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

Great Lakes Region
2300 East Devon Avenue
Des Plaines, IL 60018

AUG 18 2011

Thank you for your letter of April 28, 2011, concerning the proposal by the Citizens Against Plane Pollution (CAPP) organization in Park Ridge to revise the nighttime departure procedures at Chicago's O'Hare International Airport. The Federal Aviation Administration (FAA) is sensitive to and shares your concerns regarding nighttime flight operations and their resultant impacts to area residents. The partnership between the City of Chicago, the O'Hare Noise Compatibility Commission (ONCC) and the airlines has produced significant results in terms of decreased aircraft noise and increased spending on sound insulation programs since the inception of this alliance in 1996. The FAA applauds the efforts of these organizations and appreciates the opportunity to continue to work with them cooperatively to reduce aircraft noise to the communities surrounding O'Hare.

In presenting the proposal to revise the nighttime departure procedures at O'Hare, you made references to and provided supporting data for the mandatory General Aviation Noise Abatement Program currently in effect at John Wayne Airport (SNA) located in Orange County, California. You also requested that we determine the applicability of similar type procedures at O'Hare. We have reviewed that information and before we address its applicability to O'Hare, we would like to present information and historical data regarding the O'Hare Fly Quiet nighttime preferential runway use and departure procedures, and discuss their impacts to the City of Park Ridge.

The City of Chicago Department of Aviation's Fly Quiet Program is a voluntary program that utilizes preferential flight tracks between the hours of 10 p.m. and 7 a.m., when wind and weather conditions allow, and when delays at the airport have subsided. The flight tracks associated with these preferential use runways were developed by the City of Chicago in cooperation with the ONCC, the airlines and FAA Air Traffic Control. These preferred runways and their assigned flight tracks direct aircraft over less-populated areas such as forest preserves, highways, as well as commercial and industrial areas. Enclosures 1 and 2 depict the preferential use runways and the departure procedures (flight tracks) for each of those runways. In the event that one or more of these preferential use runways are not available due to weather, closures for maintenance, construction or loss of navigational aids, other runways may be used as appropriate.

The January 2011 data you provided from the City of Chicago's O'Hare Noise website shows that an average of 2,192 daily operations (arrivals and departures) occurred at O'Hare. A total of 179 of these daily operations (or approximately 8 percent) occurred

between the hours of 10:00 p.m. and 7:00 a.m. Referring to the City's Runway Use Report for that same month for the hours of 10:00 p.m. to 7:00 a.m., the most used departure runways were: 32L accounting for 57 percent of the total departures, 28 at 20 percent, 22L at 18 percent and 32R at 8 percent. All remaining runways accounted for less than 3 percent of the total nighttime departures for the entire month. As you highlight in your supporting material, your concern is nighttime departures from Runway 4R that overfly Park Ridge. However, for the month of January 2011, Runway 4R was not used for any nighttime departures.

Runways 4L and 9R are used infrequently for nighttime departures for the reasons mentioned above. When these runways are used, aircraft are typically assigned the runway heading until reaching an altitude of 3,000 feet. This means they fly straight ahead and do not turn in a different direction until after the plane is 3,000 feet high. Doing so directs them away from populated noise sensitive areas. There are instances, however, where aircraft deviate from those designated flight tracks and fly over Park Ridge. Those deviations are highlighted on the ONCC's Quarterly Fly Quiet Program Reports which are located at: http://oharenoise.org/fly_quiet_program.htm

These reports contain detailed information regarding nighttime runway use, flight operations and flight tracks. Adherence to nighttime departure preferential flight tracks is measured by the Airport Noise Management System (ANMS) to an altitude of 3,000 feet and is shown graphically as a percentage of deviation (in nautical miles) from the preferred flight tracks. High levels of airport delay sometimes result in activity occurring after 10:00 p.m. During those instances FAA Air Traffic Control continues to manage the airport to minimize continuing delay impacts. This effort may include dispersing or fanning the departures from each runway end on multiple headings (directions) as is done during the day. Fanning the departures from the runway ends increases airport throughput by minimizing aircraft hold time on the ground immediately prior to take-off and tends to increase aircraft in areas that may not normally experience traffic at night.

You reference recent FAA statistics on the increased percentage of take offs and the use of the airspace over the City of Park Ridge. The FAA is uncertain as to the origin of your specific statistics, "…48% to the East and 38% to the NE Quadrant – all belonging to the city of Park Ridge…". The answer to Question #10 in the FAA's letter to you dated April 7, 2011, identifies approximately 27% of the total flights (for the full-build OMP) will be flying over the northeast quadrant of the airport in the direction of Park Ridge, and only 35% percent of the nighttime flights will be flying over the northeast quadrant.

Although John Wayne Airport and Chicago O'Hare are both important components in the National Airspace System, there is a significant difference in how their nighttime procedures were developed. The nighttime procedures at John Wayne Orange County Airport referenced in your letter are mandatory procedures required by local ordinances. The procedures were implemented before the Airport Noise and Capacity Act (ANCA) of 1990. In order to continue after 1990, those programs had to obtain a written agreement between the airport operator and the aircraft operators by November 5, 1990.

With ANCA in place today, the process for establishing mandatory noise management programs is quite involved. Title 14 Code of Federal Regulations (CFR) Part 161, which implements ANCA, requires:

- Each airport operator proposing a noise or access restriction to aircraft operations shall prepare the following and make it available for public comment:
    - An analysis of the anticipated or actual costs and benefits of the proposed noise or access restriction;
    - A description of alternative restrictions; and
    - A description of the alternative measures considered that do not involve aircraft restrictions, and a comparison of the costs and benefits of such alternative measures to costs and benefits of the proposed noise or access restriction.
- In preparing the analyses required by this section, the airport operator shall use the noise measurement systems and identify the airport noise study area and shall use currently accepted economic methodology. The airport operator shall specify the methods used to analyze the costs and benefits of the proposed restriction and the alternatives.

In summary, the analysis must show that the benefits of the proposed restrictions must outweigh the potential lost commerce.

The City of Chicago developed the existing Fly Quiet Program in 1996. Any suggestions for modifications to that program should be directed to the City's Department of Aviation.

I believe this response addresses the points raised in your letter. The FAA appreciates the opportunity to respond to your questions and concerns.

Sincerely,

Barry D. Cooper
Regional Administrator
Great Lakes Region

2 Enclosures

cc: Sharon Kurywchak, Manager, O'Hare ATCT
Kimberly A. Stover, Manager, Tactical Operations, Midwest United States
Brendan McLaughlin, Executive Director, O'Hare Noise Compatibility Commission
Rosemarie Andolino, City of Chicago, Commissioner of Aviation

Enclosure 1

Fly Quiet Program

Preferential Runway Use

1 Arrivals on 14R
Departures on 28 and 14R

2 Arrivals on 32L
Departures on 28 and 32L

3 Arrivals on 27L
Departures on 28 and 32L

4 Arrivals on 22R
Departures on 28 and 22R

5 Arrivals on 10
Departures on 9R and 10

Departures

Arrivals

N

NOT TO SCALE

The operational plans depicted on this page are presented in no particular order

— Note: Effective May 6, 2010, Runway 32L will be shortened to 9,685'.

Existing conditions as of May 2010

Enclosure 2

Fly Quiet Program

Arrival and Departure Procedures

Recommended Nighttime Departure Procedures

During 10 p.m. to 7 a.m. (2200-0700 local)

The preferred routes direct aircraft over less-populated areas in an effort to limit the effects of noise on the surrounding communities.

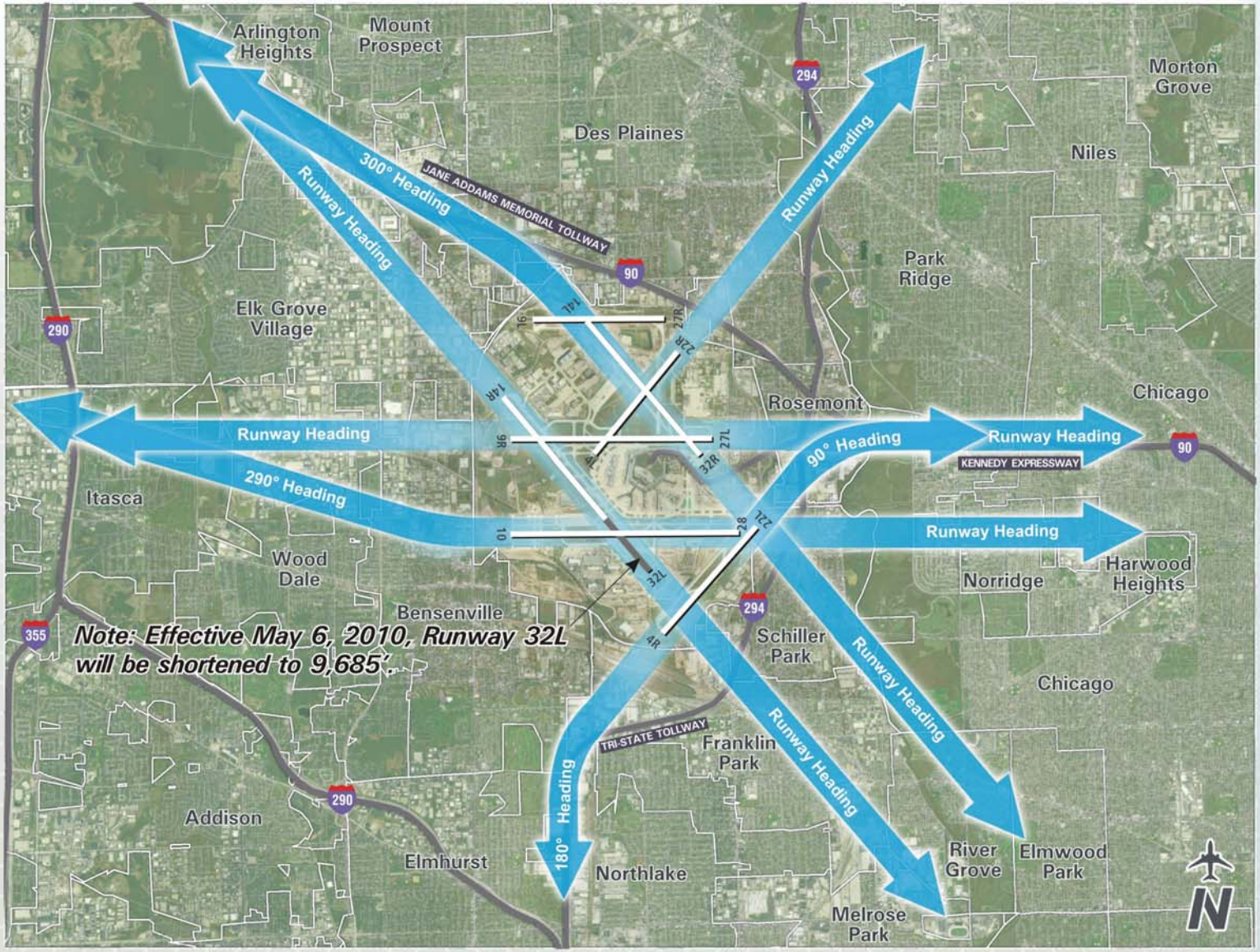
4L, 9R, 10, 14L, 14R, 27L, 32L — Fly runway heading until 3,000 feet MSL.

4R — Fly runway heading for 1 mile then right turn heading 090° until 3,000 feet MSL *(following the Kennedy Expressway).*

22L — Make left turn heading 180° until 3,000 feet MSL *(following the Tri-State Tollway).*

28 — Make right turn heading 290° until 3,000 feet MSL.

32R — Make left turn heading 300° until 3,000 feet MSL *(following the Jane Addams Memorial Tollway).*



*Procedures not yet established for Runways 9L and 27R.

Existing conditions as of May 2010