



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

Eastern Service Center  
Air Traffic Organization

11 Murphy Drive  
Nashua, NH 03062

December 17, 2008

Ms. Bernice Mader  
President, Logan Airport Community Advisory Committee  
108 Connell Street  
Quincy, MA 02169

Dear Ms. Mader:

This is a response to the points and questions you raised in your letter dated September 25, 2008, on behalf of the Logan Airport Community Advisory Committee (CAC). Our responses below are organized by topic.

CAC Goals and Objectives for the Boston Logan Airport Noise Study (BLANS) and FAA Purpose and Need (P&N) (Items 1, 2, 5 & 6)

We agree that the CAC's goals and objectives for use in the screening process for the BLANS and the P&N statement required under the National Environmental Policy Act (NEPA) for agency action are two different things. The Federal Aviation Administration (FAA) would ultimately be responsible for finalizing the P&N in a NEPA document. Normally, however, for an airport noise study, the P&N would be based on the noise abatement goals and objectives of the sponsoring airport and, if available, the surrounding communities. For the BLANS we are asking the CAC to provide that input. This is consistent with FAA's 1976 Aviation Noise Abatement Policy which explains the basic authorities and responsibilities of various parties related to aircraft noise.

We were encouraged that CAC had set a meeting date of October 23, 2008, to discuss specific goals and objectives for FAA consideration; however, no meeting has occurred to date. We maintain that this is a critical step to move forward with the alternatives analysis process. Although the Runway 14/32 Record of Decision includes an overall goal to reduce noise, it is not specific enough to eliminate certain measures the CAC has voted to reject (e.g. fanning). Until measures such as fanning are modeled for potential noise reduction, there is no way to know whether or not they do in fact "reduce" noise. Any measures that are currently part of the BLANS project record need to be addressed. Once we establish the criteria CAC would like to use, it may well be that fanning, as an example, does not meet the criteria and it is eliminated from further study.

On the October 6, 2008, Project Management Team (PMT) call, CAC suggested that we use Jon Woodward's language from the May 29, 2008, Boston Technical Advisory Committee (BOS/TAC) meeting as a guide or goal to reject certain BLANS measures from further

study. Based on that language, we understand that the CAC as an organization is opposed to measures that:

“Will result in the unwarranted introduction of new adverse and objectionable noise event levels into areas not currently so affected.”

This language is a step closer to establishing a framework beyond the 2002 ROD requirement to reduce noise. It further stipulates under what conditions the CAC is willing to agree to proposals that are intended to reduce noise. We still need further clarification, however, on the terms “objectionable” and “areas not currently so affected”. We recommend using Jon Woodward’s expertise to help CAC further define these parameters. The Project Consultant has already provided some information to the CAC for consideration on definition of terms.

We agree that it is important to keep the P&N in the NEPA phase broad enough to allow some flexibility to meet the intent of the CAC’s noise abatement goals and objectives. It is necessary; however, to apply the same set of parameters to all measures or alternatives evaluated in the BLANS. This includes those evaluated early in the planning phases of the BLANS (where we are now) and those alternatives that may be introduced during the NEPA public comment period. There is more flexibility in the planning phase to adjust or clarify goals than there will be after the publication of a NEPA document. As we have offered in the past, we would like to discuss these issues with the CAC in more detail in a web conference or face-to-face meeting to ensure both FAA and CAC’s concerns are clearly understood.

#### Level 1 Screening Report and Additional Measures Submitted by Elected Officials (Items 1 & 3)

Based on CAC’s recommendation, we will conduct a Level 1 safety screening on the proposals submitted by Representative Frank Hynes of Marshfield. We will also conduct the Level 1 screening for the proposal submitted by Representative Provost for Somerville as we clarified on the October 6, 2008, PMT call. We are planning an FAA Evaluation Team meeting in early January 2009. Once we have completed our internal screening, the CAC and the Independent Consultant will have an opportunity to comment on our findings as we did with CAC’s initial list of measures for Phase 2.

After the elected officials proposals are assessed, the FAA will direct the Project Consultant to finalize the Level 1 Screening Report. Safety and technical feasibility of FAA related procedures is ultimately an FAA decision. In addition, we expect Massport will finalize its decisions on the measures under their control. Any comments received at the May 29, 2008, BOS/TAC meeting from the CAC or the Independent Consultant will be included in the report for the record. Measures that FAA considers safe and that the CAC has voted to reject without clearly defined criteria will remain in the report as “pending” measures, until they can be evaluated using a clear set of criteria. As Steve Smith stated in his December 2, 2008, email message, the CAC will have other opportunities to voice its objection to such

measures once clear noise abatement goals and objectives have been established for the BLANS.

#### BLANS Project Schedule and Budget (Items 7-12, 14 & 16)

The budget numbers and dates we provided in our August 13, 2008, letter are accurate. Some of the funding discrepancies you mention in your letter are related to Massport's portion of the funds. As shown on the updated schedule, the project management task is funded until June 2009, which is when the Project Consultant's contract expires. Phase 2 was projected to end at that time. This is shown by the blue baseline bar in the schedule, which has been updated and shared with PMT members on a monthly basis. Because of delays in the alternatives analysis (key milestones did not occur when expected), the baseline schedule had to be pushed out another two years. As we stated in our August 13, 2008, letter, a scope reassessment will be necessary in the very near future in order to find ways to complete Phase 2 in an acceptable manner with existing funds. Funds will need to be reallocated from other tasks to cover the essential task of continued project management by the Project Consultant. The same situation occurred in Phase 1 (BONS), and a successful reassessment was done to bring the phase to a close with results using the existing budget. Although tasks can be amended within the Scope of Services, the grant amount cannot, as it is contractual, fixed and tied to a completed Scope of Services. It is our responsibility to be forthcoming with this type of information.

To date, we have made minor modifications to the scope, which we provided to you on June 10, 2008, at your request. This included a revision to Task 6.1 for the Project Consultant to assist the FAA on the development of clear BLANS goals and objectives that will ultimately be used to formulate a P&N statement. The FAA will write the final P&N statement.

The specific challenges we referred to in our August letter that face the CAC are the same challenges most volunteer organizations have to confront. We recognize that it is difficult to schedule meetings and coordinate information for decision making purposes, especially with such a large group of people, many who have other day time commitments. The statement was intended to be positive, that despite these challenges, many accomplishments have already occurred. Little progress has been made since May 2008, however, and we need to get back on course by keeping an open dialogue and focusing on the tasks that need to be completed to move the project forward. The FAA can assist with telecom bridge lines or web meetings for the CAC if necessary. We can discuss the details of budget and schedule in a separate meeting if you continue to have outstanding concerns or questions on this.

#### BLANS Tasks to be Completed and Miscellaneous (4, 11, 13 & 15)

As previously explained, we have already modified the Scope of Services to include Project Consultant support on the establishment of clear goals and objectives and P&N. We did this to further ensure that the BLANS process is legally sufficient based on applicable laws, regulations and policies. This is in the interest of all parties involved. The requirement to collect and analyze data on departures was a request made by the Independent Consultant on behalf of the CAC at the May 29, 2008 BOS/TAC meeting. This was an FAA initiative

without assistance from the Project Consultant that was completed in September 2008. The results will be included in the Level 1 Screening Report. There was no need to amend the Scope of Services.

As you know, we provided clarification on a few other items in your letter on the October 6, 2008, PMT call (i.e., 18 measures for Level 2, alternatives evaluation process, etc). The PMT meeting notes that address these issues will be finalized once we have another PMT call. While we had expected that PMT members would disseminate PMT meeting notes to their respective constituents, in the future we will commit to sending all CAC members email copies of the PMT notes when they are finalized. We can also continue discussion on many of these issues in future PMT calls.

In closing, our goal remains focused on seeing the noise study to completion by identifying a series of noise abatement measures for implementation that are evaluated using objective criteria developed by all parties. Our hope is also that we can work together to accomplish this. We support your suggestion for a mini-summit to discuss how to move the study forward and to address any other outstanding items related to the BLANS. We look forward to scheduling this soon.

Sincerely,

A handwritten signature in black ink that reads "Terry English". The signature is written in a cursive, flowing style.

Terry English  
Project Manager, Boston Logan Airport Noise Study

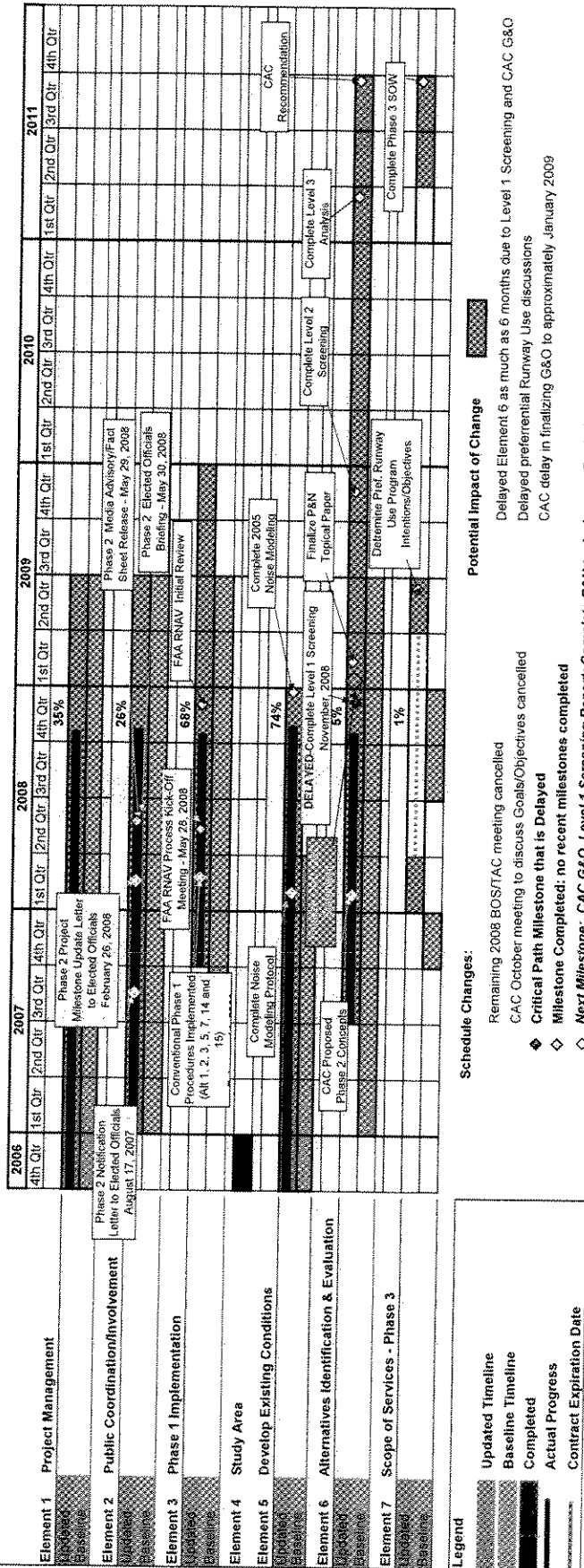
Enclosure

Cc

Jerome Falbo, CAC, Vice President  
Jon Woodward, Landrum and Brown, Inc.  
Flavio Leo, Massport  
Steve Smith, Ricondo and Associates

# BLANS Project Schedule Update

as of October 31, 2008



**Potential Impact of Change**

- Delayed Element 6 as much as 6 months due to Level 1 Screening and CAC G&O
- Delayed preferential Runway Use discussions
- CAC delay in finalizing G&O to approximately January 2009

## BLANS - Project Consultant Budget Status

as of October 31, 2008

Task No.	Description	Project to Date	Budget	Percent
1	PROJECT MANAGEMENT	\$ 196,407.72	\$ 555,348.00	35%
2	PUBLIC COORD./INVOLVEMENT	\$ 145,639.38	\$ 570,233.00	26%
3	PHASE 1 IMPLEMENTATION	\$ 48,808.14	\$ 72,146.00	68%
4	STUDY AREA	\$ -	\$ -	N/A
5	DEVELOP BASELINE CONDITIONS	\$ 821,424.12	\$ 1,108,629.00	74%
6	ALTERNATIVES IDEVALUATION	\$ 80,158.00	\$ 1,276,061.00	5%
7	RWY USE/SCOPE OF SERVICES - PHASE 3	\$ 1,176.00	\$ 107,911.00	1%
<b>TOTAL</b>		<b>\$ 1,273,613.36</b>	<b>\$ 3,690,328.00</b>	<b>35%</b>

**Schedule Changes:**

- Remaining 2008 BOS/TAC meeting cancelled
- CAC October meeting to discuss Goals/Objectives cancelled
- Critical Path Milestone that is Delayed**
- Milestone Completed: no recent milestones completed**
- Next Milestone: CAC G&O, Level 1 Screening Report; Complete P&N topical paper; Begin Level 2 Screening Step**