing Elements	6.2.2
Tarisa, David	6378	EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Public Meetings	Tinimum Meeting	4.5.6
		Quality of Life	Safety	6.2.4
Taskalos, Joan	7343	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Tawalare, Samir	7592	Quality of Life	Education	6.2.3
Telesco, Connie	6170	Impacts on CT	LGA Traffic Shift	17.1.2
		New Mitigation	New Runways	1.3.3
		Preferred Alternative	Opposition	1.1.1
Thalman, Coryn	6225	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
	Purpose and Need	Noise Reduction	5.1.1	
	7286	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3

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		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Thomas, Hellen and Howard	7315	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Thomas, Mary Ellen	6488	Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Thome, Susan	7357	EWR Flexible Headings	ATC Complexity	18.3.4
		Quality of Life	Contributing Elements	6.2.2
Thompson, Helen	7530	Air Pollution	Perceived Increases	7.1.3
		Airlines	Focus on Profits	9.1.1
		Quality of Life	Structural Damage	6.2.6
Tierman, Mindy	7290	Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Timpanaro, Mary	6647	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1

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		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Timpanaro, N. and S.	6652	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Tinicum Resident	6844	Preferred Alternative	Opposition	1.1.1
Tinney, John and Diane	6441	Preferred Alternative	Opposition	1.1.1
Tinney, Robert	6606	EWR Arrivals	Opposition to Reroutes	18.7.10
		Health	Impacts of Noise	8.1.1
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Tobin, Jacqueline	6614	Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Tomasi, Michelle	7193	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Tomecki	6900	JFK Airport	Runway 22 Arrivals	20.1.1
Tomlinson, Evelyn	6013	Preferred Alternative	Opposition	1.1.1

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Tompkins, Douglas	6284	Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Trader, Helen	6048	Preferred Alternative	Opposition	1.1.1
Trainer, Bill	6765	Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
Trainor, James	6040	EWR Arrivals	Opposition to Reroutes	18.7.10
		Health	Impacts of Noise	8.1.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Triantafillou, Maria	7703	Air Pollution	Quantification	7.1.1
		Health	Impacts of Noise	8.1.1
Triggiani-Musco, Nancy	7742	Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Tuch, Kay	6684	Air Pollution	Perceived Increases	7.1.3
		Airlines	Focus on Profits	9.1.1
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Economic Analysis	6.1.1
		Quality of Life	Contributing Elements	6.2.2
Education	6.2.3			
Tufano, Catherine	6626	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3

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		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Tunthatakas, Tum	6475	Preferred Alternative	Support	1.1.2
Turk, Diane	7431	Air Pollution	Perceived Increases	7.1.3
		Delay	Landside Operations	10.3.1
			Severe Weather	10.3.2
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Public Meetings	Prejudged Outcome	4.5.8
		Quality of Life	Contributing Elements	6.2.2
Safety	6.2.4			
Turk, Greg	7349	Delay	Landside Operations	10.3.1
			Severe Weather	10.3.2
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Turk, Richard	7200	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Turpin, William	6591	Efficiency Gains	Optimal Conditions Only	10.2.1

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		EWR Arrivals	Opposition to Reroutes	18.7.10
Unger, Bonnie	7618	Airlines	Focus on Profits	9.1.1
		Mitigation	Volume Restrictions	2.1.2
Urban, Alison	7164	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Urban, Ann	7408	Air Pollution	Perceived Increases	7.1.3
		Preferred Alternative	Reduced Spacing	1.1.7
		Quality of Life	Contributing Elements	6.2.2
Urban, Margaret	7412	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Urban, Percy	7409	Air Pollution	Perceived Increases	7.1.3
		Preferred Alternative	Reduced Spacing	1.1.7
		Quality of Life	Contributing Elements	6.2.2
Vajian, Doris	7873	Quality of Life	Contributing Elements	6.2.2
Valas, Joan	7595	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Valentin, David	6070	Efficiency Gains	Small Benefits	10.2.2
		Preferred Alternative	Opposition	1.1.1

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		Quality of Life	Contributing Elements	6.2.2
Valentin, Maria	6090	DNL	Averages	4.3.1
		Documentation	Lacking Detail	3.1.3
		Quality of Life	Contributing Elements	6.2.2
Vandervalk, Charlotte	6461	Preferred Alternative	Opposition	1.1.1
Varano, Amy	6658	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Varano, Mario	6657	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Vartanian, Sara	7417	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Venetos, Natalie	6489	Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
Verhagen	6963	Air Pollution	Greenhouse Gas	7.1.4
		Mitigation	Volume Restrictions	2.1.2

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		Modeling	Terrain	11.1.3
		Multi-modal	Comprehensive Solution	4.4.1
Vernacchio, Sal	7101	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Viceconte, Kathy	7263	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Vincent, Jennifer	7467	Air Pollution	Perceived Increases	7.1.3
		Airlines	Congestion Pricing	9.1.6
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Vine, Eleanor	7520	Air Pollution	Perceived Increases	7.1.3
		Health	Impacts of Noise	8.1.1
Voelker, Steve	7465	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Vogel, Carla	6633	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1

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		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Vogel, Veronica	6594	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Voter	6912	Delay	Landside Operations	10.3.1
Votla, John	6064	Delay	Severe Weather	10.3.2
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Vukek, Francis	6124	Preferred Alternative	Opposition	1.1.1
Wagner, Bob and Muriel	6751	Airlines	Re-regulation	9.1.3
		Delay	Landside Operations	10.3.1
		Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Wagreich, Bette	7664	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
Wag Reid, Lawrence	7665	Airlines	Re-regulation	9.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
Wahlers, Herman	7597	EWR Arrivals	Opposition to Reroutes	18.7.10

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		Preferred Alternative	Opposition	1.1.1
Wahlers, Nancy	7596	EWR Arrivals	Opposition to Reroutes	18.7.10
		Preferred Alternative	Opposition	1.1.1
Waldron, R. and A.	7289	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Walker, Mark	6108	Efficiency Gains	Small Benefits	10.2.2
		Preferred Alternative	Opposition	1.1.1
Wallace, Mark	7689	Process	Public Vote	4.1.13
Wallace, Susan	7683	Process	Public Vote	4.1.13
		Quality of Life	Contributing Elements	6.2.2
Wallenster, Joanna	7812	Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Wallgren	6935	EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Safety	6.2.4
Wallgren, Charles	6045	Quality of Life	Safety	6.2.4
	6065	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Multi-modal	Comprehensive Solution	4.4.1
		Property Value	Impacts of Noise	6.1.2
Quality of Life	Contributing Elements	6.2.2		

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Wallgren, Judi	6049	Preferred Alternative	Opposition	1.1.1
Walsh, Cynthia	6234	Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Walsh, Paul	6233	Preferred Alternative	Opposition	1.1.1
Wanvig, Roy	7644	Comment Period	Internet Submission	4.6.2
		Delay	Landside Operations	10.3.1
		Efficiency Gains	Optimal Conditions Only	10.2.1
		Public Meetings	Additional Meetings	4.5.1
Public Input	4.5.7			
Warren, Joseph	6024	Preferred Alternative	Support	1.1.2
Waters, William	6524	Documentation	Lacking Detail	3.1.3
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Weible, Grace	6783	Delay	Landside Operations	10.3.1
		Preferred Alternative	Opposition	1.1.1
Weir, Eileen	6053	Preferred Alternative	Opposition	1.1.1
Weissenbon, Rich	7627	Airlines	Focus on Profits	9.1.1
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Weitz, Henry	6075	Preferred Alternative	Opposition	1.1.1
Wenger, Virgil	6505	Altitudes Over CT	Fairfield County	17.2.1
		Mitigation	NY/NJ Water Routing	2.1.12

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
Wenzel, Sandy	6514	Airlines	Re-regulation	9.1.3
		PHL Departure Headings	Time of Day Restrictions	24.4.3
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Wernert, Carol	6450	Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		PHL Airport	Airport Governance	24.1.5
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Westervelt, Robert	7298	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Wexler, Robin	6709	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Whaley, Jacqui	6892	Delay	Severe Weather	10.3.2
		Efficiency Gains	Small Benefits	10.2.2

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
White, Barbara	7243	Air Pollution	Perceived Increases	7.1.3
		Delay	Landside Operations	10.3.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
White, Karen	7663	EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
White, Reimer Jacquelyn	6221	Efficiency Gains	Small Benefits	10.2.2
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
White, Valerie	6238	Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Widmer, Arlene	7550	Preferred Alternative	Opposition	1.1.1
Widmer, Robert	7628	Airlines	Re-regulation	9.1.3
		Multi-modal	Comprehensive Solution	4.4.1
Widmer, Robert and Arlene	6255	Efficiency Gains	Small Benefits	10.2.2
		EWR Arrivals	Traffic Over Montvale	18.7.16
		Preferred Alternative	Opposition	1.1.1

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Wiggins, Evonne	7506	PHL Airport	Airport Governance	24.1.5
		Preferred Alternative	Opposition	1.1.1
Wigmore, Suzanne	6882	Air Pollution	Perceived Increases	7.1.3
		Comment Period	Extension	4.6.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Public Meetings	Meeting Requests	4.5.2
			Tinimum Meeting	4.5.6
		Quality of Life	Contributing Elements	6.2.2
Wilens, David	6810	Comment Period	Extension	4.6.1
		Mitigation	NY/NJ Water Routing	2.1.12
		Preferred Alternative	Opposition	1.1.1
			Support	1.1.2
Wilens, Deborah	6518	Mitigation	NY/NJ Water Routing	2.1.12
		Preferred Alternative	Opposition	1.1.1
			Support	1.1.2
Wilker, Simone	7717	EWR Arrivals	Opposition to Reroutes	18.7.10
Williams, Bonnie	7623	Airlines	Focus on Profits	9.1.1
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Williams, John	7494	Airlines	Re-regulation	9.1.3
			Restricting Access	9.1.4
		Delay	Landside Operations	10.3.1

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Property Value	Impacts of Noise	6.1.2
Williams, Richard	7383	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Williamson, Craig	7449	Air Pollution	Perceived Increases	7.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Willis, Lillian	7260	4F	Historic Sites	14.1.4
		LGA Routings Impacts	Danbury Airport	17.3.1
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
		Stewart Airport	Expansion	1.4.1
		VFR Traffic	Additive Impacts	12.3.4
Wilson, Robert	6485	Delay	Landside Operations	10.3.1
			Severe Weather	10.3.2
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
Winton, Randolph	7469	Airlines	Re-regulation	9.1.3
		Efficiency Gains	Optimal Conditions Only	10.2.1

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Wisneski, Kevin	6470	Preferred Alternative	Support	1.1.2
Wisniewski, Jessica	6611	Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Wisniewski, Patricia	7241	Air Pollution	Perceived Increases	7.1.3
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Health	Impacts of Noise	8.1.1
		Quality of Life	Contributing Elements	6.2.2
Wisniewski, Stanley	7129	Air Pollution	Perceived Increases	7.1.3
		Airlines	Focus on Profits	9.1.1
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Health	Impacts of Noise	8.1.1
		Quality of Life	Contributing Elements	6.2.2
			Education	6.2.3
Witman, Camilla	6787	Nighttime Ocean Routing	Noise Impacts	18.4.1
		Quality of Life	Contributing Elements	6.2.2
Witman, William	6782	JFK Airport	Monmouth County	20.1.3
		Quality of Life	Contributing Elements	6.2.2
Wolf, Eric	7253	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Wolf, Mary	7166	EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Wolosz, John	7704	New Mitigation	Quieter Jet Engines	1.3.2
Woods, DJ	6499	Preferred Alternative	Opposition	1.1.1
Woods, Paul	6428	Airlines	Re-regulation	9.1.3
		Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Woodward, Jane	6832	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Woodward, RP	6833	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Woolf, Kim	6379	Air Pollution	Perceived Increases	7.1.3
		Documentation	Lacking Detail	3.1.3
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Public Meetings	Meeting Requests	4.5.2
			Tinimum Meeting	4.5.6
		Quality of Life	Contributing Elements	6.2.2
Safety	6.2.4			
Woolley, Jeannine	7295	Preferred Alternative	Opposition	1.1.1
Wowkun, Gregory	7314	Preferred Alternative	Opposition	1.1.1
Wowkun, Josephine	7322	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Woxniak, Agnes	7360	DNL	Averages	4.3.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Wrede, Jeffrey	7123	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Wright, Maryann	6631	Air Pollution	Perceived Increases	7.1.3
		Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Quality of Life	Contributing Elements	6.2.2
Education	6.2.3			
Wright, Susan	7493	Air Pollution	Perceived Increases	7.1.3
		Airlines	Focus on Profits	9.1.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		PHL Airport	Airport Governance	24.1.5
		Quality of Life	Contributing Elements	6.2.2
			Education	6.2.3
Safety	6.2.4			
Yakomin, Lisa	6226	Documentation	Lacking Detail	3.1.3
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
	7815	Part 150	Noise Abatement	4.2.1
Quality of Life		Contributing Elements	6.2.2	
Yarbrough, Kimberly	7380	JFK Airport	Monmouth County	20.1.3

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Nighttime Ocean Routing	Noise Impacts	18.4.1
		Quality of Life	Contributing Elements	6.2.2
Yeager, Dale	6775	Preferred Alternative	Opposition	1.1.1
You, Iris	6400	4F	Orange County	14.1.1
		Preferred Alternative	Opposition	1.1.1
		Quality of Life	Contributing Elements	6.2.2
Yuhas, Ren	6545	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Zakutansky, Mike	6214	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		
Zalewski, Monika	6254	Comment Period	Extension	4.6.1
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
Purpose and Need	Noise Reduction	5.1.1		

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
Zang, Kathy	6449	Efficiency Gains	Optimal Conditions Only	10.2.1
		EWR Arrivals	Opposition to Reroutes	18.7.10
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Zanko, Peter	7557	Air Pollution	Perceived Increases	7.1.3
		Efficiency Gains	Small Benefits	10.2.2
		Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
Zebley, Robin	6834	Preferred Alternative	Opposition	1.1.1
Zelinsky, John	6109	Preferred Alternative	Opposition	1.1.1
Zerby, Roseann	7079	Air Pollution	Perceived Increases	7.1.3
		Efficiency Gains	Small Benefits	10.2.2
		Health	Impacts of Noise	8.1.1
		Quality of Life	Safety	6.2.4
Ziegel, Michael	7545	Preferred Alternative	Opposition	1.1.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
			Safety	6.2.4
Ziegenfuss, Marge	6304	PHL Departure Headings	River Departure Only	24.4.1
		Property Value	Impacts of Noise	6.1.2
		Quality of Life	Contributing Elements	6.2.2
Zimmermann, H.	7653	Airlines	Re-regulation	9.1.3
		Public Meetings	Prejudged Outcome	4.5.8
Zuccaro, Susan	7294	Comment Period	Extension	4.6.1

<b>Commentor</b>	<b>Letter Number</b>	<b>Topic</b>	<b>Subtopic</b>	<b>Response Code</b>
		Documentation	Flight Track	3.1.7
			Lacking Detail	3.1.3
		Preferred Alternative	Opposition	1.1.1
		Public Meetings	Additional Meetings	4.5.1
		Purpose and Need	Noise Reduction	5.1.1
Zuk, Ben	7845	Preferred Alternative	Opposition	1.1.1
Zuk, Harriet and Ben	7385	Preferred Alternative	Opposition	1.1.1
Zurinsky, R	6028	EWR Arrivals	Opposition to Reroutes	18.7.10



# WESTCHESTER COUNTY BOARD OF LEGISLATORS

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**THOMAS J. ABINANTI**  
*Legislator, 12th District*  
May 10, 2007

Mr. Steven Kelley  
FAA-NAR  
c/o Michael Merrill  
12005 Sunrise Valley Road  
Reston, VA 21091

**Chairman**  
Committee on the Environment & Energy  
**Member**  
Committee on Budget & Appropriations  
Committee on Legislation  
Committee on Family, Health  
and Human Services

Dear Mr. Kelley,

As the Chair of the Environment and Energy Committee at the Westchester County Board of Legislators, I review numerous projects affecting environmental issues in the County. I respectfully request that you hold public hearings in Westchester County to fully evaluate impacts from the FAA's proposed Preferred Alternative Redesign plan.

Many residents have expressed their concern to me about the significant impact on Westchester County that will result from the proposed changes cited in the April 3 "Noise Mitigation Report." These changes will double the number of flights in a narrower flight path, thus concentrating noise pollution impacts, including upon a state nature preserve.

The public comment period will close tomorrow, yet no hearings were held in Westchester County. The New York State public hearing was in Queens, which is not an easily accessible location for Westchester residents. The single Connecticut hearing in Stamford did not provide sufficient opportunity to address the concerns of Westchester residents.

In addition to holding a public hearing in Westchester County, I request that you extend the period for public comment to allow sufficient input. Thank you for your consideration of this important matter.

Sincerely,

A handwritten signature in black ink that reads "Thomas J. Abinanti".

Thomas J. Abinanti

006727

14 HILTON WOODCLIFF LAKE  
200 Tice Boulevard  
15 Woodcliff Lake, New Jersey 07677  
Thursday, June 28, 2007  
16 Commencing at 6:00 p.m.

17 Joseph & Theresa Abou-Daoud  
Westwood, New Jersey

7 MR. ABOU-DAOUD: What I said to them  
8 was my Joseph Abou-Daoud, I'm a Westwood resident,  
9 Westwood business owner, Westwood Chamber of  
10 Commerce President. My questions aren't as  
11 important as my daughter's and I'm going to let her  
12 read to you what she said today.

13 MISS ABOU-DAOUD: My name is Theresa  
14 Abou-Daoud. I'm seven years old and live in  
15 Westwood, New Jersey. My dad told me that the  
16 people who control the airplanes' path in the sky  
17 were going to change the paths.

18 The new path all go right over my  
19 house. It will be loud, dirty, smelly, and will  
20 make my breathing worse. I have reactive airway  
21 disease, a form of asthma. I already have trouble  
22 breathing, please don't make it worse. My mom has  
23 asthma. I have friends who have asthma, don't make  
24 it worse for them either. We are only kids, and  
25 she's my mom, and we want to live a long time.

0038

1 I also have a little sister, and I  
2 will be a big sister again in three weeks. It is  
3 not fair to them. My dad says that our house will  
4 lose money, and he said so will his business; that  
5 the planes will ruin our town. Why do you want to  
6 ruin our lives and our town?

7 (Whereupon, the statement concluded.)

007844



AIR TRANSPORT ASSOCIATION

May 11, 2007

Steve Kelley  
Federal Aviation Administration  
National Airspace Redesign  
c/o Ram Nagendran  
12005 Sunrise Valley Drive, MS C3.02  
Reston, VA 20191

Dear Mr. Kelley:

On behalf of the airline members of the Air Transport Association of America, Inc. ("ATA"),<sup>1</sup> I would like to offer the following general comments on the Noise Mitigation Report issued on April 6, 2007 in conjunction with the environmental review of the New York/New Jersey/Philadelphia Metropolitan Airspace Redesign. Our members have supported the efforts of the FAA to improve the management of airspace in this congested and critically important region. The selection of a Preferred Alternative by the FAA represents the culmination of nearly a decade of study, analysis, public comment and consideration of all of the relevant issues.

No issue has received more public attention throughout this process than the potential impact of any airspace changes on the noise environment of the residents of a broad

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<sup>1</sup> ATA airline members are: ABX Air, Inc.; Alaska Airlines; Aloha Airlines; American Airlines; ASTAR Air Cargo; Atlas Air; Continental Airlines; Delta Air Lines; Evergreen International Airlines; Federal Express Corp.; Hawaiian Airlines; JetBlue Airways; Midwest Airlines; Northwest Airlines; Southwest Airlines; United Airlines; UPS Airlines; and US Airways. Associate members are: Aeromexico; Air Canada; Air Jamaica; and Mexicana.

region that encompasses parts of four different states and hundreds of thousands of square miles. While ATA does not wish to minimize the importance of this issue, it is important to remember that the purpose of the project, as stated in the Draft Environmental Impact Statement, is to increase the efficiency and reliability of the airspace structure and ATC system in light of the need to accommodate growth while maintaining safety and mitigating delays. This overarching goal – to improve efficiency while maintaining safety – should not be lost sight of in the effort to mitigate any noise impacts.

We are particularly concerned that some of the efficiencies identified in this exhaustive and well-documented analysis could be eroded or obviated by the introduction of noise abatement measures that would *increase* flying time for some aircraft. While this clearly would be inconsistent with the goal of increasing efficiency and reducing delays, it also has the less obvious potential to create another type of environmental impact – one that was not studied in the environmental review process. Specifically, any noise mitigation measure that increases flying time also may increase fuel burn, and therefore the emissions that are produced by aircraft engines.

In contrast, there is a mitigation option – the development and implementation of Continuous Descent Approach (CDA) procedures – that has the potential to reduce both noise and emissions. The Noise Mitigation Report accurately observes that CDA procedures may not be feasible in a complex and/or congested airspace environment, but ATA supports the development of CDA for use at nighttime or in situations where it is technically feasible.

A final point we would like to make is that any noise mitigation strategies must recognize the future capacity needs of the system. Indeed, both the FAA and the Congress are grappling with the challenge of increasing airspace capacity because the current, ground-based radar system is inadequate to safely meet future needs. Here, several of the recommended measures rely on using certain runway headings only when demand requires, or prioritizing use of multiple headings based on noise mitigation goals. This is similar to the long-standing policy of allowing airports to adopt preferential runway use programs as part of a noise mitigation strategy. Like the airport runway programs, this mitigation measure has the potential to create expectations that should not be allowed to dictate future airspace capacity. As we have seen at many airports, once a flight pattern (and the attendant noise environment) has been established, it is difficult to overcome community opposition to any change in the *status quo*, even where the possibility of change was identified at the outset. If FAA does not preserve the ability of the airspace system to accommodate future demand, the entire airspace redesign exercise will have accomplished only short-term objectives.

Again, we applaud the FAA's effort to improve management of the New York-New Jersey-Philadelphia region's airspace, and support reasonable noise mitigation measures that do not compromise the efficiency and safety of operations within that airspace.

Sincerely,

A handwritten signature in black ink, appearing to read "D. A. Berg". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

David A. Berg  
Vice President & General Counsel

**MICHAEL ALFIERI, ESQ.  
ATTORNEY-AT-LAW  
35 SHADOW LANE  
LARCHMONT, NY 10538**

May 10, 2007

Mr. Steve Kelley, FAA NAR  
c/o Nessa Memberg  
12005 Sunrise Valley Drive, MS C3.02  
Reston, VA 20191

**Re: Comment Letter from the Sound Shore Communities on the NY/NJ/PLH Metropolitan Airspace Redesign Draft EIS Noise Mitigation Report – Dated April 6, 2007 and the Operational Analysis of Mitigation of NY/NJ/PHL Airspace Redesign - Dated April 2007**

Dear Mr. Kelley:

This letter is in response to **the NY/NJ/PLH Metropolitan Airspace Redesign Draft EIS Noise Mitigation Report – Dated April 6, 2007 and the Operational Analysis of Mitigation of NY/NJ/PHL Airspace Redesign - Dated April 2007**. We represent the Sound Shore Communities, including the Village of Larchmont, Town of Mamaroneck, residents of the Village of Mamaroneck, and the Quiet Skies of WRAIN (collectively “Sound Shore Communities”).

Please find described and outlined below the following comments which constitute the Sound Shore Communities’ response to **the NY/NJ/PLH Metropolitan Airspace Redesign Draft EIS Noise Mitigation Report – Dated April 6, 2007 and the Operational Analysis of Mitigation of NY/NJ/PHL Airspace Redesign - Dated April 2007**. The Federal Aviation Administration prepared these two documents, (collectively referred to as the “Mitigation Reports”) for the New York/ New Jersey/ Philadelphia Metropolitan Airspace Redesign (“Project”).

Throughout the Environmental Impact Statement review process, the citizens of the Sound Shore Communities have expressed their concerns, both written and verbal, concerning the proposed Airspace Redesign. These concerns were specifically addressed and documented in writing as per our Letter to Steve Kelley (“hereinafter Kelley Letter”) in May of 2006. Notwithstanding said Kelley Letter, please be advised that the citizens of the Sound Shore Communities continue to share these very same concerns.

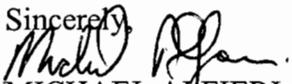
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1 of 2

Please be advised that the proposed Mitigation Reports address issues of importance to us. Although, while on the one hand, we welcome Noise-Mitigation solutions, we continue to have some important concerns about the implementation of these strategies.

Our comments include the following:

1. Although FAA recommends the increased use of the LDA (over the LI Sound) from 29% to 40% minimum with R-NAV assistance, we believe it is necessary and imperative to include quantitative measures and compliance assurances. Some recommendations include:
  - **The Issuance of an official directive to comply with LDA preference, both pre- and post- R-NAV implementation;**
  - **The Training and Education of ATC staff to ensure compliance with said official directive;**
  - **The Maintenance and Preservation of periodic records of flight tracks to verify and confirm compliance with said official directive. This data could be handled by outside agents.**
2. Once R-NAV system is implemented and in place at LGA, and the LDA becomes a precision route, there should be a drastic decrease in ILS use. In connection with same, we make a formal request of the following:
  - **That Flights looping from up the Hudson River pull south to over the Sound before lining up with Runway 22, thus eliminating the noisy final turn sequence over our Communities, and placing it out over the neutral buffer zone, the L. I. Sound.**
3. Further, once R-NAV is in place, there should be no further constraints on big jets' use of the LDA.
4. Please be advised that in the Mitigation Reports we did not see any reference to LGA Runway 4 takeoff pattern that would have put a stream of departing aircraft over the Sound Shore towns of Westchester and into CT. We have been informed by FAA officials that the proposed LGA Runway 4 takeoff up the Sound Shore Communities is no longer a part of the Redesign Project. We raise this issue and bring it to your attention in order to confirm that this heading has been eliminated and is not included in the final plan.
5. Please note that information about actual altitudes, noise impacts and implementation/timing of R-NAV systems are not evident in the Mitigation Report; we kindly request further detail as available.

The Sound Shore Communities thank the FAA for the opportunity to comment, and for its anticipated cooperation in managing these environmental airspace improvements over our area for the long-term.

Sincerely,  
  
MICHAEL ALFIERI, ESQ.  
Michael Alfieri

**ROBERT E. ANDREWS**

FIRST DISTRICT, NEW JERSEY

COMMITTEES:

**EDUCATION AND THE WORKFORCE**

SENIOR RANKING DEMOCRAT, SUBCOMMITTEE ON EMPLOYER-EMPLOYEE RELATIONS

MEMBER, SUBCOMMITTEE ON 21ST CENTURY COMPETITIVENESS

**ARMED SERVICES**

MEMBER, SUBCOMMITTEE ON MILITARY RESEARCH AND DEVELOPMENT

MEMBER, SPECIAL OVERSIGHT PANEL ON MORALE, WELFARE AND RECREATION

MEMBER, SUBCOMMITTEE ON MILITARY PERSONNEL

**Congress of the United States  
House of Representatives  
Washington, DC 20515-3001**

May 10, 2007

PLEASE REPLY TO:

- 2439 RAYBURN HOUSE OFFICE BUILDING  
WASHINGTON, DC 20515  
(202) 225-6501
- 506-A WHITE HORSE PIKE  
HADDON HEIGHTS, NJ 08035  
(856) 546-5100
- 63 NORTH BROAD STREET  
WOODBURY, NJ 08096  
(856) 848-3900

E-MAIL:

rob.andrews@mail.house.gov

Mr. Steve Kelley, FAA NAR  
FAA Airspace Redesign  
c/o Nessa Memberg  
12005 Sunrise Valley Drive, MS C3.02  
Reston, VA 20191

Dear Mr. Kelley:

I strongly oppose The Federal Aviation Administration's decision to choose the Integrated Airspace option as their preferred alternative for rerouting air traffic in the Northeast corridor to help reduce delays and accommodate growth because it is a waste of taxpayer resources and an undue burden to the residents of South Jersey. It is clear to me that the plan will do little to reduce delays but will significantly jeopardize the quality of life for many residents in South Jersey. Under the most optimistic conditions, a 22-minute flight delay will only be reduced by 4 minutes. However, redesigning the airspace to accommodate more traffic at lower altitudes over South Jersey, will create a substantial increase in noise in the communities I represent.

The Draft Environmental Impact Statement (DEIS), fails to show measurable and significant evidence that "enhanced safety, reduced delays, and the ability to accommodate growth," will occur. Furthermore, the DEIS does not indicate any appreciable increase in safety, or any measurable reduction of collision risk over current airspace configuration.

Especially troubling is the fact that the FAA has failed to produce a cost benefit analysis for this project and cannot say with any degree of certainty how much the project will cost taxpayers. In a published report by the Office of the Inspector General dated May 2005, the Department of Transportation raised specific concerns that the FAA cost and schedule estimates for the vast majority of airspace redesign projects was unreliable. Given this information and the fact that to date, the FAA has refused to hold a separate South Jersey meeting to ensure that the concerns of the hundreds of constituents who were refused admittance to the public hearing held in Philadelphia on May 1, 2007, are addressed, I am absolutely convinced that this project is a colossal mistake at the expense of not only taxpayer's dollars, but their quality of life as well.

006866

182

I ask the FAA to abandon this plan and develop a new alternative that will adequately address the delays at our region's airports, while also preserving the quality of life for area residents.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert E. Andrews", with a long horizontal flourish extending to the right.

Robert Andrews  
Member of Congress

REA:cd

Congress of the United States  
Washington, DC 20515

May 4, 2007

The Honorable Marion Blakey  
Administrator  
Federal Aviation Administration  
800 Independence Ave., S.W.  
Washington, DC 20591

Dear Administrator Blakey,

We write regarding the public meetings the Federal Aviation Administration (FAA) recently held regarding its plans for New York/New Jersey/Philadelphia airspace redesign. These public meetings are designed to provide an opportunity for residents of communities affected by your agency's plan to learn details of the impact and have their questions answered. However, we think the meetings held thus far did not provide an adequate opportunity for those who will be affected by the FAA plan to learn of the impact and voice their concerns.

We learned with dismay that at the most recent meeting, which took place on May 3 in Essington, Pennsylvania, hundreds of area residents were not able to have their concerns heard. Given the overwhelming response in attendance it is clear that many are concerned about the FAA's plans. We believe the FAA should take into account the severe impact this proposal would have on many residents across the state. As the FAA has proposed, this airspace redesign plan could significantly alter the quality of life some 300,000 New Jerseyans, exposing them to increased noise and lowering their property values. Furthermore, the planned flight patterns would affect residents from very different parts of the State.

We are particularly displeased that our previous requests for an additional meeting have gone ignored. Before these meetings took place, we expressed our concerns to you that many New Jersey residents, specifically those in Gloucester County, would not have sufficient opportunity to participate in the public meeting process because of the insufficient effort FAA was making to accommodate them.

Given the extenuating circumstances of the meeting in Pennsylvania, we urge you to provide New Jerseyans another opportunity to hear from the FAA on these plans. For many New Jersey residents in the southern part of our State, the Pennsylvania meeting location was closer than the meeting held in Newark, New Jersey. Because of the direct impact the redesign would have on communities in southern New Jersey, we urge you find a location that is convenient for residents from this region.

007004  
1 of 2

We thank you for your immediate consideration of this matter. New Jerseyans should be given sufficient opportunity to learn about the impacts of the plan and provide their feedback. Until this occurs, the redesign should not move forward.

Sincerely,



ROBERT MENENDEZ  
United States Senator



FRANK R. LAUTENBERG  
United States Senator



ROBERT ANDREWS  
Member of Congress

PERRY ARTESE  
President  
JOHN PURCELL  
Vice President  
MARY MCFALL HOPPER  
LEN PINTO  
ALEX RAHN  
GEORGE WOLHAFE  
MICHAEL WRIGHT

HENRY A. EBERLE, JR.  
Mayor

# Borough of Ridley Park

COUNTY OF DELAWARE, PA

## Council Chamber

105 EAST WARD STREET  
RIDLEY PARK, PENNSYLVANIA 19078

610-532-2100 • FAX: 610-532-2447

www.ridleyparkboro.org

ROBERT J. POOLE  
Borough Manager

May 1, 2007

Steve Kelley, FAA NAR  
c/o Ram Nagendran  
12005 Sunrise Valley Drive, Ms C3.02  
Reston, VA 20191

Re: New York/New Jersey/Philadelphia Airspace Redesign

Dear Mr. Kelley:

Enclosed please find a certified copy of Resolution No. 07-2007 unanimously approved by Ridley Park Borough Council on April 17, 2007 in opposition to the FAA's decision to proceed with the Integrated Airspace Alternative for Airspace Redesign Project that includes the Philadelphia International Airport.

If you have any questions, please feel free to contact me at your convenience.

Sincerely,



Robert J. Poole  
Borough Manager

Enclosure  
cc: Mayor  
Council

006007  
182

**BOROUGH OF RIDLEY PARK**  
**DELAWARE COUNTY, PENNSYLVANIA**

**RESOLUTION NO. 07 – 2007**

**WHEREAS**, the Federal Aviation Administration (FAA) has released its decision to proceed with the Integrated Airspace Alternative for the Airspace Redesign Project that includes Philadelphia International Airport (PHL); and

**WHEREAS**, the proposed changes in flight patterns will result in increase noise pollution, safety hazards and property damage in many Ridley Park neighborhoods located under the proposed flights paths; and

**WHEREAS**, the FAA's plan will do little to correct the problem of flight delays at PHL, but will result in a negative impact on residents in Ridley Park and Delaware County; and

**WHEREAS**, the FAA's Noise Mitigation Plan uses flawed data and manipulates noise data, and the two proposed headings that go westward over Delaware County will still result in increased air traffic and resulting noise pollution over Ridley Park and the county; and

**WHEREAS**, the FAA has failed to consider other alternatives to improve efficiency at PHL

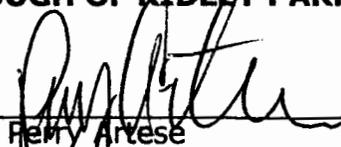
**NOW, THEREFORE, BE IT RESOLVED** that:

1. Ridley Park Borough stands by Delaware County Council's opposition to the FAA's proposed Airspace Redesign Plan.
2. Ridley Park Borough supports County Council's position that the FAA should require that all planes departing PHL in a westward direction be required to stay over the Delaware River until they reach an altitude of 3,000 feet.
3. Ridley Park Borough, while supporting an economically viable and efficient airport, objects to any expansion or changes that will have a negative impact on the quality of life for its residents.

**ADOPTED** this 17<sup>th</sup> day of April, 2007.

**COUNCIL OF THE  
BOROUGH OF RIDLEY PARK**

By: \_\_\_\_\_

  
Perry Arrese  
President of Council

Attest: \_\_\_\_\_

  
Robert J. Poole  
Borough Manager/Secretary

(SEAL)

I, Robert J. Poole, Manager/Secretary of the Borough of Ridley Park do hereby certify that the foregoing is a true and correct copy of the Resolution adopted by the Borough of Ridley Park at a regular meeting of the Borough Council held the 17<sup>th</sup> day of April, 2007.

  
Robert J. Poole, Borough Manager

  
Date

(SEAL)

# Comment Form

FAA AIRSPACE REDESIGN  
NY/NJ/PHL Metropolitan Area Airspace Redesign Project  
Noise Mitigation Meetings

Submit your comments on Noise Mitigation Procedures for the Preferred Alternative.

Comment form must be submitted today

Please print clearly

Thank you!

Date 6/28/07

Please Circle the Meeting Location:

Cherry Hill, NJ

Woodcliff Lakes, NJ

Mr.  Mrs.  Ms.  Dr.  Title \_\_\_\_\_

First Name Deborah Last Name Basile

Affiliation/Organization/Agency Oradell Environmental Committee

Street Address 719 Neill Ct.

City Oradell ST NJ ZIP 07644

Phone # 201-261-0667

Email Address \_\_\_\_\_

Comment (only comments on the Mitigation and Preferred Alternative) \_\_\_\_\_

1. Why were the communities in question not asked for involvement at the inception of your study?

2. Concern about our reservoir - is the quality of our water compromised?

3. Noise + Air pollution that will be created is unacceptable

4. Q+A - your panel does not give answers to questions

5. Averages are unacceptable - give us statistics for certain times of days / seasons, etc.

If More Space Is Needed, Please Use Flip Side

007616

MAYOR  
PETER A. BEE

TRUSTEES  
JOHN L. MAUK  
GERARD P. LUNDQUIST  
JOHN J. WATRAS  
ROBERT J. ROTHSCHILD  
NICHOLAS P. EPISCOPIA  
THOMAS M. LAMBERTI  
DONALD T. BRUDIE

VILLAGE ADMINISTRATOR  
ROBERT L. SCHOELLE, JR.

INCORPORATED  
**VILLAGE OF GARDEN CITY**  
351 STEWART AVENUE  
**GARDEN CITY, N.Y. 11530-4528**

WEBSITE: GARDENCITYNY.NET

TELEPHONE (516) 465-4000

FAX (516) 742-5223



May 8, 2007

Mr. Steve Kelley, FAA  
c/o Ram Nagendran  
12005 Sunrise Valley Drive, MS C3.02  
Reston, Virginia 20191

Re: Comment on *Noise Mitigation Proposals* of the FAA in regard to the *Integrated Airspace Alternative Variation with Integrated Control Complex (ICC)*

Dear Mr. Kelley:

*Thank you for affording the Village of Garden City with the opportunity to comment on the FAA's Noise Mitigation proposals in relation to the Integrated Airspace Alternative Variation with Integrated Control Complex, as the volume of air traffic over Garden City dramatically impacts the quality of life in this densely populated residential community. Representatives of the Incorporated Village's Environmental Advisory Board attended the briefing session on this proposed program. It is the Village of Garden City's observation that the program will increase air traffic at all of the runways at John F. Kennedy Airport with increased numbers of planes at closer intervals.*

*It is the Village's position and request that the proposed plan provide mitigation to include a method for implementation of a continuous descent approach for both ILS and VOR arrivals on runways 22L and 22R prior to the final approval of the program.*

*Your consideration and hopefully favorable disposition of this matter is of great concern to the residents of Garden City and is greatly appreciated.*

Sincerely,

Peter A. Bee  
Mayor

PAB:kma

cc: Senator Charles E. Schumer  
Senator Hillary Rodham Clinton  
Congresswoman Carolyn McCarthy  
Senator Kemp Hannon  
Mayor Phil Guarneri, Floral Park  
Mayor Daniel Petruccio, New Hyde Park

00 6726

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**From:** bmcpherson@co.bergen.nj.us  
**Sent:** Friday, May 11, 2007 1:00 PM  
**To:** Nagendran, Ram  
**Subject:** Comment on Noise Mitigation Procedures for the Preferred Alternative

- **Last Name:** McPherson
- **First Name:** Bernadette
- **Email Address:** bmcpherson@co.bergen.nj.us
- **Street Address:** One Bergen County Plaza 5th floor
- **City:** Hackensack
- **State:** New Jersey (NJ)
- **Zip Code:** 07601

**Comments:**

To: letterstotheeditor@northjersey.com; TheRecordLetters@northjersey.com Sent: Fri, 4 May 2007 8:54 AM Subject: Letter to the Editor

The Board of Chosen Freeholders has passed numerous resolutions and taken action such as joining the Coalition for Public Health and Safety and working with our residents and all levels of government to address the ongoing impact that Teterboro Airport has on the quality of life of our residents. Progress has been made in a more ambitious voluntary curfew and the implementation of a variety of safety measures as well as the ban of certain aircraft secured by Congressman Steve Rothman. The FAA on the other hand has consistently ignored the Board's demands for a mandatory curfew and noise mitigation and other efforts to reduce that impact. The latest example of the FAA's patronizing arrogance has been its airspace scoping procedures. Although purportedly seeking public comment and input it has been a complete and utter sham inspiring not confidence in the agency responsible for safety in our skies but disgust and frustration. The most recent public meeting held on April 25, 2007 in Newark was no exception. The materials presented omitted any reference to Teterboro Airport and at the same time falsely portrayed mitigation of airplane noise in Northern Bergen County under its approved alternative airspace design for this area known as the ICC plan. The Board of Chosen Freeholders will continue to make its extreme dissatisfaction known to both the FAA, our Congressional representatives, our State legislators, the Port Authority and all 70 towns within Bergen County with the ICC plan. We have once again called upon the FAA to utilize the ocean routing alternative and will call upon the leadership of all 70 towns to join us in the effort to bring about the results we are seeking. The Borough of Rutherford has taken a similar action. That is why it was extremely gratifying to witness Acting Governor Codey sign into law legislation that would permit acquisition of Stewart Air Force base by the Port Authority. This acquisition will put in place the potential for real relief for the residents of Bergen County from the reality that is Teterboro Airport. This is a great day for the residents of Bergen County affected by Teterboro Airport and all those who have been working together to lessen its impact. At a time when the FAA is ignoring our input the initiative to acquire Stewart by the Port Authority moves forward. It demonstrates how far we have come over the last several years and what can be accomplished when there is cooperation at all levels. It should not be forgotten that not too long ago we were told here in South Bergen by now former state leaders that nothing could be done about Teterboro Airport. The Port Authority and its Chairman Tony Coscia and our current state leaders, Governor Corzine, Acting Governor Codey and others, clearly recognize how Teterboro affects our quality of life. We should all continue to work together to prevail upon the FAA to do the same. Bernadette P. McPherson

Resolutions Passed:

BOROUGH OF RUTHERFORD

County of Bergen RESOLUTION

007325

5/15/2007

May 1, 2007

Whereas, The Borough of Rutherford has passed numerous resolutions and taken action such as joining the Coalition for Public Health and Safety and working with our residents and all levels of government to address the ongoing impact that Teterboro Airport has on the quality of life of our residents and Whereas, the FAA has consistently ignored the Borough's demands for a curfew and noise mitigation and other efforts to reduce that impact and Whereas the FAA's airspace scoping procedures although purportedly seeking public comment and input have been a complete and utter sham inspiring not confidence in the agency responsible for safety in our skies but disgust and frustration and Whereas the most recent public meeting held on April 25, 2007 was no exception in omitting any reference to Teterboro Airport and at the same time falsely portraying mitigation of airplane noise under the ICC plan in Northern Bergen County towns Now therefore be it resolved that the Borough will make its extreme dissatisfaction known to both the FAA, our Congressional representatives, our State legislators, the Port Authority and all 70 towns within Bergen County with the ICC plan and will once again call upon the FAA to utilize the ocean routing alternative and will call upon the leadership of all 70 towns to join us in the effort to bring about the results we are seeking.

#### 2007 BERGEN COUNTY BOARD OF CHOSEN FREEHOLDERS RESOLUTION

Certified as a true copy of a Resolution adopted by the Board of Chosen Freeholders on above date at the Regular Meeting by:

Valerie Coniglio, Clerk, Board of Chosen Freeholders, Bergen County, New Jersey

WHEREAS, The Bergen County Board of Chosen Freeholders has passed Resolutions 294, 305, 480, 903, 1035, 1042, 1065, 1164, 1586 to address the ongoing impact that Teterboro Airport has on the quality of life of our residents; and WHEREAS, the FAA has consistently ignored the Board's demands for a curfew and noise mitigation and other efforts to reduce that impact; and WHEREAS, the FAA's airspace scoping procedures although purportedly seeking public comment and input have been a complete and utter sham inspiring no confidence in the agency responsible for safety in our skies but disgust and frustration; and WHEREAS, the most recent public meeting held on April 25, 2007 was no exception in omitting any reference to Teterboro Airport and at the same time falsely portraying mitigation of airplane noise under the Integrated Control Complex Plan (ICC) in the Northern Bergen County municipalities; and NOW, THEREFORE, BE IT RESOLVED that the Board will make its extreme dissatisfaction known to both the FAA, our Congressional representatives, the Port Authority and all 70 municipalities within Bergen County with the Integrated Airspace Alternative Variation with the Integrated Control Complex Plan (ICC) and will once again call upon the FAA to utilize the ocean routing alternative and will call upon the leadership of all 70 municipalities to join us in the effort to bring about the results we are seeking.

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This email was generated automatically by the following page:

[http://www.faa.gov/airports\\_airtraffic/air\\_traffic/nas\\_redesign/regional\\_guidance/eastern\\_reg/nynjphl\\_redesign/noise\\_mitigation\\_comments/](http://www.faa.gov/airports_airtraffic/air_traffic/nas_redesign/regional_guidance/eastern_reg/nynjphl_redesign/noise_mitigation_comments/)

007325

5/15/2007

FAA - 070315 - 019 138

RICHARD BLUMENTHAL  
ATTORNEY GENERAL



55 Elm Street  
P.O. Box 120  
Hartford, CT 06111-0120

Office of The Attorney General  
**State of Connecticut**

May 7, 2007

Marion C. Blakey  
Administrator, Federal Aviation Administration  
U.S. Department of Transportation  
800 Independence Avenue, S.W.  
Washington, D.C. 20591

Dear Administrator Blakey:

I strongly urge the Federal Aviation Administration (FAA) to reopen the draft environmental impact statement (DEIS) -- or risk potential legal action -- concerning the proposed New York/New Jersey/Philadelphia Metropolitan Area Airspace Redesign Project (Redesign Project) to permit further formal public comment. The DEIS must be revised to properly reflect important issues regarding noise pollution, from Westchester/White Plains Airport and elsewhere, after the FAA releases detailed and specific information about the number, aircraft type and altitude of flights over individual neighborhoods. The FAA has an obligation to provide such information fully and accurately as soon as possible.

The Redesign Project is an important major realignment of air traffic and control in the Northeastern United States. It continues to deserve careful and complete study by all stakeholders, including hundreds of thousands of Connecticut residents. The scale of this project is daunting. The project involves redesign of air traffic for a 31,000 square mile, five state area. DEIS, p. ES-8. Numerous airports and 29 million residents who live in this area will be affected by the results.

I fully support the stated purpose of the project "to increase efficiency and reliability of the airspace structure and [air traffic control] system." DEIS, p. ES-1. I am particularly pleased that flights will be directed away from the Indian Point Nuclear Power Station. I have been urging federal officials to do so for several years.

The public is entitled to know that its best interests have been served before the FAA makes a final decision in the final environmental impact statement. The DEIS failed to consider the noise impacts from White Plains/Westchester Airport, an airport that abuts the New York/Connecticut border and commonly directs flights at low altitude over Connecticut residents. Many of the larger airports evaluated in the DEIS are huge, with runways far from the perimeter fences. Many are primarily surrounded by valet parking and other commercial activities. The White Plains/Westchester Airport is located in an essentially residential area in

007003  
1 of 3

close proximity to the runways. The noise impacts, therefore, can be much more disturbing than at some major airports.

Excessive noise is a form of pollution with a direct impact on quality of life. It must be thoroughly and completely addressed in an environmental impact statement for a project of this type. In fact, the DEIS for this project did consider an Ocean Routing Alternative which would have directed flights from various airports over open ocean to limit noise impacts to New Jersey residents. DEIS, p. ES-2. An analysis of the FAA's Noise Mitigation Report released April 6, 2007, by Williams Aviation Consultants points out that no direct evaluation of the noise impacts from the White Plains/Westchester Airport was conducted and no alternatives to mitigate the noise impacts considered. Adjustments to the flight paths for the large aircraft from the major airports often require adjustments in the flight paths from the regional airports in order to avoid conflicts. There is no analysis in the DEIS or the Noise Report of the secondary impacts of the Redesign Project on altitudes and flight paths from smaller airports like White Plains/Westchester. These secondary impacts are not only reasonably foreseeable -- they are a necessary corollary of the Redesign Project. This omission must be corrected.

The National Environmental Policy Act, 42 U.S.C. § 4321, *et seq.* (NEPA), requires federal agencies to take a "hard look" at the potential environmental and other impacts of a project before giving approval. The purpose of an environmental impact statement is to identify *all* the impacts from a project, clearly and completely, in a manner that allows both regulators and the public to make informed decisions about available alternatives. *Mississippi River Basin Alliance v. Westphal*, 230 F.3d 170, 175 (5th Cir. 2000); *Town of Huntington v. Marsh*, 859 F.2d 1134, 1142-1143 (2d Cir. 1988).

This legally required analysis is absent in the Redesign Project DEIS. As noted above, no consideration at all was given to the White Plains/Westchester Airport or its impacts that will be necessitated by changes related to the FAA's preferred alternative. The DEIS provides no information about the impact to Connecticut residents from potential changes to existing aircraft routes. At a minimum, both the DEIS, and the Noise Mitigation Report released on April 6, 2007, must be revised to include the impacts from Westchester Airport. In order to provide a fair and meaningful opportunity for public input, the FAA must promptly release all relevant information, including altitude, aircraft types and number of flights over area neighborhoods. All alternatives to the existing take-off and landing routes must be examined, including requiring changes to landing and takeoff angles, minimum altitudes, and better management of nighttime flights in order to minimize the impacts of noise from this airport. Further, the DEIS does not contain an analysis of the comments of the Connecticut Department of Environmental Protection (CDEP) and Connecticut Department of Transportation (CDOT) on the overall project.

In addition, the DEIS for this project did not propose a single redesign approach. Instead, it offered and discussed various alternatives. Now that the FAA is moving towards a single preferred approach, it must comply with the requirements of the National Environmental Policy

Ms. Marion C. Blakey  
Administrator  
Federal Aviation Administration  
Page 3 of 3

Act by providing a full opportunity for concerned citizens to file formal comments on the recommended proposal before the final environmental impact statement is issued.

For the reasons explained above, the FAA must promptly initiate a new formal comment period. In addition, the FAA must include in the FEIS a full evaluation of the Westchester Airport and all of its environmental impacts and alternatives and of the recommendations of the CDEP and CDOT. The law is clear that regulators must comply with the terms of NEPA and, as chief legal officer of the State of Connecticut, I will ensure that Connecticut residents receive the full protection of the law.

Thank you for your consideration of this important issue.

Very truly yours,



RICHARD BLUMENTHAL

RB/RDS:les

# Comment Form

FAA AIRSPACE REDESIGN  
NY/NJ/PHL Metropolitan Area Airspace Redesign Project  
Noise Mitigation Meetings

Submit your comments on Noise Mitigation Procedures for the Preferred Alternative.

Comment form must be submitted today

Please print clearly

Thank you!

Date 6/28/07

Please Circle the Meeting Location: Cherry Hill, NJ Woodcliff Lakes, NJ PV Mayors Association  
Mr.  Mrs.  Ms.  Dr.  Title Mayor - River Vale NJ

First Name Joseph Last Name Blundo

Affiliation/Organization/Agency Mayor, River Vale - PV Mayors Association

Street Address 745 Tiffany Ave

City River Vale ST NJ ZIP 07075

Phone # 201-664-7416

Email Address Blundoj@optonline.net

Comment (only comments on the Mitigation and Preferred Alternative)

The PV Mayors Association strongly objects to the FAA redesign plan. We stand united in our belief that this plan poses safety and quality of life concerns.

If More Space Is Needed, Please Use Flip Side

007622



## TOWNSHIP OF NETHER PROVIDENCE

214 Sykes Lane, Wallingford, PA 19086-6350  
(610) 566-4516 Fax (610) 892-2890  
[www.netherprovidence.org](http://www.netherprovidence.org)

Lin Axamethy Floyd, President  
4<sup>th</sup> Ward  
Deena Beard, Vice President  
1<sup>st</sup> Ward  
Sallie Anderson  
2<sup>nd</sup> Ward  
Frank Noyes  
3<sup>rd</sup> Ward  
John P. Kennedy  
5<sup>th</sup> Ward  
Robert E. O'Connor  
6<sup>th</sup> Ward  
Robert M. Firkser  
7<sup>th</sup> Ward

Gary J. Cummings, Manager  
Robert Scott, Solicitor  
NDI Engineering, Engineer  
Theresa White, Treasurer

May 10, 2007

Mr. Steve Kelley, FAA  
c/o Nessa Memberg  
12005 Sunrise Valley Drive MS C3.02  
Reston, VA 20191

Re: Flight Patterns - Philadelphia International Airport

Dear Sir or Madam:

The undersigned comprise the Board of Commissioners of Nether Providence Township, in Delaware County, Pennsylvania. This letter is in response to your invitation for input regarding the proposed change in flight patterns in and out of Philadelphia International Airport. Some of us attended the recent public meeting, but were denied entry due to the large number of protestants in attendance.

We are opposed to the proposed changes. Of course, no community would welcome increased numbers of flights or increased noise. However, our opposition is not merely a "not in my backyard" reaction.

The proposed changes, and the significant increase in the number and decibel levels of flights over our community, will negatively impact many people. Simply put, this will cause a great many people a great amount of inconvenience and discomfort. It will negatively affect both property values and quality of life in our community.

In order to justify such a severe impact, it must be demonstrated that the proposed action is necessary - not simply desired, not simply easier, but genuinely necessary. Neither the Federal Aviation Administration nor its hired consultants have shown such necessity.

006737  
1 of 3

This action is not necessary for safety. In fact, it increases risk. The stated goal is to increase the number of planes that can take off from Philadelphia - obviously, a greater number of planes means a greater risk of collision or a crash. Increasing the number of planes flying over residential neighborhoods, and reducing the altitude of those planes, increases risk. Taking off and then flying over our neighborhood allegedly reduces the amount of time that must elapse between take-offs - the next plane does not have to wait as long to take off. In other words, there will be more planes, closer to each other in both distance and time. This plan is a formula for disaster. It drastically reduces safety and drastically increases risk.

This action is not necessary for efficiency. In fact, studies have shown that an overwhelming percentage of delays are the result of bad weather or mechanical issues. Of course, the proposed changes do not address these issues, and, it is submitted, the changes will result in an increase in pain to the affected residents, but not an increase in efficiency.

This action is not necessary for economic reasons. No consideration has been given to regional infrastructure or the ability of regional transportation to accommodate the increased number of arriving and departing passengers that will purportedly result. There is no benefit in getting people to depart at a faster pace if they cannot get to the airport, and there is likewise no benefit in bringing more passengers in faster if they cannot then get out of the airport efficiently.

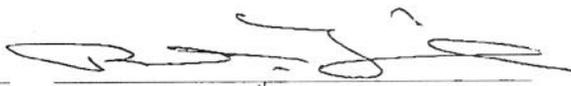
This action is not environmentally necessary. The impact on the John Heinz National Wildlife Refuge has not been addressed. The environmental impact of more flights, more traffic, and more congestion has been ignored.

FAA representatives have attempted to "sell" this plan in some rather ingenious, but inaccurate, ways. For example, you have shown comparisons of current average decibel levels to anticipated average decibel levels, with projected increases of purportedly minimal DNL. However, this comparison is faulty - apparently intentionally so. What is relevant is not the average daily noise level, but the noise level at times that a plane is overhead. Such transparent attempts to misrepresent that effects of these changes only diminish the FAA's credibility and further convince us that this proposal is ill-conceived.

The bottom line is that many people will be hurt, with little corresponding benefit. Instead of addressing the real issues, such as the need for additional flight control personnel and the need for more efficient maintenance, and instead of recognizing the reality that there is a finite number of incoming and departing flights that the Philadelphia Airport can accommodate, you are embarking on a course of action which is calculated to cause a great deal of harm to residents and increase the risks of tragedy, without attaining the goals you have identified.

It is time to go back to the drawing board. We could support a plan that is reasonable, actually addresses the needs of the Philadelphia International Airport, and is not unnecessarily dangerous. The current proposal is none of these.

  
Lin Floyd, 4<sup>th</sup> Ward Commissioner

  
Robert Firkser, 7<sup>th</sup> Ward Commissioner

Deena Beard, 1<sup>st</sup> Ward Commissioner

Robert O'Connor, 6<sup>th</sup> Ward Commissioner

Sallic Anderson, 2<sup>nd</sup> Ward Commissioner

John P. Kennedy, 5<sup>th</sup> Ward Commissioner

Frank Noyes, 3<sup>rd</sup> Ward Commissioner

Cc: Delaware County Council  
Congressman Joseph Sestak  
Representative Bryan Lentz  
Representative Thomas Killion

Untitled

SHERATON NEWARK AIRPORT HOTEL  
128 Frontage Road  
Newark, New Jersey 07114  
April 25, 2007  
Commencing at 6:00 p.m.

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15  
16  
17  
0003

J. CHRISTIAN BOLLWAGE

3

Mayor of the City of Elizabeth

50 Winfield Sacott Plaza

Elizabeth, New Jersey 07201

Statement of Mayor J. Christian

Bollwage in opposition to the ICC Alternative and  
Noise Mitigation Impact proposed by the Federal  
Aviation Administration.

Today is Wednesday, April 25, 2007. My  
name is Chris Bollwage and I am the Mayor of the  
City of Elizabeth. Tonight I will deliver my  
statement in opposition to the Integrated Airspace  
Alternative with Integrated Control Complex (ICC)  
and Noise Mitigation Report, which has been  
identified by the Federal Aviation Administration  
(FAA) as the preferred alternative design for the  
New York/New Jersey/Philadelphia Metropolitan  
Airspace Redesign Project.

The City of Elizabeth is the fourth  
largest municipality in the State of New Jersey,  
with a population of 125,809, according to the 2005  
Census estimate.

In addition to being the Union County  
Seat, Elizabeth is home to more than 30 educational  
institutions, the Jersey Gardens Mall, Trinitas  
Hospital, Union County College, several senior  
citizen centers, libraries, and numerous day care  
and social services facilities.

Elizabeth maintains a thriving business  
district, an award-winning Urban Enterprise Zone and  
is located in close proximity to the entire  
tri-state area.

In addition to its designation as an  
economic development destination, Elizabeth is also  
a transportation hub, home to two rail stations,  
which transport riders on the North Jersey Coast  
Line and the Northeast Corridor Line, Port  
Newark/Elizabeth, as well as substantial portions of  
the Newark Liberty International Airport property,  
including the entire Terminal A and a hub of  
Terminal B.

A segment of runways 22 L and R,  
including the takeoff and landing routes for these  
runways are also located within the city of  
Elizabeth.

The City of Elizabeth is at the heart  
of the most significantly impacted area of airplane  
noise in the State of New Jersey and, most likely,  
in the entire tri-state area.

Because of its proximity to Newark  
Airport, many portions of the City of Elizabeth are  
already beyond the FAA's maximum threshold of 65 DNL

Page 1

24 for noise.

25 Any increase in airplane noise triggers

0005

1 great concern for the City of Elizabeth and under  
2 the FAA's selected alternative, the entire Elizabeth  
3 community is deeply concerned.

4 In 1995 and 1996, the City of Elizabeth  
5 led the fight against the Federal Aviation  
6 Administration's plan to deflect the flow of  
7 airplane traffic from Staten Island directly over  
8 the City of Elizabeth.

9 The FAA's routing change at that time  
10 unfairly shifted the burden of airplane traffic over  
11 the City of Elizabeth. In fact, that 190 degree  
12 noise abatement maneuver which intended to lessen  
13 airplane noise over Staten Island, had the opposite  
14 effect on the City of Elizabeth.

15 In 1995, the FAA demonstrated little  
16 regard for the residents of Elizabeth and because  
17 Staten Island would not share the burden of the  
18 airplane noise, the residents of the City of  
19 Elizabeth were unfairly and significantly impacted  
20 with the late night rumblings overhead and window  
21 shaking vibrations. These problems, I regret to  
22 inform you, continue today.

23 The City of Elizabeth continues to suffer the  
24 negative impact of this alternative at all times  
25 throughout the day and night; however, there is no

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1 air traffic being sent over Staten Island. Even the  
2 industrial areas of Staten Island are not impacted  
3 had.

4 How can this lack of noise distribution  
5 be adequately justified when more than 125,000  
6 residents have to bear the brunt of this  
7 disturbance?

8 Last year, the FAA released its Draft  
9 Environmental Impact Statement, which introduced  
10 five potential plans for the redesign of the  
11 airspace around Newark International Airport.  
12 Public comments on the Draft Environmental Impact  
13 Statement (EIS) raised concerns about noise,  
14 emissions, operating assumptions, and airspace  
15 design parameters.

16 In light of the adverse history  
17 severely impacting the residents of the City of  
18 Elizabeth and contrary to the voluminous comments  
19 against the proposed redesign plans and their  
20 deleterious noise impacts, the FAA has chosen a  
21 flight plan alternative which has shown a blatant  
22 disregard and lack of consideration for the health  
23 and quality of life of the residents of Elizabeth.

24 This effort demonstrates a complete and  
25 total disregard for the concerns of the City of

0007

1 Elizabeth and a gross inequality with respect to air  
2 traffic and noise levels.

3 The FAA urges that the Integrated  
4 Airspace Alternative with the Integrated Control  
5 Complex option was chosen because it would yield the  
6 most effective operating efficiency. However, the  
7 noise mitigation report, which follows this selected  
8 redesign plan, does not satisfactorily address the

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9 noise concerns for the city's residents. In fact,  
10 there is an increase in airplane noise of between 10  
11 to 20 DNL throughout the entire part of the city.

12 What makes matters worse is that the  
13 FAA makes numerous assumptions and derives many  
14 conclusions about noise and its impact over the City  
15 of Elizabeth. Unfortunately, the city will have  
16 great difficulty in refuting many of these  
17 outrageous claims because the FAA has either failed  
18 to include any of its analytical data and maps or  
19 just plain erred.

20 It is difficult for individuals  
21 directly and adversely impacted by this alternative  
22 to truly understand the information offered by the  
23 FAA as fact when no supportive information can be  
24 offered.

25 There are no noise impact graphs, which  
0008

1 apparently demonstrate decreases in noise from the  
2 previously stated information in the DEIS, available  
3 for review by the public who are the impacted  
4 parties in this issue.

5 If the data that is presented through  
6 the FAA's conclusive statements is accurate and  
7 exists, why can it not be provided to the public? I  
8 am sure the FAA would not appreciate city residents  
9 drawing any conclusions without adequate backup data  
10 or information.

11 Therefore, I am respectfully requesting  
12 that backup data and analysis, as stated within the  
13 FAA's conclusions, be provided to all impacted  
14 municipalities.

15 Operating under a number of  
16 assumptions, the FAA continues to make elaborate  
17 plans that depend on the ICC. However, funding to  
18 update the air traffic control operating efficiency  
19 has not been adequately identified.

20 Receipt of several billion dollars in  
21 funding has been assumed by the FAA in order to  
22 ensure that the ICC is a success and intricate plans  
23 have been laid with the ICC at its core.

24 What will occur if its funding stream is  
25 not secured and the ICC does not materialize?  
0009

1 The FAA has built elaborate plans on  
2 mere assumptions, which may not come to fruition  
3 and, therefore, unraveling the overall plan yielding  
4 operating inefficiency and negatively impacting all  
5 involved.

6 The alternative chosen with the ICC  
7 component will not only produce the most  
8 inefficiency if funding is not secured, but will  
9 also result in the greatest noise level for  
10 residents within the City of Elizabeth.

11 The increased noise level will be  
12 coupled with years of disruption and noise from air  
13 traffic traveling over the City of Elizabeth and  
14 from Newark Liberty International Airport.

15 The Noise Mitigation Report that was  
16 dated April 6, 2007 provided commendable information  
17 which demonstrated a decrease in the current noise  
18 level.

19 However, the alternative that was

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20 chosen has the overall highest noise content, which  
21 is contrary to the intent and purpose of noise  
22 mitigation.

23 In addition, although there is a  
24 mitigated preferred alternative offered for J. F. K.  
25 and LaGuardia airports, there appears to be no

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1 demonstration of a Newark Liberty International  
2 Airport mitigated preferred alternative.

3 The City of Elizabeth concurs with the  
4 Port Authority of New York and New Jersey to the  
5 extent that the FAA must look at expanding the  
6 Newark Airspace to the east to allow Newark  
7 controllers to run arrivals or departures along the  
8 Hudson corridor.

9 This would greatly improve the  
10 efficiency of Newark Liberty International Airport  
11 and reduce conflict with Teterboro Airport traffic.  
12 It would also provide much needed noise relief in  
13 the area around the airport.

14 Currently LaGuardia Airport traffic  
15 occupies the Hudson River corridor. If these  
16 aircraft are shifted east, there may be additional  
17 benefits achieved by sequencing over the Long Island  
18 Sound.

19 What is more disturbing is that the FAA  
20 has not even addressed the city's viable  
21 environmental justice claims.

22 The FAA fails to address the  
23 environmental impact on residents throughout the  
24 City of Elizabeth. While the FAA has decreased the  
25 noise level only slightly for highly impacted urban

0011  
1 impoverished areas from ridiculously high to a level  
2 that is still well above the normal accepted level,  
3 they have increased the surrounding areas in the  
4 city from well below to well above acceptable  
5 levels.

6 In addition, the FAA has proposed  
7 re-instating the fanning flight plans, which were  
8 utilized in the 1950's.

9 Historically speaking, the straight-out  
10 departures from Newark Liberty International Airport  
11 were the standard procedure until they were banned  
12 in the early 1950's after three horrific airplane  
13 crashes occurred within the City of Elizabeth.  
14 These accidents took the lives of both individuals  
15 on the aircrafts, as well as on the ground.

16 In 1951, Miami Airlines C-46 crashed  
17 into the Elizabeth River killing 56 people. In  
18 1951, American Airlines Convair crashed into  
19 Elizabeth killing seven residents and 23 individuals  
20 on the plane. In 1952, National Airlines DC-6  
21 crashed in the City of Elizabeth killing 26 people.

22 These tragedies were directly related  
23 to the straight-out fanning departures which are  
24 being proposed once again in 2007. This practice  
25 has proven to be unsafe and dangerous to air traffic

0012  
1 control as well as to residents living within the  
2 flight paths.

3 The straight-out departures place  
4 residents at risk and create a potentially

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5 devastating situation for tragic accidents to once  
6 again occur.

7 With critical historical events such as  
8 this, why would the FAA subject the City of  
9 Elizabeth to increased risk?

10 The city does not and will not support  
11 plans and that severely, deliberately and adversely  
12 impact the residents of the City of Elizabeth.

13 The initial infrastructure of Newark  
14 Liberty International Airport was not constructed to  
15 support the increased air traffic and large  
16 aircrafts which are consistently arriving and  
17 departing from this location.

18 Newark Liberty International Airport  
19 has virtually reached its maximum capacity and must,  
20 therefore, take some responsibility for the growth  
21 and expansion of the industry.

22 This plan ignores environmental justice  
23 issues and disregards the profound negative noise  
24 impact on the residents of Elizabeth.

25 Furthermore, this plan drastically

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1 impacts the large urban minority and low income  
2 population of the City of Elizabeth.

3 The FAA needs to effectively address  
4 the measure of environmental justice as it relates  
5 to this segment of the population in Elizabeth.  
6 Yet, the FAA continues to act in a deplorable  
7 fashion by not highlighting these issues and  
8 providing worthy solutions.

9 With an expected increase of more than  
10 40 percent in airplane traffic throughout the  
11 tri-state area over the next ten years, the  
12 residents of the city implore the FAA to ensure that  
13 a responsible and quality environmental justice  
14 course be of action be developed.

15 These critical concerns must be  
16 addressed in an effort to remedy the deteriorating  
17 quality of life that will result from increased  
18 noise pollution.

19 The millions of dollars the FAA is  
20 spending to minimize delays is ridiculous. The  
21 minutes saved do not and can not justify the expense  
22 and noise. After all, the FAA is forcing our  
23 community to hire an expert at taxpayer expense for  
24 eventual court proceedings in order to protect the  
25 city's interests.

0014

1 Environmental justice is for the people  
2 living around the airports, not so the FAA and  
3 airlines can save a few minutes and fuel.

4 I would like to thank Senators  
5 Lautenberg and Menendez, Congressman Payne, the  
6 Union County Board of Chosen Freeholders and the  
7 City Council of Elizabeth for their public support  
8 in opposition of this plan furthered by the FAA  
9 which would increase airplane noise over the City of  
10 Elizabeth.

11 From the legislature and local  
12 government to the residents of impacted  
13 municipalities, opposition for this plan continues  
14 to increase; although the FAA presses on with their  
15 adversely impacting course of action.

Page 5

Untitled

16 Doesn't the FAA think it means  
17 something when two U.S. Senators, Members of  
18 Congress and hundreds of thousands of people say you  
19 have a bad idea?

20 When is the FAA going to start  
21 listening and to whom? Obviously the FAA won't  
22 listen to our senators, legislators, representatives  
23 and the residents who are directly impacted, so who  
24 will it take?

25 Will the FAA wait for more disasters to  
0015

1 occur, such as the ones in Elizabeth during the  
2 1950s, before the appropriate action is taken?

3 The City of Elizabeth will not sit idle  
4 while the FAA displays a blatant disregard for the  
5 residents of our city and continues to take  
6 advantage of an already crucial situation.

7 The FAA has chosen a plan which has had  
8 devastating effects almost 50 years ago. There  
9 should be a successful progression of ideas and  
10 procedures, not repeating past mistakes and  
11 perpetuating current problems.

12  
13

9 Hilton Woodcliff Lake  
200 Tice Blvd  
Woodcliff Lake, New Jersey 07677-9998

10

11 Thursday, June 28, 2007  
Commencing at 6:30 p.m.

Senator Gerald Cardinale 39th District  
306 Hardenbergh Avenue  
Demarest, New Jersey 07627

22 SENATOR CARDINALE: I represented  
23 the people of this district for 27 years in the  
24 state legislature. I have never seen a public  
25 meeting that drew this much attention from the  
1 residents or this number of people we have well over  
2 1000 people. I know that you had a meeting last  
3 night in Camden and the reports I've heard are there  
4 were approximately 100 people at that meeting. The  
5 sheer numbers alone ought to impress you with the  
6 kind of impact that this proposal will have on the  
7 quality of life of the residents of Bergen County.  
8 Bergen County is the life blood of the states  
9 income. If we devalue this portion of our state  
10 will do very, very serious damage to the entire  
11 economy of New Jersey and the ability of the state  
12 to meet it's budgetary needs. That's the financial  
13 aspect of it. But people have moved to this area  
14 because of the kind of quality of life it offers to  
15 them and to their children.

16 This proposal seriously threatens  
17 that. I understand the responsibility of the public  
18 official I've been one for most of my life, but you  
19 must understand that those responsibilities are more  
20 then to the immediate task at hand. As a public  
21 official you must understand the bigger picture.  
22 The totality of the impact that you have, not the  
23 impact simply on flight delays. I am begging you  
24 and I am imploring you to take another look. I know  
25 you have a preferred alternative but that preferred  
1 alternative does not fit the total picture of the  
2 needs of the people of New Jersey, please  
3 reconsider.

007882

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**From:** lactman@selectgreaterphila.com  
**Sent:** Wednesday, May 09, 2007 10:13 PM  
**To:** Nagendran, Ram  
**Subject:** Comment on Noise Mitigation Procedures for the Preferred Alternative

- **Last Name:** Actman
- **First Name:** Laurie
- **Email Address:** lactman@selectgreaterphila.com
- **Street Address:** 200 South Broad St., Suite 700
- **City:** Philadelphia
- **State:** Pennsylvania (PA)
- **Zip Code:** 19102

**Comments:**

**STATEMENT FROM CEO COUNCIL FOR GROWTH ON FAA AIRSPACE RE-DESIGN:**

In today's global economy, having a world class airport is essential. Throughout history, commerce has occurred where trade routes cross; in the 21st century, that means airports.

Philadelphia International Airport is a critical driver of our regional economy that also provides very real benefits to local communities. Tens of thousands of jobs rely upon the airport. The ability to easily travel in and out of the region is a significant factor for professionals doing business, and for residents seeking convenience.

The CEO Council for Growth supports efforts to improve and expand the region's major infrastructure assets and, we support the FAA's decision to redesign airspace along the eastern half of the United States. This area is the most complex and densely traveled airspace in the world. Travelers in and out of Greater Philadelphia will benefit from better air traffic flows, as will people traveling to and from Boston, Washington and New York.

However, we also want to make sure that the costs of redesign are worth the regional benefits. We commend the FAA for listening to the concerned citizens of Delaware County and other communities, resulting in significant mitigation of the proposed headings over the County from six to three. We are committed to working with the FAA and regional stakeholders to help in implementing this as efficiently as possible while preserving quality of life and improving regional economic competitiveness.

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This email was generated automatically by the following page:

[http://www.faa.gov/airports\\_airtraffic/air\\_traffic/nas\\_redesign/regional\\_guidance/eastern\\_reg/nynjphl\\_redesign/noise\\_mitigation\\_comments/](http://www.faa.gov/airports_airtraffic/air_traffic/nas_redesign/regional_guidance/eastern_reg/nynjphl_redesign/noise_mitigation_comments/)

006538

5/11/2007

**Mayor Cook  
Borough of Prospect Park  
720 Maryland Avenue  
Prospect Park, PA 19076**

April 24, 2007

Mr. Steve Kelley, FAA  
c/o Ram Nagendran  
12005 Sunrise Valley Drive, MS C3.02  
Reston, VA 20191

Dear Mr. Kelley,

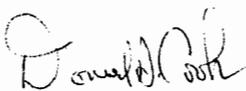
On behalf of Prospect Park Borough Council and myself, I am writing to re-emphasize our strong opposition to your agency's Airspace Redesign at the Philadelphia International Airport.

We strongly oppose your plan to alter flights at low altitudes with increased noise levels over Prospect Park and neighboring communities in Delaware County.

As you know, most flight delays are caused by weather and mechanical failures. I believe your proposed flight changes would have minimal impact on the flights at Philadelphia International, but at the same time would cause problems to our residents. Your significant noise level increases, safety factors of low flying aircraft over our businesses, houses, and schools will cause the people that live, work and attend school here undue harm on a daily basis!

Again, I emphasize that all of our local officials strongly oppose the FAA Airspace Redesign at Philadelphia International Airport.

Sincerely,



Donald A. Cook  
Mayor

Cc: Prospect Park Borough Council  
Congressman Joe Sestak  
County Council President, Andy Reilly

006003



## BOROUGH of YEADON

Church Lane and Baily Road

P.O. Box 5187

Yeadon, PA 19050

Offices: 610-284-1606 • Fax: 610-284-2138

May 1, 2007

Steve Kelly, FAA  
C/o Ram Nagendran  
12005 Sunshine Valley Drive, MS C3.02  
Reston, VA 20191

Dear Mr. Kelly:

I am writing on behalf of Yeadon Borough Council and the residents of Yeadon to formally register our strong opposition to the Federal Aviation Administration's plans to direct flights from Philadelphia International Airport over Yeadon and other Delaware County communities.

Yeadon residents are already adversely affected by air traffic over our borough. There are times when one can almost reach-up with a long pole and touch the belly of an airplane flying overhead. It is only a matter of time before a plane flying at too low an altitude will crash into a residence or business in Yeadon. Or, even worse will crash into a group of children playing in the park or on one of our ball fields.

The noise from planes flying over Yeadon now is almost deafening. What are we to expect if you are permitted to implement your new proposed flight plan? How will the environment in which our children and we live be impacted?

Additional planes "fanning" over our community will mean increased noise and air pollution, and increased risk of planes crashing into buildings or into human beings. Our residents will no doubt experience increased unexplained illnesses and lack of sleep. In addition, the "fanning" of additional planes will have a negative impact on the quality of the recreational lives of our residents.

While the Federal Aviation Administration may not feel any responsibility for the health, welfare, and well being of our adult citizens and our children, we do!!

We are deeply grateful that our president of Delaware County Council, Andrew J. Reilly and Congressman Joseph Sestak have taken a strong stand on behalf of the residents of Delaware County. We pledge to stand behind them and support their efforts until justice is done for our communities.

Very sincerely yours,

Isaac L. Dotson III  
President, Yeadon Borough Council

006008



## Town of Fairfield

Office of the First Selectman  
Fairfield, Connecticut 06824

**Kenneth A. Flatto**  
First Selectman

**Sullivan Independence Hall**  
725 Old Post Road

May 3, 2007

Mr. Steve Kelley, FAA  
c/o Ram Nagendran  
12005 Sunrise Valley Drive, MS C3.02  
Reston, VA 20191

Dear Mr. Kelley,

We appreciate the FAA holding a noise mitigation workshop last week in Stamford, Connecticut. On behalf of the Town of Fairfield's residents, I would like to encourage the FAA to curtail the proposed number of increased flights coming through our area for both environmental and noise purposes.

Quality of life and preservation of town character is very important to Fairfield's residents. The town is already facing environmental concerns because of high rates of smog (Connecticut is one of the worst in the country) and asthma, along with pollutants from severe traffic congestion on our highways (I-95) and local roads.

Fairfield has worked very hard to take positive measures to acquire and preserve passive open spaces and reduce school bus emissions through a Federal EPA grant we received last summer. We have also created Clean Energy, Town Green, Earth Day and Forestry Committees to promote more environmental awareness and helpful practices. We have one of the best wastewater treatment plants in the state that helps keep our Long Island Sound clean. It would be a shame for increased air travel in our area to further impact the environment.

We hope the FAA will reduce some of the proposed number of increased flights coming through our area.

Thank you very much for your consideration and your efforts to keep us informed.

Yours truly,

Kenneth A. Flatto  
First Selectman

006728

# Comment Form

FAA AIRSPACE REDESIGN  
NY/NJ/PHL Metropolitan Area Airspace Redesign Project  
Noise Mitigation Meetings

Submit your comments on Noise Mitigation Procedures for the Preferred Alternative.

Comment form must be submitted today

Please print clearly

Thank you!

Date 6/28/07

Please Circle the Meeting Location:

Cherry Hill, NJ

Woodcliff Lakes, NJ

*Orange Co. NJ*

Mr.    Mrs.    Ms.    Dr.    Title   

First Name LINDA

Last Name FRANCIS

Affiliation/Organization/Agency WARWICK attending for Warwick Department  
Michael Sweeton

Street Address 87 Pines Swale Rd

City Warwick

ST NY ZIP 10990

Phone # 845-9861929

Email Address LINDRON@WARWICK.NET

Comment (only comments on the Mitigation and Preferred Alternative)

We demand that you send someone to assess the noise levels we are experiencing: your figures are incorrect! Newark has grown 20% since 2006 and you are only projecting only a 20% increase in traffic in 2011. False assumptions from the beginning. Kennedy has increased ~~to~~ 27% this year. Your figures are incorrect. We demand a reevaluation of our area.



630 Bedford Road  
Sleepy Hollow, New York 10591  
(914) 333-0102  
E-mail: friends@friendsrock.org  
www.friendsrock.org

May 4, 2007

Steven Kelley, FAA-NAR  
c/o Nessa Memberg  
12005 Sunrise Valley Drive, MS C3.02  
Reston, VA 20191

U.S. Department of Transportation  
Federal Aviation Administration  
800 Independence Avenue  
Washington, D.C. 20591

### Comments on NY-NJ-PHL Integrated Airspace Redesign

Friends of the Rockefeller State Park Preserve, Inc. is a not-for-profit support organization dedicated to the preservation and enhancement of the Rockefeller State Park Preserve as a natural area and a significant public amenity. The Park Preserve is owned by the State of New York, and is a "park preserve" under the New York State parkland classification scheme, dedicated to walking, carriage driving, horseback riding, fly fishing, bird watching, photography, family fishing and winter cross-country skiing. Formerly part of the John D. Rockefeller estate, it is a park of national, state and local significance. This comment letter addresses the FAA's proposed "mitigated preferred alternative" departure corridor as described in the FAA's April 6, 2007 Noise Mitigation Report ("FAA Proposal") insofar as it addresses departures and landings at the Westchester County Airport ("HPN").

The FAA Proposal will concentrate approximately 75% of the departures from HPN in a narrow corridor running to the northwest that encompasses the area lying between the intersections of Route 448 and Lake Road, Route 448 and Route 117, and proceeding northwest encompassing the area between Route 117 and Sleepy Hollow Road to the intersection of Sleepy Hollow Road and U.S. Route 9 and across Route 9 to the Hudson River. See, New York/New Jersey/Philadelphia Metropolitan Airspace Redesign Draft EIS, Noise Mitigation Report, Figure 31. The Noise Mitigation Report clearly states that there will be an increase in noise levels within this area. *Id.*, Figure 32 and associated tables. The Park Preserve is situated directly under the FAA's proposed departure corridor as it proceeds north and west of the Saw Mill Parkway. In fact the corridor nearly perfectly encompasses the entirety of the more than 3000

006009  
1 of 6

*Comments on NY-NJ-PHL Integrated Airspace Redesign by  
the Friends of the Rockefeller State Park Preserve, Inc.  
May 4, 2007*

acres of land that comprises the Park Preserve from its eastern boundary near the Saw Mill Parkway to the Hudson River. *See the attached map of the Park Preserve lands and Exhibits 31 and 32 from the Airspace Redesign Draft EIS Noise Mitigation Report.* Based on current data, fixed wing aircraft will overfly the Park Preserve at elevations of between 3000 feet and 6000 feet, and, based on the FAA's noise impact analysis contained in the DEIS, will generate noise levels in the 60-65 DNL range. Instantaneous noise impacts, which the FAA's DNL noise matrix does not recognize, will be at significantly higher decibel levels.

The Park Preserve was established to provide a quiet, natural environment for walking, picnicking and horseback and carriage driving. Within the New York State park system, the "park preserve" classification restricts public activities to passive enjoyment of the natural amenities provided by the parkland. There is no question that the impact of clustering most of the departures from HPN over the Park Preserve will adversely impact it and the members of the public, including members of the Friends, who use the Park Preserve, effectively destroying the ambience of the Park Preserve.

The FAA must comply with Section 4(f) of the Department of Transportation Act, 49 U.S.C. § 303 with respect to the proposed action. It is settled law that aircraft routing decisions by the FAA that can have a serious indirect noise or other impact on protected park land constitutes a "constructive use" that requires compliance with the restrictions of Section 4(f). 23 C.F.R. § 771.135(p)(1)(iii) (2000); Morongo Band of Mission Indians v. Fed. Aviation Admin., 161 Fed. 3d 569, 583 (9<sup>th</sup> Cir. 1998). In order for the FAA to avoid the strictures of §4(f) it must make a factually supported finding that the increase in overflight impacts on the protected area is *de minimis*. Adler v. Lewis, 675 F.2d 1085, 1092 (9<sup>th</sup> Cir. 1982), Save Our Heritage, Inc., et al. v. Federal Aviation Administration et al., 269 F.3d 49 (1<sup>st</sup> Cir.2001).

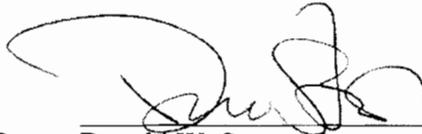
In this case the FAA's own FEIS demonstrates that the impact of the proposed redesign on the Rockefeller State Park Preserve will quite clearly not be *de minimis*. Under current ("no action") conditions less than one-third of the aircraft exiting HPN fly over some portion of the Park Preserve's airspace. Few aircraft fly over the entirety of the Park Preserve. See, New York/New Jersey/Philadelphia Metropolitan Airspace Redesign Draft EIS, Noise Mitigation Report, Figure 30 and underlying data. The redesign will nearly triple the number of aircraft flying over the Park Preserve at low altitude, and those overflights will encompass the *entirety* of the land of the Park Preserve, instead of only portions of it as is the existing conditions case.

Thus, the FAA may not adopt the preferred alternative airspace redesign for HPN unless it finds that "there is no prudent and feasible alternative" to use of the airspace over the Park Preserve. We submit that the FAA can not make this finding. The original "preferred alternative", depicted on Figure 31 of the Noise Mitigation Report, met the underlying airspace management criteria and shifted the concentrated corridor to the north and east of the Park Preserve. This remains a prudent and feasible alternative to the use of sensitive parkland.

*Comments on NY-NJ-PHL Integrated Airspace Redesign by  
the Friends of the Rockefeller State Park Preserve, Inc.  
May 4, 2007*

Shifting low level overflights from populated areas to parkland is simply not a strategy that is consistent with the underlying purpose of Section 4(f).

Friends of the Rockefeller State  
Park Preserve, Inc.

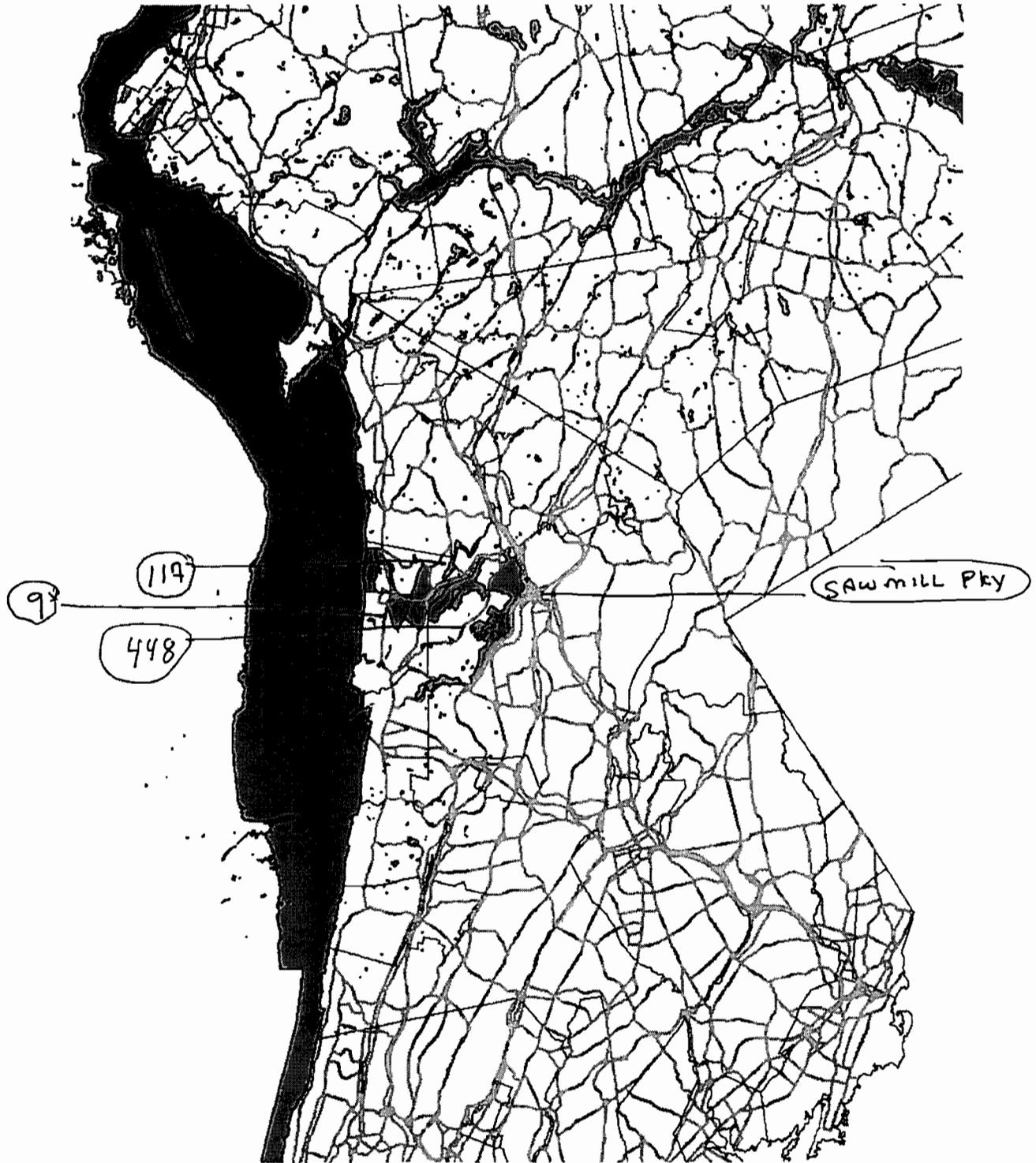


By: Donald W. Stever, Secretary of the Corporation  
On behalf of the Board of Directors

cc: Carol Ash, Commissioner  
New York State Department of Parks, Recreation and Historic Preservation  
Empire State Plaza  
Agency Bldg. 1  
Albany, NY 12238

Westchester County Deputy Commissioner of Transportation Henry J. Stanton  
Westchester County Environmental Project Director Robert Funicello  
Westchester County Airport Noise Abatement Officer John Inserra

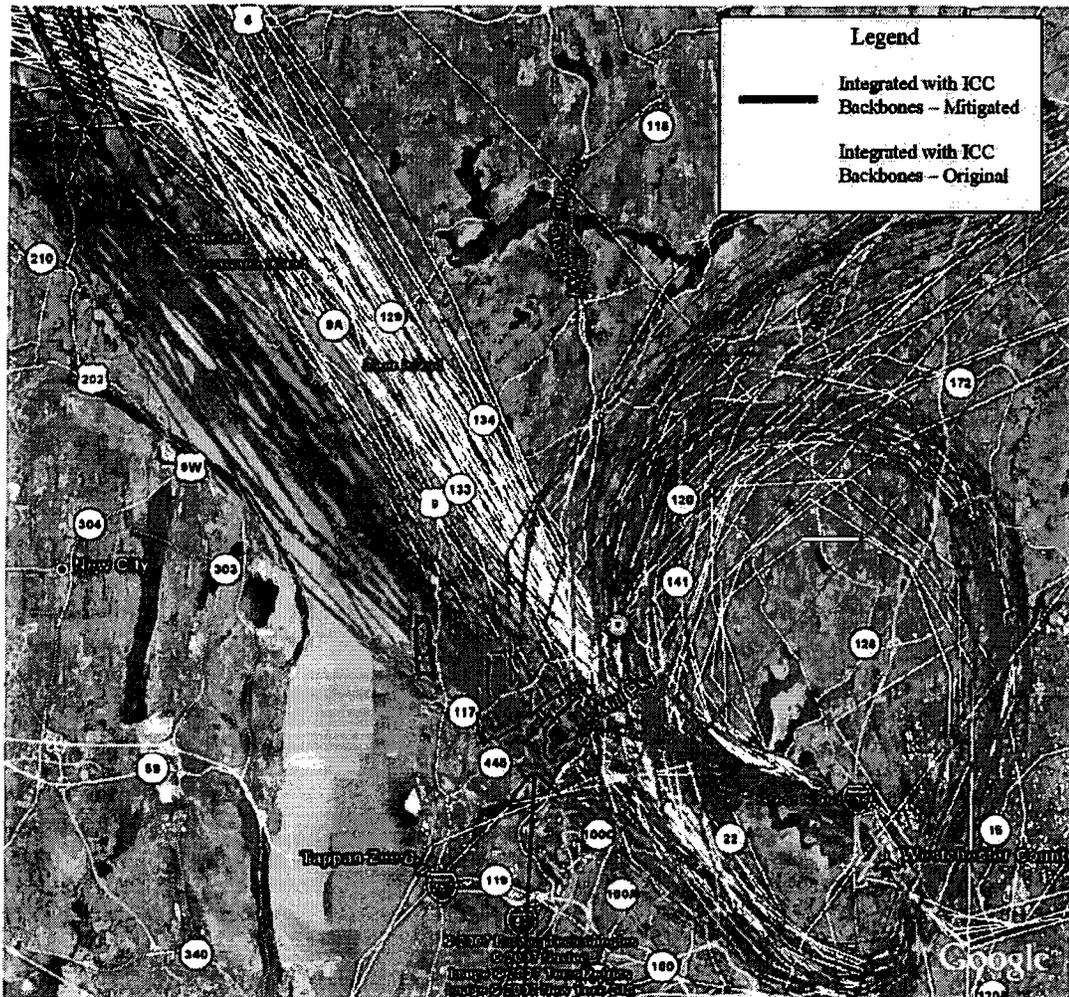
# Rockefeller State Park Preserve



1 0 1 2 3 4 5 Miles

## Legend

- |   |                          |   |                                 |
|---|--------------------------|---|---------------------------------|
|  | Westchest Municipalities |  | Major Roads                     |
|  | Surface Waters           |  | Rockefeller State Park Preserve |



**Figure 31: HPN Preferred Alternative Departures – Mitigated vs Original**

Figure 32 shows the geographic details of how mitigation would potentially affect the population experiencing noise impacts surrounding near HPN. A satellite image shows HPN and the surrounding area. The semi-transparent colored map overlaying the area uses a color gradient to convey the difference in noise levels between the mitigated version of the Preferred Alternative and the original version of the Preferred Alternative. This color gradient map directly illustrates how much influence the mitigation strategies would have on the Preferred Alternative. Note that the yellow centroid shown in Figure 31 is no longer present as a result of the mitigation package.

APPROXIMATE LOCATION OF  
ROCKEFELLER STATE PARK PRESERVE



# HPN Mitigation Results



Original Preferred Alternative



Population Impact Change Analysis Summary - Original Preferred Alternative 2011

Level of Impact	Noise Increases			Noise Decreases		
	Change	Resulting In	Estimated Pop.	Change	From Level	Estimated Pop.
Significant	1.5+ DNL	65+ DNL	0	1.5+ DNL	65+ DNL	0
Slight to Moderate	3.0+ DNL	60-65 DNL	0	3.0+ DNL	60-65 DNL	0
Slight to Moderate	5.0+ DNL	45-60 DNL	40	5.0+ DNL	45-60 DNL	0

Mitigated Preferred Alternative



Population Impact Change Analysis Summary - Mitigated Preferred Alternative 2011

Level of Impact	Noise Increases			Noise Decreases		
	Change	Resulting In	Estimated Pop.	Change	From Level	Estimated Pop.
Significant	1.5+ DNL	65+ DNL	0	1.5+ DNL	65+ DNL	0
Slight to Moderate	3.0+ DNL	60-65 DNL	0	3.0+ DNL	60-65 DNL	0
Slight to Moderate	5.0+ DNL	45-60 DNL	0	5.0+ DNL	45-60 DNL	0

SCOTT GARRETT  
5TH DISTRICT, NEW JERSEY

FINANCIAL SERVICES COMMITTEE  
FINANCIAL INSTITUTIONS SUBCOMMITTEE  
OVERSIGHT SUBCOMMITTEE  
BUDGET COMMITTEE

1318 LONGWORTH HOUSE OFFICE BUILDING  
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FAX: (201) 712-0830

93 MAIN STREET  
NEWTON, NJ 07860  
(973) 305-2600  
FAX: (973) 300-1051

**Congress of the United States**  
**House of Representatives**  
**Washington, DC 20515-3005**

FAA - 070514 - 003 SA

May 11, 2007

Ms. Marion Blakey  
Administrator  
Federal Aviation Administration  
800 Independence Avenue, SW  
Washington, DC 20591

Dear Ms. Blakey:

I am writing to express my deep concern about the FAA's New York/New Jersey/Philadelphia Airspace Redesign proposal. As you are aware, I represent the citizens of the Fifth District of New Jersey where residents of Bergen and Sussex Counties could be adversely affected by the rerouting of air traffic to and from Newark International Airport.

I appreciate the difficult task that the FAA had in trying to mitigate the impact of changing routes, but I am concerned that the current plan does not accomplish this and will in fact disrupt communities which previously were not affected by air noise. Increases in noise in these communities could lead to devaluation of property affecting home sales and community services and generally degrades the quality of life in these quiet suburban communities.

There is great concern that the altitude increases planned to mitigate noise over northern New Jersey will not be as successful as indicated in the mitigation report. Also there are continuing concerns that Continuous Descent Approach (CDA) is a strategy which remains untested and may not be feasible in the New Jersey airspace. I ask that you make available all data in regard to these calculations so that it can be held up to public scrutiny.

The citizens of the Fifth District have invested significant time and money on homes in quiet suburban and rural areas. The quality of life in these tranquil communities must not be overlooked in this process and I ask again that the FAA consider noise as a primary factor as it continues to work toward a final airspace redesign.

I also wish to reiterate my request for a public meeting in the impacted areas in North Bergen County. The residents of this area are amongst the most severely affected, yet they have had limited opportunities to voice their concerns to the FAA. I appreciate your office's verbal assurance of a meeting with local elected officials and look forward

007006

10/3  
(incl cover sheet)

to setting the date and time for that meeting. But I also again ask for a similar opportunity for the residents of these communities.

Thank you for your attention to this matter. Please contact me or my Legislative Assistant, Andrew Wimer, at (202) 225-4465 if you have any questions or a response to my thoughts.

Sincerely,

A handwritten signature in black ink that reads "Scott Garrett". The signature is written in a cursive, flowing style.

Scott Garrett  
Member of Congress

ESG/apw

# FAX COVER SHEET

ACR-3 LOG IN  
5-14-07



## CONGRESSMAN SCOTT GARRETT

WASHINGTON DC OFFICE

1318 LONGWORTH HOB

WASHINGTON, DC 20515

PHONE: 202-225-4465

FAX: 202-225-9048

TO: FAA Legislative Affairs

FAX #: (202) 267-8210

- FROM:
- Congressman Scott Garrett
  - Michelle Presson, Chief of Staff
  - Will Holley, Press Secretary
  - Chris Russell, Legislative Director
  - Laurel Edmondson, Scheduler
  - Matt Turkstra, Senior Legislative Assistant
  - Andrew Wimer, Legislative Assistant
  - Stacey Forbes, Legislative Assistant
  - Rachel Houston, Staff Assistant

DATE: 5/11/2007

PAGES: 3

REMARKS: Airspace Redesign comment

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/O=NG/OU=VA004/CN=SYSCON/CN=NAGENDRAN RAM1BD6CDF1

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**From:** vinceg1@comcast.net  
**Sent:** Tuesday, May 08, 2007 12:34 PM  
**To:** Nagendran, Ram  
**Subject:** Comment on Noise Mitigation Procedures for the Preferred Alternative

- **Last Name:** Giovannitti
- **First Name:** Councilman Vincent
- **Email Address:** vinceg1@comcast.net
- **Street Address:** 419 Jefferson Street
- **City:** Gibbstown
- **State:** New Jersey (NJ)
- **Zip Code:** 08027

**Comments:**

Please reconsider your plans for your preferred alternative. It will be such a negative impact on Gibbstown. We're struggling now, the added noise will be just another reason for people and businesses not to move to gibbstown.  
councilman vincent giovannitti

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This email was generated automatically by the following page:  
[http://www.faa.gov/airports\\_airtraffic/air\\_traffic/nas\\_redesign/regional\\_guidance/eastern\\_reg/nynjphl\\_redesign/noise\\_mitigation\\_comments/](http://www.faa.gov/airports_airtraffic/air_traffic/nas_redesign/regional_guidance/eastern_reg/nynjphl_redesign/noise_mitigation_comments/)

006714

9 Hilton Woodcliff Lake  
200 Tice Blvd  
Woodcliff Lake, New Jersey 07677-9998

10

11 Thursday, June 28, 2007  
Commencing at 6:30 p.m.

12

6 Peter Gonzales 8  
41 Buena Vista Way  
7 Bloomingdale, New Jersey 07403

22 MR. GONZALES: Speaking as a  
23 representative of Mors Lake Property Owners  
24 Association and Lake Iasco consisting of more than  
25 250 homes we oppose the current flight patterns that  
0009

1 have been initiated in the past eight months and  
2 feel that there are more viable alternatives out  
3 there that have not been properly evaluated, such as  
4 ocean routing and the further expansion of Stewart  
5 Airport and Atlantic City Airport.

007855

22 Holiday Inn Select  
12 700 East Main Street  
13 Stamford, Connecticut  
14 April 24, 2007  
15 Commencing at 6:30 p.m.

23  
24  
25  
0003

1 MS. GRUVER: I am the Vice  
2 President of New Canaan Environmental Group. I  
3 am opposed to the FAA's integrated airspace  
4 alternative proposal for a number of reasons,  
5 primarily environmental, since I am Vice  
6 President of the New Canaan Environmental Group.  
7 I think they should be thinking more along the  
8 lines that physicians do with the Hippocratic  
9 oath, saying first do no harm.

10 I think there were many other  
11 options that weren't investigated in as much  
12 detail as the one they seem to prefer and that  
13 seems to have snowballed so far along. I don't  
14 understand why the modifications to the existing  
15 airspace hasn't been considered as strongly as  
16 the integrated airspace alternative, frankly, in  
17 that regard, not changing the current airspace  
18 system, such as the modifications to the  
19 existing airspace allows for the people who are  
20 used to living with the airplane noise who,  
21 frankly, bought their houses sometime in the  
22 last 50 years while the current airplanes were  
23 making noise in that area to continue  
24 experiencing what they are accustomed to and  
25 what they certainly got a discount in their

0004

1 housing values for.  
2 Personally, I have moved from one  
3 town to another, Greenwich to North Branford,  
4 now to New Canaan, to escape air traffic noise.  
5 I have paid a premium to do so. Now I truly  
6 believe my housing values will be impacted by  
7 the decision to fly the plains at 58' underneath  
8 over New Canaan.

9 More than that, I am concerned  
10 about the quality of life, the noise pollution  
11 and the air pollution that no one seems to be  
12 talking about, the environmental toll of this  
13 change on Connecticut, on the health impacts of  
14 that, as well as the safety impacts. Let's be  
15 real; a plane can only crash in your town if  
16 it's flying over your town.

17 Connecticut is now being asked to  
18 take all the burdens associated with the New  
19 York airports but not really getting any of the  
20 benefits, such as revenues that the airports  
21 generate and jobs. I think it's kind of being  
22 an unfair neighbor and placing the burden on one  
23 town, while the benefit on the other.

24 And lastly, I wrote a letter. It  
25 was much more cogent, since I am on painkillers

0005

1 right now for my root canal, to the FAA. Sent

2 it to their web site. Had a number of questions  
3 for them, specifically asking for detailed  
4 information comparing all four plans. And the  
5 response I got was a mere, "Go look at our web  
6 site." And I did. And it's not on there. So  
7 they did not answer those specific questions,  
8 nor my own personal questions about housing  
9 values.

10 So I'm actually disappointed that  
11 they asked for public comment. I took the time  
12 to write a letter; and their response to the  
13 letter was, "Look at our web site," which, as a  
14 resourceful citizen, I certainly did before  
15 writing the letter.

16 And in closing, I'd say the vast  
17 majority of New Canaan people are in agreement  
18 that we oppose the integrated air space  
19 alternative. It's going to negatively impact  
20 the quality of life in New Canaan, negatively  
21 effect the prices of houses in New Canaan. I  
22 wonder who is going to pay for that, as well as  
23 impact the environment overall.

24 I think there is quite an uproar  
25 for legal action to be pursued against the FAA

0006

1 on the towns Greenwich, Stamford, New Canaan  
2 Darien, Wilton, Ridgefield. People in those  
3 towns are talking about suing the FAA. Should  
4 be aware of that. These are towns that have  
5 successfully blocked other Federal projects,  
6 such as Super 7 Highway in Wilton and  
7 Ridgefield, Connecticut. And these are the same  
8 people who will probably put the money, time,  
9 effort and legal action into suing the FAA about  
10 this proposal. Thank you.

# Comment Form

FAA AIRSPACE REDESIGN  
NY/NJ/PHL Metropolitan Area Airspace Redesign Project  
Noise Mitigation Meetings

Submit your comments on Noise Mitigation Procedures for the Preferred Alternative.

Comment form must be submitted today

Please print clearly

Thank you!

Date 6-28-07

Please Circle the Meeting Location: Cherry Hill, NJ Woodcliff Lakes, NJ  
Mr.  Mrs.  Ms.  Dr.  Title ENVIRONMENTAL COMM + FORMER COUNCILWOMAN

First Name SONJA Last Name HANLON

Affiliation/Organization/Agency \_\_\_\_\_

Street Address 954 PHYLLIS LANE

City ORADELL ST NJ ZIP 07649

Phone # 201-265-6995

Email Address SONJAHANLON1@AOL.COM

Comment (only comments on the Mitigation and Preferred Alternative) \_\_\_\_\_

THE TITLE OF YOUR PROGRAM IS MIS LEADING. THE NOISE "MITIGATION"  
DOES NOT DESCRIBE THE SITUATION - IT DESCRIBES THE PLAN.  
WE ARE THE MOST DENSELY POPULATED COUNTY IN THE COUNTRY, HIGHEST  
COST OF LIVING. THIS PLAN WILL NEGATIVELY AFFECT OUR SAFETY,  
HEALTH, MENTAL HEALTH, WATER QUALITY, PROPERTY VALUES.  
THE FAA HAS NO RIGHT TO IMPOSE ITS PLANS ON OUR NEIGHBORHOODS.  
LOCAL RULE RULES!

If More Space Is Needed, Please Use Flip Side

007611

June 28, 2007

Steve Kelley  
Federal Aviation Administration  
c/o Ram Nagendran  
12005 Sunrise Valley Drive, MS C3.02  
Reston, Virginia 20191

Robert Belzer, President  
New Jersey Coalition Against Aircraft Noise  
P.O. Box 554  
Scotch Plains, NJ 07076

RE: Harris Miller Miller & Hanson Mitigation Comments

Dear Mr. Kelley:

Please accept the attached comments prepared by Harris Miller Miller & Hanson for Westchester County dated June 22, 2007.

Yours truly,



Robert Belzer

Cc: Robert Funicello, Westchester County

007590  
1 of 13



# HARRIS MILLER MILLER & HANSON INC.

77 South Bedford Street  
Burlington, MA 01803  
Tel. (781) 229-0707  
Fax (781) 229-7939  
W www.hmmh.com

## MEMORANDUM

---

**To:** Robert Funicello, Westchester County

**From:** Ted Baldwin and David Crandall

**Date:** June 22, 2007

**Subject:** Review of Revised Noise Analysis and Mitigation Report for New York / New Jersey / Philadelphia Metropolitan Airspace Redesign Draft Environmental Impact Statement with Respect to Westchester County

**Reference:** HMMH Project 301630

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### 1. INTRODUCTION AND BACKGROUND



Harris Miller Miller & Hanson Inc. (HMMH) is assisting Westchester County, New York in its review of the Federal Aviation Administration (FAA) analyses related to the New York / New Jersey / Philadelphia Metropolitan Airspace Redesign. Our assistance focuses on potential noise effects on residents in the environs of Westchester County Airport (HPN) – including residents in the County and neighboring jurisdictions. Those noise effects may result from changes in operations at HPN or other airports affected by the redesign.

#### 1.1 Previous HMMH Analyses

A preceding HMMH memorandum, dated June 8, 2006, summarized the results of our analysis of the FAA's Draft Environmental Impact Statement ("DEIS") for the airspace redesign project.<sup>1</sup> That memorandum presented the following primary conclusions and recommendations:

- \* Predicted changes in noise exposure are likely to be highly detectable.
- \* Actual changes in exposure may exceed FAA's threshold of significance.
- \* Operational changes under consideration would require the County to reevaluate and revise its noise abatement program, noise monitoring locations, and noise contours.
- \* DEIS documentation is insufficient to thoroughly review the proposed action.
- \* Westchester County should request that FAA provide further documentation.

#### 1.2 Scope and Basis of Current Review

This memorandum summarizes our review of five further elements of DEIS-related documentation:

1. *The FAA's April 6, 2007 "Noise Mitigation Report" ("NMR") for the airspace redesign DEIS.*
2. *The April 2007 "Operational Analysis of Mitigation of the NY/NJ/PHL Airspace Redesign," prepared for FAA by the MITRE Corporation ("the MITRE report").*
3. *Information received from FAA in response to the County's comments on the DEIS*

The County submitted the original HMMH memorandum to FAA with its comments on the DEIS.<sup>2</sup> Those comments and other County communications with the FAA led to a meeting at Senator Schumer's office on September 25, 2006. The meeting included representatives of the County, FAA, and other interests; HMMH participated via telephone. A major result of the meeting was an FAA commitment to have its consultant, Landrum & Brown (L&B), provide us with data we needed to further investigate issues of concern to the County. HMMH received

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<sup>1</sup> "Review of New York / New Jersey / Philadelphia Metropolitan Airspace Redesign Draft Environmental Impact Statement with Respect to Westchester County Airport"

<sup>2</sup> The County's comments were presented in a June 22, 2006 letter (with attachments) from the County Executive, Mr. Andrew J. Spano, to Mr. Steve Kelley, FAA's Project Manager for the airspace redesign project.

# HARRIS MILLER MILLER & HANSON INC.

Memorandum to: Robert Funicello, Westchester County  
Review of Revised Noise Analysis and Mitigation Report for Airspace Redesign DEIS

Page 2

June 22, 2007

material from L&B on May 9, 2007 that included input files for the Noise Integrated Routing System ("NIRS") program that FAA used to develop the noise values for the alternatives discussed in the DEIS and NMR. Access to those files permitted HMMH to evaluate the FAA's modeling assumptions, and to conduct limited sensitivity analyses, as discussed in later sections.

#### 4. Data presented on the FAA's DEIS website.

The DEIS website includes detailed tables of NIRS noise modeling results for geographic grids of analysis locations around airports considered in the study.<sup>3</sup>

#### 5. Corrected DEIS noise analyses.

Based in part on HMMH's review of the DEIS, the FAA determined that the DEIS noise analysis included an "anomaly in the modeling of the noise data for the DEIS" that "resulted in an over-estimation of the noise levels." The FAA indicated the anomaly related to the manner in which the model addresses differences between in airport and terrain elevations.<sup>4</sup> The noise-related information presented in the preceding four items reflects those corrected results.



We have not prepared an exhaustive, section-by-section commentary on the NMR. Our review of the NIRS input files focused on "high-level" issues discussed in this memorandum and its predecessor. Our review of noise values was limited to the aircraft noise levels for the unmitigated and mitigated versions of the FAA's Preferred Alternative; i.e., "The Integrated Airspace Alternative Variation with Integrated Control Complex (ICC)," as presented in material discussed above. We have not considered the relationship between ambient and aircraft noise or conducted any independent data collection or analysis.

## 2. GRAPHICAL COMPARISONS OF CHANGES IN NOISE EXPOSURE

The previous HMMH memorandum included two figures that illustrated changes in aircraft-related noise exposure, in terms of Day-Night Average Sound Level (DNL)<sup>5</sup> for forecast operations in the year 2011, for the unmitigated version of the FAA's Preferred Alternative, compared to the 2011 "No Action" Alternative. One figure depicted *absolute* changes in DNL; the second presented changes *relative to impact assessment criteria*.

Figures 1 – 4 appended to this memorandum present the same comparisons for the corrected noise analyses as reported the FAA in May 2007. There are now two sets of comparisons to address the corrected unmitigated results and the mitigated results:

- \* Figure 1: Absolute Change in DNL from 2011 No Action to Integrated Airspace Variation with ICC without Mitigation
- \* Figure 2: Change in DNL Relative to Criteria from 2011 No Action to Integrated Airspace Variation with ICC without Mitigation<sup>6</sup>
- \* Figure 3: Absolute Change in DNL from 2011 No Action to Integrated Airspace Variation with ICC with Mitigation
- \* Figure 4: Change in DNL Relative to Criteria from 2011 No Action to Integrated Airspace Variation with ICC with Mitigation<sup>6</sup>

These figures assist in illustrating major issues discussed in this memorandum.

<sup>3</sup> HMMH downloaded those tables on June 1, 2007 from: [http://www.faa.gov/airports\\_airtraffic/air\\_traffic/nas\\_redesign/regional\\_guidance/eastern\\_reg/nynjphl\\_redesign/noise\\_exposure\\_tables/](http://www.faa.gov/airports_airtraffic/air_traffic/nas_redesign/regional_guidance/eastern_reg/nynjphl_redesign/noise_exposure_tables/)

<sup>4</sup> December 20, 2006 email from Mr. Kelly to Ms. Karen Pasquale of Westchester County; March 21, 2007 letter from Mr. Kelley to Mr. Spano; The NMR also identified this anomaly and correction on page 2 of the NMR.

<sup>5</sup> In simple terms, DNL represents the steady-state noise level that would provide the same cumulative exposure as the actual time-varying noise over the period of interest, with noise between 10 pm and 7 am counted ten times.

<sup>6</sup> Figures 2 and 4 show locations that meet one aspect of the impact criteria and are within one decibel of the other, or that are within one decibel of meeting both criteria for significant impact.

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## 3. PRIMARY CONCLUSIONS AND RECOMMENDATIONS

The following paragraphs summarize our primary comments. These comments raise very complex issues; Section 4 presents additional discussion and graphics to aid in clarifying some of them.

### 3.1 *FAA should compare the Mitigated Preferred Alternative to the No Action Alternative.*

The NMR discussion of noise and operational issues in the HPN environs compared the mitigated and unmitigated versions of FAA's Preferred Alternative.<sup>7</sup> While that comparison is of value in understanding the benefits of proposed mitigation, comparison of the Mitigated Preferred Alternative to the No Action Alternative answers the question of greatest importance to County residents; i.e.: "How will aircraft-related noise exposure change for me if the FAA pursues its proposed action?"

Moreover, FAA Order 1050.1E, "Environmental Impacts: Policies and Procedures," states that noise exposure should be "...compared to the no action alternative for the same timeframe." This is the change that the community would likely experience at the time of implementation. The appended figures provide this comparison; the NMR does not.

There is evidence that the practice of comparing the mitigated and unmitigated versions of the Preferred Alternative has, in fact, confused some members of the public. For example, the NMR showed that noise levels in the area of Rockefeller State Park Preserve would be slightly higher under the Mitigated Preferred Alternative than in the Unmitigated Preferred Alternative.<sup>8</sup> Some commenters misinterpreted this comparison to mean the Preferred Alternative will increase noise relative to the No Action Alternative. However, that is not the case. The predicted noise exposure at the Preserve is approximately the same under the No Action and Mitigated Preferred Alternatives; the Unmitigated Preferred Alternative is slightly less than both of the other alternatives.<sup>9</sup>

### 3.2 *Either the modeling anomaly has not been addressed fully or actual changes in exposure may exceed FAA's threshold of significance.*

Our June 8, 2006 memorandum noted that the predicted change in exposure (for the Unmitigated Preferred Alternative compared to the No Action Alternative) at an analysis location in the HPN environs was within two tenths of decibel of the FAA's threshold of significance. The site is southeast of the airport, under the approach to Runway 34, in the vicinity of the "Belle Faire" development; it is identified as Area A in the figures appended to this memorandum.<sup>10</sup> The FAA explained this situation as an "over-estimation" of noise exposure due to the previously discussed modeling anomaly and they expected the corrected model runs would "...reduce, if not eliminate, many of the 'near-threshold' concerns..."<sup>11</sup>

However, the revised modeling results indicate the increase in noise at this location over the No Action Alternative is just as high as in the original DEIS, for both the mitigated and unmitigated versions of the Preferred Alternative. Our review of information provided by the FAA suggests that there may still be a terrain-related "modeling anomaly" in the HPN environs (and potentially around other study airports). Sections 4.1 and 4.2 discuss this matter further. We recommend the County request further FAA investigation into it. If that investigation indicates the modeling anomaly has been corrected and the noise estimates are correct, it is possible that analyses using a more tightly spaced grid in this area could reveal increases in exposure above impact assessment criteria.

<sup>7</sup> For example, see NMR pages 54 – 58 and Figure 32.

<sup>8</sup> NMR Figure 32. The Preserve falls between Areas C and D on the appended figures.

<sup>9</sup> The levels are predicted to increase in the Preserve under the Mitigated Preferred Alternative relative to the unmitigated version due to proposed mitigation of impacts of HPN departures on residents in the Pleasantville area northwest of the airport, as discussed on pages 54 and 55 of the NMR. This mitigation addresses an increase in noise that the Unmitigated Proposed Action created by rerouting HPN departures slightly north of the existing northwesterly noise abatement route. Sections 3.4 and 4.2 of this memorandum provide additional details.

<sup>10</sup> The DEIS Noise Exposure Tables identify this point as Census Tract 83.02, Census Block 9013, latitude 41.04993 and longitude 73.69322. In the NIRS studies, this location has identifier C361190083029013.

<sup>11</sup> December 20, 2006 email from Mr. Kelly to Ms. Pasquale. Also see footnote 4.

# HARRIS MILLER MILLER & HANSON INC.

### 3.3 *The Mitigated Preferred Alternative reduces noise exposure compared to the Unmitigated Preferred Alternative, but noise increases compared to the No Action Alternative are still likely to be detectable.*

The DEIS considers noise impact (i.e., the increase in noise exposure of a proposed action relative to the no action alternative for the same timeframe) in three categories:<sup>12</sup>

- Significant Impacts: 1.5 DNL minimum increase resulting in 65+ DNL noise exposure, or 1.5 DNL minimum increase where noise exposure already exceeds 65 DNL
- Slight to Moderate: 3 DNL minimum increase resulting in noise exposure between 60 and 65 DNL, or 3.0 DNL minimum increase where noise exposure is already between 60 and 65 DNL
- Slight to Moderate: 5 DNL minimum increase resulting in noise exposure between 45 and 60 DNL, or 5 DNL minimum increase where noise exposure is already between 45 and 60 DNL



Comparison of appended Figures 2 and 4 show that the Mitigated Preferred Alternative eliminates almost all of the noise changes that would exceed, or come close to exceeding, FAA criteria for significant or slight-to-moderate impact in the County and neighboring areas. The primary exception is the modeling anomaly discussed in Section 3.2 and identified in Area A in the appended figures.

However, as shown in Figures 1 and 3, both the unmitigated and mitigated versions of the Preferred Alternative result in large areas around HPN where noise exposure will increase from three to eight (or more) decibels. Taking into account that a three-decibel increase is equivalent to doubling the aircraft-related noise exposure and an eight-decibel change is equivalent to more than a six-fold increase, it is highly likely that residents in many areas will detect the changes, even though they are below impact assessment criteria. While many of the changes are due to operations to and from airports other than HPN, past experience has shown that residents of Westchester County and neighboring Fairfield County, Connecticut, will associate the change with HPN operations. Westchester County should expect negative feedback in response to these changes, if implemented.

### 3.4 *Documentation related to the proposed mitigation of HPN departures is confusing.*

Page 54 of the NMR indicates that the refined noise analysis identified a population centroid northwest of HPN near Pleasantville that “tripped” the FAA threshold for slight to moderate change in exposure between 45 and 60 DNL. Section 15 of the MITRE report describes a proposed Area Navigation (RNAV) procedure to mitigate this impact. The concept is that the more precise guidance provided by an RNAV procedure would concentrate the departures into a narrow band, so that they can be routed west of the area of concern without impinging on the Newark airspace west of the Hudson River. Figure 38, on page 57 of the MITRE report illustrates this proposal; Figures 31 and 32 on pages 57 and 58 of the NMR present related NIRS modeling tracks and changes in noise exposure. These discussions raise several questions:

- The MITRE report and NMR appear to contradict each other with respect to the flight path assumptions. The MITRE report shows the proposed RNAV path exiting the County through its northern boundary, east of the Hudson River and east of the “IAICC Design Paths” (i.e., the paths for the unmitigated preferred alternative). However, the NMR shows the tracks for the mitigated case *over* the river and *west* of the unmitigated tracks.
- The NMR tracks, and the NIRS data, show a relatively high degree of dispersion for both the mitigated and unmitigated cases; this is inconsistent with the tendency of the RNAV procedures to *reduce* dispersion. It is reasonable to model dispersion even in the mitigated case, because not all aircraft and pilots are capable of flying RNAV procedures. However, the documentation should include an analysis of which aircraft can and will likely fly the RNAV procedure and separate plots of the tracks that will be flown by the RNAV and non-RNAV departures.

<sup>12</sup> These definitions are from DEIA Section ES.6.1 (page ES-11). They are based on FAA Order 1050.1E requirements.

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- The FAA should document its commitment to the RNAV procedure more clearly. The NMR (page 56) says that with the mitigation, departure routes "... might be able to be brought back closer to their original locations ..." and the MITRE report (page 57) says "[i]t may be possible to mitigate this noise change by developing an RNAV procedure for the departures." When will this uncertainty be eliminated? When will the procedure be fully developed and implemented; i.e., before the implementation of the Preferred Alternative or after?

### *3.5 Operational changes under consideration would require the County to reevaluate its noise abatement program, noise monitoring locations, and noise contours.*

The preceding items identify a range of issues that illustrate that the Preferred Alternative – with or without mitigation – will result in noticeable changes in noise exposure and flight routes in the HPN environs and noticeable changes in flight routes, particularly for departures. In our opinion, the County would be well-advised to review the HPN noise abatement procedures in detail in light of these changes. The new routes would lead aircraft over areas where existing Remote Monitoring Terminal (RMT) locations do not provide adequate coverage; the County would have to reassess the existing locations, and consider moving and possibly adding RMTs. The changes in exposure would make the most recent noise contours out-of-date, and justify preparation of an updated noise study.<sup>13</sup> These actions would be required to maintain the County's commitment to a responsive and effective noise compatibility program at HPN.

### *3.6 Westchester County should request that the FAA investigate the possibility of reducing the eastward shift of the "Sound Visual Approach."*

The NMR does not address the relatively dramatic shift in this downwind approach to Runway 34, which will relocate flights from the current route, which is largely over Armonk and Greenwich, to the east over Pound Ridge and Stamford. As discussed in Section 4.2, it appears that wide dispersion in the tracks modeled for this approach might permit design of a mitigated route that keeps tracks closer to the existing path.

### *3.7 Westchester County should request that FAA provide further documentation.*

The preceding conclusions, and other issues raised by our review of the DEIS and related material justify a request that the FAA provide further documentation and conduct additional analysis of the proposed action and changes in activity over the County related to the preceding items.

## **4. DISCUSSION**

This section presents expanded discussion of some issues raised in preceding sections.

### **4.1 Potentially Unresolved Modeling Anomalies**

As discussed in Section 3.2, our evaluation of NIRS data provided by L&B suggests that the revised noise analysis may not have corrected all of the modeling anomalies that the FAA identified based on our previous comments. The following example illustrates our concern.

We reran some of the HPN operations data with a 500 foot spaced grid with and without adjustment for surrounding terrain.<sup>14</sup> The following figures present noise modeling results for 2011 HPN mitigated arrivals to Runway 34 with the terrain adjustment feature turned off (top figure) and on (bottom figure).<sup>15</sup> Comparison of the figures suggests that the NIRS model may still be placing the end of HPN arrival tracks below the elevation of receivers, even along the runway itself. Additional reruns, not presented here, suggest that this anomaly applies to all HPN operations in all alternatives.

<sup>13</sup> HMMH assisted TAMS Consultants, Inc. to prepare the 2002 "Westchester County Airport Aircraft Noise Study" that presented noise contours for 1999 and 2005.

<sup>14</sup> We used NIRS 6.0c3 and the FAA provided study NYNJStudy4. The HMMH developed 500 foot grid covered the HPN environs.

<sup>15</sup> NIRS traffic file PIWB\_2011\_nirs\_BB-KHPN\_34\_Arr\_D.nsf.nsf in the NYNJStudy4, scenario PlanIWB2011

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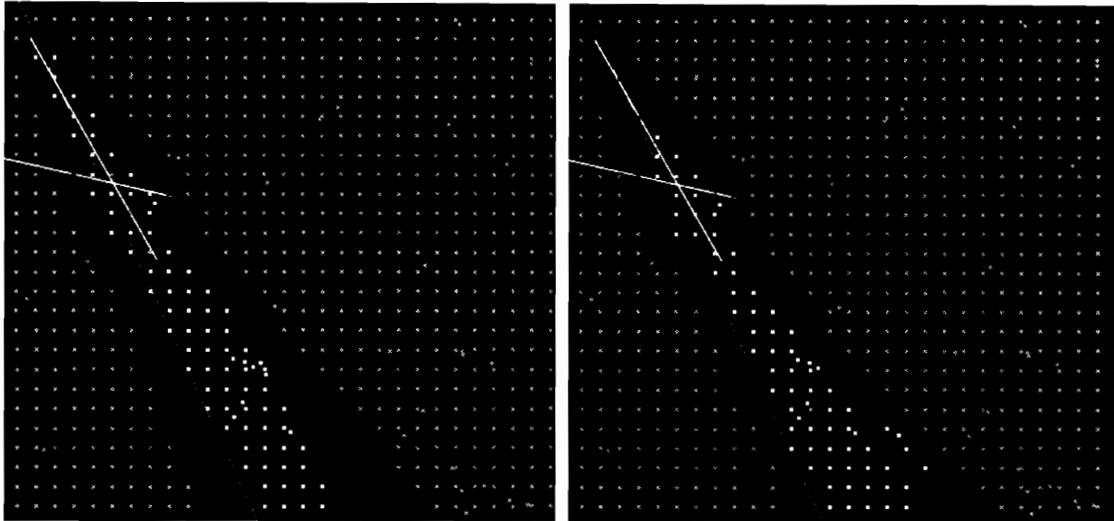
Memorandum to: Robert Funicello, Westchester County

Page 6

Review of Revised Noise Analysis and Mitigation Report for Airspace Redesign DEIS

June 22, 2007

The left graphic shows the noise values without terrain adjustments (i.e., assuming a “flat earth”) and is consistent with how we would expect noise values to look; the red points along the runway near the landing threshold represent higher levels, reflecting the low altitude of aircraft on final approach and the application of thrust reversers immediately after touchdown. The right graphic shows the noise results with terrain adjustments. If the model is working properly, the same red dots should appear on this graphic, because properly modeled local terrain should not affect the distance between the aircraft and the runway pavement. However, with the terrain adjustment turned on, the noise values are lower on at several points along the runway, suggesting that the aircraft are farther from the pavement.<sup>16</sup>



## 4.2 Graphical Summaries of Changes in Noise Exposure

The DEIS did not identify noise impacts in any of the three FAA impact categories in the vicinity of HPN. To obtain a greater understanding of changes in exposure in the area, HMMH evaluated detailed noise values available from the FAA-provided NIRS files and data on the DEIS website. The noise values for from NIRS and the DEIS website were almost identical for the population centroids for five of the 2011 alternatives that we compared.<sup>17</sup> The NIRS noise values were used for these graphics because NIRS values, unlike the website-reported values, include the 5,000 foot spaced grid, points for parks and other points of interest.

The appended figures distill the critical results of our review. These figures use the same base map as our June 8, 2006 memorandum. However, we have identified some additional communities, and state and national parks; e.g., Rockefeller State Park Preserve and Franklin Roosevelt State Park.

The figures outline the following areas of particular interest:

- Area A is almost directly under the extended centerline of Runway 16/34, to the southeast of the airport. It encompasses one analysis location where the NMR data indicate the DNL would increase by 2.8 decibels (dB), compared with the 2011 No Action Alternative, and, result in an

<sup>16</sup> The right-hand graphic also includes an orange dot surrounded by green dots under the approach to Runway 34, which indicates a five decibel increase in a distance of less than 500 feet. This increase is discussed in Section 3.2 and in the discussion of Area A in Section 4.2.

<sup>17</sup> We compared a set of 23,600 population centroids for the following 2011 alternatives: No Action, Integrated Variation without ICC, Integrated Variation without ICC with Mitigation, Integrated Variation with ICC, and Integrated Variation with ICC with Mitigation. This provided a comparison of 118,000 individual noise values. Only two were not exact and neither effects the DEIS, NMR or HMMH analysis: (1) New York, Westchester County Census Tract 148.09, Census Block 3011 for 2011 Integrated Variation without ICC; the web site Noise Exposure Tables reported a value of 35.4 while NIRS reported a value of 35.3; and (2) New York, Nassau County Census Tract 3025.01, Census Block 2000 for 2011 No Action; The web site Noise Exposure Tables reported a value of 45.6 while NIRS reported 45.5.

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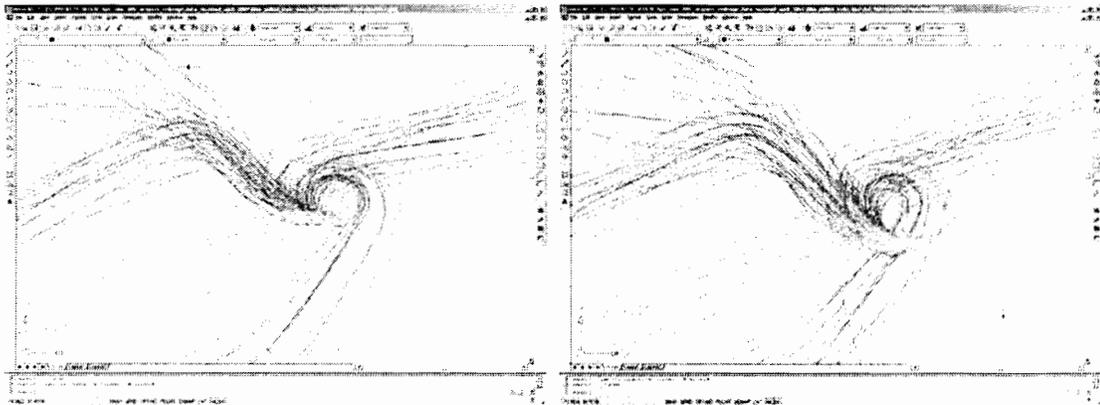
aircraft-related DNL of 64.9 dB<sup>18</sup>. Therefore, the change in exposure at this location would be within tenths of a decibel of creating a significant impact.

This is the same point, and almost the same values, that we identified in our June 8, 2006 memorandum. FAA responses to our previous memorandum indicated that this change in noise is due to a modeling anomaly rather than the proposed action. We also note that there is a region where noise decreases continuing south east on Runway 16/34 centerline. This indicates that whatever the cause may be, it is likely associated with arrivals rather than departures. The DEIS and NMR do not suggest any reason why there should be noise change in that area.

*This change in exposure on the brink of significance clearly merits more detailed analysis and documentation of the causative factors. The FAA should investigate additional locations in this area to identify locations of potentially significant or light to moderate impact. If these noise changes are representative of the proposed action, residents in this area would likely respond in a strong negative fashion. If this is a modeling anomaly, it should be corrected or, if it can not be corrected because of limitations of the model, needs to be fully documented.*



- ☛ Area B is a roughly triangular, with corners in Yonkers, Hastings-On-Hudson, and Scarsdale (at its border with the southern end of White Plains). The NMR predicts changes in exposure of approximately 1.5 to 2.9 dB in this area. The mitigated version of the preferred alternative confines the increase to a smaller area and includes 1.5 to 2.9 dB decreases just east of Area B.
- ☛ Areas C and D are related. Area C is west of the airport, running from White Plains and Valhalla to Tarrytown and the Hudson River. This area is under the existing corridors for departures on both Runways 16 and 34 (turns to 320° and 295°, respectively).<sup>19</sup> The DEIS predicts 1.5 to 4.9 dB decreases in exposure in this area. Area D runs northwest from Kensico Reservoir to Tomkins Cove and Jones Point. The DEIS predicts DNL increases of at least 1.5 to 8 dB in this area. To the best of our understanding, the airspace changes would shift Runway 34 departures from Area C to Area D; departures on Runway 34 would make a slight dogleg to the west over Rye Lake then proceed up Area D; Runway 16 departures would make a 180 ° right-hand turn and also proceed up this area, as illustrated in the following figures.



**Comparisons of Tracks for No Action (green) and Mitigated Proposed Action (magenta) for Runway 34 Departures (left) and Runway 16 Departures (right)**

This change is documented in the NMR (pages 54 to 58) and the MITRE report (pages 57 and 58). While the NMR, particularly Figure 58, compares the mitigated and unmitigated versions of the

<sup>18</sup> This location is within Westchester County and is identified in the Noise Value Tables on the DEIS web site as Census Tract 83.02, Census Block 9013, latitude 41.04993, longitude -73.69322.

<sup>19</sup> This procedure is currently called the "Westchester One Departure"

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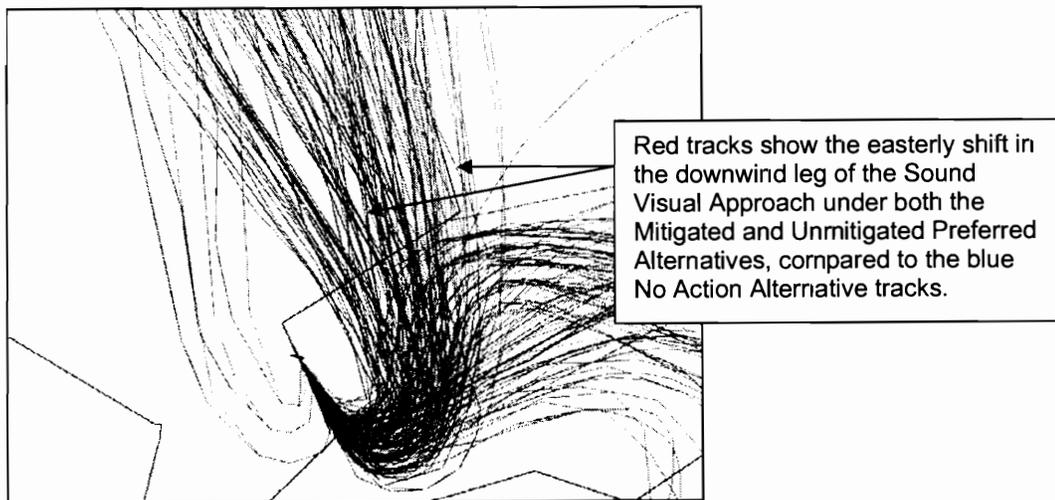
preferred action, the appended Figures 1 through 4 compare these two versions of the preferred action to the No Action alternative.

The mitigated version does offer some improvements compared to the unmitigated. Area C still has a decrease, although the magnitude and land area subject to that decrease is smaller and shifted slightly south compared to the unmitigated version. Area D still would still have noise increases with the mitigated version of the alternative, although the increases would be of a smaller, but still noticeable, magnitude. Also, the mitigated version of the preferred alternative shifts the noise increases primarily to a path roughly defined has Thornwood, Pleasantville, Briarcliff Manor, Ossining, west side of Crotonville, Crugers, and finally exiting the County between Verlanck and Buchanan. Most of these areas would have three to four decibel increases. The exception is near Verlanck and Buchanan, where noise levels would increase five to seven decibels.

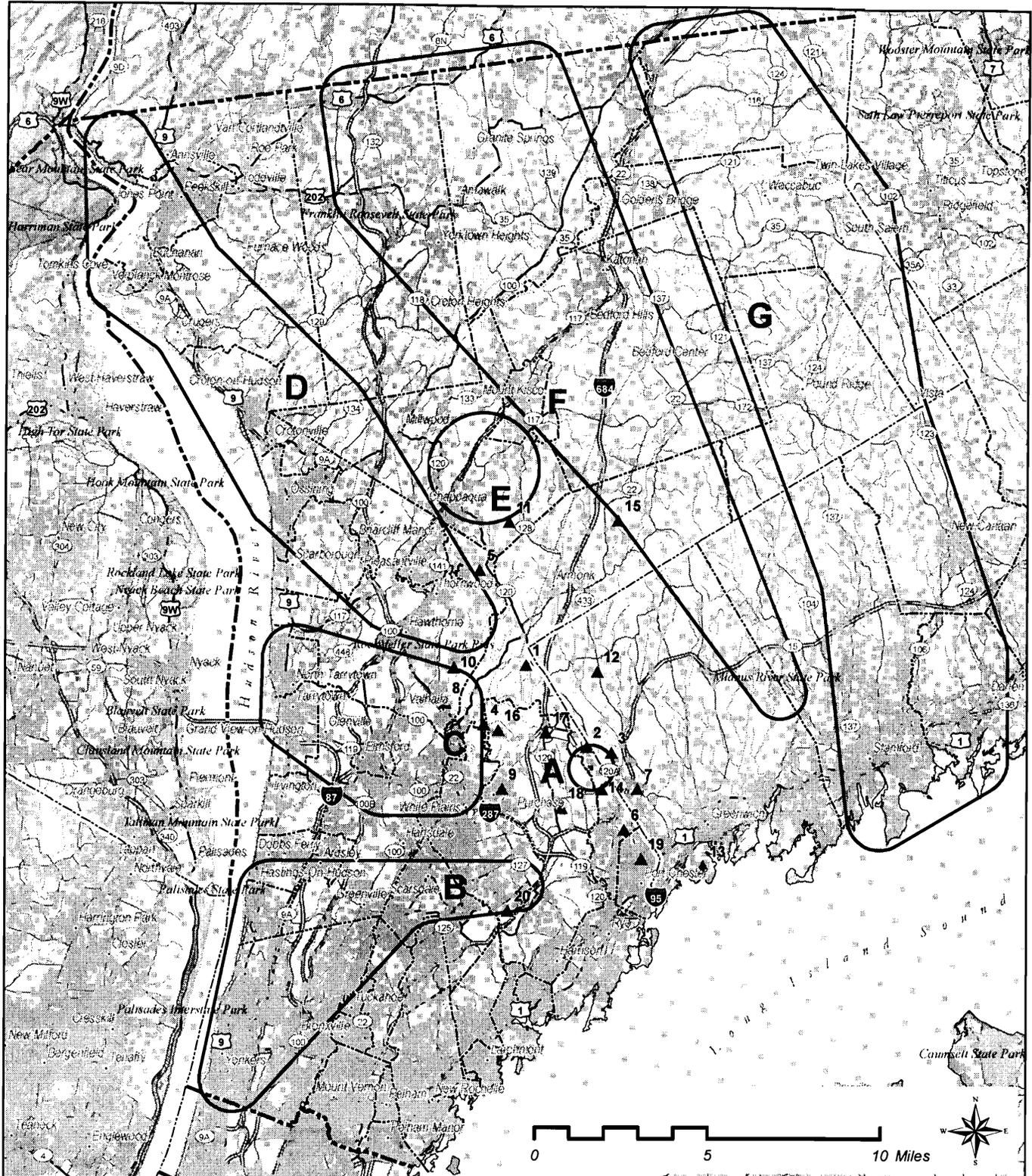
The Rockefeller State Park Preserve, between Area C and D, is predicted to have almost no noticeable change in DNL levels for the Mitigated Preferred Alternative compared to the No Action Alternative. The southern part of the Preserve may have some slight decrease associated with Area C. The northeast portion of the Preserve, along with Hawthorne and Scarborough are on a southwest/northeast line about where the increases from Area D may become noticeable.



- Area E runs from Chappaqua to Mount Kisco, and includes predicted DNL increases in the 1.5 to 2.9 dB range. It appears to be under the easterly loop proposed for Runway 34 departures; the increases may be the result of that new procedure. The noise values here are expected to increase on the order of 1.5 to 3 dB. Comparison of Figures 1 and 3 shows the mitigated version reduces the area over which the increases would occur compared to the unmitigated version.
- Areas F and G also appear to be related. Area F seems to be under the downwind leg of the existing "Sound Visual Approach" to HPN. It appears from the DEIS and the NIRS files that these approaches would be shifted to the east, over Area G. All four figures show increases in noise levels in Area G; Figures 1 and 3 show reductions in Area F. As shown in Figures 1 and 3, the DEIS predicts that the shift in traffic will increase levels between Pound Ridge and Stamford, CT by five decibels or more, with aircraft noise under the proposed action at levels of 40 dB DNL or greater. These increases are likely to be highly noticeable. This procedure is not addressed in the NMR; however with the overlap of dispersion between the proposed action and the no action, there may be opportunity to keep aircraft closer to their existing location. The following figure shows the NIRS arrival tracks to Runway 34; the eastward shift in the Sound Visual Approach is clear. The No Action tracks are in blue and the preferred action tracks in red. These arrivals tracks are the same in the Mitigated Preferred Action and the Unmitigated Preferred Action.



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- Alternative is greater than or equal to 40 dB DNL ( $\geq 40$ ) and increases 5 dB or greater compared to No Action.
- Alternative is between 44 dB DNL and 45 dB DNL ( $\geq 44$  and  $< 45$ ) and increases 5 dB or greater compared to No Action, or Alternative is greater than or equal to 45 dB DNL or greater ( $\geq 45$ ) and increases 4 dB or greater compared to No Action.
- Alternative is between 45 dB DNL and 60 dB DNL and increase 5 dB or greater compared to No Action
- Alternative is greater than 64 dB DNL and increases 2.7 dB or greater compared to No Action.
- ▲ Other modeling locations that do not have these increases.
- ▲ RMT Locations
- Municipal Boundary

Data Sources: Federal Aviation Administration (FAA), Westchester County Airport, Westchester County Geographic Information Systems (WOGIS), Environmental Systems Research Institute, Inc. (ESRI).

## Westchester County Airport

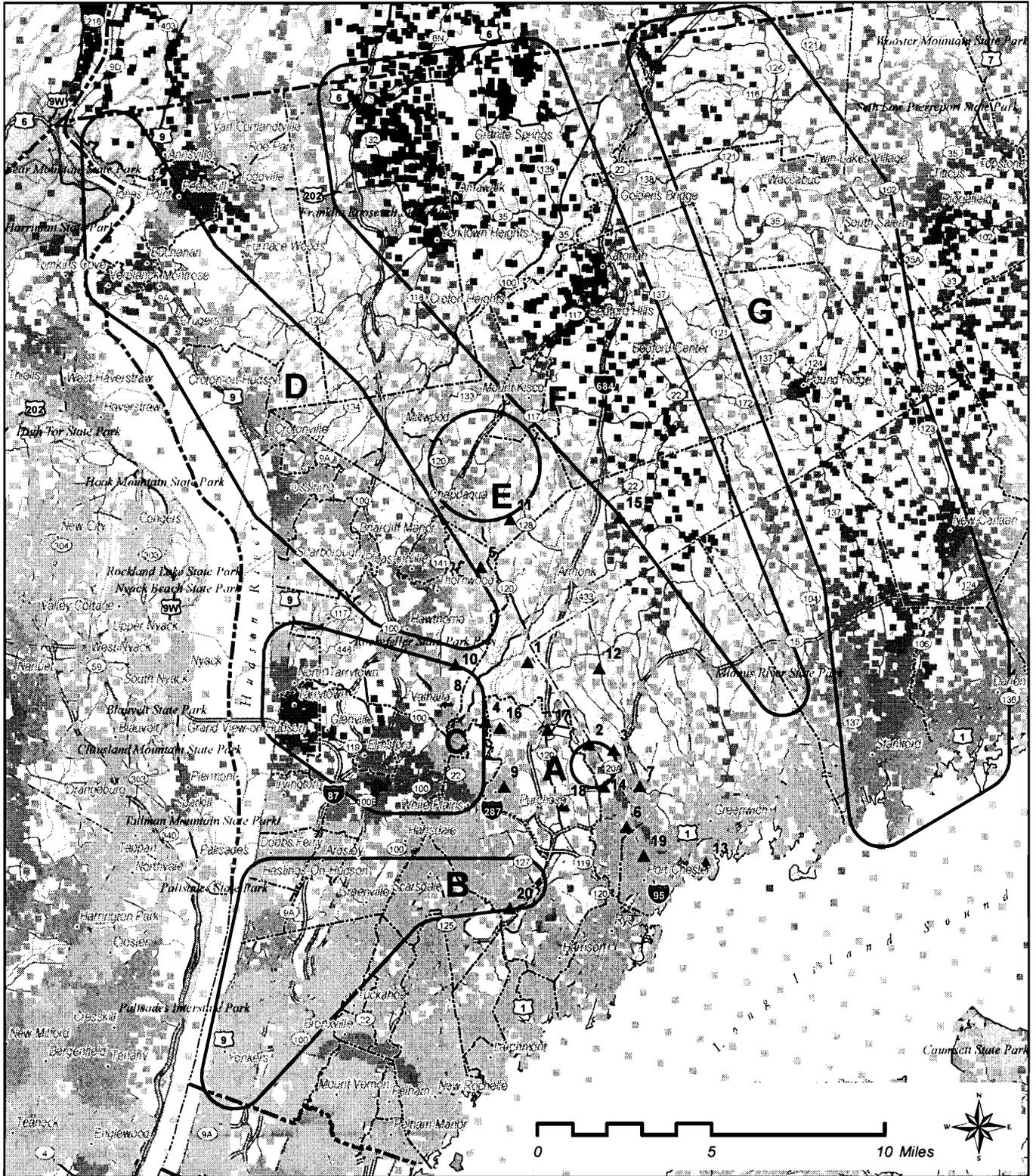
Analysis of New York/New Jersey Philadelphia Metropolitan Area  
 Airspace Redesign Draft Environmental Impact Statement

**Change in DNL Relative to Criteria from 2011 No Action to Integrated  
 Airspace Alternative Variation with ICC with Mitigation as reported by  
 FAA May 2007**

June 13, 2007

 **HARRIS MILLER MILLER & HANSON INC.**

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- |  |                        |
|--|------------------------|
| ■ <= -8 Proposed action would be quieter | ▲ RMT Locations        |
| ■ -7.9 to -5                             | --- Municipal Boundary |
| ■ -4.9 to -3                             |                        |
| ■ -2.9 to -1.5                           |                        |
| ■ -1.4 to 1.4                            |                        |
| ■ 1.5 to 2.9                             |                        |
| ■ 3 to 4.9                               |                        |
| ■ 5 to 7.9                               |                        |
| ■ >= 8 Proposed action would be louder   |                        |

## Westchester County Airport

Analysis of New York/New Jersey Philadelphia Metropolitan Area  
Airspace Redesign Draft Environmental Impact Statement

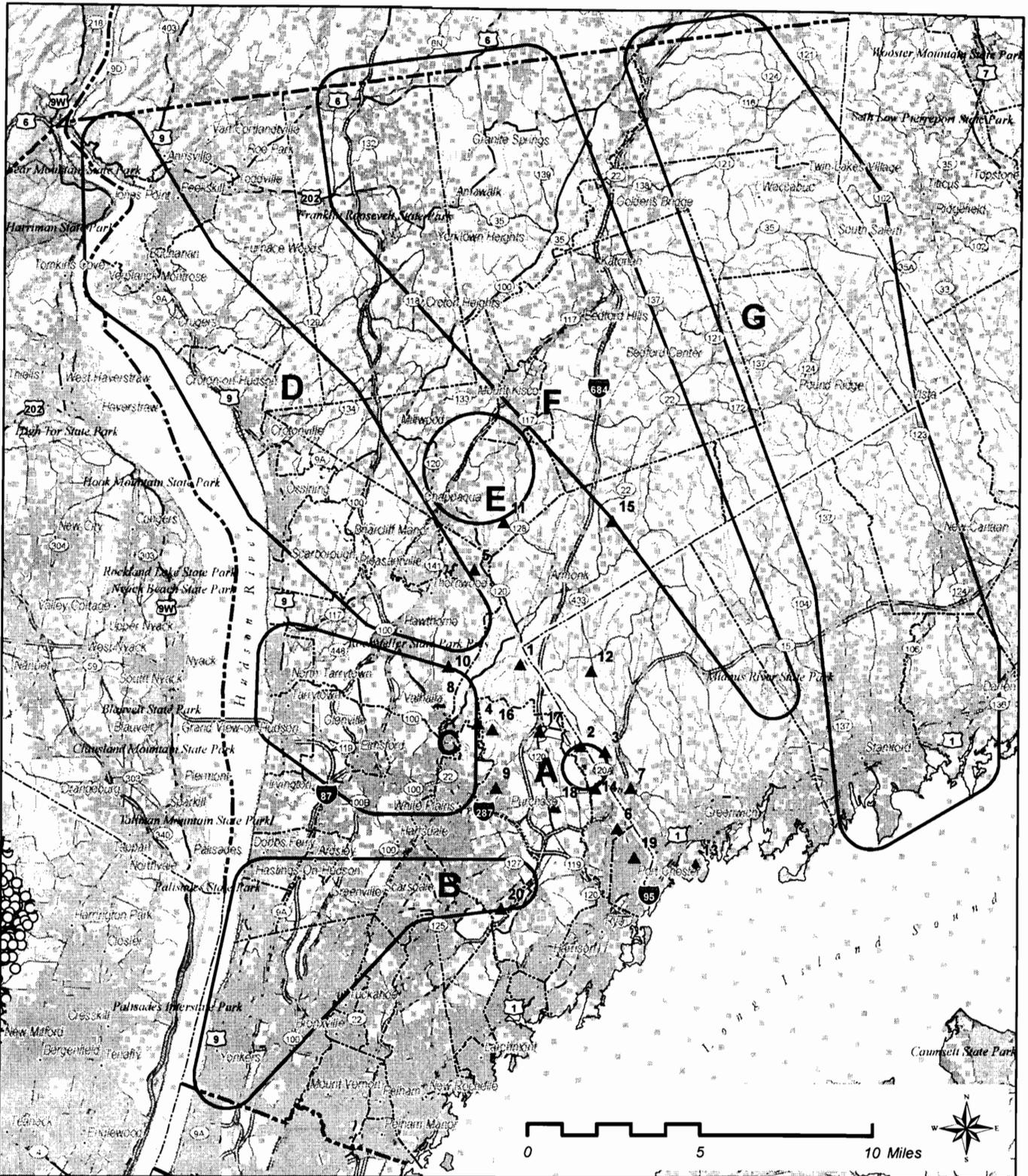
**Absolute Change in DNL from 2011 No Action to Integrated  
Airspace Alternative Variation with ICC with Mitigation as reported by  
FAA May 2007**

June 13, 2007

Data Sources: Federal Aviation Administration (FAA), Westchester County Airport, Westchester County Geographic Information Systems (WCGIS), Environmental Systems Research Institute, Inc. (ESRI).



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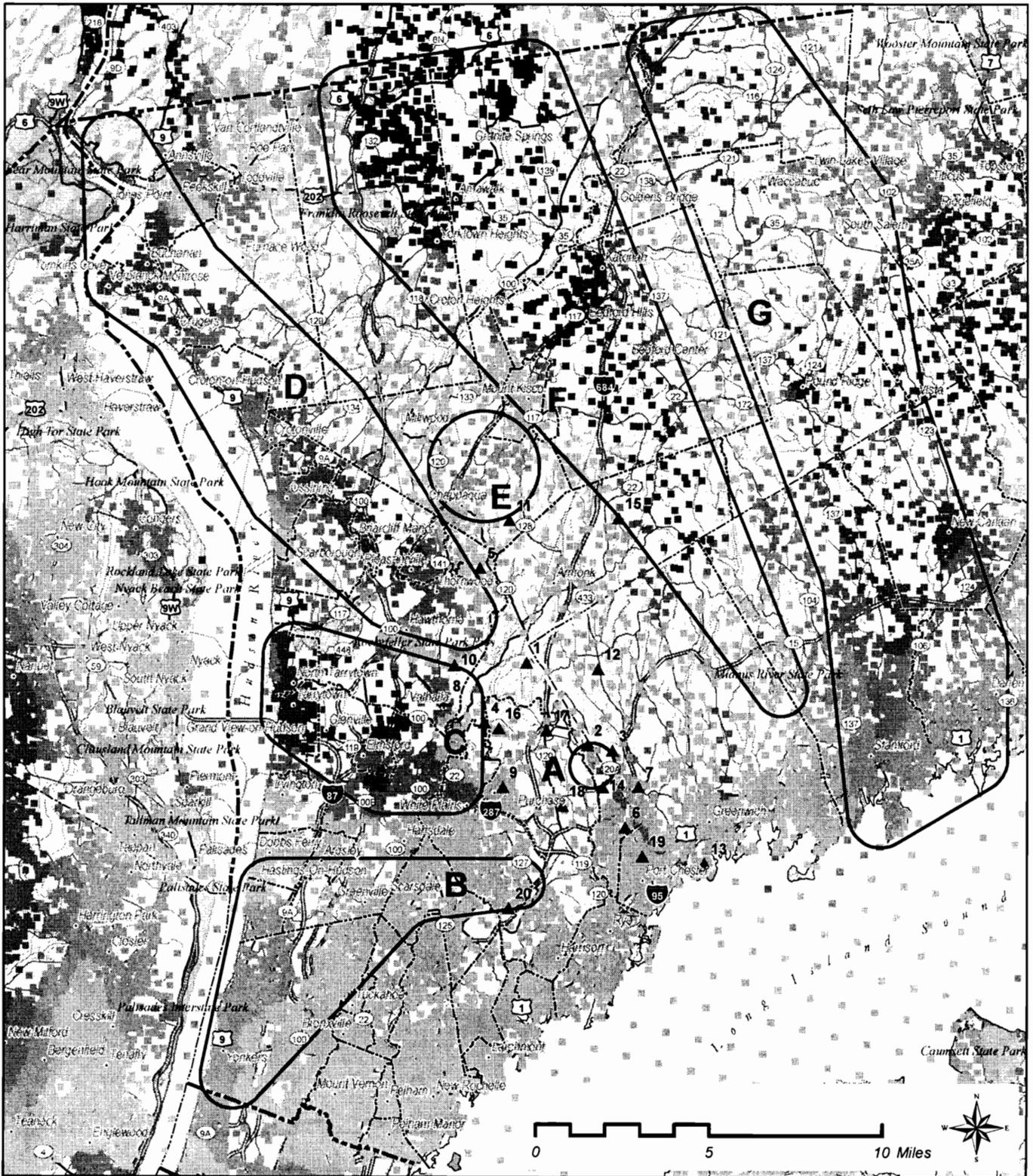
- Alternative is greater than or equal to 40 dB DNL ( $\geq 40$ ) and increases 5 dB or greater compared to No Action.
- Alternative is between 44 dB DNL and 45 dB DNL ( $\geq 44$  and  $< 45$ ) and increases 5 dB or greater compared to No Action, or Alternative is greater than or equal to 45 dB DNL or greater ( $\geq 45$ ) and increases 4 dB or greater compared to No Action.
- Alternative is between 45 dB DNL and 60 dB DNL and increase 5 dB or greater compared to No Action
- Alternative is greater than 64 dB DNL and increases 2.7 dB or greater compared to No Action.
- Other modeling locations that do not have these increases.
- ▲ RMT Locations
- Municipal Boundary

Data Sources: Federal Aviation Administration (FAA), Westchester County Airport, Westchester County Geographic Information Systems (WOGIS), Environmental Systems Research Institute, Inc. (ESRI).

**Westchester County Airport**  
 Analysis of New York/New Jersey Philadelphia Metropolitan Area  
 Airspace Redesign Draft Environmental Impact Statement  
**Change in DNL Relative to Criteria from 2011 No Action to Integrated  
 Airspace Alternative Variation with ICC without Mitigation  
 as reported by FAA May 2007**  
 June 13, 2007

 **HARRIS MILLER MILLER & HANSON INC.**

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- <= -8 Proposed action would be quieter
  - -7.9 to -5
  - -4.9 to -3
  - -2.9 to -1.5
  - -1.4 to 1.4
  - 1.5 to 2.9
  - 3 to 4.9
  - 5 to 7.9
  - >= 8 Proposed action would be louder
- ▲ RMT Locations
  - Municipal Boundary

## Westchester County Airport

Analysis of New York/New Jersey Philadelphia Metropolitan Area  
Airspace Redesign Draft Environmental Impact Statement

**Absolute Change in DNL from 2011 No Action to Integrated Airspace  
Alternative Variation with ICC without Mitigation as reported by  
FAA May 2007**

June 13, 2007

Data Sources: Federal Aviation Administration (FAA), Westchester County Airport, Westchester County Geographic Information Systems (WCGIS), Environmental Systems Research Institute, Inc. (ESRI).



**HARRIS MILLER MILLER & HANSON INC.**

Lynda Heinemann  
178 Woodcliff Ave.  
Woodcliff Lake, New Jersey 07677

Joanne Howley  
92 Glen Road  
Woodcliff Lake, New Jersey 07677

Mr. Steve Kelley:  
Federal Aviation Administration

Re: NY/NJ/Philadelphia Metropolitan Area Air Space Redesign

Dear Mr. Kelley:

As far as we can understand, the proposed rerouting of air traffic is purely to accommodate and speed up the landing of incoming planes. It does not seem to be a safety matter and is a capricious and arbitrary answer to a perceived problem that shows a complete lack of sensitivity to the residents of northern Bergen County. We already have a line of planes stacked up waiting to land at Newark and other airports that can be seen for hours in the afternoon and evening, with the accompanying noise that heralds their descent. They come in over our highways, schools, town recreation areas, and hospitals without too many complaints from people, except for well-deserved criticism from the towns surrounding Teterboro.

However, a deliberate redesign that would significantly increase the noise and number of landings just to accommodate the “efficiency” of the airports and airlines is unacceptable. We find it offensive that towns should feel or be pressured to hire connected lawyers to protect their rights, under the guise of following the correct procedures in order to be “heard.” The FAA is an appointed Agency and should be more responsive to the people who pay the bills. They should not force us to resort to enlisting high-priced legal remedies. Our towns have enough pressing problems to handle, without pouring money into law firms that may or may not ensure that we are “heard.” With this plan, the FAA has shown total disregard for one of the most heavily populated areas of the country – Bergen County, NJ and Rockland County, NY. Our concerns, health and quality of life are more important than any the airlines might have, especially as “efficiency” (read money) is their main objective, and quality of life does not enter into their perspective.

In fact, according to FAA Order 1050.1E, the FAA is required to consider environmental information in their decision; obtain information from the public regarding environmental concerns surrounding an agency’s proposed action; fully assess and disclose potential environmental impacts resulting from the proposed action and alternatives. The same order goes on to require that the FAA must consider the affected communities’ opinions.

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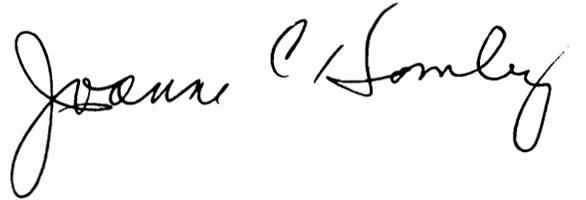
We ask that the FAA stand up and do the right thing for the people, reconsider this plan, and come up with a system for "efficiency" that does not involve destroying the peace and quiet of a million residents.

Very truly yours,



Lynda Heinemann  
(201) 391-4641 - Home  
(201) 652-0080 - Office

Joanne Howley, Councilwoman, Woodcliff Lake  
(201) 391-1205 - Home



# Comment Form

FAA AIRSPACE REDESIGN  
NY/NJ/PHL Metropolitan Area Airspace Redesign Project  
Noise Mitigation Meetings

Submit your comments on Noise Mitigation Procedures for the Preferred Alternative.

Comment form must be submitted today

Please print clearly

Thank you!

Date 6/28/07

Please Circle the Meeting Location:

Cherry Hill, NJ

Woodcliff Lakes, NJ

Mr.  Mrs.  Ms.  Dr.  Title \_\_\_\_\_

First Name HANS

Last Name HLINZIKER

Affiliation/Organization/Agency AOPA

Street Address 30 4TH STREET

City PARK-RIDGE

ST N.J. ZIP 07656

Phone # 201 3915 743

Email Address \_\_\_\_\_

Comment (only comments on the Mitigation and Preferred Alternative)

2000' HIGHER APPROACH  
ALTITUDE. - LONG TERM  
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50-80 MILES WEST OR N/W  
OF NEWARK WITH HIGH SPEED  
TRAIN TO N.J. AND N.Y.!

If More Space Is Needed, Please Use Flip Side

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# Community Board 7

Borough of Queens

Bay Terrace, College Point, Beechhurst, Flushing,  
Malba, Queensborough Hill and Whitestone

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(718) 359-2800

Fax: (718) 463-3891

**Helen Marshall**  
*Borough President*

**Karen Koslowitz**  
*Deputy Borough President/Community Boards*

**Eugene T. Kelty, Jr.**  
*Chairperson*

**Marilyn Bitterman**  
*District Manager*

May 3, 2007

Mr. Steven Kelley  
FEDERAL AVIATION ADMINISTRATION  
c/o Ram Nagendran  
12005 Sunrise Valley Drive, MS C3.02  
Reston, Virginia 20191

**RE: AIR SPACE REDESIGN – NOISE MITIGATION WORKSHOP 2007**

Dear Mr. Kelley:

One of Community Board #7's Board Member, who is also a member of the Aviation Advisory Board, attended the Public Hearing on April 23, 2007 at the LaGuardia Marriott.

Our main concern is the high noise levels surrounding LaGuardia Airport namely Flushing, College Point, Corona, Queensborough Hill. The video presentation made no mention about the noise mitigation in the above areas about which we have previously complained and commented. The arrivals and departures from Runway 13 at LaGuardia are causing maximum noise to the residents whereas your report on noise mitigation is silent in this aspect. We are disappointed about this lack of effort in this direction by the FAA. We reiterate again that mitigation efforts should continue.

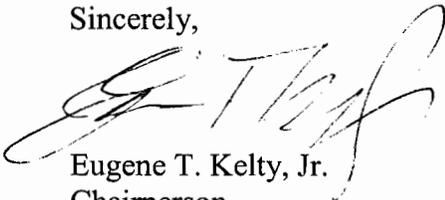
1) While the FAA has conducted this study with the objective of improving the Operational efficiency to benefit the industry and to their passengers, the required attention has not been paid to the health and safety of the residents of Queens. Queens County residents are constantly complaining about the loud noise of the aircraft at the ground level. It is understood that noise levels are determined by a complex computer modeling at an office in Washington, D.C. to obtain threshold levels such as "significant", "moderate", etc. In order to verify the authenticity of the theoretically obtained sound levels ground measurements does not seem to have been taken. This must be carried out to obtain realistic noise levels.

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- 2) It is a fact that Queens residents are subjected to high levels of aircraft noise, and are disappointed with the efforts made by FAA during the workshop of April 2007. Further efforts to mitigate the noise surrounding areas of LaGuardia airport should continue until mutually acceptable solutions are achieved.
- 3) Usage of Runway 31 for arrivals should be reduced to minimum.
- 4) Night arrivals and departures should be regulated only through Runway 22, in order to avoid the highly populated area of Queens, unless otherwise due to emergencies.
- 5) Aircraft that are small, or old or inefficient with respect to noise and air quality should not be allowed to use LaGuardia Airport in accordance with the agreement of FAA with communities. During the time of phasing out such aircraft should be directed to use only Runway 22. This is required in the interest of public health and safety setting aside the operational and commercial interests.

It is requested that FAA keep us informed about the further measures being taken with respect to our community.

Sincerely,



Eugene T. Kelty, Jr.  
Chairperson

cc: Community Board #7's Elected Officials  
Queens Borough President Helen Marshall  
Hugh Weinberg, Borough President's Office  
Robert LoPinto, C. B. #7's Environmental Committee Chairperson  
Queens Community Board #3

ETK/lo

PO Box 603  
Ridgefield, CT.06877  
May 7, 2007

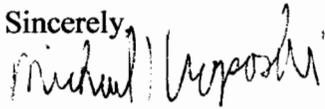
Steve Kelley,FAA  
c/o Ram Nagendran  
12005 Sunrise Valley Drive,MS C3.02  
Reston, VA 20191

Re: NY/NJ/Phil Airspace Redesign

Dear Mr. Kelley,

Enclosed please find my comments on the Preferred Alternative with Mitigation for the above mentioned project.

Sincerely,

A handwritten signature in black ink that reads "Michael Kroposki". The signature is written in a cursive style with a large initial "M".

Michael kroposki Esq.

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188

Comments on the NY/NJ/Phil Airspace Redesign, Preferred Alternative with Mitigation

1. Request for a No-Action Alternative on North Arrival Post

I live in Ridgefield Ct. (elevation 600') and request that the FAA consider a No-Action Alternative to moving the North Arrival Post from Westchester to Fairfield County Ct. based upon significant new circumstances ( 40 CFR 1502.9(c)(1)ii and Order 1050.1E Section 516a). The States of New York and New Jersey recently passed legislation for the PANYNJ to take over and operate Stewart Airport with the expressed intention of drastically increasing aircraft operations there in order to relieve congestion at Newark et al airports(1).

If this expressed intent is successful and there is no reason to doubt it will be, there is little need to now move the North Arrival Post. This Post movement was necessary to accommodate a second north arrival track into Newark Airport. Since the new North Arrival Post will have adverse environmental impacts on Fairfield County,Ct, including the Wier Farm National Historic Site in Wilton Ct. and the FAA has identified no mitigation measures, the FAA is required under 40 CFR 1500.2(e) and Order 1050.1E Section 500a to consider a reasonable alternative such as the above mentioned No-Action one which would avoid the adverse environmental impacts.

(1) see attached news reports.

2. Request for Extension of time to Comment on the Redesign.

An extension of time to comment on the Airspace redesign including the preferred alternative with mitigation should be made because significant information concerning the noise modeling has been withheld from public review notwithstanding Section 208a of Order 1050.1E. The NIRS input data have been withheld to date by the FAA upon their claim of continuing deliberations. However the public comment period for the redesign proposed action will be prematurely closed as of May 11,2007. FAA Order 1050.1E provides:

**208a.** NEPA and the CEQ regulations, in describing the public involvement process, require Federal agencies to: consider environmental information in their decision making process; obtain information from the public regarding environmental concerns surrounding an agency's proposed action; fully assess and disclose potential environmental impacts resulting from the proposed action and alternatives; and provide the public with this information and allow it to comment on these findings. ..... FAA's "Community Involvement Policy Statement" (dated April 17, 1995) affirms FAA's commitment to make complete, open and effective public participation an essential part of its actions, programs, and decisions.

and 40 CFR 1506.6 provides:

(e) Explain in its procedures where interested persons can get information or status reports on environmental impact statements and other elements of the NEPA process.

(f) Make environmental impact statements, the comments received, and any underlying documents available to the public pursuant to the provisions of the Freedom of Information Act (5 U.S.C. 552), without regard to the exclusion for interagency memoranda where such memoranda transmit comments of Federal agencies on the environmental impact of the proposed action.

It is my understanding that NJCAAN has a continuing FOI requesting the NIRS input data which has not been answered substantively to date. Further at the FAA Public Meeting in Stamford on April 24 several members of the public including local elected officials specifically asked for the NIRS input data especially the details of aircraft operations and flight path geometry. Mr Steve Kelley of the FAA responded that their legal counsel has not yet allowed release of this data. It was pointed out to him that access to this data was needed to fully make comments on the proposed redesign. When the aforementioned NIRS input data is released the public must have the opportunity to comment on the proposed redesign as provided by Section 208a above.

### 3. The EIS needs to include full consideration of GA Aircraft impacts.

The DEIS states on page I-22 that

" High-performance general aviation aircraft operating out of satellite airports are restricted to less efficient altitudes below major airport flows."  
In other words General Aviation aircraft have to fly below the arrival and departure routes. The new North Arrival Post is going to force many GA aircraft, especially those from DXR and OXC, to fly at lower altitudes. However as the Redesign Newsletter Volume 1 page 4 states

"there is a direct relationship between the plane's distance from the ground and the amount of noise individuals on the ground can hear." and  
When aircraft .... stay higher... the amount of ground level noise is decreased or mitigated"

The direct impact of ground level noise created by GA aircraft under altitude restrictions from the new North Arrival Post must be evaluated. The contribution of GA aircraft to the overall noise level is particularly significant because many GA aircraft are still Stage II jets which are known to generate inordinate amounts of aircraft noise when compared to more modern ones.

### 4. The Exclusion of DXR and OXC from the Redesign Study is improper.

It was stated by FAA members of the redesign team that GA aircraft operation (both VFR and IFR) were excluded from the redesign study based upon Order 1050.1E. However this order only excludes GA aircraft operations when they are below stated thresholds. In Paragraph 14.6a it states

No noise analysis is needed for proposals involving Design Group I and II airplanes (wingspan less than 79 feet) in Approach Categories A through D (landing speed less than 166 knots) operating at airports whose forecast operations in the period

covered by the EA do not exceed 90,000 annual propeller operations (247 average daily operations) or 700 jet operations (2 average daily operations).

DXR Part 150 Noise Compliance Program of 2006 states that in 2000 there were 114,594 aircraft operations and OXC's draft Part 150 report states that there were 3700 jet operations in 2003. Both of these airports clearly exceeded the Paragraph 14.6a thresholds and should have been included.

5. The Numerical Limitations of the Methodology must be clearly stated and explained. 40 CFR 1502.24 states that:

Agencies shall insure the professional integrity, including scientific integrity, of the discussions and analyses in environmental impact statements. They shall identify any methodologies used and shall make explicit reference by footnote to the scientific and other sources relied upon for conclusions in the statement.

The April 6, 2007 Noise Mitigation report states at page 3 that:

[The FAA] decided to present the results of the analysis in the Final EIS document based on rounding to one decimal place. Similarly, the analysis presented in this report is based on rounding to one decimal place. It should be noted that this change in methodology only results in slightly more impacts and not less. The rounding to one decimal place generally makes no difference at most points, but some that were very close to the thresholds are indeed tipped into the category of a FAA threshold based impact.

This passage suggests that NIRS output in dBs is accurate to one decimal place. Since some input data such as annual temperature has only 3 significant figures, the output may have no more than 3 significant figures. The computation introduces roundoff and truncation errors. The input data also has random measurement errors so it is unlikely that the output is accurate to within one tenth dB. The FAA should state what level of accuracy the NIRS output has and the scientific basis for it.

It is my understanding based upon discussions with Mike Graham of the FAA that NIRS uses the same computational engine that INM does. Therefore any known limitations inherent in the INM computations are also present in the NIRS computed outputs. It has been shown by mathematical analysis reported in the scientific literature that a 1% error in most INM input variables results in a 1% error in output data such as the dB noise levels. Meteorological data are some of the primary inputs. The DEIS reports that those for Newark, NJ were used in all computations. Newark's annual average temperature is cited as 55.5 degrees F ( DEIS Appendix E, Noise Modeling Tech. Rep. sec. 3.3.2). The National Weather Service reports that the annual average temperature for Danbury Ct is 49.7. This is a 5.8 degree or 1.5% deviation from the NIRS baseline. The NIRS noise computations for Danbury may therefore have a 10% error in them! The FAA must list and explain all such sources of error and analyze their magnitude.

The Noise Mitigation report cited above also states on page 3 that:

" The refined NIRS runs used in this analysis incorporate various airport elevations to more closely model these differences at the higher elevation airports."

It is my understanding from discussions with Mike Graham of FAA that Mitigation noise

computations were done by dividing the NIRS computation into 4 subparts, each of which incorporated the appropriate different airport elevations data. However the actual elevations used and the geographical bounds for each subproject have not been disclosed. The full data set for these new subproject computations must be disclosed so that the computational integrity of them can be substantiated.

6. The position of Holding patterns in the redesigned Airspace should be identified.

In response to questions from myself and separately Congressman Shay's office, FAA team members have stated that there are no holding patterns planned in the new LGA North Arrival route from the new Post to the airfield. But the DEIS states at page 8-4 of Appendix C under Delay adsorption Techniques that " There is no place to hold in the NY TRACON." and "With Integrated Airspace with ICC,.... holding takes place under terminal separation rules. Holding using terminal rules is so much more efficient than holding en route that it almost qualifies as an additional technique." Nevertheless, holding in the terminal area may be at lower altitudes so it is important from a noise analysis perspective to identify potential holding areas in the redesigned airspace.

7. The Data for Aircraft emissions should be disclosed in the EIS.

The DEIS claims under general conformity rules that complete air emissions modeling and analysis is excused because the emissions involved in the airspace redesign are less than the thresholds required for action in this rule. However the amounts of annual pollutants is not given to substantiate the claimed exemption. The specific annual amounts of each pollutant monitored under the law which will be introduced directly into Connecticut airspace by the preferred alternative should be disclosed in the EIS.

8. Validation of NIRS software.

The NIRS software is new program which has not been extensively used and does not have any published independent verification of its of its scientific integrity. Details of all FAA efforts to valid its use in the present redesign project should be disclosed so that independent groups can substantiate the scientific validity of its current use.

Respectfully submitted by  
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# NewsTimesLIVE.com

May 03 200

## Jersey acting governor to sign bill to create more airports

TETERBORO, N.J. (AP) — New Jersey's acting governor will sign a bill today to allow the Port Authority of New York and New Jersey to create two more major airports in the region to alleviate air congestion.

The first airport won't be in New Jersey, but in Newburgh, N.Y., about 60 miles north of New York City and about 40 miles from Danbury, Conn.

The Port Authority plans a \$78.5 million, 93-year lease of Stewart International Airport and hopes to take over operations by 2010.

The legislation matches the New Jersey law with New York's equivalent, allowing the Port Authority to buy or build two new airports — one in each state — outside the agency's district, which extends for a 25-mile radius from the Statue of Liberty.

About 300,000 passengers used Stewart last year, although authority officials have said it could handle 1.5 million and relieve congestion at LaGuardia, John F. Kennedy International and Newark Liberty International airports.

Those airports, operated by the Port Authority, handled more than 100 million passengers last year. By 2025, the numbers are expected to reach 150 million.

Port Authority officials have said they have no plans to open a new airport in New Jersey.

Still, New Jersey legislators hope Stewart will also ease congestion at Bergen County's Teterboro Airport, which has become the nation's busiest smaller airfields.

Teterboro Airport has been a longtime sore spot for neighboring residents, who have complained of aircraft noise, exhaust and other incidents involving planes running off runways.

# ASSEMBLY DEMOCRATS NEWS RELEASE



www.assemblydems.com

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**FOR RELEASE:**

May 3, 2007

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John Duthie

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**Assemblyman Scalera**

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## **LEGISLATION ALLOWING PORT AUTHORITY TO OPERATE STEWART AIRPORT SIGNED INTO LAW**

(TETERBORO) – Legislation Assembly members Frederick Scalera, Gary S. Schaer, Bob Gordon, and Joan Voss sponsored to help mitigate noise, pollution, and safety concerns at Teterboro Airport was signed into law today by Acting Governor Richard J. Codey.

The measure (A-3948/S-25) allows the Port Authority of New York and New Jersey to move forward with a planned purchase of the operating lease for Stewart International Airport in Orange County, New York. Assemblyman Gordon Johnson (D-Bergen) and Assemblywoman Valerie Vainieri Huttle (D-Bergen) were among cosponsors of the new law.

“This is an air traffic strategy that should have been employed a long time ago to help address the noise and safety concerns at Teterboro,” said Scalera (D-Essex/Bergen/Passaic). “Without this air travel safety valve, Teterboro Airport could have been forced to accommodate increasingly larger aircraft, which would have only resulted in more air traffic and more potential for life-threatening accidents.”

Previously, the Port Authority had only been empowered to operate within an existing “port district” that extends for 25 miles in all directions from Liberty Island in New York Harbor.

The law authorizes the Port Authority to establish two additional air terminals outside the bi-state agency’s jurisdictional border – one in New York, one in New Jersey, as respectively designated by the Governor of each state. The law does not change the boundaries of the port district, but allows exceptions for the operations of Stewart Airport in New York and an additional air facility in New Jersey.

(MORE)

“This is a quality of life issue for all New Jersey residents, but especially for those living near Newark and Teterboro airports,” said Schaer (D-Passaic/Bergen/Essex). “Between media reports on the abysmal on-time ratings of Newark International Airport and the constant safety concerns surrounding Teterboro Airport’s jet load, it is clear that we need another airport to handle the enormous volume of air traffic entering and leaving the New York metropolitan area.”

According to the Port Authority, under its current configuration, Stewart International Airport could accommodate 1.5 million passengers annually. The airport is situated on 2,400 acres of land and is equipped with two large runways capable of handling major jet service similar to those found at Newark, LaGuardia, or John F. Kennedy international airports. The Port Authority has said it expects to be able to increase passenger service and volume to the airport through careful planning and expansion.

“Providing relief to residents concerned about noise levels and safety concerns stemming from Teterboro is a no-brainer,” said Gordon (D-Bergen). “Any steps that can be taken to reduce air traffic over Bergen County and the rest of North Jersey should be embraced wholeheartedly.”

The New York Legislature passed similar companion legislation in 1967, however, because of the bi-state nature of the Port Authority, enabling legislation had to be passed by both state legislatures before the purchase could be authorized.

The Port Authority is now authorized to purchase the remaining 93 years of the Stewart International Airport lease from the National Express Corporation. The estimated cost of the lease purchase is \$78.5 million. Once completed, the Port Authority will be given operational control of the airport, which the agency expects to assume by October 2007.

“Allowing this takeover carries with it concrete benefits to New Jersey from a safety, quality of life, and economic standpoint,” said Voss (D-Bergen). “This is something that has been on the books in New York for 40 years, and it’s high time New Jersey followed suit.”

“There are enormous transportation and economic dividends attached to this,” said Johnson. “Our region’s economic vitality depends on our ability to serve this demand for air travel and operations at Stewart Airport will aid in that cause.”

“The investments that get made today in Stewart could provide dividends for generations of residents and business owners in our region,” said Vainieri Huttle. “The addition of Stewart Airport as a new Port Authority air facility just can’t happen soon enough.”

0007

13 NEW YORK LA GUARDIA AIRPORT MARRIOTT  
14 102-05 Ditmars Boulevard  
15 East Elmhurst, New York 11269  
16 April 23, 2007  
17 Commencing at 6:00 p.m.

1 KENDALL WAYNE LAMPKIN  
20 Town-Village Aircraft Safety and Noise Abatement  
21 Committee

7

2 MR. LAMPKIN: My name is Kendall  
3 Lampkin. My official capacity is as the Director of  
4 the Town-Village Aircraft Safety and Noise Abatement  
5 Committee known as TVASNAC. We are an organization  
6 that represents the incorporated villages and  
7 municipalities on the south shore of Long Island  
8 that are adjacent to and affected by noise emanating  
9 from Kennedy Airport.

10 I stress Kenney Airport for a specific  
11 reason. When this meeting was announced, we were  
12 advised that the meeting was being held at LaGuardia  
13 Airport, when there was no mention of Kennedy  
14 Airport. I note that all of our concerns, once  
15 again, are about Kennedy Airport.

16 I was advised there was also only going  
17 to be one meeting per state and that the meeting was  
18 going to be held at this location, which is fine. I  
19 mention this because there is a bit of history in  
20 which the scoping sessions were held at Hofstra  
21 University. Because most of our noise is south  
22 shore, I was able to persuade them, the Airspace  
23 Redesign Committee, to hold one of their scoping  
24 sessions at Lawrence High School which accommodated  
25 many of the communities that are affected, within  
the 65 DNL.

0008

1 I came here today hoping to be  
2 pleasantly surprised about noise mitigation measures  
3 that would have affected J.F.K. Airport. After  
4 listening to the presentation, I was somewhat  
5 hopeful in finding what was termed a subset of  
6 strategies that would affect Kennedy Airport. Much  
7 to my chagrin and after the comment period I  
8 discovered that, in fact, there is no strategy,  
9 subset of strategies being considered for Kennedy  
10 Airport.

11 I note that the redesign project has a  
12 glossy brochure which lists mitigation for Newark  
13 Airport, LaGuardia Airport, Philadelphia Airport and  
14 Westchester Airport. Nowhere is mentioned Kennedy  
15 Airport.

16 I also know that there was a  
17 considerable amount of time and effort in putting  
18 together the airspace redesign and all the scoping  
19 sessions. Indeed, I noted there were at least one,  
20 two, three, four, five different consulting  
21 operations that helped to put together what we see  
22 here today, Metron Aviation, Mitre Corporation,  
23 Landrum and Brown, Northrop Grumman, HNTB and in  
24 addition to this, the FAA. One would expect that  
25 with all that talent there would have been an

0009

1 opportunity to find an acceptable subset of  
2 strategies that would have affected Kennedy Airport.

3 We are doubly affected in that Kennedy  
4 Airport is one of the few airports that does not  
5 have a Part-150 study although it is emanated or  
6 starts from the Port Authority, is a document that  
7 would have allowed us to address and take a look at  
8 the airspace noise affecting the airport. Port  
9 Authority had indicated that Part-150 study would  
10 not be done until airspace redesign was completed.

11 In waiting seven years for airspace  
12 redesign to only find that there will be no change  
13 in noise mitigation for Kennedy Airport is terribly  
14 disconcerting.

15 Our organization intends to meet with  
16 our member of Congress, Carolyn McCarthy, on May 7  
17 and make her aware of the fact of the disregard of  
18 Kennedy Airport in this redesign.

19 I know that the end of the comment  
20 period is May 1. It is our hope our Congressman's  
21 offices will redress the authority, FAA and all  
22 concerned with this redesign to consider some  
23 mitigation matters for the communities in and around  
24 Kennedy Airport.

25  
0010

# TOWN OF NEW CANAAN

TOWN HALL, 77 MAIN STREET

NEW CANAAN, CT 06840

TEL: (203) 594-3000

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May 9, 2007

Mr. Steve Kelley, FAA NAR  
c/o Nessa Memberg  
12005 Sunrise Valley Drive, MS C3.02  
Reston, VA 20191

## **NY/NJ/PHL Airspace Redesign**

Dear Mr. Kelley:

The following provides official comments from Greenwich, CT and New Canaan, CT on the NY/NJ/PHL Airspace Redesign and your Noise Mitigation Report dated April 6, 2007. Details are based largely on a study done by Williams Aviation Consultants at our request.

### **General**

For decades, residents living in Greenwich and New Canaan have been suffering from severe noise pollution from low flying aircraft over their homes. This worsening problem is having a serious impact on quality of life and raising the potential for a major public safety issue. We have registered our concerns on numerous occasions with little result.

More specifically, Greenwich and New Canaan are two of the most severely impacted communities in the entire country by air traffic. There is an average of at least 340 low altitude flights per day – an astonishing number – principally from Westchester and LaGuardia. In addition, there are continual violations of the “voluntary curfew” at Westchester Airport.

The FAA does not make effective use of unpopulated or less populated tracts of land, industrial and commercial zones, major highway systems or large bodies of waters as “natural troughs” for mitigating noise impact. Alternative routes exist that meet all FAA standards while simultaneously and substantially reducing the effects on population.

### **Draft EIS**

Williams has identified numerous deficiencies in the DEIS on which the alternatives were based. To the extent the conclusions in the DEIS are wrong, the proposed alternatives would be wrong.

Specifically, the ICC option only shows a benefit because the FAA’s Consultant manipulated the fleet mix by substituting some of the large aircraft for regional jets. The FAA also did not consider the impacts of air traffic from 80% of the airports in the study area and did not consider the impacts of general aviation, military traffic, over flights and VFR traffic, etc. If

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1 of 11

actual conditions were modeled for noise and capacity, none of the alternatives would meet the purpose and need, and the true adverse impacts to areas surrounding the region's airports would be revealed.

Further deficiencies identified by Williams are shown in Attachment 1.

### **Noise Mitigation Report**

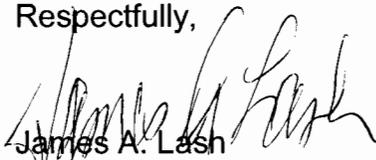
The Integrated Airspace Alternative selected by the FAA promises to reduce congestion and delays but, in doing so, adds new flight paths and fans aircraft on departure, severely impacting our two residential communities. Given that the FAA initially excluded aircraft noise mitigation from the project's "purpose and need," we do not believe that the FAA adequately reviewed the four alternatives and that the preferred alternative is not in the public's best interest. To pick just one example, airplanes bound for New York City's La Guardia Airport would begin their descent over the heart of Fairfield County and hug the coastline near Stamford and Greenwich before crossing over Long Island Sound to land. Safety and quality of life, not efficiency, should have been the most important considerations in the FAA's evaluation. Despite the many predicted impacts to Fairfield County communities, no mitigation strategy is even attempted for LGA arrivals over Connecticut.

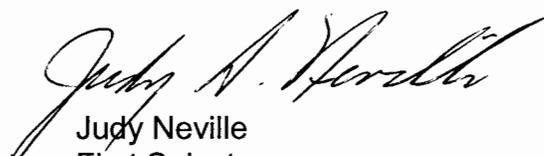
It is difficult to provide specific comments since the data on which it was designed are badly flawed. Nevertheless, Attachment 2 provides the Executive Summary from Williams, Attachment 3 provides remarks delivered to the FAA in Washington by Judy Neville on April 16 and Attachment 4 gives a statement from Congressman Christopher Shays read at the FAA hearing in Stamford on April 24. We support the views in these attachments.

In particular, we agree with our Congressman's view that "the FAA and Congress need to consider alternative methods of reducing air travel delays, including market-based solutions such as...auctioning slots at airports." The economic cost of air traffic should be borne by the airlines and their customers, not by those living under flight paths.

We look forward to hearing from you.

Respectfully,

  
James A. Lash  
First Selectman  
Town of Greenwich

  
Judy Neville  
First Selectwoman  
Town of New Canaan

## **Attachment 1: Williams Aviation Consultants-- Additional deficiencies in the DEIS**

- ◆ Modeling baseline for noise and capacity was manipulated to show efficiency gains.
- ◆ The capacity analysis did not consider the impacts on adjacent Air Route Traffic Control Centers.
- ◆ The capacity analysis did not model ground operations.
- ◆ The capacity analysis did not model the transition of aircraft to the en route ATC system.
- ◆ The capacity analysis assumed that the en route controller would accept “stacks” of aircraft in one chapter and then admitted that “stacks” would not be the norm.
- ◆ The LGA over the water route (055 degree heading) is being eliminated.
- ◆ LGA over the water departures will now over-fly the land areas west of the Sound.
- ◆ The FAA’s Consultant states that there are no adverse impacts on residents or on land use but later states that there will be adverse impacts. Impact on land use is not evaluated.
- ◆ ICC is not an option that can be completed within the DEIS timeframe.
- ◆ ICC did not consider impacts of building and construction of a facility to house the combined ATC facilities.
- ◆ The ICC alternative only shows a benefit based on the manipulated data base.
- ◆ The alternatives without ICC do not meet the stated need.
- ◆ No noise mitigation measures are proposed although the FAA’s Consultant admits that the project will result in adverse impacts.
- ◆ The alternatives in the DEIS are capacity enhancing, but the FAA’s Consultant did not identify airports where the additional operations would occur or the impacts on the underlying land areas.

**Attachment 2: Williams Aviation Consultants-- Executive Summary**  
**FAA Noise Mitigation Report dated April 6, 2007**

This Executive Summary is a compilation of the comments contained in each section during our review of the Operational Analysis of Mitigation of the NY/NJ/PHL Airspace Redesign as it pertains to Greenwich and New Canaan, CT and the Westchester County Airport.

Williams Aviation Consultants Inc. (WAC) analysis of the MITRE Report concerning the "Evaluation of Arrivals to LGA via the Localizer Directional Aid to Runway 22" elicited several comments.

An LDA (Localizer-Type Directional Aid) approach is a non precision approach that uses a ground based localizer in conjunction with altitude crossing restrictions along the final approach course for navigation to an airport. As with the ILS approach, each arriving aircraft will fly the same ground track. The LGA LDA Runway 22 Approach to LGA can effectively be used when the ceiling is at or above the Circling Minimums as published on the approach plate.

The FAA contends that the LDA Approach to Runway 22 at LGA and the ILS Runway 22 Approach to JFK are not compatible being "a safety requirement due to lack of maneuvering room in the airspace".

WAC findings reveal that procedurally, there is no problem using these two instrument approaches simultaneously even though their final approach courses are not parallel. The two final approach courses would cross at some point but that point would be so far east as to make the safety contention ridiculous.

LGA Runway 13 departures referred to as the "Whitestone Climb" takes departures down the middle of the LGA ILS/LDA Runway 22 and JFK ILS Runways 22L/R final approach courses. These departure aircraft normally are well above the LGA/JFK arrivals prior to turning northeast. If this departure procedure had not historically taken aircraft safely above the arrival flows to LGA/JFK Runways 22, it would have been discontinued years ago.

The FAA claims safety issues regarding the use of the LDA Runway 22 Approach at LGA in that the descent gradient is too high for large aircraft. The LDA at LGA contains no written restrictions on the approach plate for any category of aircraft therefore any contention that the approach cannot be used by Large or Heavy aircraft is untrue.

It is unclear where the consultant found data that supports their claim that the approach to Runway 22 is designed with a 3.6 degree angle of descent. Our research reveals a descent angle on the final segment of the approach within legal limits. The descent gradient does not exceed the maximum descent gradient for large or heavy Category C and D aircraft. There is no specific Glide Path Angle published for this approach. The contention that flight crews may not be qualified to fly the LDA approach is like saying that some licensed automobile drivers can't drive on roundabouts. They may not want to drive on one, but there is no law that prohibits it.

Analysis of LaGuardia Runway 31 Departures over Rikers Island compares the original Preferred Alternative (Integrated Airspace with Integrated Control Complex) with the mitigated Preferred

Alternative. Neither the DEIS nor the Noise Mitigation Report assign LGA Runway 31 departure aircraft definitive ground tracks and climb profiles making it impossible to analyze actual noise impacts for any location.

The FAA's consultant's analysis concluded that LGA would actually need three simultaneous headings during the morning departure push from 6 am to 7 am. By their own admission, "noise modeling in the Draft EIS showed that a three-heading scenario would potentially cause noise impacts."

The three headings are "initial" departure headings assigned by the tower. Once the aircraft passes the Minimum Vectoring Altitude (MVA) the departure controller may assign new headings with subsequent altitude restrictions based upon other traffic and/or the departure gate the aircraft is being vectored to.

Once the three headings option is available as a delay reducing tool, its use will expand outside the morning time frame and will ultimately be available at the discretion of Air Traffic Control (ATC).

Aircraft that fly unpublished ground tracks without climb profiles will have protracted impacts on satellite air traffic such as Westchester County (HPN) departures/arrivals. HPN departures/arrivals will have their routes/altitudes moved/restricted to accommodate LGA RWY 31 departure traffic or vice versa. These protracted impacts will move aircraft noise to communities that have had no noise impact prior to the airspace redesign.

In the Assessment of Departure Flight Paths for Westchester County the FAA Consultant is attempting to make the point that under the Preferred Alternative of the DEIS, Westchester County Airport (HPN) departures are constrained by Newark (EWR) and La Guardia (LGA) air traffic, airspace and procedures. This being the case, there is no evidence that any type of operational or procedural analysis was performed for HPN Preferred Alternative and part of the DEIS. Because air traffic flows to and from HPN, EWR and LGA are highly interrelated, a procedural analysis should have been performed on HPN in the original DEIS.

The FAA has not determined whether or not an ICC that combines the Center and TRACON into one facility is feasible by the end of the DEIS out year 2011 date. The ICC Alternative is well above the current technical abilities of the FAA in terms of technology, personnel and feasibility that it should not even be considered.

The FAA Consultant draws attention to increased controller workload required under current HPN departure procedures. However, the current Westchester Departure is a Radar Vector procedure which by definition requires greater controller workload than would be the case with other types of departure procedures that could be designed for HPN. The FAA Consultant also attempts to add increased pilot workload to the controller. In so doing, the consultant erroneously describes pilot considerations during departure at HPN.

The Consultant does, however, correctly state that an FMS/RNAV departure procedure, if designed and implemented at HPN, would reduce workload. Not stated however is that it is true that any charted "Pilot Navigation" departure procedure confines a departing aircraft to specific ground tracks and altitudes. The associated routes and climb profiles can be specifically adapted to circumnavigate both adjacent airspace

boundaries and conflicting departure procedures from nearby airports. Assigning charted departure procedures reduces controller workload, but has no effect on pilot workload.

In one chart the FAA Consultant states that “the dispersal of the departure tracks from Runway 34 at Westchester County Airport results in a borderline change in noise for a single point located on the charts. However, the reason for the dispersal of departure flight tracks is that the only departure procedure available at Westchester is a Radar Vector procedure. If the existing Radar Vector procedure was replaced by RNAV and Pilot Navigation procedures, ground tracks would not disperse and could possibly be designed to over-fly less populated areas.

The lack of detail presented throughout the DEIS is remarkable. Because aircraft headings are utilized rather than specifically designed courses, it is not possible to determine where a route will actually track and at what altitudes departing aircraft will over-fly populations. It is not clear how the FAA Consultant arrived at their conclusions regarding noise changes when literally every departing aircraft could theoretically fly a different departure track. This is true for both the current procedure and the recommendations for the Preferred Alternative.

The FAA Consultant states “In the Preferred Alternative, the simplest departure path was chosen for HPN 34 departures. A path that runs parallel to the EWR airspace boundary, after the heading off the Runway contained in current noise abatement guidelines, keeps aircraft clear of EWR airspace. However, this brings aircraft further north of where they fly today. The “simplest departure path” may not be the best or most effective path.

It appears that no thought was given to the effect departing aircraft flight tracks have on populations, but rather to conforming to new approach control airspace boundaries. There is no evidence that Westchester departures were taken into consideration in the design location of the proposed EWR boundary. It is within the realm of possibility that a study of the proposed EWR approach control boundary in conjunction with HPN departure issues might allow a slight change to better accommodate HPN departures.

The FAA Consultant further states that “It may be possible to mitigate this noise change by developing an RNAV procedure for the departures.” However, RNAV and Pilot Navigation departure procedures confine aircraft to repeated, uniform and specific ground tracks and climb profiles, and serve well to circumnavigate populations in certain cases. The statement “It may be possible” is not a solution but only a wish. Mitigation measures should correctly include definitive mitigation measures rather than statements to the effect of “this might work.” The FAA Consultant draws attention to the fact that “departures must stay 1.5 miles away from the boundary with EWR arrival airspace until they are high enough to pass over the top. If this is not possible, then the departures must be coordinated with the EWR arrival controllers. The requirement to “stay 1.5 miles away from the boundary with EWR” as well as controller coordination issues is solely an air traffic control issue and does not relate in the least to community interest in mitigation measures. The fact that HPN departures must be merged with LGA departures again confirms that a procedural analysis of HPN should have been included in the DEIS.

The FAA Consultant concludes by stating that “The application of an RNAV departure procedure for westbound flights departing Runway 34 at Westchester County Airport would ensure that flight tracks were focused and followed a predictable, predetermined path. Such a change would have no operational impact, since the extra mileage flown is negligible.” However, RNAV and Pilot Navigation departure

procedures would have a positive operational impact on air traffic control issues and community noise mitigation issues.

Continuous Descent Arrivals (CDA) is a concept that would work very well under ideal conditions. In the current and near future the broad use of CDA is impractical for the simple reason that allowing an aircraft to continue this type of profile descent to the airport unaffected by other arrival and departure traffic is just not possible.

When arrival traffic increases, sequencing on the final approach course becomes necessary. Aircraft that are high and fast are difficult to fit into the sequence to the runways. If additional vectors and speed control are required to sequence CDA traffic, any benefit gleaned from the descent thus far will be lost.

CDA's however can be expected to have some impact on departure traffic which may be required to tunnel beneath arrivals potentially causing additional noise for some communities.

**Attachment 3: Congressman Christopher Shays—Statement on the  
New York/New Jersey/Philadelphia Airspace Redesign**

I appreciate the FAA's willingness to come to Stamford tonight to discuss its proposed New York/New Jersey/Philadelphia Northeast Airspace Redesign. I also appreciate so many concerned residents coming out to see the FAA's presentation and to share their legitimate concerns about the plan's impact on their quality of life.

Over the past few months, the FAA has zeroed in on the Integrated Airspace Alternative as its preferred alternative. Throughout this time, I have shared my concerns and many of your concerns with the FAA, particularly the fact that the plan brings more planes into the region at the expense of the region's quality of life.

I strongly oppose the FAA's integrated airspace alternative that would route more air traffic over residential neighborhoods. I am particularly disappointed that the FAA has not developed any noise mitigation strategies, despite the wide swath of land over the Fourth Congressional District that will be adversely impacted by planes at altitudes that appear to go as low as 4,000 feet in the southern portion of the district.

Even though they have no mandate to consider quality of life issues, we cannot simply ignore the hugely negative impacts of air noise in this process.

I believe that if the FAA had to consider the true impacts of the Integrated Airspace Alternative on the communities below the air traffic, they would never have concluded that airspace redesign was the appropriate first attempt at relieving air traffic congestion. The FAA and Congress need to consider alternative methods of reducing air travel delays, including market-based solutions such as de-peaking strategies and incentives, auctioning slots at airports or implementing quotas, especially in light of the fact that no noise mitigation strategies appear to be available for our area. It seems to me these common-sense solutions should not just be studied but tried before implementing such a radical alternative that negatively affects many thousands of residents throughout the Northeast.

I also am concerned many residents don't know precisely how many planes and at what altitude these planes will be passing over them. I am hopeful we can clear at least that up tonight.

Unless the FAA demonstrates that strategies other than airspace redesign are not sufficient, or until a workable noise mitigation is implemented, I will continue to work with other Members of Congress whose regions are affected to oppose this plan.

# TOWN OF NEW CANAAN

TOWN HALL, 77 MAIN STREET  
NEW CANAAN, CT 06840

JUDY A. NEVILLE  
FIRST SELECTMAN

TEL: (203) 594-3000  
FAX: (203) 594-3123

May 9, 2007

Mr. Steve Kelley, FAA NAR  
c/o Nessa Memberg  
12005 Sunrise Valley Drive, MS C3.02  
Reston, VA 20191

Dear Mr. Kelley:  
Here are my comments to the FAA.

## **Comments to the FAA on April 24, 2007**

My name is Judy Neville and I am the First Selectman of New Canaan, Connecticut. I am here tonight representing the Towns of Greenwich, New Canaan and our surrounding neighbors in opposition to the Integrated Airspace Alternative. The Integrated Airspace Alternative selected by the FAA as its preferred alternative to the Airspace redesign project promises to reduce congestion and delays, but involves adding new flight paths and fanning aircraft on departure, which will have the most adverse noise impact over our residential communities.

We agree with the Chairman of the House Aviation Subcommittee Rep. Jerry Costello that the FAA delay this ambitious airspace redesign project to address issues of noise impact and inadequate noise modeling. We need to be assured that the FAA airspace redesign process addresses concerns on "citizens' safety, health, education, and property values."

Given that the FAA excluded aircraft noise mitigation from the project's "purpose and need", we do not believe that the FAA adequately reviewed the four alternatives, and that the preferred alternative is not in the public's best interest. We do not believe that the Integrated Airspace will reduce delays, which principally are caused by adverse weather conditions. We believe the new, lower flight corridor over Fairfield County is a significant threat to our quality of life. Airplanes bound for New York City's La Guardia Airport would begin their descent over the heart of Fairfield County and hug the coastline near Stamford and Greenwich before crossing over Long Island Sound to land. Other than safety, quality of life should have been the most important consideration in the FAA's decision.

We do not agree that of the 19 environmental categories identified in the report that the FAA needs to address only noise mitigation. We believe that other environmental concerns such as the impact of noise on educational development, air emissions on health

as well as the adverse effects on property values and increased risks in ground safety need to be thoroughly reviewed. Your evaluation of 70 to 90 days of operational radar data is totally insufficient to address these concerns.

We have several questions that we would like the FAA to address.

1. We have been told that the new air traffic pattern would allow commercial jets landing at LaGuardia to come in lower on arrival over Fairfield County. Minimum flight altitudes at various points along the proposed flight paths are not provided in the report. I was told at the FAA Hearing in Washington D.C. that the new Integrated Airspace Alternative would lower the operational altitude for arrivals over New Canaan to 5,800 to 6,200 feet. Reduction of aircraft altitude is contrary to widespread public recommendations taken during the project's Scoping period and should have been outright dismissed by the FAA.
2. Most of the current complaints from residents involve low flying aircraft using either Westchester County or Danbury airports. Greenwich is one of the most severely impacted communities in the country. There is an average of 340 low altitude flights per day from five different airports. Air Tran and Jet Blue, low-fare airlines, are now both operating new flights at Westchester County Airport. There are a large number of arrivals operating at 3000 feet over our area which already create significant noise. We understand that the number of flights over Fairfield County will double from a combination of the increased number of small private airplanes and the new commercial carriers. Has the FAA considered the impact of these recent developments and the resulting noise generated by more airplanes flying at lower altitudes?
3. We were told by the FAA at the hearing in New Canaan in October that this increase in small aircraft is an "unintended consequence of doing nothing." What measures will the FAA take to assure the safety of small aircraft flying over southern Fairfield County?
4. The environmental impact statement omits numbers and altitudes of flights that will be redirected, making it virtually impossible to assess the impact to neighboring communities. What information can you provide us to evaluate the number of current flights, frequency of projected flights, altitude data and what aircraft model were used to calculate noise levels? This should be public information; however, I have been told that these numbers are vague and unavailable. When will the current and projected number of flights for arrival at La Guardia airport in the new flight corridor over New Canaan be made available? I have asked for this information as has Congressman Chris Shay's office and Senator Chris Dodd's staff on our behalf only to be told that it is unavailable. The residents of New Canaan have a right to know how many flights will fly over their community and at what intervals.
5. We understand that the FAA's preferred alternative claims to save an estimated 12 million minutes of delay annually for the five major metropolitan airports— Kennedy, LaGuardia, Newark, Teterboro and Philadelphia. I was told at the FAA Hearing that the Preferred Alternative will save 6 minutes per flight and a total of 32% decrease overall in delays. What analysis can you provide that verifies this

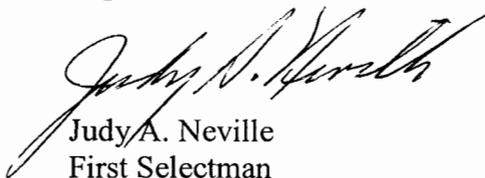
information? Is it not true that small capacity improvements are rapidly taken advantage of by the carriers to schedule additional flights during peak period, so reduction in delays are unlikely? The FAA needs to study the real cost/benefit analysis of this proposal to verify what we believe is a marginal benefit compared with the substantial costs to our Towns.

6. The Noise Mitigation Report released on April 6<sup>th</sup> shows that departures from Westchester County Airport that used to be routed West will now make a right turn and climb East over Fairfield County. What will be the specific routes and altitude of these northbound departures from White Plains?

A few final comments on noise - The FAA does not consider any noise levels below 45 decibels and ONLY noise changes in excess of 5 decibels to generate a significant impact. The aircraft noise levels, for the most part, in the metropolitan area are in the 45 – 60 decibel threshold or lower. A noise change of 5 decibels is equivalent to a factor of 3.2 times increase in noise energy. In reviewing the grid completed by the FAA, New Canaan can expect a “slight to moderate” increase of four times the current noise level to a high of 41.8 decibels. The average increase in the report is 57% in Fairfield County. The residential areas of Fairfield County are extremely noise sensitive and residents react vehemently to changes far less than this. Residents should know when over-flights might increase by a factor of even two or three as a result of proposed changes in order to evaluate and offer comment on these changes. Residents also need to know if the FAA intends to implement this proposal in slow, gradual steps through the year 2011 so the surrounding communities do not feel the immediate impact. If the FAA changes routes for arrivals or departures at or below 3,000 feet at Westchester County, will it not have to release an Environmental Impact Statement?

Furthermore, we believe that the DEIS is fatally flawed as to the impact on New Canaan since it relies on data from the year 2000 for noise assessment. The FAA only considered the instrument operations from 21 airports in its modeling of noise impacts for the proposed project. The FAA did not consider all military aircraft, over-flights, VFR aircraft and excluded air traffic from 119 airports.

In closing, I would like to mention that the First Selectman and Mayors of eight surrounding towns attending the FAA Public Hearing in New Canaan were unaware of the four alternatives presented by the FAA at the time of closing comments in July 2006. The FAA did not present the data in a timely and accessible manner for officials to make any kind of assessment in order to comment or respond. The Towns of Greenwich and New Canaan are very concerned that large constituencies of southern New York and Connecticut remain largely unaware about how the Airspace Redesign proposals may impact their communities.



Judy A. Neville  
First Selectman

# United States Senate

WASHINGTON, DC 20510

March 23, 2007

The Honorable Marion Blakey  
Administrator  
Federal Aviation Administration  
800 Independence Avenue, SW  
Washington, DC 20591

Dear Administrator Blakey,

We are writing to express our strong concerns about the Federal Aviation Administration's (FAA's) proposed redesign of the New York/New Jersey/Philadelphia region airspace. Today's announcement indicates your agency's direction on this proposal, which will force scores of New Jerseyans—who already must live with unacceptable levels of noise—to have their lives interrupted and further burdened with the nuisance of having more noise from aircraft flying over their homes and businesses.

FAA's decision provides no indication that the Bush Administration gave any consideration to a practical alternative that incorporates both operational benefits and effective air noise reduction as primary design elements. The New York Times reported in February that Steven Kelly, FAA's project manager for the redesign, focused only on safety and efficiency during this process, and that noise concerns were "at best, a side issue." The nuisance of aircraft noise is anything but a side issue for many of our constituents. In our opinion, the FAA's decision to shut them out of the process, and to relegate their noise concerns to secondary or tertiary importance, has produced a flawed redesign proposal.

If your proposal is adopted, some 300,000 New Jerseyans will experience elevated noise levels, including residents in northern Bergen County, Gloucester County, Essex County, and Union County. Furthermore, FAA is only planning on holding one public hearing in New Jersey about its decision. Failure to hold separate public hearings in these locations prevents many of our constituents who would be affected by your proposal from voicing their opinions on this matter and truly inhibits the possibility of constructive public input on FAA's decision.

Your proposal will impact severely the quality of life for hundreds of thousands of New Jerseyans, and reduce property values for many in our State. We believe that it may not be possible to adequately mitigate the environmental noise effects of FAA's proposed design, and that the design proposal itself must be reevaluated with aircraft noise

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reduction as a major design element. Until then, we will continue to have grave reservations about this plan.

Sincerely,

  
Frank R. Lautenberg

  
Robert Menendez

BRYAN R. LENTZ, MEMBER  
161ST LEGISLATIVE DISTRICT

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\*\*PLEASE REPLY TO SWARTHMORE OFFICE\*\*

E-MAIL: BLENZT@PAHOUSE.NET

May 7, 2007



House of Representatives  
COMMONWEALTH OF PENNSYLVANIA  
HARRISBURG

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VETERANS

Steve Kelley, FAA NAR  
12005 Sunrise Valley Drive, MS C3.02  
Reston, VA 20191

Dear Mr. Kelley:

As the State Representative for the 161<sup>st</sup> Legislative District in Delaware County, Pennsylvania, I would like to offer my opposition and comment on the FAA's Preferred Alternative and Mitigation Plan for the airspace redesign at Philadelphia International Airport.

The FAA has maintained that an airspace redesign was needed "for the purpose of accommodating growth while maintaining safety and mitigating delays." Yet, this plan provides no real improvement in flight delays. In optimal conditions, a few minutes – at most – might be saved per flight. At the same time, the burden of changing flight patterns will fall squarely on the shoulders of Delaware County residents. I also fail to see how safety will be increased with jets directed at low altitudes over residential areas, and the space between aircraft reduced by 40%.

The airspace redesign included Philadelphia International in the New York City metropolitan region with little or no input from officials here. Despite the inclusion with New York City airports for the purpose of airspace redesign, the FAA's own forthcoming study on Air Service Demand in the NY Metro region fails to even address or consider Philadelphia International Airport.

Most troubling is that the airspace redesign ignores the fact that Philadelphia International is at or near its maximum capacity. Regrettably, the FAA intentionally declined to consider the potential use of other existing airports with underutilized capacity to alleviate delays. In recognition of the fact that no modifications at PHL are going to solve the increase in demand for air travel, I have introduced a bill in the Pennsylvania House of Representatives to establish a regional airport authority. This authority would help relieve the burden of air traffic concentrated at PHL and would

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coordinate the operation of Philadelphia International Airport, Lehigh Valley International Airport, and other airports in Southeastern Pennsylvania. This bill has received bipartisan support, and I hope that the FAA will similarly embrace this effort to improve the efficiency of air travel with without harming the communities in Delaware County.

Thank you for your consideration.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Bryan R. Lenz". The signature is stylized with a long horizontal stroke extending to the right from the end of the name.

Bryan R. Lenz  
State Representative  
161<sup>st</sup> Legislative District

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**Nita M. Lowey**  
**Congress of the United States**  
**18th District, New York**

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May 11, 2007

Steve Kelley, NY/NJ/PHL Airspace Project Manager  
Federal Aviation Administration  
c/o Nessa Memberg  
12005 Sunrise Valley Drive, MS C3.02  
Reston, VA 20191

Dear Mr. Kelley:

I am writing in regard to the Federal Aviation Administration's New York/New Jersey/Philadelphia Airspace Redesign project and the Noise Mitigation Report (NMR) that was released subsequent to the Draft Environmental Impact Statement (DEIS). I appreciate the FAA's interest in reducing the noise impacts suffered by our communities as a result of air traffic in our region. I also appreciate that Regional Administrator Manny Weiss was willing to meet with me regarding this important issue and look forward to following up on this discussion.

Air traffic has grown tremendously over the past several decades. Yet the basic principles that have regulated our airspace have not changed. The communities that surround airports and lie along takeoff and landing pathways have been significantly impacted by increased air travel.

In my comments on the DEIS, I expressed my concerns regarding the area in Westchester County along the shore of the Long Island Sound, in my Congressional district. As previously stated, these communities lie along the extension of LaGuardia's runway 4/22 and often have planes lining up and flying overhead to land on this runway. I am pleased to see in the NMR that the FAA is planning to institute new procedures regarding the ILS and LDA landing to Runway 22 at LaGuardia, which will decrease the number of planes over the Sound Shore area. I ask that the FAA institute these new procedures as soon as possible. There is no need to wait to make these changes – they can and should be implemented immediately.

I would also like to reiterate my desire that the FAA make use of new and emerging technology, including RNAV technology, as quickly as possible at the busiest airports in the New York region. This new technology will increase operational flexibility and precision, while at the same time offer new opportunities to institute noise mitigation activities. As stated previously, I stand ready to work with the FAA as it

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moves towards the goal of modernization that will increase safety and efficiency while also decreasing noise impact in our community.

Finally, I am pleased to see that the FAA has heeded the calls that I and the County of Westchester made to not route planes over the Indian Point nuclear power facility. To do so would have been a huge mistake, threatening our homeland security and needlessly increasing the risk of an accident with horrific consequences.

I look forward to continuing to work with you and your staff on this important process. I am confident that by working together through administrative and legislative processes we can achieve results that improve efficiency and the quality of life for those who have long been affected by air traffic.

Sincerely,

A handwritten signature in black ink that reads "Nita Lowey". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Nita M. Lowey  
Member of Congress



**TOWN OF RIDGEFIELD**  
Office of the First Selectman

May 10, 2007

Mr. Steve Kelley  
Federal Aviation Administration  
In Care of: Nessa Memberg  
12005 Sunrise Valley Drive, MS C3.02  
Reston, VA 20191

Dear Mr. Kelley:

On behalf of the entire Town of Ridgefield Board of Selectmen, we are writing to express our deep concerns with the FAA plan to redirect New York air traffic over our town. Specifically, there are two points which we would like to call to your attention.

First, we are troubled by the fact that the FAA has not considered the Port Authority of New York and New Jersey's agreement to establish operations at Stewart Airport in Newburgh, NY, in an effort to reduce congestion associated with the major New York metropolitan airports. In light of this, any shift in flight paths would clearly be premature.

Moreover, this plan shows a blatant disregard for the value of Weir Farm National Park, which happens to be the only national park in the entire state of Connecticut. Its location here in Ridgefield is something that we, as a community, take great pride in. A redesign of air space will bring air traffic directly over Weir Farm, and as a result, the natural tranquility it affords countless residents and visitors will undoubtedly be destroyed. In fact, Gateway National Park was recently cited by CBS News Radio as being the worst national park for its garbage, noise and pollution from planes. To see Weir Farm fall to the same fate would be a true tragedy.

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1 of 2

Mr. Steve Kelley

May 10, 2007

Page Two

I urge you to thoroughly consider these aforementioned points, and advise that any plans for redirecting air traffic be reconsidered.

Should you have any questions, please do not hesitate to contact me.

Regards,

A handwritten signature in black ink, appearing to read "Rudy Marconi", with a long horizontal flourish extending to the right.

Rudy Marconi  
First Selectman

Copy:       Honorable Christopher Dodd, United States Senator  
              Honorable Joseph Lieberman, United States Senator  
              Honorable Christopher Shays, Member of Congress  
              Honorable Chris Murphy, Member of Congress  
              Attorney General Richard Blumenthal  
              Representative John Frey  
              Linda Cook, Weir Farm

HELEN M. MARSHALL  
PRESIDENT



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CITY OF NEW YORK  
OFFICE OF THE  
PRESIDENT OF THE BOROUGH OF QUEENS  
120-55 QUEENS BOULEVARD  
KEW GARDENS, NEW YORK 11424-1015

May 9, 2007

Mr. Steve Kelley, FAA 1  
c/o Ram Nagendran  
12005 Sunrise Valley Drive, MS C3.02  
Reston, Virginia 20191

Re: Comments on the Preferred Alternative and Noise Mitigation Plan for the New York / New Jersey / Philadelphia Metropolitan Area Airspace Redesign Project

## Introduction

My office has reviewed, in pertinent part, the documents describing the Preferred Alternative (the Integrated Airspace Alternative Variation with Integrated Control Complex) and the accompanying proposed Noise Mitigation procedures, made available last month by the United States Department of Transportation (USDOT) and the Federal Aviation Administration (FAA), for their New York / New Jersey / Philadelphia Metropolitan Area Airspace Redesign Project (the "Project"). As you know, I am the only borough-wide elected official in the Borough of Queens in New York City, which is home to two of the nation's busiest airports, John F. Kennedy International Airport (JFK) and LaGuardia Airport (both of which fall within the airspace targeted for redesign in the Project). As the Borough President, I count among my constituents not only the two airports and their tenants, employees and customers, but also more than 2,000,000 residents who make their home here, the majority of whom have been, at one time or another, impacted by the airports' operations. For these reasons, I offer my comments on the recently-published Preferred Alternative and the proposed Noise Mitigation procedures on behalf of the Borough of Queens. If some of my observations seem familiar, it is because I have made most of them again and again for the past several years, starting well before the current airspace redesign project even began. Further, I expect to continue to raise these points until someone in the federal bureaucracy listens and responds to our needs and concerns.

## Comments

Allow me to start by commenting once again on the purpose of the Project, the intention of which has been described by the FAA as follows: “[the Project is intended] to increase the efficiency and reliability of the airspace structure and air traffic control system. The airspace redesign is needed to accommodate growth while maintaining safety and mitigating delays, and to accommodate changes in the types of aircraft using the system.” I agree that it is important to ensure that our region’s aviation system continues to operate effectively; after all, a vibrant aviation industry is vital to the economic well-being of Queens, New York and the surrounding region. Our two airports provide tens of thousands of on-site jobs and another several hundred thousand aviation-related jobs, and they generate millions of dollars in tax revenue annually. Moreover, they are integral components of New York City’s tourism trade. While we want to see the airports and their operations continue to flourish, we do *not* want that economic development to come at the expense of our residents’ quality of life.

It is out of concern for Queens’ residents that I express my profound disappointment and frustration that the FAA chose to examine the potential aircraft noise impacts of the Preferred Alternative at LaGuardia only in the narrowest way permitted by law, and even then the possible impacts on JFK were not even considered (presumably because any increases in noise levels around JFK would not, according to the FAA, meet the minimum threshold required by law to trigger noise mitigation action). Worse, air quality seems to have been altogether neglected by the authorities as an area of concern. While there was considerable statistical data about noise in the environmental impact statement and in the more recently released documents, I do not believe that the proposed noise mitigation tactics will provide Queens with much relief, if any. The use of “departure mitigations” (i.e., altering departure paths and perhaps rates of ascent) and shifting more arrivals over Long Island Sound might look promising on paper, but, given the volume of air traffic in and around this borough, and the untested nature of the FAA’s proposals, it is clear that a more comprehensive plan is needed. Discussing the impact of noise on our communities in terms of decibels, and examining how various shifts in flight paths and the adoption of other procedures might conceivably cause a reduction of a few decibel levels in scattered areas, tends to minimize the nature of our noise problem. Also, when the noise level is measured on the basis of day-night averages, as was the case here, the noise problem is always going to look less severe on paper than it really is. I wonder how much research time was spent in some of the homes or backyards of our Queens residents.

Taking such a narrow, constricted approach in examining the impact of airport operations on the quality of life in Queens has apparently enabled the FAA to conclude that our problem is a minor one that can be addressed with a few simple adjustments.

What ought to have been done— and what still needs to be done— is for those in charge of the Airspace Redesign Project to actually visit some of these neighborhoods so they can finally hear first-hand how aircraft noise interferes with our students’ ability to learn and causes many of us to lose hours of sleep on any given night. I am all too aware of the impact that aircraft noise has on our neighborhoods— not only did I represent the LaGuardia Airport area for approximately ten years in the State Legislature and another ten years in the City Council before I became Borough President in 2002, but I also live near LaGuardia Airport.

I am also aware of the other health risks generated by the airports’ operations, in particular the heightened asthma rates in Queens and its environs, which experts believe are caused at least in part by the noxious exhaust fumes being spewed out at and near our airports, both on the ground while the aircraft idle, and in the sky while they pass overhead. Instances of improper fuel dumping also plague our area. While the environmental impact report indicated that airspace redesign might have some positive impacts on the level of air pollution caused by air traffic, I regret that the FAA neglected to fully acknowledge or address this problem. In fact, as I discussed above, the current proposals contains little information on the subject, which apparently means that the FAA’s earlier conclusion in the environmental impact statement was also its last words on the subject—that is, that since the airspace redesign “alternatives would be considered *de minimus* actions and would have little effect on vehicle traffic, no negative air quality impacts would be expected.”

From the time that the Project was initiated many years ago-- and actually long before then-- many of our community boards, civic associations, other elected officials, and I have protested again and again that the FAA, which is, after all, a government agency, should be taking a serious look at aircraft noise and air pollution caused by aircraft operations. In fact, when the Project was first announced, many of my constituents and I expected that the Project would bring much-needed and long-awaited relief from aircraft noise to the people of Queens. Now, unfortunately, the best hope the Project seems to offer is that things might not get too much worse with the implementation of the Preferred Alternative. We deserve better from our federal government!

It is now disingenuous— and too convenient-- for FAA officials or their representatives to hide behind their cramped reading of the law and thereby avoid taking responsibility for those of us who live on the ground but who are nevertheless deeply impacted by local aircraft operations. When my staff raises noise and pollution concerns with some FAA officials, these officials simply hold up their hands defensively and say that such matters were beyond the agency’s mandate when this Project was conceived.

We are very disappointed that, at least in this instance, the FAA appears to be acting more as a consultant for the airline industry than as a guardian of the people.

My office does not have the technical expertise to analyze the documents released in connection with the Project and all the data contained therein, but in light of the broad concerns addressed in this letter, a mathematically precise analysis of the Preferred Alternative and the noise mitigation plan is unnecessary. While we would never outright reject a plan that could even potentially reduce aircraft noise over our neighborhoods, we prefer, however, that the FAA instead reconsider the entire Project, and in so doing, factor into its calculations the needs of those people who are most profoundly impacted by the airports' operations. Furthermore, this reconsideration of the entire Project must be done only after air monitoring *at* our airports has been implemented, and the results have been analyzed, so that aviation's affect on air quality can be studied at the same time as and in conjunction with its impact on noise levels in our communities. Another compelling reason to reconsider the entire project is presented by the fact that airspace redesign has taken so many years to implement that many developments in the aviation industry, such as the increased and more frequent use of much larger aircraft and the development of Stewart Airport as a fourth major New York City-area airport, apparently have not been properly integrated into the current plan.

On another front, the FAA believes that the Preferred Alternative would enhance aviation safety, which is of course another huge concern in Queens. One need look no further than the tragic crash of American Airlines Flight 587 in November 2001 to understand why this is so. Unfortunately, we cannot just take the FAA's word for it. What basis is there for concluding that both air travelers and those who live under flight paths will be safer after this airspace redesign plan has been implemented?

The Project also has possible socioeconomic ramifications and raises concerns about environmental justice. Concerning the former, the drafters of the Project's environmental impact statement had foreseen possible indirect impacts caused by the increased noise levels, but seemed to preemptorily dismiss concerns about such impacts: "All of the significantly impacted census blocks are located in the vicinity of LGA, EWR, and PHL. These areas are already exposed to extensive aviation noise. In addition, because of their urban setting, ambient noise is also high in these areas.... Therefore, it would be unlikely that residences or businesses would relocate, surface transportation patterns would be altered, established communities would be divided, planned development would be disrupted or employment levels would be changed as the result of any of the Airspace Redesign Alternatives." It is disrespectful to the people and businesses of Queens for the FAA to imply that a new airspace plan might adversely

impact the quality of life in the region, but not enough to make these affected people and businesses move out of the area. The environmental impact statement suggests that only then would the implementation of an airspace redesign plan have a significant socioeconomic impact. To conclude that since a working and living environment is already burdened by aircraft noise and that, therefore, more noise will not have an impact on a particular area, is an easy way for the FAA to avoid addressing the larger socioeconomic issues raised by the increasingly frequent clashes between the quality of life and commercial concerns in a large urban area such as Queens.

Similarly, the FAA has not addressed issues of environmental justice. The FAA must identify and address disproportionately high adverse health and / or environmental impacts on low-income and minority populations in the communities potentially affected by the Preferred Alternative. The FAA is charged with analyzing the potential for disproportionate adverse impacts to these communities; however, by not including middle class communities in its environmental impact study, the FAA disregarded the past, present and future impacts of aviation noise on a significant part of the Queens population. Thus, as I have attempted to make clear throughout these comments, the parameters guiding the conduct of the entire Project were so narrowly drawn that the conclusions suggesting minimal adverse impacts on Queens communities were inevitable. Shockingly, under the criteria applied by the FAA, the environmental impact statement concluded that the only part of Queens where increased aircraft noise would raise environmental justice issues is Riker's Island. The report did not discuss the potential impacts on any other areas of Queens, including, for example, parts of southeast Queens (where JFK Airport is located), which have substantial minority populations.

In addition, the FAA, in its environmental impact statement, was dismissive of any new airspace plan's potential impact on publicly-owned lands (including parks, recreation areas, wildlife / waterfowl refuges, as well as on migratory birds, fish, wildlife and plants, and on any historic sites, including historical, architectural, archeological and cultural resources). Queens of course has many natural resources on public lands, most of which have been impacted to varying degrees by aviation activity, including, but not limited to: Flushing Meadows Corona Park, Flushing Bay, the East River (all affected mostly by operations at LaGuardia Airport), as well as Gateway National Park, Jamaica Bay, and the beaches on the Rockaway peninsula (all affected by operations at JFK Airport). Rather than analyzing all the minute data at its disposal in so narrowly as to conclude that any impacts on our quality of life will not rise to some arbitrarily-set threshold, the FAA and other responsible government entities should be doing all that they can to address the countless aviation-related problems already faced by our borough. The goal of improving aviation efficiency in the skies need not be mutually exclusive from the even more important goal of protecting the quality of life of those on the ground.

The only potentially good news in the FAA's most recent actions is contained in the noise mitigation proposals. However, I believe it would have been much more efficient, effective and fair to factor noise mitigation directly into the initial design phase of each of the airspace redesign alternatives, rather than considering mitigation almost as an afterthought. Even the Port Authority, which, above all else, would like to see a more effective use of this region's airspace, recognized the common sense of this approach in its comments on the draft environmental impact statement. Among the mitigation strategies that the FAA should implement— rather than merely consider-- are:

— Continuous Descent Approach (CDA): As they approach an airport for landing, aircraft would do a continuous descent, which results in a higher-altitude flight path and lower engine power levels. Ultimately, this practice might result in less noise on the ground;

— Nighttime abatement procedures: During nighttime hours, when demand decreases, it might be possible to implement flight track and runway use programs that direct air traffic away from residential and other noise-sensitive areas. I would go further and impose a late-night to early morning curfew on flights to and from the local airports and only allow exceptions for exigent circumstances. Even if such a measure would require an act of Congress, the FAA's support would surely help persuade others that reasonable curfews are necessary and appropriate;

— Additional Use of water and / or industrial areas: Potential flight tracks may be adjusted so that aircraft are routed away from residential and other noise-sensitive areas. While this method seems to have been incorporated to a limited degree in the FAA's noise mitigation procedures, much more re-routing (and oversight of air traffic controllers and pilots to ensure compliance with the new routing) could be done; and

— Sound insulation of impacted buildings with educational and medical uses: This kind of facility ought to be more frequently eligible for Airport Improvement Program (AIP) funds for soundproofing programs, and indeed, the Port Authority has, with federal funding, soundproofed a number of schools in Queens. Also, while I have been working with New York City and the Port Authority to implement a modest residential noise abatement project for those residents afflicted by aircraft noise, the federal government must contribute much more to local efforts to deal with noise, both by increasing funding levels and, where appropriate, by sharing its technical expertise.

I would also like to share my observation that, though the FAA repeatedly claims that this entire airspace redesign project was conducted with ample opportunities for

public input, the public meetings that were held could have been better-publicized and made more accessible. Also, while I understand that the FAA claims that residents near JFK will experience no significant noise increases and thus it was not necessary to conduct a public meeting near there, it is simply unthinkable that no such meeting was scheduled in the neighborhoods surrounding JFK. In fact, only one public meeting was held in New York City, while much less densely populated areas in Connecticut and Long Island each had meetings. Further, while public meetings are one way to gauge public sentiment, they are not the *only* way. Forgive the pun, but it does not take a rocket scientist to understand the serious negative impacts of aircraft noise on affected communities.

## **Conclusion**

It is my understanding that neither the Port Authority nor the City of New York, both of which have a vested interest in seeing the aviation industry flourish, particularly supports the current airspace redesign plan. Neither the City nor the Port Authority seems to have much confidence that implementation of any of the plan would accomplish the goals for which it is intended. If that is the case, and any benefits realized by the aviation industry indeed turn out to be negligible, we wonder if that is enough to justify exposing Queens to an increased risk of even more aircraft noise. Rather than looking to the potential benefits of the so-called Preferred Alternative and waiting to see what harmful impacts would accompany these potential benefits, the FAA and other responsible government entities at the federal, state and local levels should act *now* to address the quality of life issues caused by the aviation industry.

Because I am not convinced that the Preferred Alternative would not have a significant negative impact on the quality of life in Queens, I do not support the implementation of the plan in its current incarnation.. The FAA must discard this plan and compose new plans that will accommodate the people and businesses of Queens, as well as the aviation industry and the people it serves.

First, the executive and legislative branches of the federal government must adopt a new approach to the aviation industry. Among other things:

--- The federal government must start to view aviation in context with other modes of transportation, particularly in the northeastern United States. Other modes of transportation, particularly high-speed passenger rail service, must be supported in some way by the government. It makes no sense for the government to be cutting its assistance to the nation's rail systems, as it has been doing in recent years. A reliable high-speed rail

system would relieve some of the airport congestion caused by, among other things, an abundance of commuter-length flights at local airports;

— Reasonable limits must be imposed in congested residential areas such as Queens. The High Density Rule, or a similar system used to cap daily operations at LaGuardia Airport and JFK Airport must remain in place. It is worth noting that the FAA still has not found an acceptable replacement rule for the High Density Rule, which was supposed to have expired at the beginning of this decade. Local airport operators and municipalities must be allowed to provide more meaningful input into operating airports. Therefore, for example, if a municipality determines that it is in the best interests of all concerned to reasonably limit an airport's hours of operation and / or impose a curfew, then at the very least, there should be a procedure whereby the municipality can work with the FAA and the USDOT in taking such action;

— The FAA must work with localities, including New York City and Queens, to implement the above measures, as well as to develop, implement and enforce a system to limit the maximum decibel level (at any given time and not on average) of aircraft noise over highly populated residential and other noise-sensitive areas;

--- No physical expansion, including the addition or alteration of runways should even be contemplated at these airports. We are reasonably optimistic that the recent announcement by the Port Authority concerning the expanded use of Stewart Airport will at least temporarily quell all speculation about enlarging LaGuardia and JFK;

— Congress must immediately work on requiring the phasing-in of a requirement that all aircraft be Stage 4-compliant, and that all new aircraft contain the most modern and efficient technology for reducing noise and air pollution; and

— Rather than cutting funding for aviation and aviation-related programs, the federal government should be helping to subsidize the development and implementation of more widespread noise abatement programs that would reduce aircraft noise levels inside private homes, as well as in schools, hospitals, libraries, museums and other public buildings.

Again, I recognize and appreciate that our airports and the aviation industry are vital to the economic well-being of this entire region, in terms of jobs, tax revenue and the tourism trade. Of course we all want to see the industry thrive, but not at the expense of the quality of life in Queens. As I have indicated above, the FAA needs to go back and re-focus its study and take into account the profoundly negative impact that aircraft noise and pollution have had and will continue to have on this borough unless we take

advantage of this once-in-a-lifetime opportunity to fundamentally change the way that airports co-exist with the communities surrounding them in congested urban areas such as Queens.

Thank you for your consideration. If you require any further information, please do not hesitate to contact me.

Sincerely,

Helen M. Marshall  
President  
Borough of Queens



**OFFICE OF THE COUNTY SOLICITOR**

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**JOHN P. MCBLAIN**  
County Solicitor

May 10, 2007

Steve Kelley, FAA  
c/o Ram Nagendran  
12005 Sunrise Valley Drive  
MS C3.02  
Reston, Virginia 20191

Re: County of Delaware, Pennsylvania, Comments on the New York/New Jersey/Philadelphia Metropolitan Airspace Redesign Noise Mitigation Report and Operational Analysis of Mitigation of the NY/NJ/PHL Airspace Redesign

Dear Mr. Kelley:

The following are comments by the County of Delaware, by and through its County Council (“Delaware County” or “County”) on the Federal Aviation Administration’s (“FAA”) April 6, 2007 New York/New Jersey/Philadelphia Metropolitan Airspace Redesign Noise Mitigation Report (“Noise Mitigation Report” or “Report”) and the April, 2007 Operational Analysis of Mitigation of the NY/NJ/PHL Airspace Redesign (“Operational Analysis”). In its July 1, 2006 comments on the New York/New Jersey/Philadelphia Metropolitan Airspace Redesign Draft Environmental Impact Statement (“DEIS”), the County stated that it will be adversely affected by the proposed Airspace Redesign, which will result in drastic increases in noise exposure levels to Delaware County businesses, public facilities, schools and residents [County July 1, 2006 comments, p. 1], and that the DEIS failed to analyze the Airspace Redesign (“Project”) noise impacts. [County July 1, 2006 comments, p. 3].<sup>1</sup> The Noise Mitigation Report and Operational Analysis further highlight the many inaccuracies and omissions in the DEIS.

I. THE DEIS

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<sup>1</sup> The County restates and, by this reference, incorporates its July 1, 2006 comments on the DEIS in these comments on the Noise Mitigation Report and Operational Analysis.

A. Integrated Control Complex (“ICC”) Construction Environmental Impacts

In the Draft Environmental Impact Statement (“DEIS”), the FAA stated “[t]he FAA is currently studying the ICC concept to determine whether it meets operational, safety, and budget requirements. The FAA has not yet decided whether to approve the ICC concept. Should the FAA determine that the ICC concept is feasible and seek to implement it in the Study Area, it will undertake the appropriate environmental review prior to any construction activities.” [DEIS, p. 2-37, Section 2.5.6, Integrated Airspace Alternative] The DEIS does not address the potential environmental impacts of construction of the infrastructure needed to support the proposed new ICC. The impacts on resources such as coastal resources, farmlands, floodplains, water quality, wetlands, wildlife and scenic rivers have not been assessed, and issues such as pollution prevention and control and solid waste and hazardous materials disposal are also ignored. Neither the Noise Mitigation Report nor the Operational Analysis contain any environmental review of the construction impacts of the proposed ICC and its infrastructure.

B. ICC Implementation

The DEIS, the Noise Mitigation Report and the Operational Analysis do not address ICC implementation phasing and scheduling. It is unlikely that the FAA will be able to complete all of the technical requirements necessary to construct and implement an ICC within the Year 2011 time frame set forth in the DEIS. For example, a significant amount of time will be required to train Air Route Traffic Control Center (“ARTCC”) controllers to work in the terminal environment.<sup>2</sup> Until a sufficient number of ARTCC controllers become terminal certified, ARTCC sectors cannot be moved into the terminal environment, and certainly not within the time frames specified in the DEIS. It is also highly unlikely that the FAA could combine the NY ARTCC and TRACON into one facility by the end of the DEIS out-year, 2011. Thus, the efficiencies projected by the FAA could not be achieved within the anticipated time. As none of the options that are available without the ICC provide any discernable benefit, there is no need for this proposed airspace realignment, and the ICC concept should be dropped from consideration.

C. Noise Modeling

The DEIS does not adequately analyze the noise impacts of the proposed project because not all air traffic activity was accounted for or modeled in the Noise Mitigation Study. First, the impacts of Visual Flight Rules (“VFR”), over-flights and military air traffic are not addressed in the DEIS, or in the Noise Mitigation Report and Operational Analysis. These omissions are inconsistent with the Purpose and Need stated in the DEIS, that “the Airspace Redesign is needed to accommodate growth while maintaining safety and mitigating delays, and to accommodate changes in the types of aircraft using the system (e.g., smaller aircraft, more jet aircraft).” [DEIS, p. ES-1, Section ES.1, Purpose and Need].

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<sup>2</sup> The training program at the Northern California Terminal Radar Approach Control (“TRACON”), an ICC type facility, requires two or more years for controllers to become fully certified.

Moreover, the FAA excluded traffic from 119 area airports, and only considered instrument operations from 21 airports in its noise modeling of the proposed Airspace Redesign.

Finally, the DEIS Year 2000 baseline does not reflect post-9/11 aviation conditions and fleet mix and air traffic activity in Years 2006 and 2007. Any conclusions derived from using the 2000 baseline will not accurately reflect the benefits or impacts of the Proposed Airspace Redesign Alternative. The Noise Mitigation Report does not state if, or how, noise modeling was refined to account for changes that have occurred since the DEIS was completed.

## II. THE NOISE MITIGATION REPORT

### A. Departure Headings and Routes

The Noise Mitigation Report states that “[d]eparture headings are the same in both [Integrated Airspace Proposal] variations. The traffic loadings on the headings are slightly different as the variation without ICC uses different departure fixes than does the variation with ICC.” [Noise Mitigation Report, p. 13, PHL Departures. The DEIS, however, shows differences. Further, the actual traffic loadings used and the locations of departure fixes are not specified in the DEIS for either variation (with or without the ICC). Therefore, meaningful analysis of the noise impacts is not possible.

Further, none of the proposed mitigation measures will alleviate the adverse noise and other impacts on Delaware County. Fanned departure headings in both the original and mitigated Preferred Alternative will result in an increase in the size of the area impacted by PHL departures, and corresponding increases in the noise impacts along the ground tracks of the specified new headings. This differs markedly from current departure procedures from Runways 27L/R and 09L/R which create departure headings which produce initial aircraft departure ground tracks over the Delaware River. Even the so-called “mitigated” Preferred Alternative would establish three or four headings for both east and west departures, creating ground tracks that would place departing aircraft over populated areas.

The Noise Mitigation Report also presents a plan for using a single over-river route for PHL nighttime departures. The same, or similar, single over-river departure route could be used for daytime departures as well, simply by making procedural changes that can be implemented without redesigning airspace or constructing an ICC facility.

Referring to Figure 14 [PHL Preferred Alternative West Flow Departures - Mitigated vs Original] and Figure 15 [PHL Preferred Alternative East Flow Departures - Mitigated vs Original], the Noise Mitigation Report states “[i]t should be noted that for simplicity of presentation, these graphics only show the center model tracks (backbones) without their associated geographic dispersion (subtracks).” [Noise Mitigation Report, p. 31] The flight tracks shown in Figures 14 and 15 do not depict the actual flight tracks that will result from the Proposed Action. The flight tracks will be more widely dispersed, because the only departure procedure available at PHL is, and, under the Proposed Action would be, a radar vector

procedure in which the controller determines the altitude and location at which departing aircraft will be turned. The proposed new departure headings are simply “initial” headings assigned to aircraft prior to take-off. After becoming airborne, and clear of obstacles and terrain, a controller can turn aircraft in any direction. Thus, each departing aircraft at PHL could, theoretically, follow a different departure track, most of which would likely fall over Delaware County.

The Noise Mitigation Reports continues by stating “[t]he new track positions between the initial heading segment and the assigned airspace fix are mainly determined by the location where the aircraft are allowed to turn off of their initial segment. In choosing where these turns should take place, an attempt was made to select the turn locations in the areas most likely to minimize overall noise impacts [Noise Mitigation Report, pp. 31-32] . . . [i]n mitigating departures all significant impacts of the Preferred Alternative would disappear. This consists of the 251 people in zone PHL-A. The 116,925 people experiencing slight to moderate impacts in the original Preferred Alternative would be reduced to only 6,920 people in the mitigated version . . .” [Noise Mitigation Report, p. 37]. By selecting turn points that might result in a reduction in noise impacts, the FAA was able to show a reduction, from 116,925 to 6,920, in the number of people impacted. However, the turn points selected are not permanent, but are left entirely to controller discretion, and there are no assurances that they will be repeated or consistently used. Therefore, any conclusions regarding populations affected by the new flight tracks that might be drawn from this modeling are, at best, speculative and cannot be relied upon. As an alternative to the existing radar vector procedure at PHL, an Area Navigation (“RNAV”) or Pilot Navigation departure procedure would confine departing aircraft to specific altitudes and narrow ground tracks which could be designed to overfly less populated areas. These mitigation measures are not, however, proposed by the FAA.

#### B. Continuous Descent Arrival (“CDA”) Procedures

The Noise Mitigation Report states “. . . a mitigation strategy was developed for the Preferred Alternative where CDA procedures could be used at PHL during nighttime hours when the airspace is less congested.” [Noise Mitigation Report, p. 38]. While CDA procedures may be useful at night, the benefits of CDA procedures are questionable in an airspace that is as congested as the Study Area airspace. CDA approaches do provide some relief for over-flown populations. However as aircraft near the airport they must be sequenced with aircraft arriving from other points. The TRACON arrival controller must sequence multiple streams of arriving aircraft onto the final approach course. To accomplish this, the controller utilizes a combination of speed control, altitude assignment and radar vectors to sequentially place each aircraft in trail, with adequate spacing, prior to landing. Most often, a CDA that was initiated at high altitude must be terminated in the lower altitude stratum to facilitate the final sequencing of arrival aircraft. While a CDA may result in a lower power setting during the initial descent phase, subsequent descent phases performed at lower altitudes, will require power adjustments and

“level-offs” to comply with controller arrival clearances. CDA approaches will not result in continuous minimum power settings throughout approach and landing.<sup>3</sup>

### C. RNAV and Visual River Approaches

The Noise Mitigation Report states “[a]fter some consideration it was determined that if an RNAV procedure were built to mimic the river approach, the river corridor could accommodate more east flow arrival traffic.” [Noise Mitigation Report, p. 39]. RNAV flight procedures do confine aircraft routes to narrow lateral paths. However, as with CDA procedures, air traffic controllers will frequently interrupt RNAV arrivals by issuing radar vectors (*i.e.*, controller initiated turns off the RNAV track) to sequence and ensure adequate separation between arriving aircraft, placing arrival aircraft over populated areas.

The Report also addresses a river Visual Approach. “Thus a mitigation strategy was developed for the Preferred Alternative whereby certain arrivals during slow traffic periods could take advantage of a river approach.” [Noise Mitigation Report, p. 39]. Visual approaches reduce delay when they are performed simultaneously to parallel runways. However, use of parallel runways for arrivals at PHL would place some arriving aircraft over land rather than over the river, and visual approaches to a single runway would require greater spacing between arrivals and would not reduce delays at PHL.

## III. THE OPERATIONAL ANALYSIS

### A. Oceanic Air Traffic Control

Citing DEIS Section 2.5, the Operational Analysis states “[w]here current en route airspace separation rules of five nautical miles are typically used, this airspace redesign alternative would use three nautical mile terminal airspace separation rules over a larger geographical area and up to 23,000 feet MSL in some areas. [¶] The ICC airspace would be comprised of the majority of current NY TRACON and NY Center airspace, as well as some sectors from Washington Center and Boston Center. Boston Center could take the high-altitude parts of the current NY Center airspace structure.” [Operational Analysis, p. 1, Introduction] Development of an ICC presents a very important question, not addressed in the DEIS, of where and in which facility the Oceanic Control function will reside. Oceanic Control currently resides in New York Center. Oceanic Air Traffic Control uses ATC hardware that is different from that used domestically, therefore integration of Oceanic airspace into the ICC would not allow terminal three mile separation.

### B. Departure Delays

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<sup>3</sup> The County concurs with the FAA’s conclusion [Operational Analysis, p.3, Section 2.5] that the current PHL 3.0 degree angle of descent glide slope should be maintained.

The Operational Analysis states “[a]lthough additional headings will reduce delay, it may be possible to identify a subset of departure headings that would balance the need to acceptably reduce departure delay and the need to provide relief from the expected noise impacts.” [Operational Analysis, p. 48, Section 12.1.2 Proposed Airspace Changes]. OPSNET, the official FAA operations reporting site, shows that PHL experienced a total of 28,641 delays in CY 2006. Weather accounted for 18,921 [more than 66 percent] of those delays. Weather delays are unavoidable, and would not be mitigated or reduced by the Proposed Action. Equipment accounted for 129 delays, runways accounted for 7,254 delays, and “Other Factors” accounted for 1,056 delays.

Combined, these factors accounted for 95.5 percent of total CY 2006 delays at PHL. None of these factors will be eliminated or reduced by the Proposed Action. There was only one reported Center Volume delay in CY 2006, which is statistically insignificant. In CY 2006, there were only 1,280 [4.5 percent of total delays] PHL Terminal Volume delays. Terminal Volume delays are the only category of delay that might be reduced,<sup>4</sup> but not entirely eliminated, by the Proposed Action. Because Terminal Volume delays account for only 4.5% of total delays at PHL, any potential reduction in Terminal Delays would have only minimal impact on total delays, and delay times, and would be vastly outweighed by the harm to a substantial number of people who would be newly exposed to increased aircraft noise if the proposed airspace redesign were implemented.

Table 9, “Average Departure Delays by Number of Departure Headings” [Operational Analysis, p. 48] is based on the same flawed data identified in Section I.C., Noise Modeling, above. In the DEIS capacity modeling, the FAA: (1) considered air traffic from only 8 area airports; (2) omitted 119 airports that introduce air traffic into the system; (3) did not consider Visual Flight Rules (“VFR”) traffic and the requirement that VFR traffic be provided air traffic services in Class B airspace; (4) excluded all general aviation aircraft that do not operate at the 8 airports selected; (5) excluded all military air traffic, including traffic at McGuire Air Force Base and Atlantic City International Airport; and (6) did not include overflights, which were included in the data obtained. Thus, the FAA attempts to demonstrate an operational benefit by excluding a substantial portion of the air traffic control services which it provides.

### C. Consolidated Down-River Departures

The Operational Analysis states “[a]t night, the expected departure demand is light enough to consolidate the flow into a single heading down the river. Flights could remain over the river long enough to gain sufficient altitude before turning over land to join their respective departure routes. This would provide additional relief from noise impacts to the residential areas.” [Operational Analysis, p. 49, Section 12.4 Conclusions]. This option is strongly favored

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<sup>4</sup> OPSNET shows 1,964 Terminal Volume delays, or 7.3% of total delays at PHL in CY 2005. The 1,280 Terminal Delays in CY 2006 represent only 4.47% of the total delays at PHL in 2006. This reduction of almost 3% in Terminal Volume delays was accomplished solely by internal procedures, without adding new departure headings or constructing an ICC, even though total delays at PHL increased from 26,955 in CY 2005 to 28,641 in CY 2006.

by Delaware County for use not only at night, but during daylight hours as well. This is because consolidating all departure flows, including daytime departures, into a single down-river heading until reaching sufficient altitude [e.g., 3,000 feet], and then turning over land, would provide significant relief from noise impacts in residential areas and would not affect those delay categories that account for 95.5 percent of PHL delays.

IV. THE PROPOSED MITIGATION MEASURES FAIL TO ADDRESS THE PROJECT'S IMPACT ON THE JOHN HEINZ NATIONAL WILDLIFE REFUGE

As the DEIS completely failed to analyze the Project's impacts on the John Heinz National Wildlife Refuge, so to do the proposed mitigation measures completely omit any suggestion of mitigation on the impacts to this valuable national treasure.

V. THE FAA HAS PRECLUDED MEANINGFUL PUBLIC PARTICIPATION AND COMMENT REGARDING THE ADEQUACY OF NOISE MITIGATION MEASURES

Much like the preclusion of meaningful public input relating to the DEIS process, the FAA failed to provide a forum for meaningful public input relating to the proposed mitigation measures. The FAA publicly advertised and promoted the receipt of public input from residents of Delaware County at a meeting scheduled May 1, 2007 in Tinicum Township, Delaware County in a Holiday Inn hotel. Despite the large amount of publicity and the expected large crowds prior to the meeting, the facilities provided by the FAA for this meeting were woefully inadequate. It is estimated that over two thousand persons appeared at the FAA-selected venue in order to receive information and ask questions. Because of the inadequate size of the venue, the FAA staff and/or consultants made the decision to "cancel" the meeting after it already began and while hundreds were waiting to enter. The FAA printed handbills that were distributed to those waiting stating that the meeting was cancelled. An untold number of County residents left the venue, without being able to state their opinions regarding the proposal and/or the mitigation measures or ask questions about same.

For those lucky residents who were permitted entrance, not all were permitted to ask questions during the "Question and Answer" forum portion of the meeting. Instead, lottery chance-type tickets were distributed and only those individuals whose numbers were drawn were able to answer a question or express their opinion. Poor communication at the venue and the confusing layout of the hotel left almost all unaware of any opportunity to express an opinion or provide formal comments to the FAA in a different part of the hotel.

Perhaps symbolic of the FAA's attitude towards public input at the meeting, the moderator suggested to the audience prior to the Question and Answer session that, "We just get through this as quickly as possible".

VI. CONCLUSION

As far back as the DEIS, the noise modeling for the proposed airspace redesign project is flawed, because it excludes significant numbers of airports, and, thus, significant portions of the air traffic in the region. As a result, the true noise impacts of the project have not, and cannot, been determined. Consequently, it is impossible to ascertain whether the proposed noise mitigation measures would be effective. Moreover, the FAA suggests flight paths that purport to produce the least noise, but can produce no assurances that controllers will consistently restrict aircraft to those same selected departure routes.

Moreover, the airspace redesign is aimed at solving a problem that apparently does not exist. Implementation of the proposed airspace redesign, with or without the ICC, would have only a de minimis, if any, affect on air traffic delays. When weighed against the cost and complexity of developing and integrating regional air traffic control in an ICC, and the significant number of people who would be newly subjected to aircraft noise, the proposed airspace redesign project should be abandoned in favor of consolidated down-river RNAV departures.

In short, a Final Environmental Impact Statement (“FEIS”) based on the DEIS noise modeling and the noise mitigation measures proposed in the Noise Mitigation Report and the Operational Analysis Mode could not survive judicial scrutiny under the National Environmental Policy Act. Delaware County thus strongly urges the FAA to reconsider its proposal and work with affected communities and airports throughout the region to develop a plan that meets the needs of all parties.

Respectfully submitted,



John P. McBlain

CC: County Council  
Executive Director

14 SHERATON HOTEL - NEWARK AIRPORT  
15 128 Frontage Road  
16 Newark, New Jersey 07114  
17 Wednesday, April 25, 2007  
Commencing at 6:30 p.m.

6 MS. ZAK: Good evening. My name is  
7 Kristen Zak. I am the Deputy Chief of Staff for  
8 Councilman Michael McMahon, covering the North and  
9 West Shores of Staten Island. Councilman McMahon  
10 could not be here due to a scheduling conflict. I  
11 will read a statement from Councilman McMahon.  
12 Thank you for the opportunity to  
13 testify before this body. I hope this process leads  
14 to a plan that will lead to substantial noise  
15 reduction for affected residents. In my district on  
16 the North and West Shores of Staten Island, the  
17 neighborhoods in the western part of the district,  
18 particularly Arlington and Mariner's Harbor are  
19 inundated with noise from Newark Airport. These  
20 residents have endured this reality for many years,  
21 but the noise mitigation plan, if implemented  
22 correctly, can provide some relief to these  
23 over-burdened areas.

24 First and foremost, ocean routing must  
25 not be employed as part of the Metropolitan Area

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1 Airspace Redesign. The ocean-routing proposal would  
2 send flights departing from Newark Liberty  
3 International Airport over the Arthur Kill from  
4 midnight to 6:00 a.m. In using this route, planes  
5 fly over a good portion of Staten Island, disturbing  
6 many residential neighborhoods. Not only is  
7 ocean-routing bad for Staten Island residents, but  
8 that FAA has stated that this proposal does not meet  
9 the purpose and need of the redesign project, it  
10 burns too much fuel and sends Newark flights into  
11 JFK airspace, which presents safety concerns.

12 Frankly, this is a bad idea that has  
13 been refuted by experts and it must be taken out of  
14 consideration immediately. It is time for you to  
15 stop analyzing and reviewing this totally  
16 discredited and disproved plan. It makes no sense  
17 from an aviation, transportation or environmental  
18 viewpoint. It is simply the fancy of a few  
19 politically connected practitioners of NIMBY. You  
20 have mollycoddled ocean routing for far too long.  
21 Discard this notion of community bullying and adapt  
22 the Integrated Airspace Alternative now. Thank you.

9 Hilton Woodcliff Lake  
200 Tice Blvd  
Woodcliff Lake, New Jersey 07677-9998

10  
11 Thursday, June 28, 2007  
Commencing at 6:30 p.m.

Lance N. Millman (Deputy Mayor Village of Montebello  
Rockland County, N.Y.)

1 Montebello Road  
Montebello New York, 10901

19 MR. MILLMAN: The residents of  
20 Rockland County are extremely concerned about the  
21 impact of both noise quality and environmental  
22 quality and living quality that really has not been  
23 told to the residents of Rockland County and this  
24 FAA change has been in the dark to most residents in  
25 Rockland County. There is no benefit to the  
1 residents of Rockland County it seems to benefit  
2 only those who own airlines and the residents of  
3 Rockland County vehemently are against any type of  
4 proposal that now goes through their airspace where  
5 very few planes go through right now.



STATE OF DELAWARE  
OFFICE OF THE GOVERNOR

RUTH ANN MINNER  
GOVERNOR

April 30, 2007

Steve Kelley, Manager  
Federal Aviation Administration  
C/o Ram Nagendran  
12005 Sunrise Valley Drive, MS C3.02  
Reston, VA 20191

Dear Mr. Kelley:

The impact of Philadelphia International Airport (PHL) air traffic on the quality of life of Delawareans, especially in the northern part of the State, is a major concern to us. As such, we have been actively engaged in the public process for the Federal Aviation Administration's (FAA) Airspace Redesign Plan for the New York/New Jersey/Pennsylvania region. On behalf of Delaware residents, we submit the following comments to be entered into the public record for the recently released Noise Mitigation Report.

We appreciate the work of the FAA to incorporate Delaware into your study area and the inclusion of some of our recommendations in the Noise Mitigation Report, including utilizing the Continuous Descent Approach, RNAV technology and increasing usage of the River Approach. Through the Philadelphia Airport Air Traffic and Quality of Life Action Group (Action Group), we stressed last year that the FAA utilize the Airspace Redesign as an opportunity to implement strategies and take the necessary actionable steps toward alleviating existing conditions. It is our hope that the recommendations put forth by the Action Group remain in the final Record of Decision (ROD), to mitigate conditions related to increased air traffic and the resulting concerns of our citizens.

As this plan is to be phased-in over five years, the use of currently available and future technology and data will be critical to the success of the Airspace Redesign Plan. The Noise Mitigation Report and your recent response to an August 1, 2006 Action Group letter to the FAA recognized this importance. However, questions remain as to the FAA's intent to utilize critical technology and capture critical data. Specifically, in the final decision, the FAA should address

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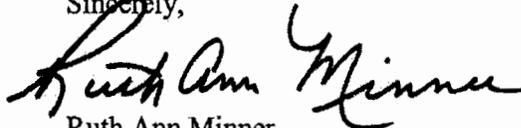
Mr. Kelley  
April 30, 2007  
Page Two

the intent and feasibility of upgrading PHL's landing system technology to include touchdown zone lights and Category II/III ILS systems, the process for utilizing or a justification for not using PAPI lights, enforcing the 3,000 foot elevation for arrivals, and detailing impacts on air quality and the State Implementation Plan. Further, we request the noise impact data from the past 12 months and a list of number and type of aircraft (i.e. cargo vs. commercial) that will be arriving and departing PHL between 10pm and 7am under the Redesign Plan.

We recognize that the use of future systems will require the participation of the airlines and airport. We cannot stress enough the importance of utilizing improved technology and therefore call upon the FAA, the airlines and PHL to work together towards this goal. To ensure this partnership occurs to progress towards our desired results of reducing traffic over Northern Delaware and increasing usage of approaches over the Delaware River in all weather conditions, the FAA should include in the ROD the requirement that airlines take steps to transition to the associated technology.

The quality of life for all Delawareans is of great importance to us and we remain concerned about the impacts of the Airspace Redesign on our northern communities and neighborhoods. We hope you will continue to thoughtfully examine and take action upon measures that will truly mitigate impacts on the State of Delaware. We look forward to your feedback and retaining an open dialogue.

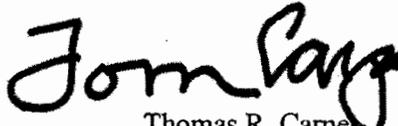
Sincerely,



Ruth Ann Minner  
Governor



Joseph R. Biden  
United States Senator



Thomas R. Carper  
United States Senator



Michael N. Castle  
United States Representative

CITY OF NEW YORK  
PRESIDENT  
OF THE  
BOROUGH OF STATEN ISLAND



JAMES P. MOLINARO  
PRESIDENT

BOROUGH HALL, STATEN ISLAND, N. Y. 10301

May 11, 2007

Mr. Steve Kelley, FAA NAR  
c/o Ram Nagendran  
12005 Sunrise Valley Drive, MS C3  
Reston, Virginia 20191

Re: Comments to *Noise Mitigation Report - New York/New Jersey/Philadelphia Metropolitan  
Airspace Redesign Draft EIS*

Dear Mr. Kelley:

The following are my comments to the FAA's April 6, 2007, *Noise Mitigation Report -  
New York/New Jersey/Philadelphia Metropolitan Airspace Redesign Draft EIS*.

Last year, on June 1, 2006, I submitted a five-page letter detailing my office's  
comments to the December, 2005, airspace redesign DEIS. In general, I was pleased to report  
that there is good news for Staten Island because the FAA came to the conclusion that, with  
regard to Newark Airport, the airport's flight management problems are based on an almost  
50-year old system of operations that are horrendously inefficient and inherently unsafe.  
Indeed, the idea of a fanning procedure was a concept that this office continuously brought  
up for discussions at public meetings/hearings for over ten years.

There remained, however, two categories of criticisms that I highlighted consistently  
in my June, 2006, letter:

- the FAA refusing to admit in any document that airplanes departing from  
Newark Airport Runways 22 L/R fly over Staten Island, and,
- the ridiculousness of the FAA continuing to give credence to the Over-the-  
Ocean routing proposal.

I am thus outraged, once again, to find that in this entire noise mitigation report not  
once does the name *Staten Island* appear - not even on maps that include portions of the  
island's land mass! Indeed, to someone residing outside of the New York City metropolitan  
area and examining the maps on pages 16, 18, and 19, you would think that the Staten Island  
land mass was actually part of New Jersey. And when the FAA places county names on

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1 of 4

maps (pages 21 and 23), the agency omits distinguishing what is in New York and what is in New Jersey.

It's as if the FAA believes that, if you don't label what exists, then it truly doesn't. Indeed, according to FAA logic, if you don't label a land mass as belonging to New York, then perhaps no one will question why the FAA continues to disregard mobile noise pollution that originates in one state to cross another state's border to then contaminate its environment.

This is the crux of my problem with the FAA and the on-going distrust for the agency as it moves forward on implementing the airspace re-design and associated noise mitigations: the FAA does not believe we are here and that we suffer from Newark Airport departures. Examine the following from the April, 2007, document:

- Page 4, Table 1: whenever mitigation measures are discussed regarding Newark Runway 22 departures, specifically, with degree headings of: less than 190; 190; 195; and 200, in every instance under the heading of *Applicable Area*, the FAA only mentions Elizabeth and Union County in New Jersey.

**Question: What does an airplane fly over after less than three nautical miles from the end of Runway 22 at a 190-degree heading? Does the FAA believe it is New Jersey?**

- Page 12, Table 3: One of the two final noise modeling mitigation measures for Runway 22 departures between the hours of 10:30 PM and 6 AM is to use a 190-degree heading.

**This is unacceptable.** There are people who live in the northwest sections of Staten Island, residents who keep trying to sleep but instead suffer, as they have for decades, from middle-of-the-night, low-flying cargo planes that follow the 190-degree heading. **And now FAA wants to permanently memorialize this offense because, to the agency, there is no Staten Island!**

- Page 15, Figure 2: Staten Island is shown, but not labeled. In fact, cities/towns in New Jersey are labeled while New York City is undefined.
- Page 16, Figure 3: Radar tracks show flights going over northwestern Staten Island - **but we're not labeled!** Only New Jersey's towns are!
- Page 18, Figure 4; Page 19, Figure 5: Staten Island roads are labeled, but not the land mass even though the Island, as per the FAA's graphic colorations, is impacted by noise.
- Page 21, Figure 6; Page 23, Figure 8: The FAA now puts labels to counties

without distinguishing those in New Jersey with those that make up New York City.

But there's more. I thus should not have been surprised to then read, given the FAA's convoluted logic on the non-existence of Staten Island, **that the agency is also proposing to implement the Over-the-Ocean proposal between the hours of 10:30 PM and 6 AM, apparently because the procedure, as per Figure 2, will not affect any population, that is, people in New Jersey.**

How did the FAA get to this bizarre conclusion?

I look no further than page 5, Table 1, specifically, the list of the applicable mitigating areas for Over-the-Ocean routing. It reads: Newark, Elizabeth and Union County. Once again, Staten Island does not exist. **Yet, when examining Figure 2 on page 15, is it not clearly shown that the green flight track goes over both northwestern and southwestern Staten Island, even without label this land mass?**

**Am I missing something here? Doesn't the flight procedure as depicted automatically warrant FAA attention for analysis of noise pollution impacts? Indeed, aren't night-time noise events considered more environmentally onerous with greater impacts than day-time noise events? Is this why the FAA chooses to ignore Staten Island and why are there no descriptions for how planes would fly the Over-the-Ocean route so that any Staten Islander could understand what the FAA is advocating? Instead, we have to go hunting for something that isn't there because, and according to Figure 2, the Over-the-Ocean route is in fact the Not-Over-New Jersey route.**

When will the FAA put the Over-the-Ocean proposal away once and for all? At an FAA public hearing over twelve years ago, this office called the constant reviving of this proposal FAA's Frankenstein. I enumerated in my letter last year the FAA's own words as to why the proposal has neither merit nor justification for its existence as a viable proposal. Instead - and talk about convoluted logic! - the FAA decides that what is very bad to implement during daytime hours must, in fact, be very good to perform in the dead of night. Indeed, the FAA mentions on page 14 that

*... an ocean routing plan that takes advantage of the Raritan Bay and the Atlantic Ocean was developed to further mitigate noise from operations that occur between 10:30 PM and 6:00 AM when airport and airspace constraints were less demanding....*

And on page 17, the top bullet states

*... Further reduce the nighttime traffic over the new heading by using a nighttime ocean routing procedure that takes traffic over the ocean before turning to their desired departure route... [emphasis added]*

But I ask the FAA:

1. How do you get from Newark Airport to the ocean?
2. How do you get from Newark Airport to Raritan Bay?
3. More to the point, what's in between the airport and the bay/ocean?
4. Who benefits from this noise mitigation in the middle of the night? Isn't it New Jersey at Staten Island's expense?

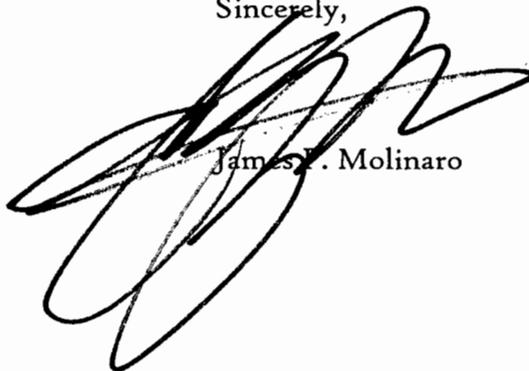
Clearly there are no answers to so many of my common sense questions anywhere in this noise mitigation report.

I thus end this letter in the same vein as my June, 2006, correspondence. I want to believe that the future will be quieter for my constituents. I want to believe that once queuing delays start at Newark that multiple headings will be followed so that a substantial number of flights will move away from my ravaged borough's airspace, especially during these horrendous summertime peak travel times, days, and months.

But by continuously ignoring the existence of my constituents, as made clearly evident in the numerous examples from the FAA's report that I have cited in this letter, the FAA, in advocating both the 190-degree heading and the Over-the-Ocean proposal for seven-and-a half hours each and every night, is choosing to pander to New Jersey, thereby condemning a new generation of Staten Islanders to sleep deprivation and to that circle of an noise pollution Hell, courtesy of the FAA and New Jersey.

Eliminate this evening Frankenstein proposal, and I have no serious issues with the redesigned airspace. But if this ignorant and foolish night-time procedure is approved and implemented, then the FAA will leave me no choice but to do what I must to stop its implementation.

Sincerely,

A large, stylized handwritten signature in black ink, appearing to read 'James F. Molinaro', is written over the typed name.

James F. Molinaro



**TOWN OF RIDGEFIELD**  
Planning & Zoning Commission

May 9, 2007

Mr. Steve Kelley, FAA  
c/o Ram Nagendran  
12005 Sunrise Valley Drive  
MS C3.02  
Reston, VA 20191

**Re: New York/New Jersey/Philadelphia Metropolitan Area  
Airspace Redesign Project  
Opposition to Increased Traffic Over Ridgefield, CT**

Dear Mr. Kelley:

The Planning and Zoning Commission of the Town of Ridgefield, Connecticut, discussed the proposed Airspace Redesign Project at its meeting on 5/8/07. The consensus of the Commission is to oppose any plan that would increase flight patterns over Fairfield County, for the following reasons:

1. The FAA plan would shift a presently more diffuse flight path pattern over the New York greater metropolitan area eastward to a much more concentrated pattern over Ridgefield and adjacent Fairfield County towns and cities. Such a shift and concentration will have an adverse impact on land use in general in the Town of Ridgefield, primarily through significantly elevated noise levels, to the detriment of the public health in quiet residential areas and public parks and open spaces (including the Weir Farm National Historical Site, Connecticut's only National Park) set aside for passive recreation, contemplation and peaceful enjoyment of citizens, and secondarily by negatively impacting property values.
2. The proposed flight path shift is premature in that any re-direction of flight paths should await evaluation and environmental assessment of the upgrading of Stewart Airport in Newburgh, New York, a stated goal of which is to reduce congestion associated with the major New York metropolitan airports and to provide a more convenient hub for citizens in the northern suburbs. Successful implementation of the Stewart upgrade could render the presently proposed re-direction moot.
3. The FAA has not properly evaluated the effect that over-flights of large aircraft would have on the flight altitudes and paths of smaller aircraft that presently use Danbury and other small regional airports. The FAA needs to assess any lowering of small aircraft flight altitudes that might ensue, and the effect of increased noise and safety impacts attendant thereto. Failure to make such assessment would render any present environmental assessment deficient and incomplete.

66 Prospect Street • Ridgefield, Connecticut 06877  
Phone: (203) 431-2766 • Fax: (203) 431-2737

[www.ridgefieldct.org](http://www.ridgefieldct.org)

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1 of 2

4. The FAA protocol for noise assessment fails to account for ambient noise levels in affected regions of Ridgefield and surrounding communities. Whereas this may be standard FAA procedure, assertions of “acceptable” maximum dbA levels which fail to note the difference between ambient and maximum levels ignores the adverse health impacts known to accompany large or sudden increases in noise above ambient levels. Flights over the greater New York metropolitan area, with its existing and endemic high level of ambient noise, are incrementally far less disruptive to health and well-being than they would be if shifted over significantly quieter areas of Fairfield County.
5. The FAA goal of greater convenience and efficiency for fliers should not take precedence over the rights of citizens to enjoy the domestic tranquility of their homes, and yet the FAA plan ignores this fundamental reality of American life.

The Planning and Zoning Commission of the Town of Ridgefield appreciates the opportunity to comment on this important issue.

Very truly yours,

  
Rebecca Muchetti, Chairman  
Planning and Zoning Commission

cc: Governor M. Jodi Rell  
Representative John Frey (Ridgefield)  
Christopher Shays, U.S. Representative  
Christopher Murphy, U.S. Representative  
Christopher Dodd, U.S. Senator  
Joseph Lieberman, U.S. Senator  
Senator Judith G. Freedman (Redding, Ridgefield, Wilton)  
Rudy Marconi, First Selectman, Town of Ridgefield  
Linda Cook, Superintendent, Weir Farm National Historic Site  
Mark Boughton, Mayor, City of Danbury  
Jonathan Chew, Executive Director, HVCEO  
Floyd Lapp, Executive Director, SWRPA



IN REPLY REFER TO:

L7617(NER-RP&C)

## United States Department of the Interior

NATIONAL PARK SERVICE  
Northeast Region  
United States Custom House  
200 Chestnut Street  
Philadelphia, PA 19106

**MAY 15 2007**

Mr. Steve Kelley  
c/o Ram Nagendran  
Federal Aviation Administration  
12005 Sunrise Valley Drive MS C3.02  
Reston, VA 20191

Dear Mr. Kelley:

This letter provides comments from the National Park Service regarding the Noise Mitigation Report, dated April 6, 2007, and the Operational Analysis of Mitigation of the New York/New Jersey/Philadelphia (NY/NJ/PHL) Airspace Redesign, dated April 2007. These documents were issued for public review and comment by the Federal Aviation Administration (FAA) subsequent to the publication in December 2005 of a Draft Environmental Impact Statement for the proposed NY/NJ/PHL Metropolitan Area Airspace Redesign. The Noise Mitigation Report presents an overview of the evaluation of various noise abatement measures considered as potential mitigation of the noise impacts associated with the FAA's Preferred Alternative: The Integrated Airspace Alternative Variation with Integrated Control Complex (ICC). The Operational Analysis of Mitigation of the NY/NJ/PHL Airspace Redesign evaluates mitigation strategies suggested by the public during review of the Draft Environmental Impact Statement (DEIS) and describes the mitigation strategies that were selected for inclusion in the Mitigated Preferred Alternative.

In the NY/NJ/PHL Airspace Redesign Noise Mitigation Report, FAA described minor changes in the noise analysis methodology since the publishing of the DEIS. These changes were a direct result of comments received on the DEIS and reflect a modest refinement in the methodology. We note that the Noise Mitigation Report focuses specifically on the 5 major airports but does not re-evaluate noise impacts or include mitigation for the 16 satellite airports that are included in the proposed Airspace Redesign.

From our review of the above-referenced documents, we offer the following comment specific to impacts to the Sandy Hook Unit of Gateway National Recreation Area in New Jersey. According to Figure 2 of the Noise Mitigation Report, departures from Newark International Airport (EWR) are routed directly over the Sandy Hook Unit, raising concerns for significant

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impacts to avian populations and to visitor enjoyment. We recommend adjusting the departure route slightly to the north of Sandy Hook. This would likely mitigate any significant impacts to resources and visitor experience of the Unit.

Overall, the Noise Mitigation Report and Operational Analysis of Mitigation of the NY/NJ/PHL Airspace Redesign do not address National Park Service (NPS) concerns related to noise analysis methodology as previously outlined in U.S. Department of the Interior comments on the DEIS, dated June 12, 2006. Those comments are re-stated below.

#### **Noise (Section 4.1)**

##### **Insufficient Data**

The information presented in the DEIS should be revised in the Final (FEIS) to address potential impacts from changes in routes, flight paths, and operating characteristics of aircraft under each alternative. It is difficult to determine potential impacts to the 30 national park units within the study area with the data provided. For example, Fire Island National Seashore, Delaware Water Gap National Recreation Area, and Upper Delaware Scenic and Recreational River are within the airspace of Islip and Newburgh/Stewart airports. These park units may be subject to impacts from routing more traffic over them. However, information in the DEIS is insufficient to evaluate such impacts because the airspace of the various airports, the proposed reroutes of flights, and the locations of parks, historic sites and other noise-sensitive receptors are not clearly illustrated. Historic resources and parks, including the park units listed above, should be added to the Alternative Flight Track Change Illustrations located in Appendix E, Attachment C. It is not clear how determinations regarding impacts to NPS resources were made. Data required to make such determinations were either not available or not clearly identified.

The DEIS states (page 4-3) that noise-sensitive sites were evaluated by identifying the “noise-sensitive sites located within the significantly impacted census blocks by using the Geographic Information System (GIS) land use data. Each site was assigned the noise exposure level computed for the census block in which it resided.” However, the DEIS does not contain a clear explanation of how the “significantly impacted” census tracks were identified. Therefore, the Department cannot concur with conclusions in the DEIS relating to impacts to NPS resources.

Section 3.3.11 of the Noise Modeling Technical Report indicates that grid-point analysis was conducted for 281 NPS points. The results of the grid-point analysis are not presented. A clear presentation of the grid-point data is essential for identifying potential impacts to national park units and other Section 4(f) properties within the study area.

##### **Inconsistency with FAA Order 1050.1E**

The analysis of impacts to units of the National Park System and other noise-sensitive receptors presented in the DEIS is not consistent with FAA guidance for conducting such analyses. Section 6.2i of FAA Order 1050.1E (FAA guidance for implementing National

Environmental Policy Act of 1969 (NEPA)) states: "Additional factors must be weighed in determining whether to apply the thresholds listed in Part 150 guidelines to determine the significance of noise impacts on noise sensitive areas within national parks . . . For example, Part 150 guidelines may not be sufficient for all historic sites (see 6.2h above) and do not adequately address the effects of noise on the expectations and purposes of people visiting areas within a national park or national wildlife refuge where other noise is very low and a quiet setting is a generally recognized purpose and attribute." (emphasis added).

### **Inadequate Metrics**

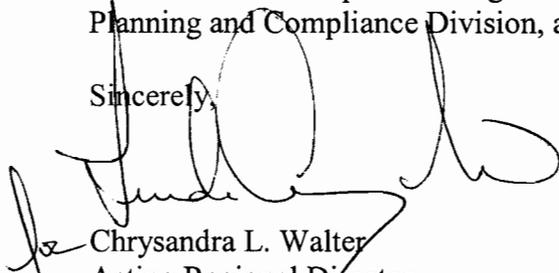
The main metric used for noise analysis in the DEIS (i.e., Day/Night Average Sound Level (DNL)) is not appropriate as the only metric for determining noise impacts to national parks. Additional metrics, such as time above ambient and percent time audible, provide a more complete and accurate description of potential noise impacts on national parks and other noise-sensitive receptors. The Department finds that the noise analysis presented in the DEIS for NPS units and other noise-sensitive receptors in the study area is inadequate, and recommends revising the impact analysis to follow the correct FAA guidelines for noise-sensitive receptors and to include audibility and other more appropriate metrics in the assessment of impacts.

Thank you for the opportunity to review the Noise Mitigation Report and Operational Analysis of Mitigation of the NY/NJ/PHL Airspace Redesign. We look forward to seeing the rest of the NPS comments contained in the June 12, 2006 letter addressed in the Final EIS.

Please note that the views expressed here are those of the National Park Service and not necessarily those of the Department.

For information or questions regarding these comments, please contact Jacki Katzmire, Resource Planning and Compliance Division, at (215) 597-1903.

Sincerely,



Chrysandra L. Walter  
Acting Regional Director  
Northeast Region

cc:

Associate Regional Director, Resource Stewardship & Science, NPS Northeast Region  
Chief, Washington Office Environmental Quality Division, NPS  
Manager, NPS Natural Sounds Program  
Regional Environmental Officer, DOI Office of Environmental Policy and Compliance

April 16<sup>th</sup>, 2007

Comments to the FAA

My name is Judy Neville and I am the First Selectman of New Canaan, Connecticut. I am here today representing the Towns of Greenwich, New Canaan and our surrounding neighbors in opposition to the Integrated Airspace Alternative. The Integrated Airspace Alternative selected by the FAA as its preferred alternative to the Airspace redesign project promises to reduce congestion and delays but involves adding new flight paths and fanning aircraft on departure, which will have the most adverse noise impact over our residential communities.

We agree with the Chairman of the House Aviation Subcommittee Rep. Jerry Costello that the FAA delay this ambitious airspace redesign project to address issues of noise impact and inadequate noise modeling. We need to be assured that the FAA airspace redesign process addresses concerns on "citizens' safety, health, education, and property values."

Given that the FAA excluded aircraft noise mitigation from the project's "purpose and need", we do not believe that the FAA adequately reviewed the four alternatives, and that the preferred alternative is not in the public's best interest. We also believe that the Integrated Airspace will not reduce delays, which principally are caused by adverse weather conditions. We believe the non specific, lower flight corridor over Fairfield County is a significant threat to our quality of life. Airplanes bound for New York City's La Guardia Airport would begin their descent over the heart of Fairfield County and hug the coastline near Stamford and Greenwich before crossing over long Island Sound to land. Other than safety, quality of life should have been the most important consideration in the FAA's decision.

We have several questions that we would like the FAA to address.

1. We have been told that the new air traffic pattern would allow commercial jets landing at LaGuardia to come in lower on arrival over Fairfield County.

We understand that the current ceiling is 10,000 feet and that the new Integrated Airspace Alternative would lower the operational altitude for these arrivals to 6,000 feet or lower. Reduction of aircraft altitude is contrary to widespread public recommendations taken during the project's Scoping period and should have been outright dismissed by the FAA. We currently have a large number of Westchester County Airport arrivals operating at 3000 feet over our area. Does this mean that the altitude of all other aircraft will be lowered? If so, the impact on our small communities will be even worse. The FAA apparently did not take this into consideration in its modeling since smaller aircraft principally fly under VFR rules and the FAA excluded all VFR traffic from its noise modeling.

2. Most of the current complaints from residents involve low flying aircraft using either Westchester County or Danbury airports. Greenwich is one of the most severely impacted communities in the country. There is an average of 340 low altitude flights per day from five different airports. Air Tran and Jet Blue, low-fare

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1 of 3

airlines, are now both operating new flights at Westchester County Airport. We understand that the number of flights over Fairfield County will double from a combination of the increased number of small private airplanes and the new commercial carriers. Has the FAA considered the impact of these recent developments and the resulting noise generated by more airplanes flying at lower altitudes? What underlying data is available to support the projected number of flights?

3. We were told by the FAA at the hearing in New Canaan in October that this increase in small aircraft is an “unintended consequence of doing nothing.” What measures will the FAA take to assure the safety of small aircraft flying below the imposed new ceiling?
4. The environmental impact statement omits numbers and altitudes of flights that would be redirected, making it virtually impossible to assess the impact to neighboring communities. Also, what information can you provide us to evaluate the number of current flights, frequency of projected flights, altitude data and what aircraft models were used to calculate noise levels?
5. We understand that the FAA’s preferred alternative claims to save an estimated 12 million minutes of delay annually for the four major metropolitan airports; Kennedy, LaGuardia, Newark and Philadelphia. What analysis can you provide that verifies this information? Is it not true that small capacity improvements are rapidly taken advantage of by the carriers to schedule additional flights during peak period, so reduction in delays is unlikely?
6. The Noise Mitigation Report released on April 6<sup>th</sup> shows that departures from Westchester County Airport that used to be routed to the East will now make a right turn and climb over Fairfield County. What will be the specific routes and altitudes of these northbound departures from White Plains?

A few final comments on noise - The FAA does not consider any noise levels below 45 decibels and ONLY noise changes in excess of 5 decibels to generate a significant impact. The aircraft noise levels, for the most part, in the metropolitan area are in the 45 – 60 decibel threshold or lower. In reviewing the grid completed by the FAA, New Canaan can expect a “slight to moderate” increase of four times the current noise level to a high of 41.8 decibels. The average increase in the report is 57% in Fairfield County. Furthermore, we believe that the DEIS is fatally flawed as to the impact on New Canaan since it relies on data from the year 2000 for noise assessment. Moreover, the year 2000 was one of the airlines’ busiest years and ultimately results in an inflated operations forecast. The FAA only considered the instrument operations from 21 airports in their modeling of noise impacts for the proposed project. The FAA did not consider military aircraft, over flights, VFR aircraft and excluded air traffic from 119 airports.

We also believe that the noise thresholds promulgated by the FAA are overly lenient, and that the noise impacts of the FAA promoted actions are profound. A noise change of 5 decibels is equivalent to a factor of 3.2 times increase in noise energy. The residential areas of Fairfield County are extremely noise sensitive and residents react vehemently to changes far less than this. Residents should know when over-flights might increase by a factor of even two or three as a result of proposed changes to evaluate and offer comment

on these changes. Residents also need to know if the FAA intends to implement this proposal in slow, gradual steps through the year 2011 so the surrounding communities do not feel the immediate impact. If the FAA changes routes for arrivals or departures below 3,000 feet, will they not have to release an Environmental Impact Statement?

In closing, I would like to mention that the First Selectman and Mayors of eight surrounding towns attending the FAA Public Hearing in New Canaan were unaware of the four alternatives presented by the FAA at the time of closing comments in July of 06. The FAA did not present the data in a timely and accessible way for officials to make any kind of assessment in order to comment or respond. The towns of Greenwich and New Canaan are very concerned that large areas of southern New York and Connecticut remain largely unaware about how the Airspace Redesign proposals may impact their communities.

Judy A. Neville

# New Jersey Coalition Against Aircraft Noise

P.O. Box 554 Scotch Plains, New Jersey 07076

May 10, 2007

Mr. Steve Kelley, FAA  
c/o Ram Nagendran  
12005 Sunrise Valley Drive, MS C3.02  
Reston, Va. 20191

Re: Comments on the April 6, 2007, Noise Mitigation Report

Dear Mr. Kelley:

Please accept the following comments of the New Jersey Coalition Against Aircraft Noise (NJCAAN) on the Federal Aviation Administration's ("FAA's") April 6, 2007, Noise Mitigation Report, which incorporates the April 2007 MITRE Operational Analysis of Mitigation of the NY/NJ/PHL Airspace Redesign (collectively, the Report). NJCAAN is a broad-based organization that represents thousands of residents throughout New Jersey who are concerned about aircraft noise. NJCAAN has been aided in its technical analysis by a consulting firm with extensive airspace expertise. The Rutgers Environmental Law Clinic also provided assistance with these comments.

NJCAAN notes that the FAA has released the Report, and has announced the fact that the "Integrated Airspace with Integrated Control Complex Design" (Integrated Airspace or IA + ICC) is the Preferred Alternative to the NY/NJ/PHL Airspace Redesign Project (Project) before finalizing its Draft Environmental Impact Statement (DEIS). This sequence of events is highly irregular and suggests that the FAA has prejudged the outcome. Further efforts on the Project should have awaited the outcome of the EIS process. This is especially so since most if not all of the comments provided by NJCAAN and others on the DEIS remain to be addressed. By commenting on the Report, NJCAAN does not intend to diminish the import of its comments on the DEIS.

## **1. General Comments**

NJCAAN is pleased that the FAA is finally examining noise and trying to minimize it. We are further pleased at the recommendation of ocean routing at night. Although the FAA data shows reduced impacts to some areas, in other key areas the FAA data shows that the mitigations are insufficient to offset the adverse effects of the Integrated Airspace plan. Impacts to some areas of New Jersey will be profoundly negative, affecting many tens of thousands of residents.

Moreover, the data that the FAA has provided is grossly insufficient to fully evaluate the proposed noise mitigation and supporting analysis. Modeling details are absent, and flaws pointed out in the DEIS are apparently unaddressed. Furthermore, some of the mitigations may not be practically implementable or very likely be less effective than shown in modeling. Thus, overall, the noise impact results are highly questionable.

The mitigation reports give excessive weight to aviation efficiency and little consideration to social and environmental impacts. There has been a lack of balance of aviation concerns against impacts to

the health and welfare of the many tens of thousands of residents who are harmed by the proposed airspace changes.

NJCAAN notes that the Report fails to adequately address these additional general concerns, which need to be studied in greater detail and supported with more comprehensive data before the DEIS can be finalized or the proposals in the Report adopted:

- Communities surrounding EWR are profoundly negatively impacted even after mitigation due to the westward fanning of departures. The impacts stand out as the worst for the entire airspace redesign and are responsible for much of the total noise impact.
- The EWR departure “fanning” poses safety risk to residents of Elizabeth and Newark, since it moves low altitude departures from low to densely populated areas.
- The investigation of alternatives for reducing noise has been unduly limited, particularly given the effect on environmental justice protected communities.
- Benefits advertised by the FAA are weak and questionable.
- The information provided on results and methodology is incomplete and inadequate.
- Issues and flaws pointed out in the DEIS have not been addressed in the new data. New issues have become apparent.
- Modeled noise impact results are virtually certain not be realized in practice as actual operations deviate from ideal assumptions.
- A coherent plan for implementing the Preferred Alternative has not been presented. Implementation by 2011 is extremely unlikely.
- The inadequate information, late introduction of alternatives without proper process, and unreasonable response deadline, circumvent proper National Environmental Policy Act (NEPA) process.

It worth noting that the nighttime and other noise abatement procedures described in the Report could be implemented now to alleviate noise impacts without redesigning the airspace or implementing the Preferred Alternative.

## **2. Need for additional information and time to respond**

The FAA reports contain very substantially changed environmental data throughout the region and describe many new procedures. A minimum of 90 days is required to assimilate and comment on all of this new information. The May 11, 2007 response deadline is unreasonable.

Critical noise information per census block was posted unannounced on the FAA web site on April 19, 2007. NJCAAN first became aware of the posting on April 23, 2007. NJCAAN will therefore have had only 18 days to assimilate the census information by the May 11 response deadline. Many others are still are unaware of the availability of this information. Therefore:

**Please extend the comment period at least until August 11 to allow the public to assimilate and comment on the new information provided.**

Significant technical issues and flaws were highlighted in NJCAAN's and others' comments to the DEIS. These comments include traffic volumes and mixes that could substantially affect results. Based on remarks by FAA experts at the public meetings, the issues and flaws highlighted in these comments to the DEIS were not addressed in the Report.

**Please address the technical issues and flaws identified in the DEIS and promulgate updated information to be used as a basis for decision and comment.**

NJCAAN has many questions on the analysis performed for the DEIS and has outstanding requests for additional information, presented under the Freedom of Information Act, that the FAA has not fulfilled. The information provided in the Report is very sketchy. Routes are cursorily described and assumptions are not given. Computer tools are mentioned by name, but only cursory descriptions of their nature and limitations are provided. FAA results must be taken "on faith." Therefore:

**Please make available the computer tools, data-sets, and related documentation used to obtain the noise and operational results. Please also make available all detailed intermediate studies behind the noise and operational results presented thus far and to be presented in the FEIS.**

DEIS and Report methodology focuses heavily on counting the numbers of people exposed to a change in noise beyond specific thresholds for the various alternatives. Knowing only the number of people exposed to change in noise is insufficient for evaluation and can misinform the public concerning environmental merit. It is also necessary and more important to count the total numbers of people exposed to various absolute levels of noise. Therefore:

**Please provide counts of the numbers of people affected at various DNL noise levels in 5 decibel noise bands down to 45 DNL for "No Action," pre-mitigation, and after mitigation cases for the individual areas covered by the mitigations.**

### **3. EWR South Flow Departures**

The region surrounding Newark Liberty International Airport (EWR) is heavily noise impacted and stands out as one that will be profoundly negatively impacted by the proposed changes. The mitigation studies have been unduly limited and not devoted adequate attention to finding strategies for minimizing these noise impacts. The range of headings and alternatives investigated is not documented in the FAA reports on the mitigation. There is further no data to show likely controller compliance and ability of the proposed demand based mitigations to achieve the noise reductions published in the DEIS.

Also, NJCAAN's aviation consultant's expert opinion is that the proposed plan of shifting a departure heading with a ground track over vacant land and industrial development to three tracks over the city of Elizabeth, NJ, does nothing to increase safety, but rather increases the risk to persons and property that lie beneath the new proposed flight tracks.

### 3.1 Description of Routes Changes and Mitigation Strategy

Fanned departure headings in both the original and mitigated Preferred Alternative will result in noise impacts to the residents of Elizabeth, Hillside, Linden, Roselle Park, Roselle, and Union, NJ, plus noise impacts from airplanes operating at lowered altitudes for municipalities further west. The current departure procedure from Runway 22 requires a left turn after departure on a single departure heading of 190 degrees and places the aircraft ground track over an area of relatively low population. The mitigated Preferred Alternative will have aircraft continue relatively straight off the runway, plus establish two additional headings, both involving a right turn after departure. All of these paths place departing aircraft over the city of Elizabeth, NJ. It should also be noted that the proposed headings are “initial headings” that can be changed at the discretion of the controller. There is no specified requirement for aircraft to fly the initial heading to a point or altitude before turning. This can result in aircraft being placed over areas different than those modeled and invalidate the noise modeling results.

The FAA also proposes that departure demand throughout the day will dictate the use of one, two or three fanned departure headings. However, the FAA reports do not indicate the specific traffic demand levels that would signal an increase or a decrease in the number of headings used at any one time, but rather rely on controller judgment, discretion, and experience as to the definition of low, medium or high traffic volumes that would generate a change in the number of headings utilized and therefore the number of households impacted by the new over-flights.

Variability in paths and controller strategy can be expected to yield a high degree of variability in noise impact footprint. As we will see later, the modeled routes paths and strategy have been likely finely tuned to show minimized impacts, and portray a situation that is impossible to achieve in practice.

### 3.2 Noise Impacts from FAA Data

Table 1 shows the noise impacts to Union County from the FAA’s census spreadsheets for the IA + ICC alternative with mitigation. The impacts are

- Net decrease by 1094 of the number of people subject to DNL 65 and above. However, because of the shifting of noise burden, 954 people previously below 65 DNL will now be subject to noise above 65 DNL. Based on the DEIS study of the nature of the affected population, these people are likely subject to environmental justice protection.
- From 60 to 65 DNL, there is a net increase of affected people by 21,261 (4.25 times year 2011, “No Action” levels) The FAA census noise spreadsheets project that 16,222 residents would receive noise increases by 3 or more decibels, and 11,443 would receive increases of 5 or more decibels. These impacts stand out as the worst of the entire redesign.
- From 55 – 60 DNL, the number of affected people increases by 27,361. This is an increase by a factor of 1.83 over year 2011, “No Action” levels. Of these, 13,157 people receive increases of 5 or more decibels.

**Table 1  
Comparison of Union County Noise Exposed Populations for FAA Alternatives**

	<b>2011 “No Action” Population</b>	<b>2011 “IA + ICC” +Mitigation Population</b>
<b>65 DNL or Higher</b>	13,890	12,796
<b>60 – 65 DNL</b>	6,569	27,919
<b>55 – 60 DNL</b>	32,817	60,178
<b>Total</b>	53, 276	100,893

The EWR noise impacts due to westward “fanning” stand out prominently in overall redesign. After mitigation, for the whole redesign, the FAA predicts that 16,803 people will receive noise increases of 3 decibels or more in the DNL 60 – 65 range. 96.5% of these are in Union County. Of these, 11, 443, or more than 70%, receive 5 decibel increases – substantially higher than the FAA impact threshold of 3 decibels. Furthermore, the FAA identifies 50,392 people as being impacted by the changes from 45 – 60 DNL. Of these 20,089 or 40% are in Union County. FAA data shows EWR “fanning” to be, by far, the largest contributor to remaining post mitigation noise impacts for the redesign.

Finally, although the above 65 DNL net results look slightly favorable, 954 new people are introduced into the DNL 65 contour that were not there previously. These people constitute an impacted environmental justice group.

**Please investigate the environmental justice implications of the EWR south flow noise increases.**

**3.2 Capacity Benefits Small and Need Clarification**

DEIS data at pages 9-38 of Appendix C shows that EWR fanning allows at most 3 extra aircraft per hour above the normal current capacity of 58. This is a very small gain, given the large noise impacts to many tens of thousands of people. The EIS should more clearly characterize the gains and applicable time periods.

**Please provide additional details on the capacity benefits anticipated from the proposed fanning change. Please inform as to the number of peak hours per average and 90% day that the increased departure capacity would apply and provide estimates as to the increase in total departure capacity. Please include the assumptions behind the assumed departure capacity such as aircraft sequencing, and the likelihood of achievement in a busy environment such as EWR.**

**Please explain the basis for any decision that the benefits of the proposed fanning change outweigh the enormous environmental impacts.**

Section 10 gives reasons why delay reduction benefits due to this change are inflated, and why residents will have to pay the price for additional departure headings, with little departure delay relief on balance.

### 3.3 Need for Study of More Easterly Headings

Approximately 15,000 people in an environmental justice community are currently affected at DNL 65 and above with the 190-degree initial departure heading now in effect. The area to the east of current flight paths is largely unpopulated and industrial. The mitigation proposals spread traffic to the west, increasing noise impacts. The FAA needs to study more easterly headings that better utilize the unpopulated and industrial areas south of EWR. FAA representatives at the public meeting indicated that headings below 215 degrees were not investigated as part of the ROMA modeling. This limited nature of the investigation is insufficient, given the enormous noise impacts of the changes being proposed.

**Please perform a thorough investigation of headings and departure strategies, for EWR Runway 22 south flow, including headings below 190 degrees, to determine strategies that minimize population noise exposure. As part of this, please search for strategies that minimize overall population noise exposure independent of aviation efficiency, and use the noise impacts of these as a baseline for measuring the impacts of other proposals, so that decision makers can accurately ascertain the degree to which population impact is being traded for aviation efficiency. Please report the number of people exposed at various DNL levels for the sub-alternatives investigated.**

One of the airspace designers at the April 25, 2007 FAA Public Meeting described a 2500 foot altitude restriction due to LaGuardia arrivals as the reason why aircraft could not use departure headings down to 190 degrees and below. A less restricted climb was being sought. However, FAA procedures dating back to 1989 and Standard Instrument Departure (SID) 3 have specified unrestricted climb to 5000 feet utilizing the 190 degree initial heading. Therefore;

**Please explain the failure to investigate more easterly initial headings down to 190 degrees and below, when in fact, such headings have been used since 1989 and are acknowledged to yield reduced noise impacts.**

As a further follow-up, aircraft can take initial departure headings 190 degrees or substantially less as long as they stop climbing after reaching an altitude of approximately 5000 feet. (Trajectory of the LaGuardia arrivals determines the exact safe permissible altitude.) All that would be needed would be to establish a "shelf" at approximately 5000 feet and give that airspace to the EWR departure controller. Aircraft could then travel east for some distance without having to pointed out to the LaGuardia arrival controller. Aircraft would ultimately be directed west of this initial heading, but at least they would have the advantage of performing the early part of their climb over non-populated and non residential areas.

**Please investigate the use of initial departure headings of 190 degrees or less in conjunction with an altitude shelf to avoid LaGuardia arrivals as a method for reducing noise impacts.**

Section 5 discusses a more extensive provision of additional airspace to EWR that might be part of a plan to support more easterly departure headings.

**Please investigate the reallocation of additional airspace to the east as described in Section 5 as a noise mitigation measure for EWR.**

### 3.4 Sensitivity of Results to Modeling Assumptions and Parameters

Although FAA data shows slight overall reduction in noise exposure above 65 DNL, many details remain unclear regarding the modeling assumptions and accuracy. Table 2 shows that the Preferred Alternative plus mitigations is accompanied by sharp increases in noise exposure immediately below 65 DNL, rendering results highly subject to even small inaccuracies in the modeling or assumptions.

**Table 2  
Sensitivity of Union County Noise Exposed Populations to Small Changes in Exposure Thresholds**

<b>DNL Level</b>	<b>2011 “No Action” Population</b>	<b>2011 IA + ICC +Mitigation Population</b>	<b>Difference in Population Exposed</b>
<b>65</b>	13,890	12,796	-1094
<b>64</b>	15,066	15,443	427
<b>63</b>	16,079	18,263	2184
<b>62</b>	17,354	22,130	4776

Table 2 shows that simply shifting the threshold from 65 to 64 decibels reverses the conclusion as to benefit and shows net increase in DNL 65 population from the proposed changes. This same effect could also arise from a one decibel cumulative error from modeling inaccuracies, differences in controller behavior from that assumed, and changes in number and flight mix of aircraft.

Changes in fleet mix and volume that will increase noise will occur without further environmental scrutiny. Therefore:

**Please project future increases in EWR fleet mix and volume 25 years forward, and compare the population exposures of the Preferred and “No Action” alternatives.**

Earlier NJCAAN DEIS comments brought to light apparent anomalies in the noise modeling results in the immediate vicinity of EWR. These remain unexplained. Further anomalies have since

appeared. For example, FAA census noise spreadsheets promulgated during 2006 showed a 2006 Union County DNL 65 population of 14,710 for the “No Action” alternative. The April 2007 spreadsheets show this same population as 13,910 – an unexplained 6% difference for the same alternative and year. The changes in modeling methodology in Pages 2 –3 of the April 2007 Noise Mitigation Report, do not account for this. The key point is that the FAA modeling in this situation is not sufficiently accurate to reliably determine impacts.

Sections 3.5 and 3.6 that follow explore additional sources of inaccuracy in the modeling. It is likely that the FAA used its ROMA tool to computer assist its exploration of routing alternatives to determine a precise set of routes that would lower the DNL 65 affected population to just below threshold to avoid the need to address impacts to the environmental justice protected population residing in the vicinity of EWR. However, the demand controlled heading strategy and controller discretion in routing introduce high variability rendering the FAA results unlikely to be achieved in practice.

### **3.5 Need for Further Details On and Effectiveness of Demand Controlled Departure Headings**

The mitigation recommends switching between lower and higher impact departure strategies continually throughout the day. The criteria for switching between the headings are left to the judgment, discretion, and experience of the controllers. The FAA suggests length of departure queue as a criterion. Since some of the headings have much higher noise impacts, the actual ground noise exposure in practice can depend critically on how individual controllers behave. Individual controllers can have their own criteria or not follow the rules at all. This strategy has the undesirable property that as the airport gets busier over time and volume rises, the highest impact headings get used more heavily, yielding disproportionate noise increases to residents living below, who constitute an environmental justice protected group.

Thus, there is question as to the effectiveness of this mitigation method, including likely controller compliance over the long term under busy conditions. Additional information is needed to understand the mitigation strategy.

**Please describe the demand-based heading scenario and criteria modeled in further detail, and describe a typical and 90% day, number of times and approximate hours headings would be switched, length of time and controller effort to switch headings, and portion of time on each set of headings so that the public can better understand the mitigation strategy, it’s likely effectiveness, and the likelihood to be followed over time. Please project demand-based heading use 25 years forward and compare noise results with the “No Action” case.**

**Please provide information regarding previous experience with demand based traffic headings, such as are being proposed in the mitigation, at busy airports comparable to EWR to allow assessment of the likely controller compliance and success of the new procedures.**

**Please investigate the sensitivity to controller compliance by providing data as to noise impacts for the designated headings if controllers left the highest demand headings in place from the start of the morning high demand period until the nighttime shift to the low demand 190 heading.**

### **3.6 Differences Between Modeled and Likely Actual Routes**

The modeling of departure routes presents a challenge due to variability in controller behavior and the gradual introduction of RNAV “overlays.”

A significant issue in regard to the proposed new departure headings is that they are simply “initial” headings. Initial headings are those issued to the aircraft prior to takeoff. After becoming airborne, the controller can turn the aircraft in any direction. The principal departure procedure available at Newark currently, and for the mitigation, is a Radar Vector procedure in which the controller determines where or when they will turn aircraft. Literally every departing aircraft could theoretically fly a different departure track. Figure 3 in the Mitigation Report shows the resultant wide dispersal of departure flight tracks. Individual controllers have different methods for directing aircraft. These methods can also depend on their workload at the moment. For that reason, conclusions drawn from this modeling effort regarding populations affected are unreliable and to a large extent an exercise in wishful thinking.

If conformance to the modeling is desired, the FAA should depict the departure procedure in a manner that insures departure headings will remain as published until either the aircraft passes a specific fix or has reached a specific altitude, or both. This has not been done, nor does it appear part of FAA plans.

Some carriers are performing flight trials with charted automated RNAV or “Pilot Navigation” departure procedures that confine a departing aircraft to specific ground tracks and altitudes. If the existing Radar Vector procedures were replaced by RNAV and/or Pilot Navigation procedures, ground tracks would narrow significantly. This might be beneficial when over-flying less populated areas, but it can also result in a concentration of noise below the precisely defined ground track when over-flying populated areas. RNAV is being gradually introduced at EWR. Unfortunately, there is no discussion or account in the modeling of how the introduction of RNAV will affect the noise modeling and impacts.

The description and modeling of EWR departures in the Report is deficient in that it does not describe how the variability in Radar Vector procedure flight tracks is accounted for, nor does it project forward the impacts of the ongoing introduction of RNAV at EWR. These deficiencies are aggravated because, as previously shown, impacts at EWR are extremely sensitive to assumptions and parameters.

As one important aspect of the modeling, the Report does not specify how realistic horizontal and vertical spreading of flight paths is generated from the assumed model tracks and what validation has been performed of these paths for operation in the immediate vicinity of the airport.

**Please describe the methodology for achieving a realistic distribution of flight paths in the modeling in the vicinity of the airport and describe actions to ensure that the distribution of noise from these truly and accurately represents the likely real situation.**

**Please explore the sensitivity and robustness of the modeling results to differences in controller behavior from that assumed by the model. How will the noise projections change if controllers differ from the assumed behavior according to differences normally experienced in practice?**

**Please explore the sensitivity of the modeled noise results to the gradual introduction of RNAV at EWR by exploring likely future scenarios and paths so that the public can be assured the proposed Preferred Alternative plus mitigations will not generate impacts beyond those presented in the Mitigation Report.**

**4. EWR North Flow**

The DEIS did not give flight paths for north flow EWR changes, so the public remains uninformed as to them. The DEIS also did not give percentage use of this fanning nor did it describe changes anticipated in this percentage of use over time.

The “fanning” of north flow departures within the IA + ICC alternative substantially increases noise impacts. The mitigation document rejected several strategies that may have improved this. We are disappointed that no mitigations were offered. Further investigation or better explanation is needed of the reason for dropping some options.

**4.1 Noise Impacts**

Table 3 shows the noise impacts to Essex County from the IA + ICC alternative with mitigation.

**Table 3  
Comparison of Essex County Noise Exposed Populations for FAA Alternatives**

	<b>2011 “No Action”</b>	<b>2011 IA + ICC +Mitigation</b>
<b>65 DNL or Higher</b>	13,625	13,987
<b>60 – 65 DNL</b>	18,108	23,557
<b>55 – 60 DNL</b>	62,674	94,372
<b>Total</b>	94,407	131,916

The impacts are

- Net increase by 362 people of the number of people subject to DNL 65 and above. Although 32 people will receive benefit and fall out of this range, 394 people who were previously below DNL 65 will now be above that level.
- From 60 to 65 DNL, there is an increase in affected people by 5,449. This is an increase of 30%.
- From 55 – 60 DNL, there is an increase in affected people by 31,698. This is an increase of 50%.

The increases in DNL 65 population exposure need to be investigated from an environmental justice perspective. Furthermore, there are dramatic increases in population exposure at high levels below DNL 65. The FAA's own data shows that 37,509 additional people would fall into the DNL 55 –65 contours.

NJCAAN believes that further exploration is needed of mitigation options for this exposure. Furthermore, further details are needed on the gains from this localized change to the treatment of Runway 4 Departures.

#### 4.2 Capacity Gains

**Please describe in detail the capacity gain from the fanning of Runway 4 departures, covering the circumstances and assumptions for achieving these gains, likelihood of assumptions being met, number of hours in an typical and 90<sup>th</sup> percentile day such gains would be achieved, and the total average increase in Runway 4 departure capacity.**

Further details on issues with the projections of capacity and delays are given in Sections 9 and 10.

#### 4.3 Sensitivity to Small Changes in Exposure Threshold

The FAA utilizes DNL 65 heavily as the primary impact criterion when in fact noise at lower levels will cause adverse affects. For the Runway 4 changes, there are sharp increases in population exposure immediately below DNL 65. Table 3 shows the sensitivity of population exposure to DNL threshold by showing what happens as the threshold is lowered slightly below DNL 65. A one decibel change in the threshold to 64 decibels triples the number of additional people exposed by the Preferred Alternative with mitigation, relative to that at DNL 65. A two decibel change in the threshold increases the number of people negatively impacted to 5020. Furthrmore, as stated above in Section 3 of these comments, any errors in modeling, assumptions, nature and volume of traffic, controller behavior, and introduction of RNAV could easily bring populations calculated in the FAA reports as below DNL 65 above this range.

**Table 4**  
**Sensitivity of Essex County Noise Exposed Populations to Small Changes in Exposure Thresholds**

<b>DNL Level</b>	<b>People Affected - 2011 “No Action”</b>	<b>People Affected - 2011 IA + ICC +Mitigation</b>	<b>Difference in Population Exposed</b>
<b>65</b>	13,625	13,987	362
<b>64</b>	16,069	17042	973
<b>63</b>	18,142	23,162	5020
<b>62</b>	24,776	28,170	3394

Because of the extreme sensitivity of projected impacts to the threshold used in the FAA’s analysis, the agency must closely scrutinize its assumptions regarding runway usage patterns, nature and volume of traffic, and future projections with respect to changes in these factors, to get an accurate picture of anticipated environmental impacts. Since nature and volume of traffic is allowed to change without further environmental analysis, it is necessary to consider in advance the likely effect of these changes.

**Please describe anticipated future changes the nature and volume of EWR Runway 4 traffic over the next 25 years and describe how this affects the impacts of the Preferred relative to the “No Action” alternative.**

NJCAAN’s understanding is that the initial implementation of “fanning” will utilize it to a lesser extent than is ultimately planned. We thus have concerns regarding the assumed versus ultimate scenarios.

**Please provide details on, including the percentage of use of EWR Runway 4 “fanning,” that were utilized in the noise modeling. Please describe projected future changes in policy for Runway 4 “fanning,” including projected usage increase as new procedures currently being actively considered are implemented. Please provide updated population impacts taking into account these projections.**

**Please investigate sensitivity of the noise impact results to variation in controller behavior and introduction of RNAV procedures.**

The remainder of this section focuses on investigations of mitigation alternatives with respect to EWR Runway 4 departures. In addition to the items immediately below, the provision of more airspace in Section 5, and ocean routing in Section 6, can both help resolve Runway 4 and Runway 22 noise issues.

**Please examine further the options to be described in Sections 4, 5 and 6 for reducing EWR Runway 4 noise impacts.**

#### **4.4 Meadowlands Option**

The FAA rejected keeping Runway 4 departure traffic over the Meadowlands Corridor due to operational conflicts with LaGuardia Airport departures. However, it offered no explanation as to why this procedure is not feasible. The procedure is commonly used for Runway 4 traffic heading north out of Newark Airport and would appear also to work for noise abatement purposes. The communities in Essex County are heavily impacted by aircraft noise from north flow Newark departures and deserve full consideration of procedures that could offer noise mitigation. Therefore:

**Please describe in detail why keeping Runway 4 departures over the Meadowlands Corridor currently can be used for operational benefits but cannot be used for noise abatement benefits. Please also specify the conflict with LaGuardia traffic and why this traffic cannot be adjusted. Please explore partial implementation, including use at night only, if full implementation is not feasible.**

The allocation of an airspace “shelf” to avoid conflicts with LaGuardia traffic was discussed in Section 3.3 for south flow departures. This could also facilitate the implementation of noise mitigation for northerly departures

**Please explore the allocation of an airspace altitude “shelf” for northerly departures with airspace below this shelf allocated EWR, as a means of avoiding conflicts with LaGuardia traffic. Please explore noise mitigation options that might be feasible after establishment of such a shelf.**

#### **4.5 Hudson River Routes**

The Hudson River procedure described in Section 11 of the “Operational Analysis” report could be adapted for noise abatement purposes. This procedure affects Runway 4 departures, and could provide noise relief for communities in Essex County, particularly Newark, which currently experience some of the highest aircraft noise in New Jersey, as southbound aircraft would not track over Newark as they do under the current procedure. This procedure warrants detailed consideration.

**Please explore full, partial and night-time implementation of Hudson River routes as a noise abatement measure.**

Several options for turning EWR north flow departures to the east were explored in the Report but rejected based on conflicts and sequencing issues with LaGuardia traffic. However, these were done in the context of the current airspace operation and boundaries. Reallocation of airspace to the east, discussed in the following section, provides additional options for noise abatement and mitigation.

## 5. Reallocation of Additional Airspace to the East to EWR

The terminal airspace for Newark departures is extremely constrained by the presence of LaGuardia Airport and its flight patterns. The separation is located in a north/south line just to the east of EWR. The Port Authority of New York and New Jersey (PANYNJ) specifically recommended moving this separation line to the east to allocate the Hudson River for Newark Airport. In recommending the allocation of additional airspace to the east to EWR, the PANYNJ commented:

*“Expanding the Newark Airspace to the east would allow Newark controllers to run arrivals or departures along the Hudson corridor. This would greatly improve the efficiency of EWR and reduce conflicts with TEB traffic. It would also provide much needed noise relief in the area around the airport. Currently LGA traffic occupies the Hudson River corridor. If these aircraft are shifted east there may be additional benefits achieved by sequencing over the Long Island Sound.”*

Furthermore, the PANYNJ made the following public statement subsequent to FAA announcement of the choice of the Preferred Alternative.

*“While the FAA chose the best of the four options for airspace redesign in the region, it did not take full advantage of this rare opportunity to significantly reduce delays for travelers and mitigate noise... For example, we recommended using routes over the Hudson River and Long Island Sound that would have further reduced delays and noise impacts, but that was dismissed.”*

One of the FAA airspace designers stated at the April 25, 2007 FAA Public Meeting that something like that had been examined, but that the alternative “just couldn’t be made to work.” However, in that same discussion the designer stated that when the alternative was investigated, LaGuardia arrival distances went up, implying that a flight distance increase was the reason for rejection. The PANYNJ comments promoting this investigation are based on substantial experience with the surrounding airspace. In view of the continuing interest in this option, further investigation is warranted and additional details to need to be made public as to the detailed nature of the investigation and results. Thus:

**Please fully and thoroughly explore expanding EWR airspace to the east to achieve operational and noise abatement benefits. As part of this, please examine procedures which run arrivals and departures along the Hudson corridor. Please also examine possible sequencing of LaGuardia arrivals over Long Island Sound. Please make public the routing options explored and the detailed results of the investigation.**

It is anticipated that an airspace change along the lines above may entail movement of a number of routes.

## 6. Further Use of Ocean Routing

NJCAAN is very pleased that the FAA has explored and recommended ocean routing for south flow nighttime operation of EWR. This played a role in achieving the noise mitigation currently projected by the FAA. Further use of ocean routing should make possible additional noise benefits. An example would be placing some but not all of the traffic on the ocean routes to avoid delays.

**Please examine operational changes that might make full or partial ocean routes feasible for 24-hour operation.**

The FAA documents are silent on why northern departure ocean routes were not included in the investigation.

**Please examine possible partial daytime or nighttime use of ocean routes for northern departures as a noise mitigation strategy. Please also investigate this in conjunction with a Hudson River path.**

NJCAAN appreciates the exploration of ocean routes using RNAV. In Section 9 of the Operational Report, Mitre concluded that Ocean Routes utilizing RNAV would not reduce the close to five mile separation standard requirement due to right angle turns. However, Mitre did not modify this procedure to improve its operational performance as it did with nighttime Ocean Routes analyzed in Section 8 of that report. The use of more gradual turns, such as the FAA used in nighttime ocean routing, or possibly other changes might resolve aircraft separation issues.

**Please explore possible procedural changes that might make further use of ocean routing feasible using RNAV**

## 7. Noise Implications of use of RNAV

The FAA remarks at the public meetings indicated the agency's awareness that RNAV procedures could introduce noise problems, even in cases where the routes overlaid existing ones. The reason is that RNAV can concentrate a set of routes previously distributed over a geographic area to a single line. When routes are "overlays," environmental analysis is not performed. Issues regarding expanded use of RNAV at EWR were mentioned in Sections 3 and 4. More broadly, the implementation of the Preferred Alternative is to be accompanied by, and facilitate, the expanded use of RNAV but there is no reported attempt to identify and address areas in which the possible concentration of routes may cause noise impact. Possible solutions would be to periodically make small movements in the RNAV paths to achieve fairer noise distribution or use small randomly generated computer variation in the RNAV paths for individual aircraft.

**Please identify the geographic areas where flight path concentration produced by RNAV may cause problems. Please describe the planned solutions in areas where problems occur.**

## **8. NEPA Issues, Project Feasibility, and Phasing**

This section collects issues related to compliance with the National Environmental Policy Act (NEPA), lack of a coherent plan for implementing the Preferred Alternative, especially in the stated timeframe, and for addressing environmental issues arising from phased implementation.

### **8.1 New Alternatives Introduced without Proper Environmental Treatment**

Some of the mitigation alternatives are in areas such as that immediately surrounding EWR where even small flight path changes have previously subject to a full EIS process. This included advance detailed description of alternatives, formal scoping phase with public comment and proposal of additional alternatives, a draft EIS, and then a final EIS. One example is the 1995 EIS undertaken when the Port Authority of New York and New Jersey proposed to simply change the a turn point on the EWR 190 degree heading from taking place at 3 miles from the Distance Measuring Equipment (DME) to 2.3 miles. This EIS had extensive public involvement. The current situation for EWR mitigation involves comparatively profound route changes that are vaguely described and shown to the public for the first time on April 6, 2007, without any scoping, or public comments on alternatives, and an unreasonably brief comment period. The NEPA process is being circumvented.

### **8.2 Expansion of Stewart Airport Not Included**

The PANYNJ has announced plans to take over and expand Stewart International Airport in New York State. New Jersey legislation to enable this was recently enacted. Stewart is forecast to be a major metro-area airport. The DEIS and April 6, 2007 reports fail to consider the operational and noise impacts of the expansion of Stewart Airport, and therefore improperly segment the review of foreseeable and connected changes.

**Please consider the operational and noise impacts of the expansion of Stewart Airport in the context of the Airspace Redesign EIS.**

### **8.3 Environmental Issues Related to ICC Not Studied**

The DEIS described the ICC as a separate facility, requiring its own environmental study. The DEIS, Section 2.5.6, "Integrated Airspace Alternative" stated that "the FAA is currently studying the ICC concept to determine whether it meets operational, safety, and budget requirements. The FAA has not yet decided whether to approve the ICC concept. Should the FAA determine that the ICC concept is feasible and seek to implement it in the Study Area, it will undertake the appropriate environmental review prior to any construction activities."

The decision as to whether or not to construct a separate ICC facility has significant potential to affect the overall project design. The DEIS showed greatly differing impacts according to the inclusion or exclusion of the ICC concept. No information has been made public regarding implementation of the ICC concept without a separate facility. It is also unknown, or not publicized, what the project design without a separate ICC facility might be and how this might

affect the benefits and environmental impacts. Project design, benefits, and impacts might also be affected according to the physical location of an ICC facility. Therefore:

**Please present the details of the proposed ICC implementation in the context of the Airspace Redesign EIS**

#### **8.4 The Project Cannot Be Competed in the Stated Time Frame**

It is highly unlikely that the FAA will be able to meet all of the technical issues inherent in developing an ICC within the time frame of the DEIS. Additionally, there is the significant problem of training the present center controllers to work in the terminal environment in the time frame allotted. The training program at Northern California TRACON (an ICC type facility) requires two or more years for controllers to become fully certified. During that period, it requires the center controllers to become terminal certified which means that the center sectors could not move into the terminal environment until sufficient personnel are available to staff the transferred sector.

Therefore, the ICC should not even be considered due to the time frames specified. The FAA is unlikely to be able to even combine the NY Center and TRACON into one building by the end of the out year 2011 date assumed in the DEIS. There is no reason to believe that the efficiencies determined by the FAA's Consultant could be reached within any reasonable timeframe and should be dropped from consideration. The only viable option within the lifespan of this DEIS is the options that do not include the ICC. However, the options without the ICC do not provide any discernable benefit and thus the need for this airspace realignment is virtually non-existent.

#### **8.5 Absence of Coherent Implementation Plan**

Neither the DEIS nor the Report discussed the details of implementation phasing, especially as it relates to schedule, whether the phasing can be completed in the timeframes allotted in the DEIS (2006 and 2011). Funding and implementation difficulties make it possible that portions of the plan may not be able to be implemented at all. This raises the possibility of partial implementation scenarios that have not been studied or that may not survive environmental scrutiny. For example, the options without the ICC yield little benefit, but portions do have severe noise impact.

**Please present a detailed implementation plan for the Preferred Alternative. Please analyze and discuss the impacts of successive individual phases. Please ensure that the halting of implementation at any phase will not cause environmental impacts not covered in the EIS.**

#### **8.6 Important ICC Details Not Worked Out**

The absence of an implementation plan raises question on feasibility and benefits. Furthermore, important airspace design issues remain to be worked out that may affect the operational analysis

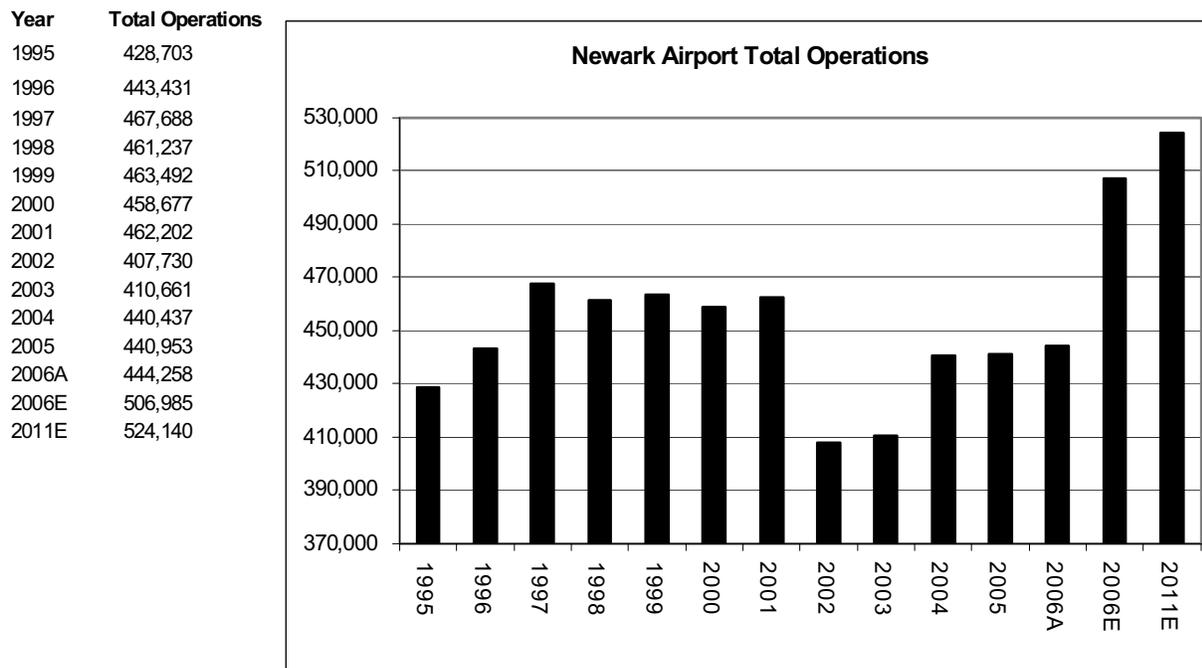
and environmental impacts. The FAA report states “Where current en route airspace separation rules of five nautical miles are typically used, this airspace redesign alternative would use three nautical mile terminal airspace separation rules over a larger geographical area and up to 23,000 feet MSL in some areas. The ICC airspace would be comprised of the majority of current NY TRACON and NY Center airspace, as well as some sectors from Washington Center and Boston Center. Boston Center could take the high-altitude parts of the current NY Center airspace structure.”

However, one significant issue inherent in the development of an ICC is where or in what facility Oceanic Control function will reside. While Oceanic Control currently resides in New York Center, the DEIS does not address this issue. Oceanic air traffic control does not use the same air traffic control hardware that is used domestically. As such the integration of Ocean airspace into the ICC will not allow the use of terminal three-mile separation

**9. Difference in Modeled vs Actual Operations**

**9.1 FAA Assumed Operation Levels Far too High**

**Figure 1: Newark Airport Annual Operations**



Notes: Actual Newark operations in 2006 totaled approximately 445,000. The FAA modeled approximately 506,985 in its baseline. The FAA projected operations to increase to approximately 524,140 in 2011 well in excess of current Newark Airport capacity.

Data source: Federal Aviation Administration; Port Authority.

Figure 1 shows annual operations counts at EWR and compares them to FAA assumptions. For 2006, the FAA assumed 506,985 operations per year (DEIS, Appendix B, Page 14), whereas the true number is approximately 444,258. This is a difference of 14%. Based on discussions with FAA representatives at the April 25, 2007 meeting, the operations levels were not changed for the data presented in the Report. The FAA traffic assumptions were unrealistic and likely have profoundly altered the modeling results for both delays and noise. Noise effects are discussed further in Section 9.3 of this comment. A 14% change in operations will, by itself, cause a relatively small .57 decibel change in noise, but if it results in a disproportionate shift into night operations for the “No Action” case, it can have a much larger effect on the noise comparisons between alternatives.

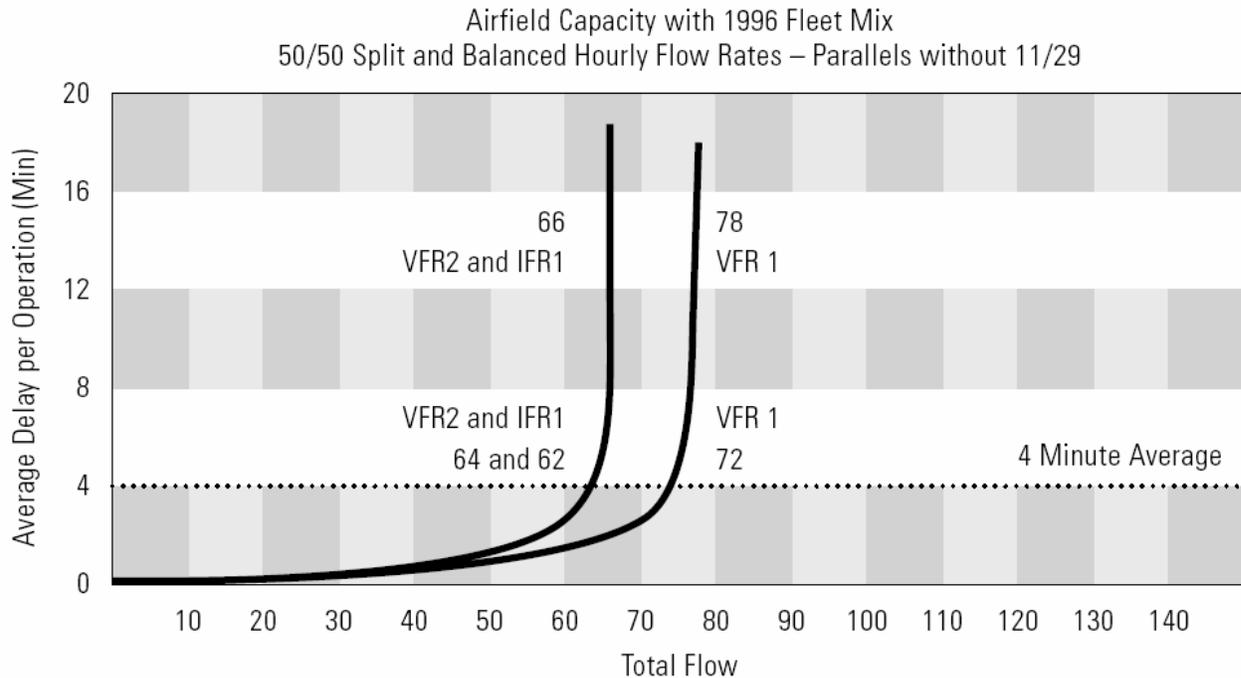
- In 2006, EWR had among the highest delays in the country with a far lower number of operations than assumed by the FAA. Thus, the FAA assumed base traffic levels for 2006 far exceeds the demonstrated capacity capability of EWR. Furthermore, the difference of 14% between the FAA assumed versus actual capacity far exceeds FAA projected capacity gain of 5% from the proposed changes.
- The FAA assumed an operations level of 524,140 annual operations for 2011, which is 18% higher than the demonstrated current capacity, and again far exceeds projected capacity gains.
- The 5% FAA projected level of capacity increase equates to approximately two years of expected volume growth (3%-5% per year). As was stated in NJCAAN’s DEIS response, the Airspace Redesign is relatively ineffective in addressing increased passenger travel demand as compared to use of larger aircraft. Use of larger aircraft on routes with low environmental impact allows the meeting of passenger demand with much less environmental impact than the Airspace Redesign.

## **9.2 Assumed Traffic Levels Greatly Affect Delays**

Figure 2 is an example how delays increase sharply as one attempts to increase traffic load or “throughput.” This figure is taken from an older year 2000 study, under limited runway configurations so the absolute numbers are not comparable to current ones, but the increase of delays with operations is representative.

The two curves show that delays increase sharply at 62 operations per hour under IFR (Instrument) operation and about 72 operations per hour under VF (Visual) conditions. Even small changes in attempted flow rate beyond airport capacity cause delays to “go through the roof.”

**Figure 2: Airport Capacity Curves – Delays versus Throughput<sup>1</sup>**



The high dependence of delays on assumed traffic levels makes it possible to greatly exaggerate the effects of throughput or capacity improvement. All that is necessary is to operate the system near capacity. If capacity is then increased by a few percent, then delays go down sharply. In real life, however, increased carrier scheduling during peak periods prevents this gain from ever being realized. In effect the study was “rigged” to create an impression of significant benefit whereas, benefits, if any, would be small.

An MIT study of EWR operations reported, “It is clear that the airport is scheduled even beyond the normal VFR capacity in some cases and well beyond bad weather IFR capacity in most instances.”<sup>2</sup> The actual delays are largely dependent on the willingness of carriers to accept them. If delays get too high then carriers cut back on the scheduling of traffic during peak hours. A key point here is that peak traffic levels are to a large extent self adjusting. If the delays get too high then the carriers schedule fewer operations. Modeling that fails to take this adjustment into account will yield erroneous numbers for delays.

When demand exceeds available capacity, carriers can switch to larger aircraft to maintain passenger flow. The failure to adjust applied system loads to likely carrier behavior was pointed out in NJCAAN’s DEIS comments. FAA experts at public meetings admitted that this adjustment took

<sup>1</sup> Federal Aviation Administration, Newark International Airport Capacity Enhancement Plan, May 2000. Report link: <http://www.faa.gov/ats/asc/publications/CAPACITY/ewr.pdf>.

<sup>2</sup> Evans, A.D.; Clark, J.B.; “Response to Airport Delays – A System Study of Newark International Airport,” Report No. ICAT-2002-5, MIT International Center for Air Transportation, Cambridge, Ma, June 2002.

place, but made no attempt to incorporate this into the modeling, except at LaGuardia Airport, where results would have become clearly unreasonable without this adjustment.

### **9.3 Impact on the Noise Modeling.**

When an airport is operated near or above capacity, small changes in attempted flow rate can result in very large increases in delays. There is a disproportionate increase in the delays for the system with lower capacity, which for the FAA's assumptions and modeling of year 2011, is the "No Action" case. The assumption of higher than realistic traffic levels can profoundly affect noise results and alternative comparisons. High delays can push aircraft into nighttime (10PM – 7AM) operation where they incur a 10 decibel penalty in the DNL calculation. This is equivalent to having each aircraft count as ten. If delays into nighttime operation are occurring in the modeling, then they could potentially severely and unduly penalize the baseline "No Action" case noise results, since, as discussed earlier, carriers adjust schedules to avoid excessive delays and nighttime operation. Furthermore, as discussed in Section 10 of this comment, the FAA projections of delay savings are unduly optimistic and arise from inaccurate assumptions and modeling.

**Please provide information on the percent of operations that are pushed into the nighttime hours due to delays for the alternatives and estimate the contribution of this effect to the modeled DNL for the various alternatives in the various mitigation localities.**

**Please adjust modeling and parameters to reflect likely actual carrier behavior in the presence of high delays in a manner similar to what was done at LaGuardia airport.**

## **10. Delay Reduction and Other Benefits Exaggerated**

Section 9 has discussed the effects on delays of assuming unrealistically high traffic levels. Other factors in the FAA modeling effort also tended to inflate the projected delay savings.

### **10.1 Benefit Inflated Because of Failure to Consider All Airports and Traffic**

Section 7.3 of the "Operations" report states that "Each proposed mitigation scenario was simulated and evaluated for operational impacts. Specifically, these impacts included the impact on delay, departure queue length at the airport, and distance flown. Results were compared across all scenarios." However, the DEIS modeling for capacity only considered air traffic into and out of 8 area airports. The FAA's Consultant eliminated 119 airports that each generates air traffic into the system. The FAA:

- Did not consider VFR traffic and the requirement for VFR traffic to be provided air traffic services in Class B airspace.
- Excluded all general aviation aircraft that did not operate into and out of the 8 study airports.
- Excluded military air traffic from the capacity analysis, eliminating McGuire AFB and Atlantic City International Airport.

- Over flights were discussed in the data that was obtained but then the FAA's Consultant did not use that data in the capacity modeling effort.

In summary, the FAA did not include all of the traffic that is provided air traffic control services, which resulted in an inflated benefit. When the FAA's Consultant removes a large portion of the traffic from the equation they are able to insert operations from the 8 modeled airports and show that the Proposed Action results in an operational benefit. The use of incomplete and inaccurate modeling data invalidates the conclusions.

### **10.2 Failure to Account for Restrictions of En-Route Controller Accepting Traffic**

The FAA has based their delay savings on the fact that the en route controller will accept traffic from the terminal area separated only by altitude. However, in addressing the ocean routing in the MITRE report, they state that the en route controller will require at least 5 miles of in-trail separation and will result in an average of 8 to 10 miles in trail. Thus, the assumption of what is acceptable to the en route controller is optimistic and delays will be higher than forecast. As such all of the FAA Consultant's projections regarding delay reduction are invalid.

### **10.3 EWR Terminal Volume Management Negates Effect of Additional Headings**

According to data contained in OPSNET, which is the FAA official source for delays, EWR has significantly more Terminal Volume delays than the other facilities in the Study Area. In fact, Terminal Volume delays at EWR have approximately doubled each year since CY 2003 and are 275% higher than LGA which experiences the next highest number of Terminal Volume delays.

This would indicate that the Traffic Management Unit (TMU) which oversees the NY/NJ/PHL area does not manage delays equitably between EWR, JFK, TEB, LGA, and PHL. Since the airports do not have individually segregated departure flows and departure gates are shared between the NY/NJ airports, there is nothing to indicate that adding two additional departure heading will appreciably improve departure delays.

### **10.4 EWR Departure Delays Will Not Be Appreciably Improved By Multiple Headings**

In 2006, EWR experienced a total of 53,619 delays. Of these, 30,770 were attributed to weather and will not be reduced by the Proposed action. The remaining delays break down as follows:

- Terminal Volume 16,599
- Center Volume 9
- Equipment 66
- Runway 5747
- Other 428

Terminal Volume delays are the only delays that have the potential to be affected by the

Proposed Action. However, since CY 2002, Terminal volume delays have risen dramatically at EWR as follows:

- 2002: 1,310
- 2003: 1,654
- 2004: 4,595
- 2005: 8,737
- 2006: 16,599

These are dramatic increases and indicate that delays at EWR result from more factors than simply having only one departure heading available for use. Since the airports in the Study Area do not have individually segregated departure flows and departure gates are shared between the NY/NJ airports, there is nothing to indicate that adding two additional departure heading will appreciably improve departure delays. Therefore residents of Elizabeth, New Jersey will have to pay the price for the additional departure headings with little departure delay relief on balance.

### **10.5 Departure Queue Benefit Inflated**

The FAA states “At geographically small, cramped airports like EWR, long departure queues can have considerable negative consequences for efficient operations.” They then go on to illustrate how departure queues will be reduced through the Proposed Action.

However, while the institution of additional departure headings may reduce the number of aircraft in the departure queue, long departure queues will still exist at EWR after airspace redesign is implemented and ground operations will continue to be constrained. Airspace redesign will have little to no positive impact on EWR ground operations.

## **11 Arrivals**

The FAA proposes two mitigation strategies:

- 1) Keeping the altitude of arriving aircraft higher until closer to the airport, and
- 2) Continuous Descent Arrivals (CDA).

### **11.1 Effects of Altitude Increases on Arrivals May Be Exaggerated**

The April reports discuss adjusting the lateral path and raising the altitudes of arriving aircraft to EWR on Runway 4R and 22L in order to mitigate the noise impact to adjacent communities.

Raising the altitudes of EWR arrival procedures will have a positive effect on noise mitigation efforts. However, arriving aircraft must still be sequenced on final approach through controller use of speed control, altitude assignment/level off, and radar vectors. It could be misleading to expect that simply raising the altitudes of arriving aircraft would greatly mitigate against noise produced by arriving aircraft.

## **11.2 Noise Benefits of Continuous Descent Not Analyzed**

The April reports claim that CDA would introduce noise benefits. However, no detailed analysis was presented to support this claim, application scenarios were not described other than generally, and gains were not quantified. If benefits are to be claimed from CDA, then a clear definition of usage and gain should be supplied. Furthermore, it was assumed that CDA would be beneficial and so this procedure was adopted without noise screening, contrary to the process used for other mitigation measures.

The benefits of CDA are questionable in an airspace that is as congested as the Study Area airspace. The TRACON arrival controller must sequence multiple streams of arriving aircraft on to a single EWR final approach course. To accomplish this, the controller utilizes a combination of speed control, altitude assignment and radar vectors to sequentially place each aircraft in trail with the appropriate spacing prior to landing. Because of this, a CDA that may have been initiated at high altitude must be terminated in the lower altitude stratum to facilitate the final sequence to the airport. While a CDA may result in a lower power setting during the initial descent phase, the latter descent phase, performed at a lower altitude such as 4,000 feet, will still require power adjustments. The area immediately surrounding EWR will not benefit from the CDA, and it is this area that is most affected by the Project.

## **12. Ocean Routing Not Seriously Considered for Implementation**

The FAA Consultant states “An ocean routing plan, proposed by the Office of the Governor of New Jersey and originally developed by the New Jersey Coalition Against Aircraft Noise, Inc. (NJCAAN), was modeled as an alternative in the New York/New Jersey/Philadelphia Draft EIS. The objective of the alternative is to reduce noise over inhabited areas rather than increase safety and efficiency of air traffic operations.” (Mitre Report; Page 22)

It would appear that the alternative is retained only to forestall the public outcry and not to provide any further consideration of the NJ recommendation. If noise impacts are the only reason for further considering this alternative, ‘noise impacts’ or ‘environmental impacts’ or ‘public support’ should be an objective and an evaluation criteria.

According to the FAA, the Ocean Routing Airspace Alternative would not: reduce delay, balance controller workload, meet system demand, improve user access, expedite arrivals and departures, increase flexibility, nor maintain airport throughput. The evaluation criteria, however, should have included criteria such as noise, community impacts, community support, etc. to reflect why some of the alternatives were carried forward and studied in more detail. Although the FAA elected to include the Ocean Routing Airspace Alternative for analysis due to the long-standing concerns of the NJCAAN, it is evident that they did not intend to implement the Alternative because it “did not meet the Purpose and Need of the airspace redesign.”

Thank you for this opportunity to comment.

Sincerely yours,

/s Jerome Feder

Jerome Feder  
Director, NJCAAN

# New Jersey Coalition Against Aircraft Noise

P.O. Box 554 Scotch Plains, New Jersey 07076

June 27, 2007

Steve Kelley  
Federal Aviation Administration  
c/o Ram Nagendran  
12005 Sunrise Valley Drive, MS C3.02  
Reston, Virginia 20191

Re: Supplemental Comments on the April 6, 2007, Noise Mitigation Report

Dear Mr. Kelley:

Please accept the following supplemental comments of the New Jersey Coalition Against Aircraft Noise ("NJCAAN") on the Federal Aviation Administration's ("FAA's") April 6, 2007, Noise Mitigation Report, which incorporates the April 2007 MITRE Operational Analysis of Mitigation of the NY/NJ/PHL Airspace Redesign (collectively, the "Report"). The Rutgers Environmental Law Clinic provided assistance with these comments. These comments are in addition to comments previously provided by NJCAAN on the DEIS and the Report. By issuing these supplemental comments, NJCAAN does not intend to diminish the import of its May 10, 2007 comments on the Report or its earlier comments on the DEIS that were submitted in 2006.

These supplemental comments focus primarily on three areas:

1. The FAA determination that "significant impact" does not occur at EWR is poorly founded and likely incorrect. This finding is based on a fragile set of circumstances that include only a subset of aviation activity and fails to consider the cumulative effects of other noise. Inclusion of ambient noise plus expected aviation procedural variations and changes over time will likely result in substantial environmental justice populations experiencing "significant impact."
2. The mitigation specification is incomplete and needs to include provisions for ongoing monitoring as required by 40 C.F.R. Part 1505 and FAA Order 1050.1e
3. The DEIS and mitigation Report failed to utilize modeling parameters that are representative of current and projected future activity as required by FAA Order 1050.1e.

**1. "Preferred Alternative" Plus Mitigation Likely Results in "Significant Impact" at EWR**

The following discussion focuses on the determinations of people impacted at levels of 65 DNL or greater surrounding Newark Liberty International Airport ("EWR"), but has more general implications elsewhere in the DEIS. NJCAAN's calculations in the following are based the FAA census noise spreadsheets placed on the FAA Airspace Redesign website in April 2007.

We first show that the FAA calculations that avoid showing "significant impact" at EWR are based on unrealistic circumstances, and even as contrived, just barely avoid a showing of "significant impact." We next enumerate factors that will cause noise results to vary substantially from those calculated by the FAA. We then show how inclusion of ambient noise will render above 65 DNL

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large areas that experience substantial noise increases from the “Preferred Alternative” plus mitigations. These areas would therefore be potentially “significantly impacted.”

### **1.1 Sensitivity to Small Differences in Actual Noise Level and Noise Change that Vary from Modeled Predictions**

The FAA has used 65 decibels as the DNL level, and 1.5 decibel noise change, as the criterion for determining when “significant impact” occurs. This is used to govern DEIS action such as the determination of when environmental justice impact needs to be further investigated.

Sections 1.1.1 and 1.1.2 that follow examine the sensitivity of the “significant impact” population determination to the DNL level and noise change criterion. The purpose is not to challenge the levels and noise change criterion, but rather to show how fragile and artificial the avoidance of “significant impact” in the mitigated scenario is. These results are used later as we examine factors that will cause the noise projections to vary from those calculated by the FAA.

#### ***1.1.1 Sensitivity to DNL Level at which Impact is Deemed to Occur***

Table 1 shows the number of people determined by the FAA to be affected by a 1.5 decibel noise change as the DNL level is reduced below 65 DNL.<sup>1</sup> These calculations are based on the FAA census spreadsheets, which consider only noise from traffic modeled by the FAA in the specialized circumstances modeled by the FAA.

**Table 1**  
**Union County Populations Experiencing FAA Modeled 1.5 Decibel Noise Change at Various DNL Values**

<b>DNL Level in Decibels</b>	<b># People Affected</b>
65.0	0
64.5	64
64.0	193
63.5	193
63.0	738
62.5	1,384
62.0	3,254
61.5	6,683
61.0	10,520
60.5	15,232
60.0	19,738

<sup>1</sup> Tables 1 – 3 were created with a simple spreadsheet program that examines the FAA census spreadsheet for the 2011 “No Action” and Mitigated Preferred Alternatives and computes the numbers of people that encounter greater than or equal to a specified noise change from “No Action” to reach greater than or equal to a specified noise level.

Table 1 shows increasing numbers of people impacted as the DNL level is lowered. If the DNL level used were 64.5 decibels instead of 65, then the FAA census data shows that 64 people would be impacted by a 1.5 decibel change. If the FAA noise projections were half a decibel too low, or inclusion of ambient noise resulted in a half a decibel higher noise than calculated by the FAA, then the impact for these 64 people would reach the 65 DNL threshold and be considered as “significant” according to the FAA criterion. Similarly, FAA census information for 64 decibels and 1.5 decibel noise increase shows 193 people to be affected. With a one decibel error, or one decibel addition due to ambient noise, these 193 people would be considered as “significantly impacted.” Continuing along these lines, a two decibel change in threshold to 63 decibels or two decibel aggregate error could result in 738 people “significantly impacted.” A 3 decibel change in threshold and error at 62 decibels could result in “significant impact” to 3254 people. This has important potential implications. In Section 1.3, we show that a census area with 62 decibels of FAA modeled noise that also experiences 62 decibels of ambient noise, will reach an aggregate cumulative noise of 65 DNL. thereby reaching the 65 DNL “significant impact” threshold.

*1.1.2 Sensitivity to Noise Change Threshold at Constant 65 DNL*

Table 2 below shows the numbers of people impacted as the noise change criterion is changed from 1.5 decibels. A reduction in noise change criterion by only .2 decibel from 1.5 to 1.3 decibels results in a determination of impact to 19 people. A reduction by .5 decibel from 1.5 to 1.0 decibel, would result in an impact determination affecting 597 people. A .5 decibel change is easily within the range of variation likely to be encountered as the mitigation flight paths, heading usage, fleet mix, etcetera are altered. Even small errors have potential to “trigger” the FAA significance criterion

**Table 2**  
**Sensitivity Union County Noise Exposed Populations to Noise Change Criterion at 65 DNL**

Noise Change Criterion (Decibels DNL)	# People Impacted
1.5	0
1.4	0
1.3	19
1.2	422
1.1	422
1.0	597

**1.2 Factors Affecting the FAA Noise Calculation**

As stated in NJCAAN’s May 10, 2007, comment, the modeling of impacts is subject to a number of factors that are poorly controlled and that could easily affect the noise calculation:

- 1) Variation in flight paths after initial heading due to controller discretion;

- 2) Degree of usage of each of the various demand based headings;
- 3) Likely change in aircraft mix and switch to larger (and noisier) aircraft over time as attempts are made to carry more passengers;
- 4) Traffic levels;
- 5) Type of navigation procedure used – vectored vs RNAV;
- 6) Possible changes in runway use policy. This is especially important if a particular runway configuration is found to yield greater capacity and then used preferentially, increasing it's noise.
- 7) Errors in the modeling methodology or models used by the FAA.

Any one of above these factors alone could yield a 1 to 2 decibel change in result. The aggregate deviation taking into account all of the factors is much larger. The FAA avoidance of significant impact is based on a fragile scenario unlikely to be realized in practice.

Absence of examination of future scenarios is a major deficiency of the DEIS and mitigation Reports. FAA Order 1050.1e Section 4.4g(2) requires that an EIS include projections of results to future scenarios, specifying that DNL contours, grid point, and/or change-of-exposure analysis be prepared for both current conditions and future conditions;

*“Future conditions both with and without (no action) the proposal and each reasonable alternative. Comparisons should be done for appropriate timeframes. Timeframes usually selected are the year of anticipated project implementation and 5 to 10 years after implementation. Additional timeframes may be desirable for particular projects.”*

Given the extensiveness of the Airspace Redesign project and its expected lifetime, future extrapolations of 10 and 25 years following implementation should be performed. Items (2), (3), (4), (5) and (6) above are especially subject to this variation over time.

**Please present a sensitivity analysis showing the degree to which the FAA calculated noise is subject to change due to variation in each of the factors listed above over ranges reasonably to be expected in actual practice. Please include in this analysis future projections of aviation changes and activity out 10 and 25 years. Please project the results of this sensitivity analysis to the calculations of populations determined to be “significantly impacted.”**

### **1.3 Cumulative Impacts of Adding Ambient and Non-Modeled Aviation Noise**

The FAA is required to consider “Cumulative Impact” in addressing the changes. From Section 500c(2) of FAA Order 1050.1e:

*“Cumulative actions should also be discussed in the same EIS. A proposed action would contribute to cumulative impacts when its effects are added to those of past, present, and reasonably foreseeable future actions, whether Federal or non-Federal. If the proposed*

action causes the cumulative impacts of these non-project actions to exceed an applicable significant threshold, then the proposed action would be one causing the significant impact (40 CFR 1508.25(a)(2)).” [Emphasis added]

DEIS Section 4.12 elaborates on cumulative impacts;

*“Consideration of cumulative impacts applies to the impacts resulting from the implementation of the Proposed Action as well as other actions. The concept of cumulative impacts addresses the potential for individually minor but collectively significant impacts to occur over time. Council on Environmental Quality Regulations, Section 1508.7, defines “Cumulative Impact” as the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of the agency, Federal or non-Federal, undertaking such actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.”*

The FAA implementation of the “Preferred Alternative” introduces large noise increases exceeding 5 decibels to the region surrounding EWR, but the FAA has avoided designating these as “significant” by failing to consider other noise that cumulatively would bring these areas above 65 DNL. This section explores the effects of combination of aircraft noise with ambient and non-modeled aviation noise sources. The addition of substantial aviation noise to areas with already high noise levels can bring these areas to 65 DNL and above, thereby rendering them no longer compatible for residential use. This can also exceed the FAA criterion for “significant” noise increase.

**Table 3  
Cumulative Adding of Modeled “Preferred Alternative” Noise with Non-Modeled and Ambient Noise to Reach 65 DNL and Above**

<b>FAA Calculated Noise from Preferred Alternative</b>	<b>Ambient Noise to Reach 65 DNL</b>	<b>Total DNL</b>
60.0	63.4	65
60.5	63.1	65
61.0	62.8	65
61.5	62.4	65
62.0	62.0	65
62.5	61.4	65
63.0	60.7	65
63.5	59.7	65
64.0	58.1	65
64.5	55.3	65
65	0	65

Table 3 is intended to show the potential for “significant impact” when ambient noise is included. The first column gives values of FAA modeled noise increasing in .5 decibel steps. The second column shows the amount of ambient noise that would need to be added to the values in Column 1 to reach 65 decibels. Geographic locations with ambient noise equal to or higher than the value in Column 2 would reach or exceed 65 DNL. Examining successive rows of this table shows that as the FAA modeled noise approaches closer and closer to 65 DNL, smaller and smaller amounts of ambient noise are needed to reach 65 DNL. When the FAA modeled noise is 64.5 decibels, an ambient noise of only 55.3 decibels is needed to reach the 65 DNL threshold. Without actual ambient noise measurements, however, it is not possible to determine the geographic locations in which this will occur.

Table 3 shows that areas with ambient noise measurements between 55 and 63 decibels have potential for exceeding 65 DNL when the FAA modeled aviation noise is added. DEIS Table 4.23 shows the noise measurements obtained at 17 sites throughout the redesign area. Review of DEIS Table 4.23 shows that 11 of the 17 sites, or almost two thirds, have ambient noise between 55 and 63 decibels, so it is likely that at least some of the areas of Elizabeth that the FAA modeling showed to be subject to large noise increases, are brought to above 65 DNL when aviation noise is added. Certainly an investigation to assess whether significant impact is occurring needs to include noise measurements in Elizabeth, NJ and evaluation of whether such impact is occurring.

Determining the actual impacts requires detailed geographic examination of the impacted area taking into account both the modeled noise increase and the ambient noise for individual locations. Without this analysis, the FAA has not determined the number of people “significantly impacted” and has not fulfilled its obligation to look at cumulative impacts of its action. Therefore,

**Please conduct sufficient representative noise measurements over portions of the City of Elizabeth, NJ, and similar areas that will experience noise increases from the proposed implementation of the “Preferred Alternative” to allow accurate determination of populations that will receive 1.5 decibel increases in total noise to reach cumulative noise levels above 65 DNL and thereby be “significantly impacted.” Please determine the environmental justice status of these affected populations.**

The FAA failed to include any noise measurement sites for the City of Elizabeth, NJ, which is the most heavily affected by the proposed airspace changes and therefore of high interest. However, the closest sites included two in Staten Island, NY, 7a and 7b, which had measured ambient noise of 61.5 decibels and 58.7 decibels, respectively. The City of Elizabeth is ranges from densely populated suburban to urban. It is thus likely that the ambient noise measured there would fall in the range 55 – 63 decibels with high potential for affecting the FAA determination of “significant impact.”

The methodological shortcomings outlined in the foregoing, particularly the failure to consider cumulative noise impacts and future scenarios, are prevalent throughout the DEIS and the Report. Therefore, other areas within the area affected by the Airspace Redesign that are at high noise levels and encounter 1.5 decibel increases as a result of the “Preferred Alternative” need to be reexamined to assess the possible presence of “significant impact.” Furthermore, the information presented to the

public needs to be adjusted, since current information that fails to account for these factors fails to adequately inform on cumulative impact.

#### 1.4 Environmental Justice

As discussed in Sections 1.1 – 1.3, the FAA analysis is inadequate to determine whether “significant impacts” occur. In examining the area south of EWR for environmental justice impacts, the FAA examined only areas of Elizabeth, NJ surrounding EWR as comparative populations and has argued (DEIS pages 4-44, 4-45) that all of this area is minority and that therefore there is no alternative that avoids environmental justice impacts. However, this argument is erroneous in that: 1) the FAA failed to note that there are large vacant and non-residential areas to the south of EWR in which there are few, if any, human residents at all of any ethnic background and in which alternatives flight paths to the east of those examined might impact fewer residents independent of environmental justice status; 2) the FAA did not consider more easterly alternative flight paths that might impact populations outside the city of Elizabeth and did not include those populations in its comparison base. Thus the range of alternatives examined was unduly limited and the environmental justice examination inadequate. Therefore;

**Please perform an environmental justice analysis of the EWR south flow changes that includes more easterly initial departure paths including those below 190 down to 175 degrees. Please consider areas of low residential population density as part of the overall analysis to minimize impacts. Please consider more easterly initial flight paths as alternatives and consider more easterly populations outside of Union County as part of the comparison base. Please consider the variation in the factors in Sections 1.2, the effect of changes over time, and cumulative impacts of other noise in the affected region. Please do a thorough search for alternatives and procedures that minimize or eliminate environmental justice impacts.**

#### 2. Need To Specify and Include Ongoing Monitoring of Mitigating Actions

When mitigating actions are required to avoid “significant impact,” provisions must be included for ongoing monitoring to assure that mitigation is implemented and remains effective at the assumed level over time. The requirements include the requirement to provide periodic reports over the long term. The April 6, 2007, Report fails to include any information at all about the proposed monitoring.

##### 2.1 Applicable Requirements

40 C.F.R. § 1505.2c requires that in cases requiring EIS that Records of Decision:

*“State whether all practicable means to avoid or minimize environmental harm from the alternative selected have been adopted, and if not, why they were not. A monitoring and enforcement program shall be adopted and summarized where applicable for any mitigation.”*

[Emphasis added]

40 C.F.R. § 1505.3 states further:

***“Sec. 1505.3 Implementing the decision.***

*Agencies may provide for monitoring to assure that their decisions are carried out and should do so in important cases. Mitigation (Sec. 1505.2(c)) and other conditions established in the environmental impact statement or during its review and committed as part of the decision shall be implemented by the lead agency or other appropriate consenting agency. The lead agency shall:*

*(a) Include appropriate conditions in grants, permits or other approvals.*

*(b) Condition funding of actions on mitigation.*

*(c) Upon request, inform cooperating or commenting agencies on progress in carrying out mitigation measures which they have proposed and which were adopted by the agency making the decision.*

*(d) Upon request, make available to the public the results of relevant monitoring.” [Emphasis added.]*

From FAA Order 1050.1e, § 506h(2) on mitigation:

*“An EIS specifies mitigation measures that the FAA has decided to include as part of the proposed action. Mitigation and other conditions established in the EIS, or during its review of the EIS, and committed to in the ROD, will be implemented by the lead agency or other appropriate consenting agency. The FAA ensures implementation of such mitigation measures through special conditions, funding agreements, contract specifications, directives, other review or implementation procedures, and other appropriate follow-up actions in accordance with 40 CFR 1505.3. Monitoring or other follow-up review should be described in the EIS, and should allow verification of the mitigation effectiveness.”*

Further from FAA Order 1050.1e, § 512b on mitigation implications for the Record of Decision (ROD):

*“Any mitigation measure that was made a condition of the approval of the FEIS must be included in the ROD. ROD's can set forth the conditions for the action approval and state mitigation measures that will be taken. A monitoring and enforcement program shall be adopted and summarized where applicable for any such mitigation.”*

## **2.2 Application to Mitigating Actions Proposed for EWR**

As discussed in NJCAAN's May 10, 2007 comment, the mitigating actions proposed for EWR are complex and at best will require careful monitoring to assure that they are effective at the assumed level. As shown above, 40 C.F.R. § 1505 and FAA Order 1050.1e require monitoring and reporting of

mitigation effectiveness. Given the complexity and required longevity of the mitigations, the following should appear in the Final EIS and ROD.

- 1) Designation of the agency or entity that will be long term responsible for the monitoring, and long term commitment by this agency to continue to carry this role. The default agency in this case would be the FAA.
- 2) Specification and provision for long term funding of mitigation monitoring
- 3) Specification and provision for measuring and reporting on details of how well the mitigation is being executed over time and its effectiveness in meeting originally assumed noise reduction levels. Specification of protocol and response time frames for obtaining reports by interested governmental entities and members of the public.
- 4) Specification of parameters and details for the mitigation such as; a) detailed specification on the assumed flight paths; b) allowed deviation from this path under which the effectiveness of the mitigation is maintained; c) specification of the allowable range of usage of demand based flight headings (i.e how much of the time each can be used and still maintain assumed mitigation effectiveness); d) anticipated change in fleet mix and fleet volume over useful life of mitigation; e) analysis showing that the mitigation effectiveness and goals of eliminating significant impact is maintained throughout the deviations in (b) –(d).
- 5) Description of contingency action and time frames for action to be taken when outages are found in (4). Description of what action will be taken if and when it is found that mitigation effectiveness cannot reasonably be brought to the level of the originally assumed

Therefore;

**Please include full descriptions of the mitigation specification and monitoring plans in the Final EIS and Record of Decision.**

To execute these responsibilities it is desirable that the responsible agency have the ability to do noise modeling to determine noise impacts from aircraft flight path and fleet mix variations and ability to assess the overall impacts of multiple outages.

### **3. Computer Model Parameters Must Reasonably Represent Current and Future Activity**

The lack of representativeness of the FAA computer model traffic level data used in its analysis was discussed in Section 9 of NJCAAN's May 10, 2007 submission. FAA Order 1050E § 14.2c specifies that;

*“All computer model input data should be collected early in the environmental process and should reasonably reflect current and forecasted conditions relative to the proposed action.”*

Order 1050.1e Section 14.4e further repeats this requirement.

#### 4. Demand Management and Recent Experience

The FAA should address in more detail the expected impacts of changes in demand side management and practical limitations on increased traffic. For example, Congress recently lifted gate slot restrictions at JFK airport, resulting in increased traffic (a 27% increase in March 2007 compared to March 2006). This has caused a sharp increase in delays and issues with respect to controller workload. There has also been a recent sharp rise in aviation “near miss” incidents in the region. These impacts should be studied. In addition, the experience of many travelers at JFK in waiting on the tarmac for hours show that there are other volume and capacity constraints (e.g., baggage terminals and handling, taxi space, gate parking, gates, etc.). These should be studied and submitted to the public for comment. Is it really useful for the FAA to make changes to increase traffic when the airports can’t handle the volume?

The estimated 5% capacity increase from the Airspace Redesign is small relative to the influence of demand control at JFK. This highlights the effectiveness of demand control measures as an alternative in achieving goals of the Airspace Redesign at much lower cost. The FAA should consider additional demand-side management as (1) an alternative to the Preferred Alternative and (2) a mitigation measure.

#### 5. Analysis of Impacts on Park Resources

The FAA must provide detailed public analysis of projected noise impacts on affected park resources, including, but not limited to, the Appalachian Trail, the Delaware and Lehigh National Heritage Corridor, the Delaware Water Gap, Hopewell Furnace, the Upper Delaware Scenic and Recreational River, and the Weir Farm National Historic Site.

Thank you for this opportunity to comment.

Sincerely yours,



Jerome Feder, Ph.D.<sup>2</sup>  
Director, NJCAAN

---

<sup>2</sup> Jerome Feder obtained a PhD in Electrical Engineering from New York University in 1969 and worked for part of his career in the Acoustics Research Department at AT&T Bell Laboratories.

007334

**From:** jlepis@hudsonregionalhealth.org  
**Sent:** Friday, May 11, 2007 11:55 AM  
**To:** Nagendran, Ram  
**Subject:** Comment on Noise Mitigation Procedures for the Preferred Alternative

- **Last Name:** Lepis for NJ Noise Control Council
- **First Name:** Joseph
- **Email Address:** jlepis@hudsonregionalhealth.org
- **Street Address:** 595 County Ave
- **City:** Secaucus
- **State:** New Jersey (NJ)
- **Zip Code:** 07094

**Comments:**

State of New Jersey DEPARTMENT OF ENVIRONMENTAL PROTECTION NOISE CONTROL COUNCIL PO BOX 402 TRENTON, NEW JERSEY 08625-0402 (201) 223-1133 (Chairman)

JOSEPH M. LEPIS, CHAIR

WHEREAS, on March 23, 2007 the Federal Aviation Administration (FAA) announced in its Draft Environmental Impact Study (DEIS) that an "Integrated Airspace Alternative" is the preferred alternative for the New York/New Jersey/Philadelphia Metropolitan Area Airspace Redesign, and followed this statement on April 6th with proposed mitigations to alleviate some of the increased noise associated with this alternative; and

WHEREAS, in the region proximate to Newark Liberty International Airport (EWR) this FAA proposal would cause unacceptable noise increases that would double or triple aviation noise pollution for approximately 35,000 people, thus causing and/or increasing adverse effects on their health, welfare, and quality of life; and

WHEREAS, the FAA "fanning" proposals for EWR would take aircraft that currently over-fly unpopulated areas and move them directly over densely populated residential areas and schools, thus increasing exposure to noise, reducing safety, with especially severe effects on populations subject to environmental justice protection; and

WHEREAS, the FAA appears to not have adequately investigated other flight paths that take greater advantage of the unpopulated areas surrounding EWR including "no change" to the current time-tested New York-New Jersey Port Authority noise mitigation procedure for departures; and

WHEREAS, the detrimental effects of cumulative aircraft/airport noise on humans, and buildings, result in unhealthy annoyance, speech and sleep interference, lack of enjoyment of personal property, diminished education and health opportunities, and destruction of residential and commercial land uses from airport buy-outs, clear zones and incompatibilities; and

WHEREAS, the most optimistic estimated capacity improvement from the proposed changes would gain no more than two to three aircraft per hour over the current EWR departure capacity of about 60 aircraft per hour, this being limited to the busiest periods, while subjecting tens of thousands of residents to increased noise and reduced safety to obtain a small increase in airport throughput; and

WHEREAS, the FAA has failed to provide most of their acoustical and demographic data in a timely manner as well as modeling assumptions, thereby preventing a thorough and timely review of their proposal; and

WHEREAS, the comment period which ends on May 11, 2007 is grossly inadequate for anyone to properly evaluate,

5/15/2007

assess, and respond to even the limited information that the FAA has provided for such a proposed drastic change that will impact the lives of tens of thousands of residents on a daily basis for years to come;

007334

NOW, THEREFORE, BE IT RESOLVED that the New Jersey Noise Control Council opposes the currently offered FAA EWR “fanning” proposal and urges that it be abandoned.

BE IT FURTHER RESOLVED that additional study be devoted to finding flight paths that reduce population impacts, particularly in cases involving those populations which are subject to environmental justice protection.

BE IT FURTHER RESOLVED that copies of this Resolution be forwarded to the Governor of the State of New Jersey, the FAA, the Port Authority of New York and New Jersey, the Commissioner of the New Jersey Department of Environmental Protection, and the various Federal representatives in whose jurisdiction EWR is situated.

Adopted: May 8, 2007 \_\_\_\_\_ Joseph M. Lepis, Chair Noise Control Council

Voting to Approve the Resolution: Arnold W. Schmidt Joseph M. Lepis John N. Surmay, H.O. Rh.P. John C. Kapferer, Ph.D. Michael T. Klewin Iris G. Udasin, M.D. Michael F. Lakat

Voting Against the Resolution None

Abstaining None

Certified by David Triggs, DEP, Office of Local Environmental Management

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This email was generated automatically by the following page:

[http://www.faa.gov/airports\\_airtraffic/air\\_traffic/nas\\_redesign/regional\\_guidance/eastern\\_reg/nynjphl\\_redesign/noise\\_mitigation\\_comments/](http://www.faa.gov/airports_airtraffic/air_traffic/nas_redesign/regional_guidance/eastern_reg/nynjphl_redesign/noise_mitigation_comments/)

007333

5/15/2007



## New York State Office of Parks, Recreation and Historic Preservation

The Governor Nelson A. Rockefeller Empire State Plaza • Agency Building 1, Albany, New York 12238  
www.nysparks.com

**Eliot Spitzer**  
Governor

**Carol Ash**  
Commissioner

May 11, 2007

Steve Kelley, FAA NAR  
c/o Nessa Memberg  
12055 Sunrise Valley Drive, MS C3.02  
Reston, VA 20191

RE: Comments on NY-NJ-PHL Integrated Airspace Redesign

Dear Mr. Kelley:

I am writing on behalf of my agency, the New York State Office of Parks, Recreation and Historic Preservation, to express our concern regarding the above referenced action. Specifically, we feel that the FAA's "mitigated proposed alternative" for the changes to the departure routes from the Westchester County Airport (HPN) will have significant adverse impacts on one of our facilities, Rockefeller State Park Preserve, located in Tarrytown New York. This alternative, as described in the FAA's April 6, 2007 Noise Mitigation Report, will result in the new departure corridor being concentrated directly above the Park Preserve from its eastern boundary near the Saw Mill Parkway to the Hudson River.

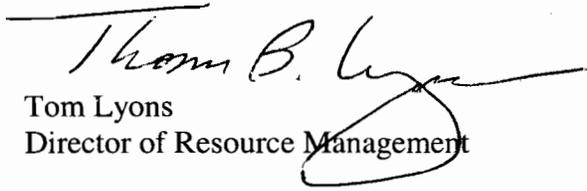
The Rockefeller State Park Preserve is comprised of a portion of the Rockefeller family estate in Pocantico Hills and was given to the New York State Office of Parks, Recreation and Historic Preservation in 1983. The most notable features of the Preserve are the system of carriage roads and the Olmstead designed landscape. The carriage roads wind through scenic landscape and are used for strolling, jogging, horseback riding, cross country skiing, snowshoeing, birding and fishing. The park's spectacular scenery and peaceful atmosphere make it an extremely valuable open space resource that was designed to provide a quiet refuge for passive recreational pursuits.

We are concerned that the alternative being proposed would result in noise impacts on the preserve that would severely impact a recreational experience that is so rare in this heavily populated area. We specifically request that the FAA review the regulation located in Section 4(f) of the Department of Transportation Act 49 U.S.C.303 that

Steve Kelly, FAA NAR  
Page 2

requires that aircraft routing decisions resulting in serious noise impacts on protected parkland be examined to determine if there are no prudent and feasible alternatives to use of airspace over parkland. We request a written response as to how the mitigated alternative shown in Figure 31 of the Noise Mitigation Report is consistent with Section 4(f).

Sincerely,



Tom Lyons  
Director of Resource Management

cc: Andy Beers  
Dan Kane  
Leslie Parrella  
Alix Schnee  
Edwina Belding



May 11, 2007

Mr. Steve Kelly  
Project Manager  
FAA NAR  
c/o Ram Nagendran  
12005 Sunrise Valley Drive, MS C3.02  
Reston, VA 20191

Re: New York / New Jersey / Philadelphia Metropolitan Area Airspace Redesign

Sub: Comments on the Noise Mitigation Report

Dear Mr. Kelly:

On May 26, 2006, Philadelphia International Airport (PHL) submitted comments on the above referenced Draft Environmental Impact Statement (DEIS). In our comments at that time, we noted that the Integrated Airspace Alternative with ICC appeared to offer the most potential to benefit PHL in terms of delay reduction. However, we also requested that noise mitigation options be explored to minimize detrimental impacts on our neighboring communities.

On March 23, 2007, the FAA announced that the Integrated Airspace Alternative with ICC was the "Preferred Alternative" because it best meets the purpose and need for the airspace redesign project. This alternative calls for both high-altitude and low-altitude airspace design changes to maximize the use of the limited runway capacity at the major airports in the NY/NJ/PHL study area. The low-altitude changes would result in most of the noise impacts presented in the DEIS.

We initially had concerns regarding the projected noise impacts over Delaware County that would result from the introduction of six new headings to handle west flow departures from PHL. However, we have reviewed the Noise Mitigation Report released on April 6, 2007, in which the "Mitigated Preferred Alternative" is presented. Based on our interpretation of this document, it appears that our concerns related to noise impacts on Delaware County have been substantially addressed through the development of mitigation measures that reduce the number of departure headings from six to three, and possibly limit the use of these during evening hours. We sincerely hope that this will reduce the population exposed to significant aircraft noise levels.

We ask again, as we did last year, that you also consider the retention of the twenty-year-old noise abatement procedures contained in the PHL Noise Compatibility Program. We also request the development of RNP and/or RNAV approach procedures for PHL insofar as they might further reduce negative noise impacts on our neighbors

007336  
192



Mr. Steve Kelly  
May 11, 2007  
Page 2

The construction of new runways and the use of satellite navigation to replace outdated, land-based navigational systems will eventually reduce air traffic delays, but such solutions are years away. Therefore, the immediate future of the Philadelphia regional economy is largely dependent on airspace efficiencies such as those you have been considering. We remain hopeful that the "Mitigated Preferred Alternative" will be beneficial to local travelers without imposing significant environmental impacts on local communities, particularly noise impacts.

As we initiate an update of our FAR Part 150 Noise Compatibility Study, we intend to utilize the noise mitigation strategies developed as part of your Airspace Redesign environmental work as a launching point to advance our own land use compatibility and noise abatement strategies.

Thank you for the opportunity to comment on your latest proposal.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles J. Isdell".

Charles J. Isdell  
Director of Aviation

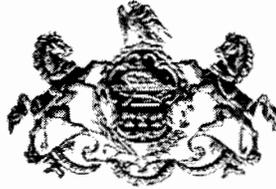
cc: Stephanie Naidoff

1-HH-070308-009 SA

9TH SENATORIAL DISTRICT  
**DOMINIC F. PILEGGI**

- ☐ THE STATE CAPITOL  
HARRISBURG, PA 17120-3009  
PHONE (717) 787-4712  
FAX (717) 783-7490
- ☐ 100 GRANITE DRIVE, SUITE 105  
MEDIA, PA 19063  
PHONE (610) 565-9100  
FAX (610) 566-2010

*The Majority Leader*



- ☐ 631 W. BALTIMORE PIKE  
WEST GROVE, PA 19390  
PHONE (610) 345-1084  
FAX (610) 345-1087
- ☐ 415 AVENUE OF THE STATES  
CHESTER, PA 19013  
PHONE (610) 447-5845  
FAX (610) 447-5848
- www.senatorpileggi.com  
dpilegg@psen.gov
- TOLL FREE 1-888-9TH-DIST

Senate of Pennsylvania

April 30, 2007

Marion C. Blakey, Administrator  
Federal Aviation Administration  
800 Independence Avenue, SW  
Washington, D.C. 20591

Re: Federal Aviation Administration Proposal

Dear Administrator Blakey:

I am writing to express my serious concerns with the Federal Aviation Administration's proposal for changes in air traffic patterns over Delaware County.

This proposal will undoubtedly have a negative impact on the lives of all of us, who will suffer from increased noise generated by the flight plan proposal.

I am advised that this plan will only improve the delays at the Philadelphia International Airport by six minutes.

Thank you for your immediate consideration of my request on behalf of the residents of Delaware County, and I look forward to your response.

Sincerely,

DOMINIC F. PILEGGI  
SENATOR

DFP/kjh

007009

Behalf of Mayor Platt... READ BY MS SARA LIPSETT  
ZONING BOARD MEMBER  
TOWNSHIP OF CHERRY HILL

FAA Meeting  
Crown Plaza/ 7:30 p.m.

Air traffic is a constant sound assault on our way of life and I'm opposed to any increase of this sound pollution over Cherry Hill.

It is public knowledge that the FAA does not have a handle on the cost of this proposed project and is operating with blinders on right now.

Furthermore, the cost of this plan needs to be hammered out, and I believe the FAA needs to get all its ducks in a row and communicate their plans to all the effected - directly and indirectly - communities before making any decrees.

I applaud our Congressmen for holding this federal agency accountable and wholeheartedly support them.

007501



**INC. VILLAGE OF SALTAIRE**  
**P.O. BOX 5551, BAYSHORE, NY 11706**



Mayor Scott S. Rosenblum  
Trustee Robert Cox  
Trustee Hugh O'Brien  
Trustee Bruce Rich  
Trustee Pia Carroll

Phone (631) 583-5566  
Fax (631) 583-5986  
Security: (631) 583-5572  
email: [office@saltaire.org](mailto:office@saltaire.org)  
Website: [www.saltaire.org](http://www.saltaire.org)

May 4, 2007

Mr. Steve Kelley, FAA-NAR  
c/o Michael Merrill  
12005 Sunrise Valley Road  
Reston, VA 20191

Dear Mr. Kelley:

The Village of Saltaire is in receipt of the letter from Fire Island Association to you regarding the Noise Mitigation Plan for NY/NJ/PHL Metro Airspace Design (copy attached.)

We concur with the sentiments of the Fire Island Association, and urge that you consider and implement alternatives that reduce, rather than increase, over-flights of Fire Island.

Thank you in advance for your considering the concerns of the residents of the Village of Saltaire and of the other 16 communities on Fire Island.

Sincerely,

Mario Posillico  
Village Administrator

006725  
1 of 3

# FIRE ISLAND ASSOCIATION INC.

PO Box 424, Ocean Beach, New York 11770

(631) 583-5069

[www.fireislandassn.org](http://www.fireislandassn.org)

Executive Committee

**Gerard Stoddard**

President

263 West 20th St.

New York, NY 10011

Fax-Tel (212)929-6415

e-mail: [licafia@att.net](mailto:licafia@att.net)

**Bob Spencer**

First Vice President

Davis Park

**Kennard N. Hirsch**

Treasurer

Ocean Bay Park

**Marsha Hunter**

Secretary

Kismet

**Suzanne Goldhirsch**

Vice President

Seaview

**Anthony Roncalli**

Vice President

Fire Island Pines

**Thomas J. Schwarz**

Vice President

Lonelyville

**Louis J. Pennachio**

Director Emeritus

Davis Park

(Ex Officio)

**Scott Rosenblum**

Mayor

Saltaire

**Joseph C. Loeffler, Jr.**

Mayor

Ocean Beach

April 16, 2007

Mr. Steve Kelley, FAA—NAR

c/o Michael Merrill

12005 Sunrise valley Road

Reston VA 20191

Re: Comments on Noise Mitigation Plan for  
NY/NJ/PHL Metro Airspace Design

Dear Mr. Kelley:

The Fire Island Association represents the interests of more than 3,500 owners of residential and business property in 17 communities within the Fire Island National Seashore. Fire Island is a 32-mile barrier island that also protects the south shore of Long Island. The airport of greatest interest to our members, and hundreds of thousands of Long Islanders to our north, is Islip/MacArthur.

We have reviewed the information provided on the proposed departure pattern for metro-New York airports. We are concerned that, as drafted, the proposal would concentrate traffic precisely over the most heavily populated part of Fire Island, as well as over a large, heavily populated mainland area, in preference to the current pattern. The latter has a minimal impact as it directs departures over the ocean. Moreover, we understand that new satellite navigation procedures are able to focus traffic over smaller geographic regions, and this could increase the impact on Fire Island communities.

Islip flights have been increasing rapidly, with a 56 percent increase expected between 2000 and 2011. This will have a negative impact on the Fire Island National Seashore and its communities even under present traffic patterns. There are fewer and fewer places on Long Island where low background sound levels can be experienced in a natural setting. Maintaining those still in existence is critical to the many for whom the Seashore is a refuge.

Accordingly, we request that you consider alternatives that reduce, rather than increase, overflights of Fire Island National Seashore. If this is not possible,

Mr. Steve Kelley  
April 16, 2007  
Page Two

please examine other measures that will reduce the number of park visitors and residents impacted.

The Association will appreciate receiving a copy of any decision document and/or final environmental impact statement issued in connection with the proposed flight pattern.

We appreciate the opportunity to comment on this issue.

Sincerely,



Gerard Stoddard  
For the Directors

cc. Hon. Timothy W. Bishop  
1<sup>st</sup> Congressional District  
3680 Route 112  
Coram NY 11727

Hon. Steve J. Israel  
2<sup>nd</sup> Congressional District  
150 Motor Parkway  
Hauppauge NY 11788

Hon. Steve Levy  
Suffolk County Executive  
PO Box 6100  
Hauppauge NY 11788

Michael T. Reynolds, Superintendent  
Fire Island National Seashore  
120 Laurel Street  
Patchogue NY 11772

Brian Foley, Supervisor  
Town of Brookhaven  
One Independence Hill  
Farmingville NY 11738

Phil Nolan, Supervisor  
Town of Islip  
655 Main Street  
Islip NY 11751

Joseph C. Loeffler, Jr., Mayor  
Inc. Village of Ocean Beach  
PO Box 457  
Bay Shore NY 11706

Scott Rosenblum, Mayor  
Inc. Village of Saltaire  
PO Box 5551  
Ocean Beach NY 11770

Untitled

13 NEW YORK LA GUARDIA AIRPORT MARRIOTT  
14 102-05 Ditmars Boulevard  
15 East Elmhurst, New York 11269  
16 April 23, 2007  
17 Commencing at 6:00 p.m.

14  
15 ROSE MARIE POVEROMO 5  
13 President, United Community Civic Association  
14 Representative for Assemblymember Michael Gianaris  
15 Chair of Aviation Community Board #1  
16 Member of Boro President Aviation Advisory Board

MS. POVEROMO: The alternative airspace  
16 redesign selected by the FAA will reduce delays for  
17 the airlines, but will most definitely add to the  
18 suffering of community residents surrounding  
19 LaGuardia Airport by seriously increasing noise, air  
20 and traffic pollution.

21 Although the FAA is not addressing  
22 toxic air pollution, we who live in these impacted  
23 communities are very deeply concerned. Astoria  
24 Heights, Jackson Heights, and Astoria all already  
25 are overburdened and over saturated by noxious jet

0006

1 fumes and heart pounding noise from airport  
2 activities.

3 How dare this federal body decide to  
4 add to our environmental problems by indicating in  
5 print that additional increases in decibel levels  
6 would be inconsequential since communities  
7 surrounding the airports are already exposed to  
8 extensive aviation noise.

9 We are outraged by your uncaring,  
10 misguided and unconscionable alternative selection.  
11 The United Community Civic Association,  
12 Assemblymember Michael Gianaris and the Aviation  
13 Community Board strongly oppose your selection. You  
14 have abused your power.

15 Prior to tonight's date the projected  
16 additional impacts of the damage will have been done  
17 from this ill conceived alternative is smoke and  
18 mirrors, as you well know. Any additional flights  
19 assault and cause irreparable harm and sharply  
20 contribute to a decline in our communities' already  
21 fragile quality of life by increasing toxic  
22 emissions.

23 We request that this federal body leave  
24 as is and do no additional harm.  
25

# Comment Form

FAA AIRSPACE REDESIGN  
NY/NJ/PHL Metropolitan Area Airspace Redesign Project  
Noise Mitigation Meetings

Submit your comments on Noise Mitigation Procedures for the Preferred Alternative.

Comment form must be submitted today

Please print clearly

Thank you!

Date 6/28/2007

Please Circle the Meeting Location:                      Cherry Hill, NJ                      Woodcliff Lakes, NJ  
Mr. \_\_\_ Mrs. \_\_\_ Ms. \_\_\_ Dr. \_\_\_ Title \_\_\_\_\_

First Name Bud & Beth                      Last Name Prober & Lawrence

Affiliation/Organization/Agency Planning board - Upper Saddle River

Street Address 9104 Place

City Upper Saddle River                      ST NJ                      ZIP 07458

Phone # 201-327-5031

Email Address budpro@optonline.net

Comment (only comments on the Mitigation and Preferred Alternative) the concentration of flight patterns into a narrow corridor approximately over the Garden State parkway about 3 miles wide including over 400 flights/day, allegedly at altitudes approximating 3000 to 4000 ft in altitude -

will dramatically alter the Quality of life

a) - Noise pollution

b) - environmental fuel exhaust deposits

c) - security diminishment & potential

for severe aircraft collision due

to concentration of volume in a

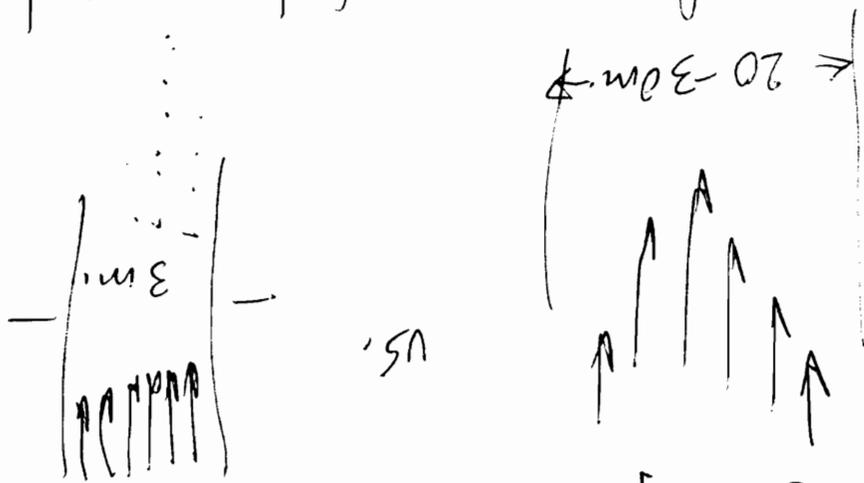
narrow corridor

over.

If More Space Is Needed, Please Use Flip Side

007631  
1 of 2

If appears that lower population areas are benefiting from this severe shift into the "corridor" as a minimum the corridor could easily be widened to a minimum of 20-30 miles. The delay envelope would remain the same.



This appears to be a political rather than an engineering solution -

- A - concentrate disturbance to minimize public opposition.
- B - minimize property value diminishment via concentrating corridor.

Consider - Limiting increase in traffic for safety & security reasons this is

within the purview of the FAA.

We have not had the opportunity to review alternatives. - Some one is not doing their job to get things out. ie the web page we just learned about tonight - & were told its All over - No the discussion with James

# Comment Form

FAA AIRSPACE REDESIGN  
NY/NJ/PHL Metropolitan Area Airspace Redesign Project  
Noise Mitigation Meetings

Submit your comments on Noise Mitigation Procedures for the Preferred Alternative.

Comment form must be submitted today

Please print clearly

Thank you!

Date 6-28-07

Please Circle the Meeting Location: Cherry Hill, NJ ~~Woodcliff Lakes, NJ~~  
Mr.  Mrs.  Ms.  Dr.  Title Council woman

First Name Barbara Last Name Bipston

Affiliation/Organization/Agency Council woman - Borough of Upper Saddle River

Street Address 23 Briarcliff Road

City Upper Saddle River ST NJ ZIP 07458

Phone # 201 825-3894

Email Address BRIPSTON@aol.com

Comment (only comments on the Mitigation and Preferred Alternative) \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
See attached  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
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If More Space Is Needed, Please Use Flip Side

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1/2

On behalf of the residents of Upper Saddle River, I, Councilwoman Barbara Ripston, vehemently object to the proposed FAA Airspace Redesign. By proposing this plan, the FAA is proposing to destroy the quality of life of the residents of northern Bergen County. They (the FAA) are ignoring the safety issues that this plan would create for a heavily populated area.

It is a travesty that this public hearing is the last public hearing, especially in Bergen County. The public should have had input from the start - not at the end after a decision had already been arrived at by the FAA.

The FAA is not only unresponsive to the needs of the people but irresponsible when it comes to our quality of life.

Barbara M. Ripston  
Councilwoman  
Upper Saddle River NJ

23 Briarcliff Rd  
Upper Saddle River NJ 07458  
201 825-3894  
BRIPSTON@AOL.COM

9 Hilton Woodcliff Lake  
200 Tice Blvd  
Woodcliff Lake, New Jersey 07677-9998

10

11 Thursday, June 28, 2007  
Commencing at 6:30 p.m.

8 Robert Rosenblatt (Woodcliff Lake Councilman) 8 Old Farms Road  
9 Woodcliff Lake, New Jersey 07677

6 MR. ROSENBLATT: I believe that the  
7 FAA has not done their due diligence in their  
8 studies in several respects. Number one, Stewart  
9 Airport is about to become a commercial airport and  
10 clearly that's going to reduce the air traffic  
11 flowing into Newark Airport. I do not believe that  
12 their study takes that into account and I believe  
13 that is a flaw in their study. There are many other  
14 elements that are lacking in the FAA plan, there's  
15 the water approach which can reduce the noise over  
16 our homes.

17 The traffic that flows to Kennedy  
18 and LaGuardia Airport fly in over the Long Island  
19 sound. They could be moved over to a different body  
20 of water and Newark Airport traffic could flow into  
21 through the Hudson River and they can take that into  
22 account as well. The Port Authority which owns  
23 Stewart Airport is opposed to this plan and I don't  
24 believe that the FAA plan is taking into  
25 consideration the objections made by the Port  
1 Authority. Another issue is I believe that the  
2 water approach is the best and safest approach. It  
3 reduces the noise level over the residents house and  
4 the noise pollution is at a minimal. I know the FAA  
5 is going to say well flying over the water approach  
6 is the route that people go into LaGuardia and  
7 Kennedy but LaGuardia and Kennedy air traffic is  
8 diverted over the Long Island sound. If they're  
9 over the Long Island sound there is no noise  
10 pollution over any of the homes in Long Island and  
11 the Long Island sound is wider than the Hudson  
12 River. So the Long Island sound can be used as the  
13 incoming and outgoing flight plan for Kennedy and  
14 LaGuardia Airports and the water approach using the  
15 Hudson River is the best, safest and least noise  
16 approach to Newark Airport.

007856

Comments on the

**NEW YORK/NEW JERSEY/PHILADELPHIA  
METROPOLITAN  
AREA AIRSPACE REDESIGN  
NOISE MITIGATION REPORT**

Related to the City of Elizabeth, New Jersey

Prepared for

**City of Elizabeth  
50 Winfield Scott Plaza  
Elizabeth, NJ 07201**

Prepared by

**Russell Acoustics, LLC**  
Butler, NJ

006731  
1 of 13

## **Introduction**

The City of Elizabeth, New Jersey retained Russell Acoustics, LLC to assess the FAA report and proposed changes to aircraft flight operations from the viewpoint of how these changes can be expected to affect the City of Elizabeth and its residents. This report is filed on behalf of the City of Elizabeth.

The 6 April Noise Mitigation Report examines many alternatives from a pre-determined list of possibilities and contrasts the effects on “operational efficiency” versus the noise impact on people on the ground.

In this report we will comment on both the techniques used and the conclusions reached. There is neither time nor the necessary background data available to cover each and every aspect of the report, so we will concentrate on major elements.

## Summary

**mit·i·gate** - [mit-i-geyt] *verb*, -gat·ed, -gat·ing.

*-verb (used with object)*

1. to lessen in force or intensity, as wrath, grief, harshness, or pain; moderate.
2. to make less severe: *to mitigate a punishment*.
3. to make (a person, one's state of mind, disposition, etc.) milder or more gentle; mollify; appease.

*-verb (used without object)*

4. to become milder; lessen in severity.

There are three points we want to make regarding the Noise Mitigation Report:

1. It compares the proposed mitigations to the "Preferred" routes discussed in the Draft Environmental Impact Statement (DEIS) from December of 2005; it does not compare the sound levels/exposures to the existing conditions. Someone reading only the Noise Mitigation Report is led to believe there are to be reductions in sound when really the "mitigations" may be more properly called lessening of increases.
2. Other than listings in Table 1 of the document, the body of the Noise Mitigation Report makes not a single reference to the City of Elizabeth although it is probably the single-most impacted municipality around Newark Airport. The "mitigations" proposed in this study would have aircraft flying directly over Elizabeth immediately after takeoff. We have previously estimated this will result in sound level increases on the order of 15 dBA from over-flying aircraft.
3. No consideration to routing aircraft departing runway 22 from Newark and turning to the east over less populated areas was analyzed, although we have seen no information backing up the claim that such routes are not feasible. The companion report to the "Mitigation" report, "Operational Analysis of Mitigation of the NY/NJ/PHL Airspace Redesign," states "the three-heading dispersal of departures from runway 22R attracted more negative public comment than any other single element of the redesign [emphasis added]." One of the stated "Initial Mitigation Strategies Considered" (Table 1) of the "Mitigation" report was "Expand EWR airspace to the east to allow EWR controllers to run arrivals or departures along the Hudson corridor" but all that was examined was Newark takeoffs to the north turning east. In response to a specific question put to the FAA representative at the local presentation on 25 April at the Sheraton Newark Airport Hotel, he stated he was specifically instructed to not look at takeoff headings less than 190 degrees from runway 22.

The New Jersey-New York metropolitan airspace is probably the most complicated airspace in the world, outside of a combat zone. Clearly aircraft must continue to fly and do so in a safe manner. However, "mitigation" of existing problems should not make matters worse; "mitigation" is supposedly a "lessening of severity." The proposed "noise mitigation" measures will significantly worsen conditions for a large number of people and has not considered obvious alternatives.

## Relative Change

Some of the proposed changes discussed in the "Mitigation" report should result in an actual decrease in noise. The Ocean Routing scenario simply removes aircraft from over-flying communities at night, moving the aircraft operations out over the ocean.

As nighttime is more "sensitive" from a noise perspective (sound levels at night – 10 p.m. to 7 a.m. – have a 10 dBA penalty added when used in calculating the day-night sound level, DNL, the FAA uses), moving a few aircraft away from many communities at night can a noticeable effect on the calculated overall sound. Put another way, getting rid of one nighttime flight allows for 10 daytime flights for the same total sound (measured on a DNL basis).

The use of a continuous descent approach instead of stair-stepping down the approaching aircraft and having them touring over most of northern New Jersey is also a benefit because it keeps some aircraft higher – and therefore further away – than the present method.

However, there are other changes that will increase the noise, certainly over what is experienced with the current routing.

In the December 2005 DEIS there were numerous route changes ("preferred alternatives") discussed, with corresponding changes in sound. These were compared to the "do nothing" alternative of keeping the current routing (not that the current routing is particularly desirable).

Now the "Noise Mitigation Report" proposes changes, and makes comparisons to the "preferred alternatives." However, any comparisons to the current "no change" routing have been left out.

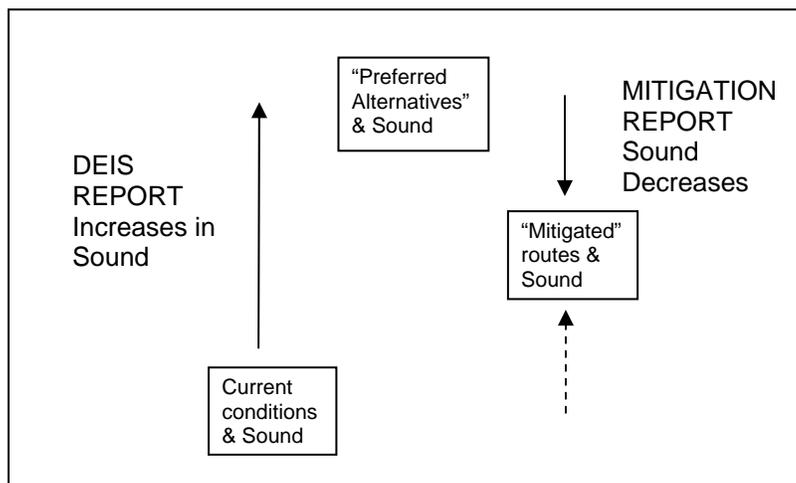


Figure 1 – Relative Changes in Sound

Figure 1 illustrates what happens between the two reports. By comparing the “mitigated” sounds to those in the “Preferred Alternatives” in the DEIS, it appears overall conditions improve. What is not stated is that the “mitigations” are still worse than the starting condition.

As the FAA analysis is concerned about “operational efficiency” a monetary analogy might be appropriate. Say someone overcharges you \$1,000 for a product or service. They realize this, and benevolently give you \$500; they claim they just “saved” you the \$500 they really just gave back; and you are still short the other \$500.

## Local Sound Increases

The Noise Mitigation Report includes Table 1, a three page listing of the “initial mitigation strategies considered” as part of the analysis. Of the 37 measures (the FAA report says 38, but we count only 37), 14 – over 37% of the total - specifically mention “Elizabeth.” “Bergen County” is mentioned in four measures, the second most frequent mention. All other locations are mentioned less frequently.

However, a search of the rest of the entire Noise Mitigation Report includes not a single mention of “Elizabeth” in discussing the effects, good or bad, of the “mitigation” measures.

One of the proposed “mitigation” measures includes routing aircraft departing to the south of Newark and presently turning away from the center of Elizabeth to a heading of 190 degrees, to turn to the west at headings of 240 and 260 degrees (the runway heading itself is approximately 220 degrees). This will result in direct over-flights of the center of Elizabeth immediately after takeoff, with aircraft being much closer to the residents. Put another way, instead of making a 30 degree turn away from the city and towards predominately industrial areas, aircraft will make up to a 45 degree turn (the “Operational Analysis” report mentions going as high as 265 degrees “to take advantage of noise-insensitive land uses”) towards the city. These routes, current and proposed, and the nature of the areas they fly over can be seen on Figure 2.

As a first approximation, as the distance between a sound source and a listener decreases by half there is a 6 dB increase in sound level. Aircraft, with the effects of banking and turning are a bit more complex, but this engineering “rule of thumb” has a firm scientific basis and is reasonable to use. Cut the distance half again and there is another 6 dB increase in sound.

Aircraft now departing Newark on runway 22 and turning left to 190 degrees will now be able to turn right at headings of, nominally, 240 and 260 degrees. We can calculate what this means to someone on the ground by making a few basic assumptions.

Imagine two people located 2 miles from the end of the runway, one on a 240 degree heading and the second at 260 degrees. Each person is “in” the City of Elizabeth.

If we assume an aircraft taking off from runway 22 and flying the current departure, the plane would turn to the left at a heading of 190 degrees. With a 10 degree climb angle the plane would be at about 1,834 feet altitude (above ground) at 2 miles out from the end of the runway.

At this point the person on the 240 degree heading from the runway is about 8,900 feet to the side of the plane and, of course, 1,834 feet below it. The person on the 260 degree heading is about 12,113 feet to the side, also 1,834 feet lower. The “slant

range" for the person on the 240 degree heading – the straight line distance from the person on the ground to the plane – is about 9,111 feet. For the person on the 260 degree heading the slant range is 12,251 feet.

Now assume the plane takes off and heads out on the 240 and 260 degree bearings, flying directly over the people on the ground. Same plane, same climb angle.

For the person on the 240 degree heading the distance from the plane to the person decreases from 9,111 to 1,834 feet. Applying the formula for how sound changes with distance ( $20\text{Log}(r_2/r_1)$  for those interested) results in a sound that is about 13.9 dB louder.

For the person on the 260 heading the distance decreases from 12,251 to 1,834, which results in an increase in sound of about 16.5 dB.

An increase of 10 dB is generally considered to be a doubling of the "loudness" a person associates with a sound. A 20 dB increase would equate to a four-fold (doubling of a doubling) increase in loudness. A 16 dB increase is roughly a tripling of the loudness.

The proposed changes in routing of aircraft directly over the City of Elizabeth would have a very significant effect on the residents. The FAA will respond by saying the average increase won't be that much, and they are correct. But it is not the average sound that stops a conversation when a plane goes over or interrupts a teacher in a classroom.

When we hear the word "average" we always think of a man with one foot on a stove and the other on a block of ice; on the average he is comfortable. Or, as someone commenting in a hearing on helicopter noise at a proposed corporate site said about averaging the sound over a 24 hour period (which is what the FAA does), "You're telling me that if you shoot a off cannon but average it over 24 hours I won't hear it."

## Routing to the East

This topic was completely ignored in the Noise Mitigation report. In the Operational Analysis report aircraft departing Newark and heading further to the east is considered only for takeoffs to the north.

In our opinion the absence of an examination of the effects on exposed population to aircraft turning further east when departing on runway 22 is obvious by its exclusion. Anyone familiar with the area would wonder why this was not examined. Where are the calculations showing the sound exposures and census data? More specifically, why is Staten Island seemingly immune from aircraft traffic while Elizabeth gets a substantial increase? When we asked this question at the public hearing the FAA person responded – we hope in a joking way – “Staten Island just has a better Congressman.”

When the subject comes up the snap answer is always something like “aircraft clearance.” The aircraft departing Newark and arriving into LaGuardia would, we are told, be in conflict (not withstanding the wind would have to be 180 degrees different between the two airports to force this runway combination).

The FAA may have data to support the position that the aircraft would be too close, but we suggest that what they've presented does not show this.

Figure 3 is an aerial photograph with a line indicating the Newark runway 22 heading and another curved line – the position taken from Figure 28 of the Noise Mitigation Report information; this figure shows Runway 22 arrivals at LGA, the “preferred alternative.” There are obviously many miles of space between these two routes.

The FAA's documentation states “Under instrument rules, the controllers maintain a minimum horizontal separation of 3 miles between the aircraft unless they are separated by at least 1000 feet vertically or they are on diverging courses.” Assuming the aircraft are at the same altitude they must be at least 3 miles apart; there is, conservatively, a 5 to 6 mile separation between these routes.

This indicates there should be room to turn aircraft to the east for a short time and then turn them south to the runway heading, just as they do now with the current 190 degree departure.

In fact, there appears to be room for multiple routes to the south-southeast. As the Noise Mitigation Report explains several times, “departure headings must be separated by at least 15 degrees.”

If the “mitigated” departure plan calling for three departure tracks at 220 degrees (runway heading), 240 and 260 degrees is adequate, then three routes could be achieved with headings of 190 degrees (the heading currently used), 205 and 220

degrees, adding them in an east to west order when needed. This would provide the necessary 15 degrees of separation and not require any additional traffic further to the east.

Moving further to the east to add additional tracks or to widen the separation to 20 degrees, headings of 180, 200 and 220 degrees could be used.

Such routes would take the aircraft away, not towards, the densely populated areas located southwest of the airport.

The FAA should provide detailed information with supporting data on why such routing alternatives are not feasible.



Figure 2 – Newark 22 Departures with Proposed Turns over Elizabeth

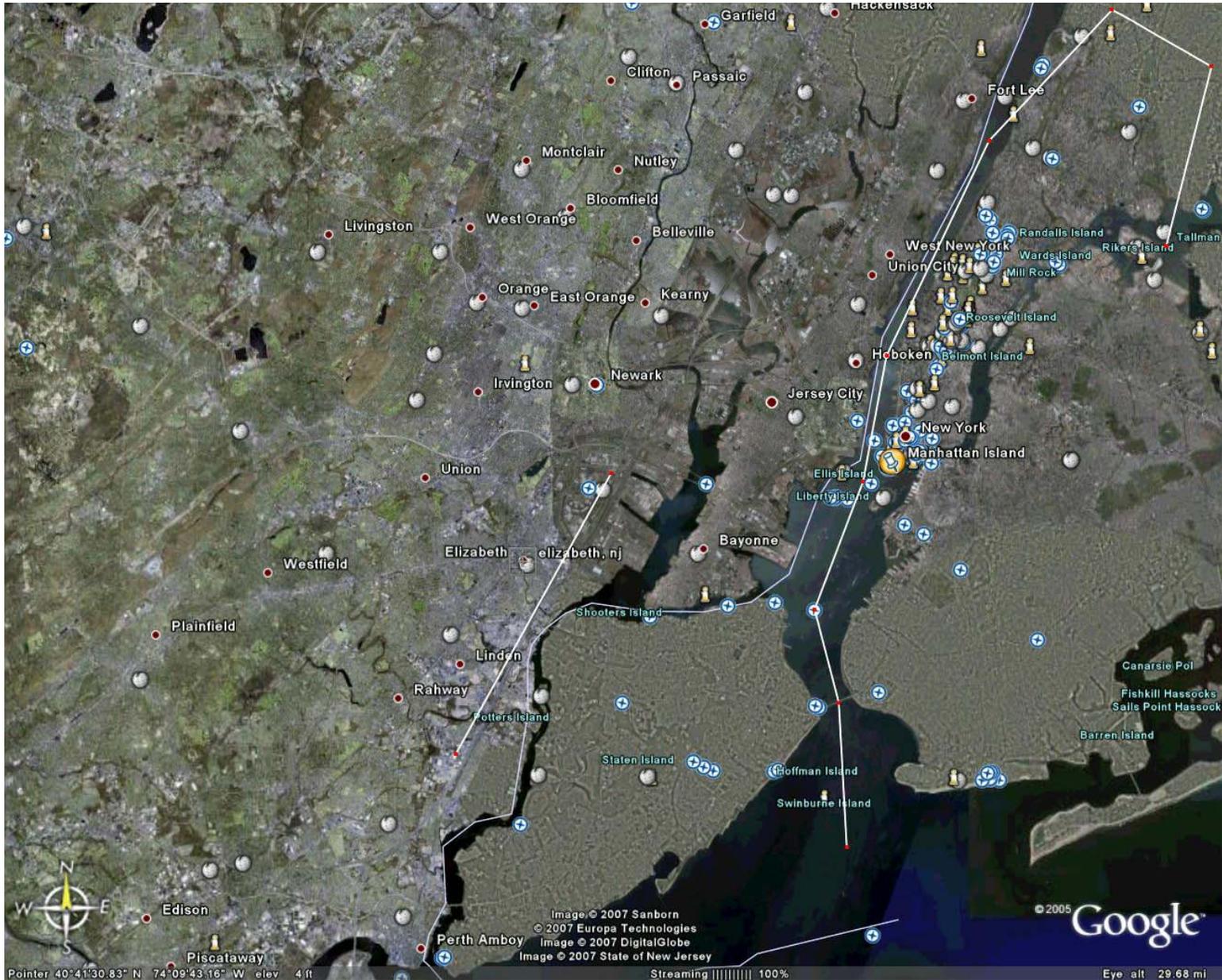


Figure 3 – Spacing of Newark Departures and LaGuardia Arrivals

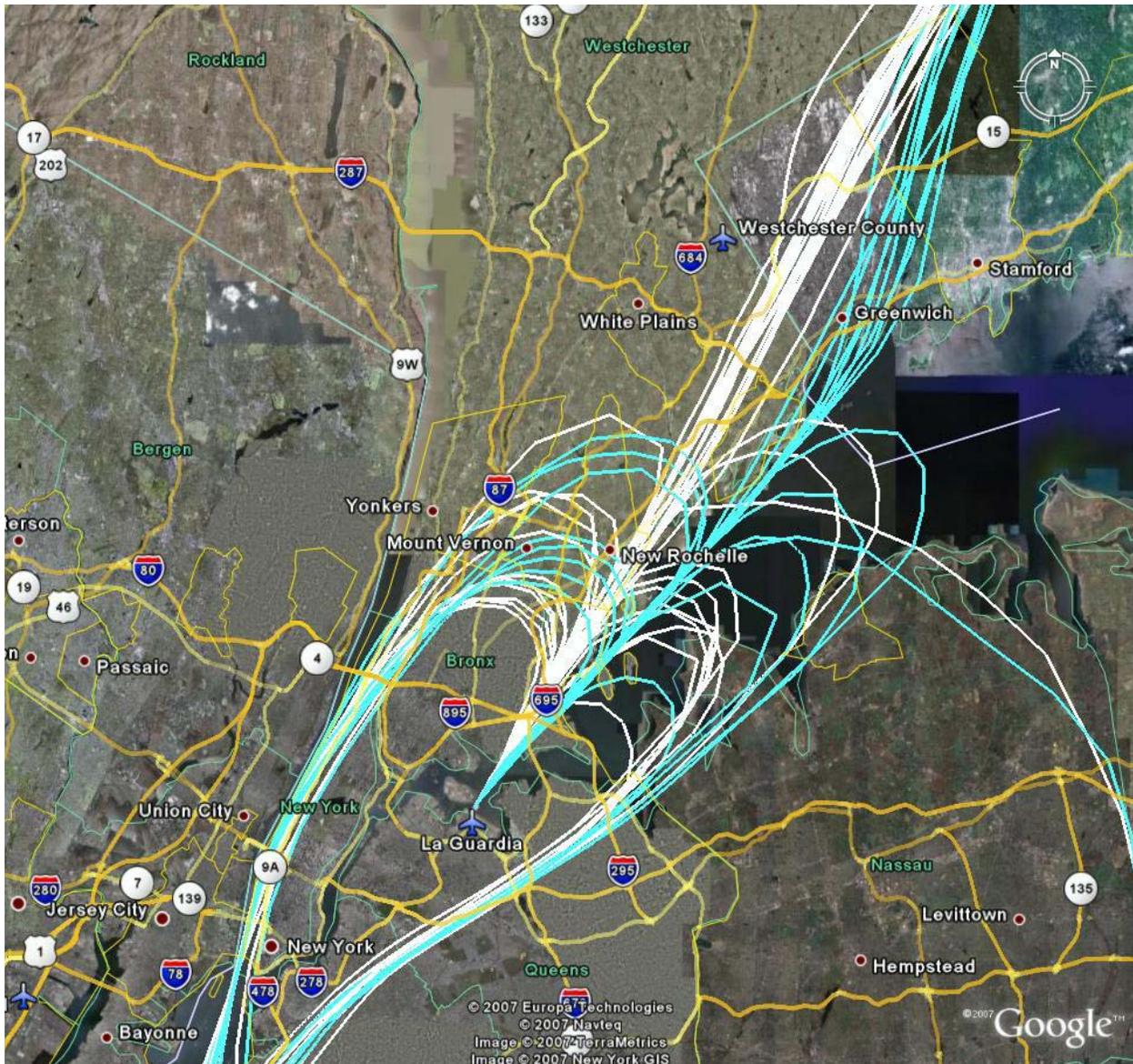


Figure 4 – Figure 28 from FAA Noise Mitigation Report “LGA Arrivals Runway 22 – Preferred Alternative”

JIM SAXTON  
DISTRICT OF NEW JERSEY  
WASHINGTON, DC 20540  
JOINT ECONOMIC COMMITTEE  
NATURAL RESOURCES COMMITTEE



ARMED SERVICES COMMITTEE  
AIR AND LAND FORCE  
THREATS AND CAPABILITIES

U.S. House of Representatives  
Washington, DC 20515

May 9, 2007

Ms. Marion C. Blakey, Administrator  
Federal Aviation Administration  
800 Independence Avenue, SW  
Washington, DC 20591

Dear Ms. Blakey:

I write today as part of the public comment period for the Federal Aviation Administration's (FAA) New York/New Jersey/Philadelphia Airspace Redesign Project.

As you know, this project will determine the approaching and departing flight paths of the New York, New Jersey, Philadelphia metropolitan area's busiest airports. Of the four alternatives being considered, the FAA has determined the Ocean Routing model does not meet operational or design needs. Unfortunately, the FAA has made the puzzling decision that ocean routing could instead be used as a noise mitigation strategy. As indicated by the FAA as far back as 2005, ocean routing does not reduce delays or meet system demand, nor does it improve user access, expedite arrivals and departures or increase flexibility. Therefore, along with the constituents of the Third Congressional District, I would like to express my continued opposition to ocean routing, either as an operational or noise mitigation strategy.

Transferring aircraft noise from one populated area of the state to another is not an acceptable alternative. The serenity of the Jersey Shore, and the tourism that drives its economy will be jeopardized, should ocean routing be implemented.

Like you, I believe the Airspace Redesign Project is necessary; however, I do not believe ocean routing is an acceptable alternative.

Thank you for your consideration of this important issue. I look forward to our continued correspondence as the FAA works to reach a final decision.

Sincerely,

*Jim Saxton*  
Jim Saxton  
Member of Congress

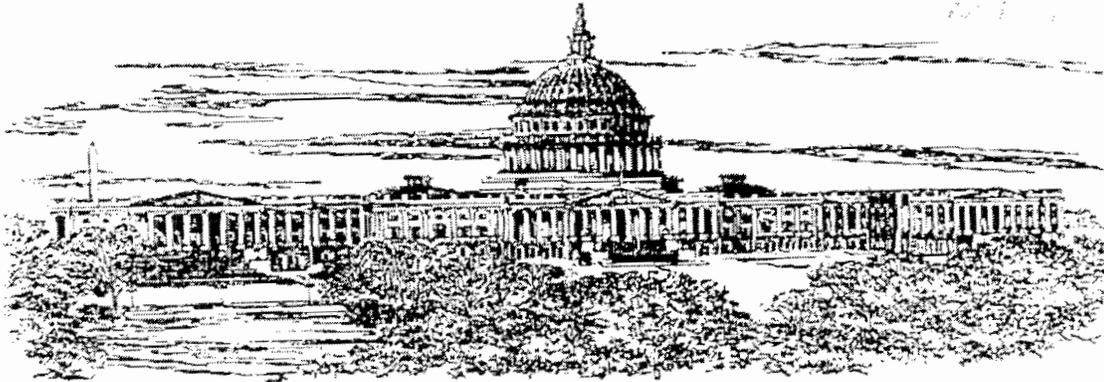
JS/jmz

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1 of 2

Encl. Cover Sheet

U.S. GOVERNMENT PRINTING OFFICE: 2006 O 481-100

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THE HONORABLE JIM SAXTON

2217 RAYBURN HOUSE OFFICE BUILDING

WASHINGTON, D.C. 20515

PHONE 202-225-4765

FAX 202-225-0778

TO: Administrator Blakey

FAX#: 202-267-8210

FROM: JONI ZIELINSKI LEGISLATIVE ASSISTANT

DATE: 5/9/07

RE:

Letter from Rep. Saxton re:  
Public Comment Period for  
NY/ NJ/ PA Airspace Redesign.

Thank you kindly,

Joni

# TOWNSHIP OF MIDDLETOWN

Township Hall, One King's Highway  
Middletown, NJ 07748-2594

GERARD P. SCHARFENBERGER

*Mayor*

PAMELA M. BRIGHTBILL

*Deputy Mayor*

THOMAS G. HALL

*Committee Member*

PATRICK SHORT

*Committee Member*

THOMAS P. WILKENS

*Committee Member*



Organized December 14, 1667

**"Pride in Middletown"**

ROBERT M. CZECH

*Township Administrator*

HEIDI R. ABS, RMC

*Township Clerk*

Tel: (732) 615-2000

Fax: (732) 957-9090

May 10, 2007

Federal Aviation Administration  
Attn: Steve Kelly c/o Ram Nagendrum  
12005 Sunrise Valley Drive  
MS C 3.02  
Reston, VA 20191

**Re: NY/NJ/PHL Metropolitan Area  
Integrated Airspace Redesign Project  
Comments on behalf of Middletown Township, New Jersey**

Dear Sir:

On behalf of the Governing Body of the Township of Middletown, kindly accept the following as the comment/position on behalf of the Township of Middletown with regard to the alternatives being considered by the FAA with regard to the NY/NJ/PHL Metropolitan Area Integrated Airspace Redesign Project. This Project, and the concerns and impacts as to Middletown, have recently been brought to the attention of the Township Governing Body by concerned residents and civic groups, and the Township Governing upon careful review has concluded that certain points, objections, and concerns should be made to the FAA for its consideration as part of its review and determination process.

First, just to focus you on Middletown and the reason for its concern, Middletown Township is a suburban coastal municipality of approximately 70,000 residents located along the Atlantic coast adjacent to Sandy Hook and is approximately 15 air miles south of Newark Airport, about 20 air miles west of JFK Airport, and about 15 air miles southwest of LaGuardia Airport. Being in that location, Middletown is presently impacted to varying degrees by air traffic to and from all three NY metropolitan airports. The entire coastal portion of Monmouth County, including Middletown, is relatively densely populated.

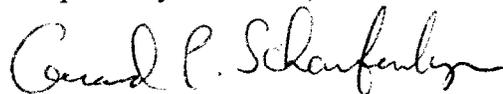
Given its proximity to these three major Airports and the existing air traffic patterns and volume, Middletown residents are already adversely impacted by the noise and pollution from low flying planes. Particularly impacting are the existing volume and patterns for JFK Airport arrivals, which frequently come directly over Middletown at relatively low altitudes. From the information available, it appears that no preferred alternative was included that would mitigate or reduce the adverse impacts already existing and resulting from the volume of JFK arrivals through the Middletown area at low altitudes, resulting in substantial impact upon the quality of life in this area. The FAA should address this deficiency and problem, and consider alternatives that would reduce the number of JFK arrivals over Middletown.

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Further, from the information available, it appears that the FAA is considering night routes from JFK over the Middletown area and, in addition, that nighttime routing to and from Newark Airport would be funneled to and over Sandy Hook and the Middletown area. As there are approximately 37,000 flights departing Newark Airport annually during nighttime hours, this proposed routing shift will no doubt have a severe adverse impact upon the westerly residential portion of Middletown Township and other adjacent communities. In addition, it would appear the Newark departures, particularly given the volume, may conflict with JFK departures and traffic in the same area, and intensify the already substantial air traffic volume to unreasonable levels on a 24 hour basis. Alternatives should be devised and considered which redirect Newark and JFK nighttime air traffic further over the Ocean away from Middletown and the densely populated coastal area of Monmouth County. In the alternative, the existing air traffic patterns which disburse the direction of nighttime Newark departures should remain in place, rather than concentrate this impact on the Middletown/northern Monmouth County coastal region.

Thus, the essence of the position/comment/objection on behalf of Middletown Township is that the community strongly objects to nighttime air traffic, and increased nighttime air traffic, directed over Sandy Hook and Middletown. The FAA is requested to seek and utilize alternative routes and scheduling so as to substantially address and mitigate those impacts and concerns. Thank you for your anticipated review and cooperation.

Respectfully submitted,



Gerard P. Scharfenberger, Ph.D.  
Mayor

cc: Middletown Township Committee  
Middletown Township Administrator  
Senator Joseph M. Kyrillos, Jr.  
Assemblyman Samuel D. Thompson  
Assemblywoman Amy H. Handlin  
Riverside Drive Association  
Bruce Huber, President  
Kimberly Warman, First Vice President  
Governors Representative for Aircraft Noise Mitigation for Monmouth County  
Joyce Gulden

14 HILTON WOODCLIFF LAKE  
200 Tice Boulevard  
15 Woodcliff Lake, New Jersey 07677  
Thursday, June 28, 2007  
16 Commencing at 6:00 p.m.

10

Dennis Schubert

11 Upper Saddle River

19 MR. SCHUBERT: My name is Dennis  
20 Schubert. I'm a councilman in the Borough of Upper  
21 Saddle River, and my take away from this meeting is  
22 that the FAA is more concerned with utilizing the  
23 airspace to the airlines' best advantage rather than  
24 looking how to better serve the public, and the  
25 negative impact that change in the air routes will  
0034

1 have on the public that lives below them.

2 Decreasing delays by six minutes and  
3 increasing throughput by 5 percent, but causing  
4 great hardship by the noise levels to the public  
5 underneath the routes is unacceptable.

6 (Whereupon, the statement concluded.)

XRFAA-070420-016

United States Senate

WASHINGTON, DC 20510

COMMITTEES: BANKING FINANCE JUDICIARY RULES

May 14, 2007

Honorable Marion Blakey Administrator Federal Aviation Administration 800 Independence Avenue, S.W. Washington, D.C. 20591

Dear Administrator Blakey,

I write to again express my concern, and the concern of many Staten Island residents, regarding the recent revelation that nighttime Oceanic Routing is still under consideration by the FAA as a viable option for airspace redesign now that the period for public comment has closed. I urge you to once and for all eliminate this ill-conceived and costly proposal from consideration.

Oceanic routes in and out of Newark airport would disproportionately affect the quality of life on Staten Island, hampering Island residents with the lion's share of airplane noise for the entire region. It is time to finally eliminate Oceanic Routing as a noise mitigation strategy for the airspace redesign. Staten Islanders have been forced to endure the roller coaster ride of this long-delayed process, at one time being told Oceanic Routing was off the table, then back on, as the illogicality of the plan became fully evident.

In addition to the amplified noise burden over Staten Island, the FAA has found that redirecting night traffic from Newark over Staten Island would cost \$300 million a year in fuel costs alone. That cost will be passed along to the already overstressed air travel consumer. Also, because of the interdependency of regional transportation systems, the FAA has determined that Oceanic Routing is only viable at night, from midnight to 6 AM. Delays and inefficiency will tax capacity at LaGuardia and Kennedy Airports, leading to increased flight delays and vehicular traffic, and forcing aircraft over Staten Island will do nothing to solve this problem.

Since, in your agency's own words, Oceanic Routing does not meet the "purpose and need" of the airspace redesign, I fail to understand why, after such lengthy and costly analysis, the FAA is again considering this option. I urge you to reconsider the FAA's stance, and eliminate Oceanic Routing as a noise mitigation strategy in all future planning for the New York metropolitan area airspace redesign.

Sincerely,

Charles E. Schumer

Charles E. Schumer U.S. Senator

PLEASE RESPOND TO THE FOLLOWING OFFICE:

- ALBANY: 100 STATE STREET, ROOM 420, ALBANY, NY 12207 (518) 431-4070
BINGHAMTON: 19 HENRY STREET, ROOM M103, BINGHAMTON, NY 13901 (607) 772-0792
BUFFALO: 120 ALBANY BLVD., #550, BUFFALO, NY 14202 (716) 945-4111
HUDSON VALLEY: P.O. BOX A, RED HOOK, NY 12571 (514) 285-0741 (845) 756-0741
LONG ISLAND: TWO GREENWAY PLAZA, 145 PARK LANE ROAD, ROOM 300N, MCKEEVILLE, NY 11747 (631) 763-0978
NEW YORK CITY: 757 THIRD AVENUE, SUITE 1702, NEW YORK, NY 10017 (212) 488-4630 YDC: (212) 488-7601
ROCHESTER: KENNETH S. KEATING BUILDING, 100 STATE STREET, ROOM 5040, ROCHESTER, NY 14614 (585) 253-3800
SYRACUSE: 100 SOUTH CANTON, ROOM 541, SYRACUSE, NY 13261 (315) 425-5471
WASHINGTON: 313 HART SENATE OFFICE BUILDING, WASHINGTON, DC 20510 (202) 224-4642 TDD: (202) 224-0420

http://schumer.senate.gov

007082



# CONGRESS OF THE UNITED STATES

## CONGRESSMAN CHRISTOPHER SHAYS STATEMENT ON NEW YORK/NEW JERSEY/PHILADELPHIA AIRSPACE REDESIGN

I appreciate the FAA's willingness to come to Stamford tonight to discuss its proposed New York/New Jersey/Philadelphia Northeast Airspace Redesign. I also appreciate so many concerned residents coming out to see the FAA's presentation and to share their legitimate concerns about the plan's impact on their quality of life.

Over the past few months, the FAA has zeroed in on the Integrated Airspace Alternative as its preferred alternative. Throughout this time, I have shared my concerns and many of your concerns with the FAA, particularly the fact that the plan brings more planes into the region at the expense of the region's quality of life.

I strongly oppose the FAA's integrated airspace alternative that would route more air traffic over residential neighborhoods. I am particularly disappointed that the FAA has not developed any noise mitigation strategies, despite the wide swath of land over the Fourth Congressional District that will be adversely impacted by planes at altitudes that appear to go as low as 4,000 feet in the southern portion of the district.

Even though they have no mandate to consider quality of life issues, the FAA simply cannot ignore the hugely negative impacts of air noise in this process.

I believe that if the FAA had to consider the true impacts of the Integrated Airspace Alternative on the communities below the air traffic, they would never have concluded that airspace redesign was the appropriate first attempt at relieving air traffic congestion. The FAA needs to explain why it has failed to consider alternative methods of reducing air travel delays, including market-based solutions such as de-peaking strategies and incentives, auctioning slots at airports or implementing quotas, especially in light of the fact that no noise mitigation strategies appear to be available for our area. It seems to me these common-sense solutions should not just be studied but tried before implementing such a radical alternative that negatively affects many thousands of residents throughout the Northeast.

I also am concerned many residents don't know precisely how many planes and at what altitude these planes will be passing over them. I am hopeful we can clear at least that up tonight.

Unless the FAA demonstrates that strategies other than airspace redesign are not sufficient, or until a workable noise mitigation is implemented, I will continue to work with other Members of Congress whose regions are affected to oppose this plan.



# CONGRESS OF THE UNITED STATES

May 11, 2007

The Honorable Marion C. Blakey, Administrator  
Federal Aviation Administration  
800 Independence Avenue, S.W.  
Washington, DC 20591

Dear Marion:

Please accept this letter as my comments on Noise Mitigation Procedures for the Preferred Alternative New York/New Jersey/Philadelphia Airspace Redesign.

I strongly oppose the FAA's integrated airspace alternative that would route more air traffic over residential neighborhoods.

The noise mitigation report of April 6 is woefully inadequate for the communities of Fairfield County, Connecticut. The report considers only one possible mitigation strategy for LaGuardia Runway 22 arrivals, and dismissed that strategy as unworkable. While the predicted noise levels in our communities do not reach the levels requiring mitigation by statute, they are, by the FAA's own acknowledgment, adverse and significant.

Congressman  
Christopher Shays  
Fourth District Connecticut

Offices:

10 Middle Street, 11th Floor  
Bridgeport, CT 06604-4223

Government Center  
888 Washington Boulevard  
Stamford, CT 06901-2927

1126 Longworth Building  
Washington, DC 20515-6704

Telephones:

BRIDGEPORT: 579-5870  
NORWALK: 866-6469  
RIDGEBELD: 438-5953  
SHELTON: 402-0426  
STAMFORD: 337-8277  
WASHINGTON, DC: 202-225-5541

E-mail:

rep.shays@mail.house.gov

Internet:

No attempt has been made to utilize unpopulated or less populated tracts of land, industrial and commercial zones, major highway systems or large bodies of waters for mitigating noise impact, or to set recommended minimum altitudes.

The failure to attempt to mitigate the impacts of this proposal on Connecticut exemplifies the badly flawed redesign process. I believe that if the FAA had to consider the true impacts of the Integrated Airspace Alternative on the communities below the air traffic, they would never have concluded that airspace redesign was the appropriate first attempt at relieving air traffic congestion.

Even though the FAA has no mandate to consider quality of life issues, you cannot simply ignore air noise in the design stages of

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(incl cover sheet)

The Honorable Marion C. Blakey, Administrator -- May 11, 2007 -- F

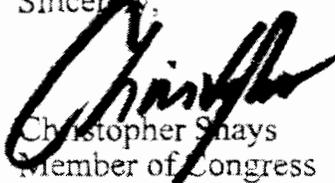
this process. It is unreasonable to design airspace without reference to impacts on the ground. Such a process necessarily results in a badly flawed "preferred alternative." Subsequent attempts to measure and then mitigate the hugely negative impacts are inevitably inadequate.

The bottom line is quality of life issues such as air noise impact should have been considered equally with safety and efficiency at the earliest stages of redesign. Failure to do so cannot be mitigated later.

Because of the inadequate noise mitigation strategies proposed, the FAA should opt for the "no action" alternative at this time. The FAA and Congress need to consider alternative methods of reducing air travel delays, including market-based solutions such as de-peeking strategies and incentives, auctioning slots at airports or implementing quotas.

It seems to me these common-sense solutions should not just be studied but tried before implementing such a radical alternative that negatively affects many thousands of residents throughout the Northeast.

Sincerely,



Christopher Shays  
Member of Congress

CS:pmp



# CONGRESS OF THE UNITED STATES

AOA-3 Log II  
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## FAX COVER SHEET CONGRESSMAN CHRISTOPHER SHAYS

10 Middle Street  
Bridgeport, CT 06604

phone: 203/579-5870  
fax: 203/579-0771

TO: FAA Congressional Affairs  
202/267-8210

---

RE: NY/NJ/PHL Airspace public  
comments on noise mitigation

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pages: 3 (including cover sheet)

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Contact: Paul Pimentel

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SHERATON NEWARK AIRPORT HOTEL  
128 Frontage Road  
Newark, New Jersey 07114

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CAROL J. SKIBA, Councilwoman 15  
320 Boulevard  
Hasbrouck Heights, New Jersey 07604

MS.  
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SKIBA: I am Councilwoman Carol J. Skiba, Hasbrouck Heights and I come here tonight because I believe that this airspace redesign and the way the FAA averages its impact of aircraft noise is completely and totally bogus. My community has two grammar schools and a high school which are in the approach path to Teterboro Airport. There is a huge impact on the children's ability to learn from the incessant aircraft noise over their heads. The way the FAA calculates and averages out noise does not remotely give an accurate

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indication of what impact those children are having during the day. You can't have an aircraft pass overhead every two minutes in a three-hour period and have that total amount of noise for three hours averaged out over a 24-hour period, it just doesn't work. I come here tonight because my community has applied to the Port Authority of New York and New Jersey to soundproof its schools for the past three years and for the past three years they have been rejected because they allegedly fall out of the 24-hour average DNL reading established by the FAA, which is 59. 65 DNL being what is required to get schools soundproofed. Here is a letter dated April 18, 2006, the last time our school applied and were rejected and I think that if the FAA wants to increase capacity to pacify and placate the aviation industry, then it must be responsible to find the funding to soundproof schools, because the children of my community do not deserve the negative impact of incessant aircraft noise while they are trying to learn. They are the future of our country and to average the noise out is just not right and to

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have it fall marginally below the accepted footprint for soundproofing is just not right. If the airport and its operations have an impact on the school system, the children should be protected. Thank you.



May 9, 2007

Mr. Steve Kelley, FAA—NAR  
c/o Ram Nagendran  
12005 Sunrise Valley Drive  
Reston, VA 20191

**RE: Comments on Airspace Redesign – Opposition to EWR “Fanning”**

Dear Mr. Kelley:

Please accept these comments by the Town of Westfield regarding the Federal Aviation Administration’s (FAA) “Integrated Airspace” plan with April 6 proposed mitigations. Westfield previously submitted a Resolution opposing Integrated Airspace as a comment to the Draft Environmental Impact Statement (DEIS). We maintain our opposition due to the Newark Liberty International Airport (EWR) traffic “fanning” proposal included in Integrated Airspace.

The census block noise information, published by the FAA last spring, showed that Integrated Airspace would increase aviation noise over Westfield. The proposal to “fan” southerly departing EWR traffic to the west is the main cause. The mitigations continue to include “fanning.” Previous FAA flight trials of more westerly headings caused increased noise and complaints by Westfield residents.

The mitigation requires that flight controllers switch throughout the day between the currently used flight heading and higher impact, westerly ones, depending on traffic volumes to reduce impact by using the high impact headings less frequently. This mitigation and noise modeling results depend on the controllers continually switching between departure headings. Many question whether flight controllers facing severe workloads and responsibilities will actually do this. Therefore the practicality of the procedure and noise modeling results are questionable.

Noise results for ocean routing, used over the full 24 hour period, were highly favorable. We therefore support the use of night-time ocean routing and ask that you explore further whether, with modifications, ocean routing could be used more extensively.



Departure capacity benefits from the proposed “fanning” are very modest, amounting to at most 5% during a few peak hours per day. “Fanning” makes poor use of the unpopulated areas surrounding EWR for safety and noise mitigation and greatly increases noise. Please eliminate EWR “fanning” from the Integrated Airspace proposal.

We appreciate that the FAA is devoting attention to reducing noise, and look forward to a final proposal that gives at least some of the capacity benefits being sought, without the adverse noise impacts.

Thank you for this opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew K. Skibitsky". The signature is fluid and cursive, with a prominent flourish at the end.

Andrew K. Skibitsky

cc: Senator Thomas H. Kean  
Assemblyman Eric Munoz  
Assemblyman Jon Bramnick

Andrew J. Spano  
County Executive

May 11, 2007

Mr. Steve Kelley, FAA-NAR  
c/o Ram Nagendran  
12005 Sunrise Valley Drive, MS C3.02  
Reston, VA 20191

Dear Mr. Kelley:

I am writing as the Chief Elected Official of Westchester County to state my continuing concern with both the content and the adequacy of the New York/New Jersey/Philadelphia Airspace Redesign Draft Environmental Impact Statement (DEIS), issued in December 2005, and with content and adequacy of the "Noise Mitigation Report" issued by the FAA on April 6, 2007 for this project.

These documents together fail to meet the primary purpose of the DEIS under the National Environmental Policy Act, to provide interested and affected parties adequate information upon which to fairly evaluate and make informed comments about a proposed action. As it concerns the potential noise impacts on hundreds of thousands of interested and affected people in Westchester, the DEIS utterly fails to meet that requirement and its failure is not cured by the Noise Mitigation Report. To cite one of the more glaring deficiencies, the Noise Mitigation Report compares the "original" and "mitigated" versions of the "preferred action" but, makes no comparison to the "no action" case. The more important question is how does the proposed action compare with no action case.

I believe the process the FAA has employed to involve the public in this important public policy process has been completely inadequate.

Therefore, I have no alternative other than to strongly oppose the proposed "2011 Integrated Airspace Mitigated Preferred Alternative Variation with Integrated Control Complex (ICC)," and to continue to urge you to prepare a Supplemental DEIS clarifying the relevant issues. Implementing the preferred alternative without the supplemental DEIS would violate your own procedures and thus make your action invalid.

As both the area government and the sponsor of the Westchester County Airport, Westchester has a long history of cooperative effort with the aviation industry and the FAA to minimize noise impacts of air traffic. The extensive noise monitoring effort managed by the airport and the airport-sponsored noise abatement procedure program are evidence of that commitment. The data provided by the monitoring system and the continued reduction of the airport's noise contours testify to its success. Indeed, our airport relying upon its advanced noise monitoring program was able to provide information requested by the FAA in connection with this very project, and it did so in a timely fashion.

The proposed reassignment of air traffic without the legally required level of review could undo decades of hard work, public understanding and good will and is unacceptable.

Office of the County Executive

Michaelian Office Building  
White Plains, New York 10601

Telephone: (914)995-2900 E-mail: ceo@westchestergov.com

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Mr. Kelley  
May 11, 2006  
Page 2

Because of our grave concern, I directed the firm of Harris Miller Miller & Hanson, airport noise consultants, to review the DEIS and the Noise Mitigation Report. Enclosed is their memorandum identifying in detail the deficiencies of the Noise Mitigation Report with regard to our community. We have previously submitted their analysis of the deficiencies of the DEIS. They deserve your serious review and appropriate follow up action in the form of a Supplemental Environmental Impact Statement.

In addition, because we did not receive from the FAA the back up data needed by our consultant to completely analyze the conclusions of the Noise Mitigation Report until May 9, 2007, I request the comment period be extended for a period of sixty (60) days, from May 11, 2007 to July 10, 2007.

I look forward to your prompt reply.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew J. Spano", written over a horizontal line.

Andrew J. Spano  
County Executive

AJS/KP/fa

**Enclosures**

# HARRIS MILLER MILLER & HANSON INC.

77 South Bedford Street  
Burlington, MA 01803  
Tel. (781) 229-0707  
Fax (781) 229-7939

April 13, 2007

Mr. Robert Funicello  
Environmental Project Director  
Westchester County Department of Transportation  
270 North Ave  
New Rochelle, NY 10801

Subject: Preliminary Review of Noise Mitigation Report  
New York / New Jersey / Philadelphia Airspace Redesign DEIS  
Reference: HMMH Project No. 301630

Dear Mr. Funicello:



HMMH has reviewed the April 6, 2007 FAA "Noise Mitigation Report" for the New York / New Jersey / Philadelphia Airspace Redesign ("ARD") Draft Environmental Impact Statement (DEIS). The report focuses on mitigation for the Preferred Alternative; i.e., the Integrated Airspace Variation with Integrated Control Complex. This letter summarizes our high-level comments related to operations at and impacts near to Westchester County Airport (HPN). These comments refer in many cases to HMMH's memorandum to you dated June 8, 2006 (which I refer to as "our Memorandum.")

**1. The mitigation-related reports present improved graphics, but insufficient detail on noise modeling inputs and outputs to fully assess the reports' conclusions.**

The FAA report and the companion April 2007 Mitre report titled "Operational Analysis of Mitigation of the NY/NJ/PHL Airspace Redesign" include graphics at a more legible scale for the HPN environs than the Draft EIS. These graphics are very helpful in assessing proposed changes.

However, in order to fully assess the reports' conclusions, we continue to require access to the types of information that we previously requested from FAA on the County's behalf (in the November 1, 2006 letter from David Crandall of HMMH to FAA's consultant, Landrum & Brown). At this time, we would require the requested modeling inputs and outputs for the following cases, which the FAA investigated for the Mitigation Report: (1) the "refined" No Action (see item 2, below), (2) the refined Preferred Action as originally proposed (i.e., without Mitigation), and (3) the Preferred Action with Mitigation.

**2. Noise modeling refinements cannot be fully understood without previously requested modeling inputs and outputs.**

Pages 2 and 3 of the FAA report acknowledge "refinements" to the noise methodology, that were made, at least in part, in response to issues identified in our Memorandum, i.e.: 1) correction of aircraft altitudes relative to local terrain, and 2) rounding of calculated noise values. The report states that the altitude-related refinement "generally results in slight reduction in computed noise values near these higher elevation airports" (which include HPN). This is an example of a key issue we cannot fully assess without access to data we previously requested from FAA.

**3. The refined analyses resulted in exceedence of an FAA impact threshold at one location in the vicinity of HPN, but may not be fully sensitive to such all such situations.**

Page 3 of the Mitigation Report acknowledges that rounding of calculated noise values (discussed under item 2, above) does in fact cause a population centroid six miles north of HPN (in Pleasantville) to be "tipped into the category of a FAA threshold based impact." That location is in the center of the geographic area where we previously identified the highest possibility that such a situation might occur (Area D in the figure labeled "Change in DNL Relative to Criteria" in our Memorandum).

We continue to be concerned that further refinements in the noise methodology might identify additional exceedences of this type. As we discussed our Memorandum, those refinements might involve more closely spaced analysis locations and greater precision in HPN modeling assumptions.

#### **4. The HPN-related discussion raises several questions about the adequacy of the proposed mitigation.**

Pages 54 through 58 of the Mitigation Report address potential mitigation in the vicinity of HPN. The discussion focuses on the single population centroid near Pleasantville that tipped into an impact category. The FAA's proposed corrective action (shown in Figure 31 on page 57) involves shifting flights to the west. Figure 32 (page 58) shows resulting changes in noise; as would be expected, noise levels are reduced under the originally proposed route and increased under the revised route. The discussion raises several questions, including:

- In the absence of detailed noise results for population centroids under the shifted route (of the type that the FAA has made available in spreadsheet format with the DEIS in March 2006), we cannot thoroughly assess the potential impact of the revised routing, which appears to pass over Valhalla and North Tarrytown.
- The mitigation-related graphics compare the "Original" and "Mitigated" versions of the Preferred Action. The more important question is: "How does the Mitigated Preferred Action compare to the No-Action case?"
- The Mitigated and Original proposals shown in Figure 31 both involve routing southbound departures from Runway 34 in a wide loop over northeastern Westchester County and western Fairfield County. Even if this traffic does not tip any population centroids into an impact category, it represents a significant change in HPN operations over historically noise-sensitive areas. (The loop relates to increased noise exposure identified in area "E" and in the vicinity of Round Hill Road in Greenwich, just south of the bend in the Merritt Parkway, in the figure labeled "Change in DNL Relative to Criteria" in our Memorandum.)
- Page 57 of the Mitre report states the following: "It may be possible to mitigate this noise change by developing an RNAV procedure for the departures." This statement raises several questions: (1) How great is uncertainty related to the effectiveness of the proposal? (2) What percent of the departures from HPN are RNAV capable? (3) How strong a commitment will the Final EIS make to the RNAV procedure? (4) When will the FAA perform any environmental assessment required to implement that procedure; will it be incorporated in the Final EIS? (5) How will the FAA monitor and assess compliance with the procedure after implementation? (6) What would be the trigger for undertaking corrective actions if the mitigation is not as effective as desired?

#### **5. The Mitigation Report does not address all areas of critical concern.**

The Mitigation Report does not address two areas we identified in our Memorandum where the change in noise level appeared to be very close to FAA impact thresholds (also shown in the figure labeled "Change in DNL Relative to Criteria"). These include:

- Area A in the Belle Fair development. The correction of aircraft altitudes relative to local terrain discussed in item 2, above, may have addressed this matter. However, the report does not address this location specifically. As noted previously, the information we have requested from FAA would permit us to assess this matter independently.
- Area G over Fairfield County. As we discussed in our memorandum, the increases in this area appear to relate to an easterly shift in the downwind leg for the existing "Sound visual approach" to HPN. Most Figures in the FAA and Mitre reports do not extend this far to the east. However, page 44 of the Miter report provides a glimpse of it on a figure titled "Flows That Must be Avoided by

# HARRIS MILLER MILLER & HANSON INC.

Mr. Robert Funicello, Westchester County  
Preliminary Review of Noise Mitigation Report for NY/NJ/PHL ARD DEIS

Page 3  
April 13, 2007

Rerouted LGA Departures." Once again, we cannot assess this change in procedures without the information we have requested from FAA.

Please do not hesitate to contact me if you have any questions about this preliminary review. As always, we appreciate this opportunity to support the County on this important matter.

Sincerely yours,

HARRIS MILLER MILLER & HANSON INC.



Ted Baldwin  
Senior Vice President

c: David Crandall, HMMH





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SENATOR SPECTER

NO. 107

MARION SPECTER  
PENNSYLVANIA

FAA-070514-004 SA

COMMITTEES:  
JUDICIARY  
APPROPRIATIONS  
VETERANS' AFFAIRS  
AGING

# United States Senate

WASHINGTON, DC 20510-3802  
specter.senate.gov

May 10, 2007

The Honorable Marion C. Blakey  
Administrator  
Federal Aviation Administration  
800 Independence Avenue, SW  
Washington, DC 20591

Dear Administrator *Marion*

I write regarding the New York/New Jersey/Philadelphia Airspace Redesign project. On May 1, 2007, my staff attended a public meeting concerning the Philadelphia portion of this project which prompted the below inquiries.

- How did you arrive at a 5.09 minute average departure delay reduction benefit at Philadelphia under the three departure heading proposal as compared to one departure heading for west flow departures on Runway 27L? Local elected officials in Delaware County have concluded that the benefit is much lower by dividing the FAA's estimated 290,000 annual minutes in delay reduction at Philadelphia under the Preferred Alternative by the airport's 255,000 annual departures.
- Section 17.5 of the operational analysis notes that because benefits analyses for airspace redesign projects must be referred to a large common denominator, airspace redesign benefits are often on the order of a few minutes. Further, Section 17.5 notes that while these numbers appear small, a change of a few minutes per flight, over a large set of aircraft, "can have enormous economic consequences for the aviation industry and the flying public." Is Section 17.5 implying that because the analyses included every flight in the study area, some of which are unaffected by the project, that the estimated benefit statistics are diluted? Would the benefits appear greater if unaffected flights were removed from the common denominator? Further, please expound on the "enormous economic consequences" which could be realized by a minute or two delay reduction.
- What was the air traffic volume in the study area when the airspace system was originally designed in the 1960s and what is the current air traffic volume in the study area?
- What is the estimated average noise exposure range for Delaware County in 2011 if no action were taken compared to the estimated average noise exposure range

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for Delaware County in 2011 under the Preferred Alternative with mitigation?

- It was noted at the public meeting that air traffic controllers at Philadelphia have not been briefed on this project. It would seem that consulting with the air traffic controllers who would be directly affected by this project would be in the public interest. Does the agency have plans to brief the air traffic controllers at Philadelphia or other facilities in the study area?

I request that you respond to these questions in a timely fashion. Your proposal is being met with sharp criticism from Delaware County residents and local elected officials. As such, it is imperative that you provide public officials with the information necessary to objectively evaluate what is in the best interest of the southeastern Pennsylvania region as well as the northeastern United States.

Thank you for your prompt attention to these inquiries.

Sincerely,



Arlen Specter

AS/mk

*Sum I couldn't  
ETA at your hearing.  
My Best*

Mayor  
Dannel P. Malloy

Director  
Michael W. Freimuth



Tel: (203) 977-5089  
Fax: (203) 977-5845  
www.cityofstamford.org

**CITY OF STAMFORD**  
**Office of Economic Development**  
**888 Washington Boulevard**  
**P.O. Box 10152**  
**Stamford, Connecticut 06904-2152**

April 25, 2007

Mr. Steve Kelley, F.A.A.  
C/o Ram Nagendran  
12005 Sunrise Valley Drive, MS C3.02  
Reston, Virginia 20191

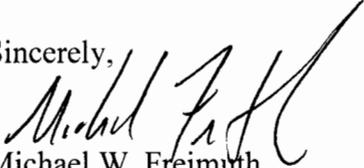
Re: Comments NY/NJ/Phil Airspace Redesign

Dear Sir:

In accordance with instructions given at the FAA April 24, 2007 Stamford, Connecticut public meeting, please include the enclosed resolution of the Stamford Board of Representatives in the public comment for the proposed Integrated Airspace Redesign for the New York – New Jersey – Philadelphia Airspace.

Thank you.

Sincerely,

  
Michael W. Freimuth

Encl. B.O.R. Resolution 3118

MWF:lc

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# 27<sup>TH</sup> BOARD OF REPRESENTATIVES CITY OF STAMFORD

President  
*DAVID R. MARTIN*  
Clerk of the Board  
*ANNIE M. SUMMERVILLE*

Majority Leader  
*JOHN J. BOCCUZZI*  
Minority Leader  
*ROBERT "GABE" DELUCA*

## RESOLUTION NO. 3118 URGING CONGRESS TO SUPPORT AN ALTERNATIVE FAA PROPOSAL BY NOT RE-ROUTING AIR TRAFFIC FLIGHTS TO LAGUARDIA AIRPORT OVER FAIRFIELD COUNTY

WHEREAS, the FAA is considering five proposals to re- route air traffic destined for LaGuardia airport to reduce delays; and

WHEREAS, the City of Stamford and its citizens understand the importance of the region's airports; and

WHEREAS, one of the proposals has aircraft beginning their descent over Fairfield County and hewing closely to the coastline near Stamford and Greenwich before crossing over Long Island Sound; and

WHEREAS, according to the FAA Web Site, projected decibel levels in the area would range from the mid 30s to the low 40s and the FAA acknowledges that an increase of 1.5 decibels is considered significant enough to be noticed; and

WHEREAS, Stamford is currently subject to considerable air traffic noise pollution, being situated near LaGuardia, Kennedy and Newark Airports along with bordering Westchester County Airport; and

WHEREAS, the negative effects on humans, and especially children, from excessive noise, including noise from air traffic, is well documented; and

WHEREAS, the public comment period for these proposals ended on July 1 but insufficient notice was issued for local elected officials and the general public; and

WHEREAS, any new flight path plan implemented requires congressional appropriations and would not be implemented until 2011.

**NOW THEREFORE BE IT RESOLVED THAT:** The Stamford Board of Representatives opposes any increased air traffic over Stamford that will contribute to an increase in noise; and

**BE IT FURTHER RESOLVED THAT:** The Stamford Board of Representatives requests that the FAA select an alternative that includes an ocean route or that leaves flight paths unchanged; and

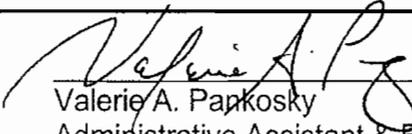
**BE IT FURTHER RESOLVED THAT:** The Stamford Board of Representatives urges the FAA to conduct a thorough cost benefit analysis of the proposed alternate routes; and

**BE IT FURTHER RESOLVED THAT:** The Stamford Board of Representatives urges its elected Federal representatives to consider the health, protection and quality of life for Fairfield County residents by electing to leave the existing flight plans in place or by electing an alternate route that would not increase air traffic over Fairfield County and by not supporting any increase in air traffic over Fairfield County.

---

This resolution was approved by unanimous voice vote at the regular monthly meeting of the 27<sup>th</sup> Board of Representatives held on Monday, December 4, 2006.

---

  
Valerie A. Papkosky  
Administrative Assistant & Recording Secretary

cc: Mayor Dannel P. Malloy  
Tim Curtin, Director of Operations  
Benjamin Barnes, Director of Administration  
Thomas M. Cassone, Director of Legal Affairs  
William Callion, Director of Public Safety, Health & Welfare  
Donna Loglisci, City and Town Clerk  
The Honorable Christopher Shays  
The Honorable Chris Dodd  
The Honorable Joseph Lieberman

FIRE ISLAND ASSOCIATION INC.  
PO Box 424, Ocean Beach, New York 11770  
(631) 583-5069  
[www.fireislandassn.org](http://www.fireislandassn.org)

Executive Committee

**Gerard Stoddard**  
President  
263 West 20th St.  
New York, NY 10011  
Fax-Tel (212)929-6415  
e-mail: licafia@att.net

**Bob Spencer**  
First Vice President  
Davis Park

**Kennard N. Hirsch**  
Treasurer  
Ocean Bay Park

**Marsha Hunter**  
Secretary  
Kismet

**Suzanne Goldhirsch**  
Vice President  
Seaview

**Anthony Roncalli**  
Vice President  
Fire Island Pines

**Thomas J. Schwarz**  
Vice President  
Lonelyville

**Louis J. Pennachio**  
Director Emeritus  
Davis Park

(Ex Officio)

**Scott Rosenblum**  
Mayor  
Saltaire

**Joseph C. Loeffler, Jr.**  
Mayor  
Ocean Beach

April 16, 2007

**Mr. Steve Kelley, FAA—NAR**  
c/o Michael Merrill  
12005 Sunrise valley Road  
Reston VA 20191

Re: Comments on Noise Mitigation Plan for  
NY/NJ/PHL Metro Airspace Design

Dear Mr. Kelley:

The Fire Island Association represents the interests of more than 3,500 owners of residential and business property in 17 communities within the Fire Island National Seashore. Fire Island is a 32-mile barrier island that also protects the south shore of Long Island. The airport of greatest interest to our members, and hundreds of thousands of Long Islanders to our north, is Islip/MacArthur.

We have reviewed the information provided on the proposed departure pattern for metro-New York airports. We are concerned that, as drafted, the proposal would concentrate traffic precisely over the most heavily populated part of Fire Island, as well as over a large, heavily populated mainland area, in preference to the current pattern. The latter has a minimal impact as it directs departures over the ocean. Moreover, we understand that new satellite navigation procedures are able to focus traffic over smaller geographic regions, and this could increase the impact on Fire Island communities.

Islip flights have been increasing rapidly, with a 56 percent increase expected between 2000 and 2011. This will have a negative impact on the Fire Island National Seashore and its communities even under present traffic patterns. There are fewer and fewer places on Long Island where low background sound levels can be experienced in a natural setting. Maintaining those still in existence is critical to the many for whom the Seashore is a refuge.

Accordingly, we request that you consider alternatives that reduce, rather than increase, overflights of Fire Island National Seashore. If this is not possible,

Mr. Steve Kelley  
April 16, 2007  
Page Two

please examine other measures that will reduce the number of park visitors and residents impacted.

The Association will appreciate receiving a copy of any decision document and/or final environmental impact statement issued in connection with the proposed flight pattern.

We appreciate the opportunity to comment on this issue.

Sincerely,



Gerard Stoddard  
For the Directors

cc. Hon. Timothy W. Bishop  
1<sup>st</sup> Congressional District  
3680 Route 112  
Coram NY 11727

Hon. Steve J. Israel  
2<sup>nd</sup> Congressional District  
150 Motor Parkway  
Hauppauge NY 11788

Hon. Steve Levy  
Suffolk County Executive  
PO Box 6100  
Hauppauge NY 11788

Michael T. Reynolds, Superintendent  
Fire Island National Seashore  
120 Laurel Street  
Patchogue NY 11772

Brian Foley, Supervisor  
Town of Brookhaven  
One Independence Hill  
Farmingville NY 11738

Phil Nolan, Supervisor  
Town of Islip  
655 Main Street  
Islip NY 11751

Joseph C. Loeffler, Jr., Mayor  
Inc. Village of Ocean Beach  
PO Box 457  
Bay Shore NY 11706

Scott Rosenblum, Mayor  
Inc. Village of Saltaire  
PO Box 5551  
Ocean Beach NY 11770

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**From:** tstull@ups.com  
**Sent:** Friday, May 11, 2007 4:43 PM  
**To:** Nagendran, Ram  
**Subject:** Comment on Noise Mitigation Procedures for the Preferred Alternative

- **Last Name:** Stull
- **First Name:** Timothy
- **Email Address:** tstull@ups.com
- **Street Address:** 825 Lotus Ave
- **City:** louisville
- **State:** Kentucky (KY)
- **Zip Code:** 40213

**Comments:**

Dear Sir or Madam,

We have reviewed the NY / NJ / PHL Metro Airspace Redesign draft EIS “Noise Mitigation Report” and the “Operational Analysis of Mitigation of the NY/ NJ / PHL Airspace Redesign” and have the following comments.

Regarding section 8 of the “Operational Analysis of Mitigation of the NY/ NJ / PHL Airspace Redesign” concerning the EWR Night-time Ocean Routing, we believe that this routing would cause a significant operational burden to UPS. The additional 7.4 minutes of flight time (as estimated by the FAA) required for each of our departures that would be required to fly the procedure would generate considerable costs as well as the potential for significant down-line disruption to our network.

The proposed routing would impact a total of 19 of the most critical flights in our system each week (under UPS’ current operating schedule) approximately 50% of the time, based on current runway utilization. Variable costs of the additional flight time alone are conservatively estimated at \$450,000 to \$500,000 per year based on a \$2.11 per gallon fuel cost. True cost of the additional flight time would be much higher were we to consider fixed ownership costs. The down-line impact cost to our network is not precisely estimatable at this time, but suffice it to say that shipments out of New York for our customers are of significant economic importance.

We would offer two alternatives to the EWR Night-time Ocean Routing. The first would be to simply handle the night time and day time operations the same as the day time. The second would be to not start the use of the routing until midnight. This alternative offers a large measure of appeal in that the residents of New Jersey would attain some measure of relief while allowing the late afternoon operators increased operational flexibility for abnormal operations such as severe weather impacts. In addition, by moving the start time to midnight, all of UPS’s would escape impact.

Thank you for your consideration. Should you have any questions as to UPS’ stance on this or any other aspect of the proposed noise mitigation strategy, please feel free to contact me.

Tim Stull Manager – Air traffic Systems UPS 502-359-5704

tstull@ups.com

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[http://www.faa.gov/airports\\_airtraffic/air\\_traffic/nas\\_redesign/regional\\_guidance/eastern\\_reg/nynjphl\\_redesign/noise\\_mitigation\\_comments/](http://www.faa.gov/airports_airtraffic/air_traffic/nas_redesign/regional_guidance/eastern_reg/nynjphl_redesign/noise_mitigation_comments/)

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5/15/2007



**THE PORT AUTHORITY OF NY & NJ**

May 11, 2007

*William R. DeCota*  
Director

Mr. Steve Kelley  
c/o Ram Nagendran  
12005 Sunrise Valley Drive, MS c3.02  
Reston, VA 20191

Dear Mr. Kelley:

The Port Authority of New York & New Jersey has spent considerable time and attention in reviewing the Federal Aviation Administration's (FAA) preferred alternative from the Draft Environmental Impact Statement for the NY/NJ/PHL Airspace Redesign Project (DEIS), as well as their Mitigation Measures that were developed to reduce the noise impacts created in the original DEIS. This letter identifies our response to these documents.

We are somewhat encouraged that the FAA listened to some of the public's comments and tried to improve the original DEIS procedures. We believe that this effort was a sincere attempt to improve the procedures and reduce the noise increases imposed on communities underlying the new flight paths. However, we continue to be very discouraged by the lack of any new ideas, and the basic disregard of many of the suggestions submitted by this agency and the public.

Specifically, the headings used at EWR for Runway 22 departures, while reducing some of the initial noise impacts, continue to impact on residential communities in Elizabeth. The procedures developed to employ the various new headings are also very difficult to administer. The procedures require the controllers to use different headings based on the volume of traffic. The change in heading use requires increased coordination between tower and Tracon controllers based on traffic conditions. This added complexity will increase controller workload during busy periods and has the ability to degrade safety by causing confusion due to the changing headings used at different times. Controllers must remember which headings are in place at any one time and they can change often based on the volume of traffic. This element will increase complexity, and based on the FAA's own assertion, increased complexity equates to decreased airport throughput. Thus, our fear is that this initiative may be counterproductive.

The EWR departure noise mitigation changes from the DEIS baseline results in no benefits to communities in the 45 through 65 DNL contour areas. These areas are usually further away from the airport than areas above 65 DNL. Yet the FAA still insists on a nighttime oceanic routing proposal that was identified as not meeting the purpose and need in the DEIS. Routing aircraft over 150 miles out of their way when it doesn't produce any noise benefits is environmentally irresponsible. This added mileage will produce tens of thousands of added tons of greenhouse gas emissions each year. In a region that is already a non-attainment area by government standards, adding extra miles with no benefit just does not make sense.

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007407  
1812  
(incl. DEIS Comm)



In addition, we disagree with the FAA on the operational impacts of the nighttime oceanic routing. Both LGA and JFK airport are very busy in the hours between 10:30 pm and midnight. These airports generate over 100 operations during this time period, and interaction with EWR departures flying the oceanic routing will increase traffic complexity and controller workload, both of which have potential to significantly delay aircraft. Delays at this time are often exacerbated due to historically lower FAA staffing levels, and crew time requirements are also at critical levels. We think the FAA needs to look at actual summer schedules and determine the potential of this procedure to produce large delays.

Finally, we are encouraged that some “tweaking” of the DEIS procedures produced noise benefits to areas close in to LGA. However, we believe that the increased use of the LDA procedure can and should be implemented now, and not wait for the Record of Decision. This procedure has been in place for many years and we are not sure why the use has waned in the last year. However, because there are no new procedures required for this mitigation measure, and it has historically been used in the past, the FAA should mandate its increase usage as soon as practical.

Overall, there are some benefits through the use of a few of the proposed mitigation procedures. But greater benefits both operationally and environmentally can and should be evaluated in a brand new alternative that looks at major changes close into the airports. Minor adjustments, while marginally better, do not address the public comments that have been received throughout this process. More can and should be done to improve upon what was started in the DEIS. We urge the FAA to take a closer look at the terminal airspace routes and develop a new alternative. This is a once in a lifetime chance to improve the flow of traffic in this region, to reduce the record level of delays, and to greatly improve the environmental impacts on our airport neighbors.

Rather than summarily rejecting proposals, once again we urge the FAA to consider proposals such as those we articulated in our comments on the DEIS, which are attached for you reference. We do believe that by entertaining these new proposals the redesign effort will be strengthened and the outcomes vastly improved.

Thank you very much for the opportunity to comment.

Sincerely,

William R. DeCota  
Director  
Aviation Department



**THE PORT AUTHORITY** OF NY & NJ

*William R. DeCota*  
Director

June 5, 2006

Mr. Steve Kelley, FAA-NAR  
c/o Michael Merrill  
12005 Sunrise Valley Drive, MS C3.02  
Reston, VA 20191

Dear Mr. Kelley:

The Port Authority of New York and New Jersey is one of the largest airport operators in the world. We operate 4 major airports and a downtown heliport in one of the most populated regions of the U.S. Last year we had 99.8 million passengers pass through our terminals, and we handled over 1.4 million flights.

Our airports support \$57 billion in economic activity, and 500,000 jobs as well as serve as the gateway to the world for millions of Americans, and the doorway to America for millions of our worldwide guests. Air transportation is a necessity to many of our local businesses. As the caretaker of these valuable assets, the Port Authority has a strong vested interest in the Air Traffic System.

We appreciate the FAA's initiative to redesign the airspace in the New York/New Jersey Metropolitan Region. We have reviewed the FAA's NY/NJ/PHL Airspace Redesign Draft Environmental Study and are pleased to submit the attached comments.

Sincerely,

Tom Bock  
General Manager  
Airspace and Operational Enhancements

*Aviation Department*  
225 Park Avenue South, 9th Floor  
New York, NY 10003

## **FAA NY/NJ/PHL Airspace Redesign Comments**

The Federal Aviation Administration's (FAA) Draft Environmental Impact Statement dated December 2005 identifies possible alternative routing changes designed to improve operational efficiency and reduce delays at all four Port Authority airports. The Port Authority of NY & NJ has reviewed this draft document extensively because of the great importance to the New York Metropolitan Region.

The development of an improved route structure is long overdue. Air traffic has continued to grow steadily over the last 30 years. While some route adjustments were made in the late 80's and early 90's there have been major changes in aircraft flying the routes in the last 15 years and the National Air Transportation System needs to change accordingly.

The three major New York/New Jersey metropolitan airports are the most delayed airports in the country. Even with JFK and LGA still under the protection of the High Density Rule, delays have continued to soar. Many of the delays are the result of airspace constraints, and not airport limitations.

At the same time, there are still a number of people in the region suffering the affects of aircraft noise. Regionally, the number of people exposed to noise has decreased in the last 2 decades from 2 million to approximately 100,000 but even residents outside of the Federally designated noise contours are asking for further relief.

The NY/NJ/PHL Airspace Redesign Draft Environmental Impact Statement (DEIS) discusses five alternative solutions to reduce delays and improve airspace efficiency. The nearly 1500 pages of data, charts, and explanation were carefully examined because of the importance of the FAA's redesign efforts to flight delays and noise for area communities. In that vein, the Port Authority offers the following comments.

### **Importance of Airspace Redesign**

There are many things that are being done to address the capacity problem like new technology, new navigational aids, etc. In the Port Authority's view, however, one of the most significant initiatives that are underway is the FAA Airspace Redesign Initiative. Air routes are not unlike a ground roadway network of highways that require good transportation planning. The way the FAA plans them and lays them out determines how well the traffic flows. Currently, regional flight patterns contain many choke points. It is because of issues like this that the FAA has been tasked with the challenge of reviewing, redesigning, and restructuring the nation's airspace to meet the rapidly changing and increasing

operational demands on the National Airspace System (NAS). The Port Authority fully endorses the FAA's Airspace Redesign objectives which include increasing efficiency, increasing reliability of the airspace structure and air traffic control system, accommodating growth while maintaining safety, mitigating delays and accommodating changes in the types of aircraft using the system.

### **Airspace Redesign Alternatives**

The DEIS is a decision making tool for the FAA that will help them decide the course of this effort with formal public comment. There are 5 alternatives that the FAA has put forward for further review.

The Baseline is no action, which is a requirement of the national environmental policy act under which the study is being conducted. The airspace would continue to operate as it does now although traffic is expected to increase over the next 15 years. Clearly do nothing is not an acceptable outcome.

The second is Oceanic Routing. This proposal is in response to noise concerns brought by the NJ Citizens Against Aircraft Noise. It moves all EWR departures along the Raritan Bay to the Atlantic Ocean before returning westbound. Ocean Routing doesn't accomplish the objectives of the study and, in fact, limits regional airport capacity. Ocean Routing is discussed further below.

The third alternative involves modifications to Existing Airspace. It essentially calls for splitting a major westbound airway into two separate ones and it also fans EWR departures. This alternative provides no huge delay reductions or true capacity increases.

There are two integrated airspace alternatives. This is the most comprehensive of the four alternatives and would be carried out in multiple phases. It calls for two major air traffic control centers in the region – the New York Center located at Islip McArthur airport and the N.Y. TRACON located in Garden City, N.Y. – to operate in a more consolidated manner or to replace them with an integrated control complex. Either would improve safety by reducing voice communications. They would also expand the terminal area airspace, increasing it to an altitude of 23,000 feet from 17,000 feet to provide greater flexibility. These alternatives, which are crucial to achieving the most benefits, are also discussed further below.

### **Ocean Routing**

Oceanic Routing is discounted because it does not meet the purpose and need of the study, yet it is analyzed in the document. The Port Authority of NY & NJ has serious concerns that the FAA kept this alternative in the document for future

consideration. The Oceanic Routing alternative, if implemented, will significantly increase delays at Newark Liberty International Airport (EWR), which is already the single most delayed airport in the country. Implementing the Oceanic Routing Procedure will cripple the local economy, force passengers and airlines to other airports, and radically increase the disruption on major roadways, and on air quality in the region. It will also tax utilities and infrastructures in other airport locations such as JFK International Airport (JFK) and LaGuardia (LGA) as more passengers avoid EWR. Prior to any additional consideration of this alternative, the FAA must do further study on the air quality and water quality impacts of the shift in demographics of local airport usage. While economic impact is not a normal study area in an environmental study, a separate economic impact on the local economy caused by a radical reduction in airport capacity must be completed and shared with the community and elected officials before this alternative can be given further consideration. If the FAA is serious about delay reduction, then Oceanic Routing needs to be eliminated from all future consideration.

### **The Integrated Control Complex Alternative**

While the other two alternatives all present some benefit in delay reduction, clearly the best of these alternatives based on the metrics utilized by the FAA in the DEIS is the Integrated Airspace Design with the Integrated Control Complex (ICC). The ICC plan adds a needed west departure fix and adds 2 additional westbound routes. It also provides JFK the ability to utilize many of the metro departure fixes that are unavailable today. Fanned headings off more runways at LGA are also a benefit of this alternative. The use of the two parallel runways at EWR for arrivals is a positive step to reduce delays. However, the FAA needs to model the use of both parallels for both arrivals and departures to realize the true benefit of this technique. Using 2 runways for arrivals and only one for departures will exacerbate delays and ultimately saturate the airfield.

Overall, the capacity benefits of airspace redesign are not great. According to the FAA's information, even with redesigned airspace, LGA can only run 80 operations per hour; EWR can possibly increase to 106 operations per hour and JFK can only accommodate 104 operations per hour. We find it hard to believe that EWR with 2.5 runways can run more operations than JFK with 4 large runways. Maximization of JFK needs to be addressed. As discussed later in the Port Authority's comments, more can be done to help improve capacity and reduce delays.

The Assumption on the ICC plan is that it will take an integrated facility, in other words, the 300+ staff from the New York Center in Ronkonkoma and the 200+ staff in the New York Tracon in Westbury, N.Y. and move them to a single building. In light of the current state of the FAA budget, the trust fund deficits, and other high priority projects it is not realistic to think the FAA will be able to

come up with the capital dollars to construct a new facility and equip it with state of the art air traffic systems. Also, the FAA pay scales are currently tied to the facility traffic counts, and the new facility will be the largest in the country, further escalating costs in the already highest paid FAA facilities. The other alternatives that do not include the ICC are not worth the cost and time commitments to achieve the minimal benefits. The FAA needs to come up with a "cheap" alternative method of implementing the ICC plan in a relatively short timeframe. We believe that it is possible to develop terminal sectors and equip the existing air traffic facilities to achieve the same benefits, especially if the management structure is changed. This needs to be addressed in the final EIS.

### **Analysis of Noise Impacts**

The FAA needs to remain mindful that all improvements to airspace capacity result in noise impacts. The FAA has said that mitigation techniques are under consideration. The ICC plan, while providing the best operational benefit also produces the most noise for outlying communities. During scoping meetings the FAA outlined the purpose and need of the Airspace Redesign project. While noise reduction was not in the FAA's purpose and need for the project, the FAA promised to look at noise and reduce aircraft impacts where practical. The Port Authority is very disappointed that the FAA has not addressed noise in any of the alternatives. The explanation given during the community meetings is that the alternatives presented are the best operational alternatives and the FAA will look at noise reduction as part of a mitigation strategy later. The Port Authority respectively disagrees with the FAA in this assertion. The amount of time and money that went into providing alternatives that are very weak at best from an operational standpoint could only be improved if the FAA included some noise measures as part of the plan. For example, Newark Runway 22 departures are fanned to provide multiple headings to expedite departures. The FAA uses straight and right turns as part of this strategy. The Port Authority asserts that the existing noise abatement procedure with a left turn over portions of the Arthur Kill and away from residential areas would not only improve departure flows and reduce delays, it would also decrease noise exposure to residents of Elizabeth, N.J. the area hardest hit by these alternatives.

Similarly, the FAA ICC alternative depicts arrivals into EWR Runways 22L/R from the south at altitudes of 5,000 & 6,000 feet. These aircraft fly on longer tracks than today's traffic, even with arrivals programmed to the two parallel runways. With some major modifications to the terminal airspace the FAA should examine moving those tracks closer to the airport at higher altitudes to reduce noise and provide for unrestricted departure climb corridors, improving efficiency and reducing noise impacts.

Moving to LGA, the noise produced by LGA traffic over flying Rikers Island appears to be a modeling error. In the Port Authority's analysis, we believe that

the tracks turn prematurely, and that actual departure tracks will proceed more in a straight line prior to initiating a turn due to the carriers' inability to turn below 400 feet. Also, with larger aircraft planned to utilize the airport in the future, the turn rates will be slower and aircraft will turn just north of Rikers Island.

As a consequence of the many years necessary to develop a complete airspace redesign some FAA assumptions and estimates were extrapolated based on the operational experience of year 2000. This approach resulted in over stating the likely number of operations for model year 2006 at EWR and JFK. Similarly, based on information we have of operations for 2005, the anticipated fleet-mix of our airports is likely to be significantly different at some airports from that which was estimated for 2006 and 2011 in the redesign models. This differential is important in that it is an objective of the FAA's "Purpose & Needs" that the system be designed to accommodate aircraft type changes. Given the operation levels known for 2005, the numbers of people impacted by aircraft noise should be less than those projected for 2006 at EWR and JFK. However, the noise generated is still a concern and needs to be addressed. Also, the anticipated maximum hourly runway throughputs may be somewhat changed by fleet-mix changes and should be remodeled.

More consideration should be given to time-of-day sequencing of runway utilization and land-use compatibility options. These are particularly important aircraft noise abatement considerations at EWR in light of the fact that so many new people are to experience significant noise. The FAA's estimate of 5,480 people significantly impacted by aircraft noise does not tell the whole story. In fact, a large percentage of this group will be newcomers to the significantly impacted status without any previous experience in that position. Usually, the populace within an aircraft arrival or departure corridor has been exposed to aircraft noise to varying degrees over many years. The FAA proposed dispersed departure headings at EWR will introduce many people in the City of Elizabeth to significant aircraft noise for the first time in areas they believed to be free of over-flights. In addition, tens of thousands more people in less significant noise zones will be experiencing aircraft over flights that they did not previously experience. The FAA needs to look at ways to mitigate this noise increase for so many people.

There is a north-south corridor south of EWR that encompasses the Elizabethport section of Elizabeth, Carteret, and the northwest corner of Staten Island. The corridor is bounded by the New Jersey Turnpike to the west, the Arthur Kill waterway in its mid-section and Route 440 and the Fresh Kills landfill in Staten Island to the east. The corridor bounds as defined roughly equate to headings off of RW 22R of between 190 and 220 degrees. This area has served as the airport's arrival/departure corridor for decades and for the most part its acreage is aircraft noise land-use compatible consisting mostly of marshland, highways, railroad sidings, shopping malls, transportation, petroleum refining, and petroleum storage facilities.

In our efforts to find headings off of R/W 22R with the least noise impacts we loaded the FAA's INM model version 6.1 with year 2000 operations and year 2000 census data. We ran about a dozen scenarios including time of day heading use to reduce nighttime exposure by comparison to our Future No Change year 2000 base case. Though these attempts were crude, using a handheld protractor to establish headings, the results we were seeking were not to be exact numbers but rather indications as to potential noise benefits. Given our interest to keep aircraft noise disturbances to a minimum, while seeking multiple headings to improve maximum throughputs, we let the 65+ DNL contour be our guide.

Our various heading results substantiated the positive influence of time of day heading use to reduce aircraft noise impacts and the benefits of utilizing land-use compatible areas for over-flight pathways. The chart in Appendix 1 ranks the top heading alternatives on the basis of those impacting the least numbers of people with regard to aircraft noise based on year 2000. Staying within the land-use compatible corridor is helpful in lowering noise impacts, particularly at night. Of particular note, is how close the 65+ numbers are among the alternatives and how greatly they diverge as you move out to 60+ and 55+.

### **More Can Be Done**

While the FAA's NY/NJ/PHL Airspace Redesign is a good start, more can and should be done to further reduce delays and improve the efficiency of the airports and airspace in the northeast U.S. This Airspace Redesign Process is a once in a lifetime chance to make all the changes necessary for the next 40 years. The FAA needs to maximize the utilization of the airspace and ensure that the airports can meet consistent maximum throughput numbers. Artificial restrictions on arriving and departing aircraft due to archaic separation standards, nose-to-tail spacing of enroute aircraft, and sector volume restrictions need to be eliminated.

While the ICC plan is clearly the best from an operational analysis, it barely "tweaks" the terminal airspace that by the FAA's own assertion has not been changed since the 1960's. The FAA needs to go back and re-look at the terminal airspace as part of this redesign process. Newark Liberty International is the most delayed airport in the country. The airspace allocated to Newark controllers hasn't changed since the 1960's and with this redesign process it doesn't change much either. There clearly was no major overhaul in the development of the terminal tracks, just a minor tweak to fit the new enroute designs where the major changes in airspace occur. We find this to be of concern since the terminals are where the delays occur and the largest noise impacts are produced.

The FAA must look at expanding the Newark Airspace to the east to allow Newark controllers to run arrivals or departures along the Hudson corridor. This would greatly improve the efficiency of EWR and reduce-conflicts with TEB traffic. It would also provide much needed noise relief in the area around the airport. Currently LGA traffic occupies the Hudson River corridor. If these aircraft are shifted east there may be additional benefits achieved by sequencing over the Long Island Sound.

In addition, additional airspace capacity enhancing measures are still required. Every year the FAA publishes an updated version of what it calls its Aviation Capacity Enhancement Plan. It contains a summary of the significant accomplishments and near term goals of FAA related programs, technologies and initiatives affecting the capacity of the National Airspace System. The ACE Plan discusses various approaches to enhancing airport and airspace capacity with the goals of meeting the levels of demand, improving efficiency in air traffic flow, (particularly, in the 8 metro areas or corridors with the most delay which includes New York), and improving the on-time performance of scheduled carriers. The FAA relies on procedural and technological investments to increase airspace capacity and, while those approaches are also useful to increase capacity in the airport environment, airport capacity is most directly enhanced by building new runways or other airfield infrastructure.

There are many things that the FAA and key stakeholders are doing to work together to chart a plan to meet the demands for the next century of flight. First, there are operational procedures. The FAA is continually enhancing the procedures governing the operation of aircraft in the National Air Transportation System. Procedural changes are implemented to increase airspace capacity, take advantage of improved aircraft and avionics performance, and maximize the use of runways or simply to make the existing air traffic management system work more efficiently. Although less expensive and time consuming than other capacity-enhancing solutions, like building new runways, new procedures are a complex project. In addition, both air traffic controllers and pilots must be trained before new procedures can be implemented. Examples of new procedures include reduced vertical separation minimum; reduced horizontal separation minimum and simultaneous approaches to closely spaced parallel runways.

Transformation of the air traffic control system also holds capacity benefits. The National Airspace System is the largest and most complex aviation system in the world. A more efficient use of the National Airspace is the chief objective of the transformation of this system. In fact there is a revolution in the making in air navigation, which includes several important concepts. For example, free flight will give pilots the flexibility to select their own routes consistent with safety and limited in only certain situations such as to ensure separation at high traffic airports and congested airspace or to prevent unauthorized entry into special use airspace such as the military.

Over the last couple of years, we have also been working with the FAA using FAA funding to identify feasible and cost-effective alternatives for reducing delay and congestion at our airports through airport capacity enhancement. The tasks that the studies entail include developing on-airport alternatives for enhancing capacity; analyzing operational benefits; estimating improvement costs; conducting cost/benefit analyses; identifying the most feasible alternatives; assessing the benefits of a new generation of FAA Aircraft Control Technologies; and producing a final report.

## **Summary**

In summary, the DEIS is a step in the right direction as a way to alleviate delays at all metropolitan area airports, only if the FAA discounts the oceanic routing proposal. However, the best of the alternatives doesn't go far enough, and it produces a huge noise impact to local communities. The Port Authority requests that the FAA redesign the terminal portion of the airspace to improve the traffic flows to further increase efficiency and reduce noise impacts, especially adding back noise abatement headings off of Runway 22L/R at EWR as part of the fanned headings. EWR needs to be modeled utilizing two parallel runways for departures, and airspace needs to be adjusted to allow EWR to utilize the Hudson corridor for arrivals/departures. Night-time noise reduction procedures need to be utilized. The FAA needs to further develop methods to "cheaply" implement the ICC plan with the above changes added. This is a once in 40 years opportunity, and we need to build for the next 40 years, not the current structure. The FAA needs to think out of the box and come up with better and wiser terminal airspace changes, that utilize state of the art navigation and consistently maximize throughput at all our airports.

## Appendix 1

### Analysis of Top Heading Alternatives Based on Aircraft Noise Impacts

Degree Headings off R/W 22R	65+ DNL	60+ DNL	55+ DNL
195--10pm-7am-100%	22,098	53,310	305,048
195--7am-10pm-50%			
215--7am-10pm only-50%			

195--10pm-7am-100%	21,098	60,413	329,390
195--7am-10pm-33%			
215--7am-10pm.only-33%			
240--7am-10pm only-33%			
200--10pm-7am-100%	2,938	62,819	332,897
200--7am-10pm-33%			
220--7am-10pm.only-33%			
240--7am-10pm only-33%			
200--10pm-7am-100%	20,201	68,571	366,277
200--7am-10pm-33%			
240--7am-10pm.only-33%			
260--7am-10pm only-33%			
Base-case –Actual 190--24hrs	19,062	49,068	331,857

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**From:** T-rowley@cranfordnj.org  
**Sent:** Friday, May 11, 2007 10:58 AM  
**To:** Nagendran, Ram  
**Subject:** Comment on Noise Mitigation Procedures for the Preferred Alternative

- **Last Name:** Rowley
- **First Name:** Tara
- **Email Address:** T-rowley@cranfordnj.org
- **Street Address:** 8 Springfield Avenue
- **City:** Cranford
- **State:** New Jersey (NJ)
- **Zip Code:** 07016

**Comments:**

The following resolution was adopted by the Township Committee of the Township of Cranford at its meeting of May 8, 2007.

A certified copy of said resolution to be sent via regular mail.

Very truly yours,

Tara Rowley Township TOWNSHIP OF CRANFORD CRANFORD, NEW JERSEY

RESOLUTION NO. 2007-201

**RESOLUTION TO PROHIBIT INCREASED AIRPLANE NOISE OVER CRANFORD**

WHEREAS Cranford, NJ and surrounding region will be directly affected by the Federal Aviation Administration's (FAA) effort to increase the efficiency and reliability of air space structure and Air Traffic Control (ATC) system through their proposal to redesign the airspace in the metropolitan area of New York, New Jersey, and Philadelphia (NY/NJ/PHL); and

WHEREAS, in December 2005, the FAA issued a Draft Environmental Impact Statement (DEIS) containing "Modified" and "Integrated Airspace" proposals to redesign NY/NJ/PHL Metropolitan Airspace which would redirect previous southward air traffic from Newark International Airport (EWR) instead to a westward path, moving traffic from non-inhabited industrial areas south of EWR and instead directing it over highly populated residential communities to the west, including Cranford, NJ and adding a second layer of flight over said region; and

WHEREAS the goal of the proposals is simply to increase capacity and efficiency of air carriers and does not take into account the harmful effects upon the communities impacted, in fact discarding previous noise abatement efforts and procedures e.g. despite the 2001 determination that aircraft noise pollution was the strongest and most widespread concern raised by the public, the FAA failed to include the reduction of aircraft noise as a formal goal of its regional redesign project; and

WHEREAS those proposed actions in fact i) have very small projected capacity increase with FAA admitting that none of the originally proposed plans would result in major improvements in delays or throughput, but ii) have potentially significant negative impacts for afflicted residents, directly affecting quality of life, property values, air pollution, hearing, and wellbeing, raising environmental and safety concerns for the state and would cost an estimated \$2.5 billion; and

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WHEREAS, in March 2007, the FAA announced their “Integrated Airspace with Integrated Control Complex (ICC)” design as its Preferred Alternative for the Metropolitan Airspace Redesign, indicating that Cranford would not suffer significant increases in air traffic noise; and

WHEREAS the Air Traffic and Noise Advisory Board of Union County indicates that this selection i) has the highest noise impact of the alternatives considered and would bring more noise to hundreds of thousands of New Jersey residents, ii) incorporates inadequate mitigations, iii) does not take into account all reasonable alternatives e.g. more easterly flight paths that take advantage of the large, relatively unpopulated non-residential space east of current flight paths, iv) based on grossly inadequate information of noise, modeling, and assumptions, v) offers weak benefit for FAA at high cost to afflicted residents and communities; and

WHEREAS numerous surrounding towns, the Union County Board of Freeholders, our New Jersey State Legislators and Governor, and U.S. Senators (and Congressman??), the Port Authority of New York and New Jersey, the New Jersey Coalition Against Air Noise, and the Union County Air Traffic Advisory Board are in accordance with our concerns regarding this serious issue impacting residents; and

BE IT RESOLVED that the Township of Cranford strongly opposes the proposed “westward fanning out” of south-flow departures from EWR and any related action that i) will increase air traffic, lower altitudes of flight patterns, and/or increase noise over Cranford and surrounding region and ii) does not bring significant decrease in related airplane noise and other detriments of increased air traffic upon our community, region, and residents’ health, well being, and quality of life; and

BE IT FURTHER RESOLVED that copies of this resolution will be forwarded to the Union County Board of Chosen Freeholders, as well as our State Assemblymen Bramnick and Munoz, State Senator Kean, U.S. Congressman Ferguson, U.S. Senators Lautenberg and Menendez, Governor Corzine, President Bush, and the Administrator of the FAA, with recommendation that they take and/or continue to take all reasonable measures to oppose and prevent implementation of the FAA proposals that do not decrease airplane noise and its related consequences on our residents, community, and region.

Certified to be a true copy of a resolution adopted by the Township Committee of the Township of Cranford at a meeting held May 8, 2007.

\_\_\_\_\_ Tara Rowley, RMC Township Clerk Dated:

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007345

5/15/2007

007329

**From:** shapiro@localnet.com  
**Sent:** Friday, May 11, 2007 12:42 PM  
**To:** Nagendran, Ram  
**Subject:** Comment on Noise Mitigation Procedures for the Preferred Alternative

- **Last Name:** Shapiro
- **First Name:** Brian
- **Email Address:** shapiro@localnet.com
- **Street Address:** 244 Fair St.
- **City:** Kingston
- **State:** New York (NY)
- **Zip Code:** 12401

**Comments:**

Steve Kelley, FAA c/o Ram Nagendran

Mr Kelley

Thank you accepting input from the Ulster County Legislature on this important issue. I have enclosed an attachment of Resolution #187, which strongly supports a reduction of noise impact on regional parkland areas. We believe it is in the interest of the all members of the public, particularly in the NY / NJ region, for the FAA to support specific areas of 'less impact,' especially given the influx and interconnectivity of the Catskill region with metropolitan NY / NJ in the post 9/11 period.

Again, thank you kindly for accepting this submission to the scoping process.

Brian Shapiro Chair, Ulster County Environmental Committee Ulster County Legislator, District 2

Resolution 187 May 10, 2006 CALLING FOR A REDUCTION OF NOISE IMPACTS FROM NEWARK AND WESTCHESTER JET ARRIVALS ON THE PUBLIC, PROTECTED CATSKILL AND SHAWANGUNK PARKLANDS

The Environmental Committee (Chairman Shapiro and Legislators Bartels, Distel, R.A. Parete, Rodriguez, Fabiano and McAfee) and Legislator Kraft offer the following:

WHEREAS, Ulster County has a longstanding history of protected parklands (Catskill State Park, Mohonk Preserve and Mountain House, Minnewaska State Park Preserve and Sam's Point Preserve) that provide places of natural quiet and are central to the tourism economy of the area, and WHEREAS, major jet arrivals from Newark and Westchester airports with flight altitudes as low as 7000 feet should not be routed over the public, protected parklands of the Catskills and Shawangunks, and WHEREAS, in order to protect the airspace of the Catskills and Shawangunks, planes should be kept as high as possible for as long as possible when approaching metropolitan airports, and

WHEREAS, a mid-level intersection at 7,000 to 11,000 feet creates an adverse impact over public, protected parkland but is not noticed over a city or transportation corridor, and WHEREAS, the Federal Aviation Administration (FAA) has not included noise mitigation for Ulster County in the draft environmental impact statement for the airspace redesign.

RESOLVED, the Ulster County Legislature calls upon the FAA to mitigate or reduce, to the greatest extent practicable, noise from Newark and Westchester jet arrivals over the Catskill and Shawangunk parklands in Ulster County, New York, and FURTHER RESOLVED, that the Clerk of the Ulster County Legislature shall forward copies of this

5/15/2007

resolution to President George W. Bush, Governor George E. Pataki, Comptroller Alan Hevesi, United States Senators Hillary Rodham Clinton and Charles Schumer, United States Congressman Maurice Hinchey, Senate Majority Leader Joseph Bruno, Senate Minority Leader David A. Paterson, Assembly Speaker Sheldon Silver, Assembly Majority Leader Paul A. Tokasz, Assembly Minority Leader James N. Tedisco, New York State Senators John J. Bonacic and William J. Larkin, Jr., New York State Assemblymen Kevin Cahill, Clifford Crouch, Daniel Hooker and Thomas Kirwan, the National Association of Counties, the New York State Association of Counties, Steve Kelly (FAA-NAR), (c/o Nessa Memberg, 12005

Sunrise Valley Rd. C302, Reston, VA 20191), Marion C. Blakey, Federal Aviation Administrator, (800 Independence Ave. SW, Washington, DC 20591), Nancy D. LoBue, Deputy Assistant Administrator for Aviation Policy, (Planning and Environment, 800 Independence Ave. SW, Washington, DC 20591), Carl E. Burleson, Director, Office of Environment and Energy, (800 Independence Ave. SW Washington, DC 20591),

and moves its adoption.

ADOPTED BY THE FOLLOWING VOTE:

AYES: 31 NOES: 0 (Legislator Stoeckeler left at 10:05 PM) (Absent: Legislator Every)

FINANCIAL IMPACT: NONE

0522

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**From:** susanstaples@netzero.net  
**Sent:** Thursday, May 10, 2007 7:47 PM  
**To:** Nagendran, Ram  
**Subject:** Comment on Noise Mitigation Procedures for the Preferred Alternative

- **Last Name:** staples
- **First Name:** SUSAN
- **Email Address:** susanstaples@netzero.net
- **Street Address:** 58 Spongia Rd
- **City:** stone Ridge
- **State:** New York (NY)
- **Zip Code:** 12484

**Comments:**

Comments on Noise Mitigation Report

May 10, 2007

Contradictory statements in the Noise mitigation table and lack of operational analysis in the Noise Mitigation Report make it impossible for our group, Ulsterites Fight Overflight Noise, to comment meaningfully on the proposed mitigation measure for reducing the impacts of Newark arrivals (V213) on the protected parklands of the Catskill Preserve and Shawangunk Ridge (Minnewaska Park Preserve and Sam Point Preserve). The report reads that moving V213 closer to the I-87 is a measure that failed to pass the initial screening yet the table comments indicate that it is part of the Integrated Airspace Alternative. The office of our Congressman, Maurice Hinchey, called for clarification and was told that the measure failed the initial screening because noise levels were not high enough to justify mitigation. We feel that a meeting with a knowledgeable representative of the Redesign Project is necessary to obtain the information not presented in the report. This information is necessary for us to understand and comment on the determination made concerning this important mitigation measure that the residents and officials of this area have been advocating for almost 20 years since the Newark arrivals were routed over the parklands without any environmental assessment at the time of the Expanded East Coast Plan.

We need to know the methodology used to determine that noise levels are not high enough if, in fact, this was the determination. This is important because in the DEIS no noise measurements were taken on the Shawangunk Parklands and the models used to assess impacts on the Catskill Preserve were dominated by Part 150 methodology. The Part 150 averaging methodology was developed to determine significant impacts for areas next to large, urban developed airports and its appropriateness for assessing impacts in parklands where quiet is a basis for use is a current issue among professionals in the field (National Park Service, Grand Canyon legislation). Single event analysis has been used to more appropriately assess the audibility of noise in areas where quiet is a basis for use. Single event analyses would have been easy to conduct for the Shawangunk and Catskill locations yet they were not part of the noise assessment. In numerous earlier comments submitted during the pre scoping and scoping sessions in Kingston, NY we have asked for single event analysis and for clarification as to how the Noise Impact Routing Model would be used to assess the intrusiveness of overflight noise in areas of low ambient noise where quiet is a basis of use. We have yet to receive this information and feel this is necessary given the fact that the nature of our impacts (i.e, noise events that are twice as loud as the background noise levels) requires an appropriate methodology.

Sincerely,

Susan Staples

Ulsterites Fight Overflight Noise, Inc. 58 Spongia Rd. Stone Ridge NY 12484 (845) 687-9719

007160

5/14/2007

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007160

5/14/2007

**COUNTY OF MERCER**  
**DEPARTMENT OF TRANSPORTATION & INFRASTRUCTURE**  
**OFFICE OF THE DIRECTOR**  
McDADE ADMINISTRATION BUILDING  
640 SOUTH BROAD STREET  
P.O. BOX 8068  
TRENTON, NEW JERSEY 08650-0068  
TELEPHONE: (609) 989-6629  
Fax: (609) 396-3968  
[awatson@mercercounty.org](mailto:awatson@mercercounty.org)



**KELVIN S. GANGES**  
Chief of Staff

**BRIAN M. HUGHES**  
County Executive

**ANDREW A. MAIR**  
County Administrator

**AARON T. WATSON**  
Director

May 2, 2007

Federal Aviation Administration  
National Airspace Redesign Project  
Steve Kelley, FAA-NAR  
c/o Ram Nagendran  
12005 Sunrise Valley Road  
MS C3.02 Stop  
Reston, VA 20191

**RE: Comment on Airspace Redesign-  
Preferred Alternative Noise Mitigation Strategies**

Dear Mr. Kelley:

Consistent with Mercer County Executive Brian Hughes's commitment to maintaining a safe, economically vibrant, and environmentally friendly airport, I offer the following comments for your consideration in response to the New York/New Jersey/Philadelphia Airspace Redesign Preferred Alternative Noise Mitigation Strategies.

First, we would like the Federal Aviation Administration (FAA) to reconsider our request to remove current altitude restrictions on departures from Runway 6/24 at Trenton-Mercer Airport (TTN). Currently, aircraft traveling under Instrument Flight Rules (IFR) departing Runway 24 at TTN are forced to maintain an altitude at or below 2,000 feet due to a conflict with Philadelphia's airspace, located just a few miles west of our facility. In addition, aircraft departing Runway 6 are forced to maintain low altitudes due to a conflict with New York's airspace located to the east of TTN. Consequently, negative noise impacts are experienced by residents located underneath the departure corridor for these runways, and increase the cockpit workload for departing pilots.

Additionally, we request that the FAA review our previous request for installation of an Instrument Landing System (ILS) on Runway 24, since the existing equipment on Runway 6 is not capable of accommodating a "back-course" approach. There was legislative interest in pursuing this development and this was a recommended alternative identified in a Noise Abatement Report that was completed for the Airport a few years ago, based on prevailing winds and Airport usage. In this way, operating aircraft will have further options in terms of runway usage.

We would also like to be considered for the possible use of Controlled Descent Approaches (CDAs) at our facility. Available data on CDAs seem to indicate a reduction of aircraft noise, decreased emissions, and conservation of fuel for the aircraft operator.

Mr. Kelly  
Page 2  
May 2, 2007  
Re: Comment on Airspace Redesign

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As you may be aware, TTN and the County of Mercer are under a considerable amount of pressure from residents living near the Airport to reduce unwanted aircraft noise. While we have been reassured by FAA's assertions that the Preferred Alternative and the accompanying Mitigation Strategies will have a negligible impact on this County's residents in terms of aircraft related noise, we do understand that it will indeed increase the amount of aircraft traveling through this area. We ask that the FAA be open to further input from our elected officials and our residents in the coming months and years as this very complex, and very necessary redesign is implemented.

Your consideration in this regard will be greatly appreciated. If you have any questions, or require further details, please contact me at (609) 989-6629.

Sincerely,



Aaron T. Watson  
Director, Department of  
Transportation & Infrastructure

ATW/mgd

c: Justin P. Edwards, Airport Manager  
Garret Hengeli, Noise Abatement Specialist  
Jim Pate, Manager ATCT

Testimony of Rockland County Legislator Patrick Withers, District 12, covering Suffern, Chestnut Ridge, and Airmont New York.

6/28/07

Ladies and Gentlemen:

I'm here tonight on behalf of the people of Chestnut Ridge and Airmont in Rockland County whose quality of life would be disrupted by this ill-advised plan.

My name is Patrick Withers and I represent District 12 in the Rockland County Legislature.

Our quiet, suburban communities have struggled for years for adequate access to mass transit and suffered long commutes to regional air facilities. We should not bear the burden of an FAA plan that provides no benefit to our communities. This plan could raise decibel levels in our neighborhoods by over 30%. Environmental impacts, from noise pollution to air quality, abound. Most importantly, there has no input from our local communities. Federal bureaucrats should not make decisions about our communities without consulting us. The people of Airmont and Chestnut Ridge should not pay the price for the metro region's crowded skies. I urge you to send this plan back to drawing board, meet with our local officials and develop a solution that protects our communities.

*Thank you!  
Patrick Withers*

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