



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

Office of the Regional Administrator  
Eastern Region

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Jamaica, NY 11434-4809

**MAR 11 2019**

Ms. Mary Reese, Chair, DC Metroplex  
BWI Community Roundtable  
c/o Maryland Aviation Administration  
P.O. Box 8766  
BWI Airport, MD 21240-0766

Dear Ms. Reese:

Thank you for your January 25, 2019 correspondence on behalf of the DC Metroplex BWI Community Roundtable (BWI Roundtable). Your letter conveyed the BWI Roundtable's response to conceptual procedures presented by the FAA at the BWI Roundtable's April 24, 2018 meeting. As explained in the FAA's presentation, some of the conceptual procedures were developed in response to recommendations submitted by the BWI Roundtable (noise-related conceptual procedures<sup>1</sup>). In addition, for information-sharing purposes, the FAA also shared certain conceptual procedures that were developed to address new safety, technology, and criteria requirements (criteria-related conceptual procedures). The FAA requested feedback from the BWI Roundtable on the conceptual procedures and appreciates your most recent response.

Upon reviewing your letter, there was some uncertainty about the Roundtable's position with respect to individual conceptual procedures. However, it appears the Roundtable is generally not satisfied with the noise-related conceptual procedures and does not support their implementation. The apparent lack of support is due in part to the Roundtable's belief that aircraft would remain unacceptably concentrated after implementation.

With respect to the criteria-related conceptual procedures, the BWI Roundtable response appears to recognize that the FAA intends to implement these changes and the BWI Roundtable recommends that FAA complete implementation as expeditiously as possible. The BWI Roundtable also requested to be advised of the FAA's implementation timeline and notified of any substantive changes. The BWI Roundtable's letter also contained a number of questions about the extent to which shifting low-altitude overflights (T-Routes) would reduce noise. The shift is intended to permit departures to execute unrestricted climbs, getting aircraft higher faster. Moreover, as the FAA indicated in its April 2018 presentation, modern T-Routes are necessary to deconflict overflight traffic from BWI arrivals and departures and due to restricted airspace in the DC metro area.

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<sup>1</sup> The noise-related conceptual procedures include the following: (1) Modification of TERPZ procedure; and (2) Creation of the LINSE procedure. Note that while the FAA's April 2018 presentation listed the CONLE and FIXET as conceptual amendments based on the BWI Roundtable's input, those amendments were part of conceptual procedures that also included criteria-related changes that the FAA intends to implement as part of its responsibilities independent of its efforts to work with the BWI Roundtable.

Please advise us if we have misread your response in any way, including if the BWI Roundtable does in fact support implementation of the noise-related conceptual procedures as presented at the April 24th meeting. At this time, the FAA does not intend to proceed with further development of the noise-related conceptual procedures unless the BWI Roundtable first endorses the changes.

The conceptual procedures presented to the BWI Roundtable represent the agency's best effort to design procedures that would respond to the BWI Roundtable's concerns about noise. Moving forward, if the BWI Roundtable does not support the noise-related conceptual procedures as proposed, the FAA recommends the Roundtable work with a consultant to independently design alternative Performance-Based Navigation procedures. If the BWI Roundtable is able to develop Performance-Based Navigation procedures that conform to FAA's criteria requirements, and that are supported by the BWI Roundtable, those designs can be submitted to the FAA for consideration. The FAA is willing to consider alternative procedure designs supported by the Roundtable, so long as the procedures conform with all FAA design criteria for development of Performance-Based Navigation procedures.<sup>2</sup>

The FAA believes this proposed approach is consistent with the BWI Roundtable Charter, which states the BWI Roundtable will be responsible for "identifying possible alternative routings and procedures," "evaluating noise effects," and "making recommendations to the FAA for further consideration." If the BWI Roundtable pursues alternative design work, the FAA is willing to try and answer questions that may arise from the BWI Roundtable's contractor.

Thank you again for your response on behalf of the BWI Roundtable. We appreciate your feedback on the FAA's conceptual procedures and hope we are able to support the BWI Roundtable's efforts moving forward.

Sincerely,



Maria Stanco  
Acting Regional Administrator

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<sup>2</sup> The following is a non-exhaustive list of FAA Orders and Advisory Circulars that contain criteria with which procedure designs must comply: Order 1000.37A, Air Traffic Organization Safety Management System Manual; Order 1050.1F, Environmental Impacts: Policies and Procedures; Order 1100.161, Air Traffic Safety Oversight; Order 8260.58A, United States Standard for Performance Based Navigation Instrument Procedure Design; Order 7110.65X, Air Traffic Control; Order 8260.3D, United States Standard for Terminal Instrument Procedures; Order 7400.2M, Procedures for Handling Airspace Matters; Order 7400.10, Special Use Airspace; Order 7470.1A, Distance Measuring Equipment (DME)/DME Infrastructure Evaluation for Area Navigation (RNAV) Routes and Procedures; Order 8260.19, Flight Procedures and Airspace; Order 8260.46F, Departure Procedure Program; Order 7400.11; Order 7100.41C, Airspace Designations and Reporting Points; Advisory Circular 25-15, Approval of Flight Management Systems in Transport Category Airplanes; Advisory Circular 90-105a, Approval Guidance for RNP Operations and Barometric Vertical Navigation in the U.S. National Airspace System and in Oceanic and Remote Continental Airspace; Advisory Circular 150/5300-13A, Airport Design.