

D.C. METROPLEX BWI COMMUNITY ROUNDTABLE
c/o Maryland Aviation Administration
P.O. Box 8766
BWI Airport, MD 21240-0766

January 25, 2019

Ms. Jennifer Solomon
Regional Administrator, Eastern Region
Federal Aviation Administration
1 Aviation Plaza
Jamaica, NY 11434

Dear Ms. Solomon,

The D.C. Metroplex BWI Community Roundtable (BWI Roundtable) has reviewed the proposed procedural changes for BWI Thurgood Marshall Airport (BWI) that were presented at the April 24, 2018 meeting of the Roundtable. Additionally, the BWI Roundtable has reviewed the technical analysis provided by the Maryland Aviation Administration (MAA) and HMMH of the proposed procedures. As you have required, the BWI Roundtable is submitting the following response.

The BWI Roundtable would like to thank the FAA personnel who worked to provide the proposed changes and appreciate efforts and resources committed by the FAA, the MAA and many others to address the harms being inflicted on Maryland residents. While it appears two of the proposed changes will address certain issues created by NextGen-related flight path changes, the BWI Roundtable finds the overall FAA proposal is insufficient to remedy the majority of factors causing continuous harm to Maryland residents since the FAA's implementation of NextGen at BWI. Moreover, one change appears to expose residents of certain neighborhoods in the Annapolis area to new overflights they had not experienced prior to the implementation of NextGen.

The BWI Roundtable's comments to the proposed changes are informed by, among other things, (i) the FAA's presentation at the April 24, 2018 meeting, (ii) an analysis of the proposed changes provided to the BWI Roundtable by the MAA and its advisor on December 4, 2018, along with supplements to the analysis, and (iii) other presentations and information provided by the FAA and MAA, Roundtable discussions and community input to the BWI Roundtable over the last two years. The BWI Roundtable also referenced:

- The March 2017 BWI Roundtable resolution reflected in our March 31, 2017 letter to the FAA requesting flight procedures and flight paths revert to pre-NextGen (circa 2012) in order to provide relief to residents in the vicinity of BWI airport who are adversely affected by NextGen-related actions,
- The BWI Roundtable's July 25, 2017 letter to the FAA requesting implementation of certain procedural actions to restore dispersion discussed with FAA representatives at the July 2017 BWI Roundtable meeting, and

- The BWI Roundtable’s September 8, 2017 letter to the FAA identifying and requesting relief from three problematic conditions: flight path changes, low altitude aircraft and concentrated flight paths.

FAA-Proposed Departure Changes

1. Modification of TERPZ procedure (westbound departures) to return aircraft flight paths closer to pre-Metroplex historical locations.
2. Creation of new LINSE procedure (westbound departures) to better distribute departures over pre-Metroplex historical locations.
3. Adjustments to CONLE and FIXET procedures (southbound departures) to meet FAA design criteria.
4. Shifting of low altitude overflights (T Routes) to de-conflict from departures.
5. “Climb Via” capability added to all procedures.

FAA-Proposed Arrival Changes

1. Modification of ANTHM and TRISH procedures (arrivals from west and north) to adjust downwind leg for Runway 28 and address design criteria issues.
2. Modification of MIIDY procedure (arrivals from southeast) to adjust base leg for Runway 28 and address design criteria issues.

BWI Roundtable Response to the Proposed Departure Changes:

1. *Modification of TERPZ procedure (westbound departures) to return aircraft flight paths closer to pre-Metroplex historical locations.*
2. *Creation of new LINSE procedure (westbound departures) to better distribute departures over pre-Metroplex historical locations.*

As proposed, these appear to be a step towards returning flight paths for westbound departures to the status quo ante, which the BWI Roundtable has continually requested. According to the information provided to the BWI Roundtable, the proposed procedures shift flights closer to their historical locations and attempt to distribute flight operations over a larger area by splitting the TERPZ departure procedure into a new modified TERPZ procedure and a new LINSE procedure. Additionally, the BWI Roundtable has been advised the proposal could potentially bring some departing flights over Howard County into compliance with the existing Noise Abatement Plans.

While increasing the distribution of some flights, this is not a re-creation of the dispersion of flights that was acceptable to the regional community prior to the flawed design and implementation of NextGen at BWI. Despite these changes, flights will continue to be

unacceptably concentrated. The FAA must continue to work to increase dispersion so that it resembles the status quo at BWI before NextGen.

3. *Adjustments to CONLE and FIXET procedures (southbound departures) to meet FAA design criteria.*

As proposed, the shift of CONLE departures over the Annapolis peninsula is unacceptable and detrimental and will increase noise in areas already burdened by the noise of concentrated arriving aircraft. The BWI Roundtable suggests that the FAA waive the design criteria in this instance to retain the current STABL waypoint.

4. *Shifting of low altitude overflights (T-Routes) to de-conflict from departures.*

The BWI Roundtable appreciates the FAA's proposal to shift some low-altitude overflights around BWI in an effort to potentially increase the altitudes of BWI departure aircraft and allow for the addition of "Climb Via" capability to departure procedures. The proposed creation of T-Route 356 (T356) as highlighted in the FAA's April 24, 2018 presentation could potentially raise the maximum altitudes of BWI Runway 33L and 33R departures and minimize instances of aircraft level offs. As such, this could result in decreased noise levels associated with these departure flight paths and represents a step towards increasing aircraft altitudes which the BWI Roundtable has continually requested.

However, the BWI Roundtable does not understand the full benefits of creating T-Routes and the addition of "Climb-Via" capability highlighted by the FAA as proposed that would facilitate further increases to the altitudes of departures from other BWI runways or allow for increases in the altitudes of BWI arrivals. The BWI Roundtable's interpretation of the technical analyses of simulated aircraft departure and arrival altitudes associated with the FAA's proposal does not support a conclusion that aircraft departure or arrival altitudes overall will be higher as a result of the creation of T-Routes or the addition of "Climb Via" capability to BWI departure procedures. For example, technical analysis of a sample of pre-Metroplex 2012 flight tracks showed the average altitude of all BWI jet departure aircraft crossing the US Route 29 corridor was calculated to be approximately 7,440 feet above Mean Sea Level (MSL), where a 2017 post-Metroplex sample of BWI jet departure operations modified to reflect utilization of the FAA's proposed procedures crossed the US Route 29 corridor at approximately 7,247 feet MSL. This represents a decrease in altitude of approximately 192 feet with the FAA's proposal relative to jet departure aircraft altitudes along this same corridor prior to the implementation of the D.C. Metroplex. Similarly, a proposed decrease in average jet altitudes of 1,371 feet, compared to post-Metroplex 2017 jet departure operations, was also calculated at the navigational point "RAISN."

These potential decreases in departure aircraft altitudes are contrary to information presented by the FAA on April 24, 2018, which indicated departure aircraft may be higher with the implementation of T-Routes and the addition of "Climb-Via" capability, and

also appear to be in direct opposition to the BWI Roundtable's requests for increased aircraft altitudes. Furthermore, the FAA's proposal does not appear to result in substantive changes to the altitudes or flight paths of BWI arrival aircraft. It is not clear what benefit, if any, the implementation of T-Routes and the addition of "Climb-Via" capability provide in addressing the expressed concerns of the BWI Roundtable regarding arrival aircraft or regarding increasing departure aircraft altitudes outside of those identified for Runway 33L and 33R departures.

Since it appears the addition of "Climb-Via" capability to departure procedures, and the implementation of T-Routes as proposed, are not anticipated to increase departure aircraft altitudes to the extent highlighted by the FAA, and in some cases may actually decrease departure altitudes, the BWI Roundtable requests the FAA clarify why BWI departure and arrival aircraft are not able to fly higher with the FAA's proposed implementation of T-Routes and "Climb-Via" procedures relative to pre- and post-Metroplex BWI operations.

5. *"Climb Via" capability added to all procedures.*

The BWI Roundtable has no comment on these changes.

BWI Roundtable Response to the Proposed Arrival Changes:

1. *Modification of ANTHM and TRISH procedures (arrivals from west and north) to adjust downwind leg for Runway 28 and address design criteria issues.*
2. *Modification of MIIDY procedure (arrivals from southeast) to adjust base leg for Runway 28 and address design criteria issues.*

It is the understanding of the BWI Roundtable that these changes are not intended to address concerns raised by the BWI Roundtable.

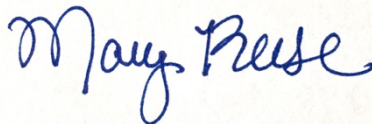
The BWI Roundtable requests that the FAA, at its earliest convenience, provide a detailed implementation timeline of any and all planned procedural changes. The BWI Roundtable strongly encourages the FAA to implement these changes as expeditiously as possible. The BWI Roundtable asks that any substantive change to the FAA's proposed procedures, that are the subject of this letter, will result in additional notification by the FAA to the BWI Roundtable for further community input prior to the FAA implementing those procedures.

Conclusion

While the FAA has proposed a first step in returning some departures to their historical locations, it has only begun the process of righting the wrongs at BWI. Critical concerns, including concentrated flight paths, flight path changes, and lower altitudes of arriving flights, must still be addressed. The FAA cannot make a small change to the BWI area, consider their job done, and check off a box claiming that all concerns have been addressed. It should be remembered that Anne Arundel County and arrivals have been ignored by the FAA from the beginning of the BWI discussions, even with reminders from BWI Roundtable members.

It should be clear after nineteen months of dialogue with the BWI Roundtable that Maryland residents in both Howard and Anne Arundel Counties are experiencing significant and widespread harm since the implementation of NextGen at BWI. Residents are entirely dependent on the FAA to design and implement flight paths and procedures that protect them. They have no ability to protect themselves, their families and property from harms caused by aircraft overflights. Knowing that this one step is only a small part of the solution, the BWI Roundtable urges the FAA to work in good faith to continue addressing these problems to bring relief to Maryland citizens. What the BWI Roundtable needs now are concrete actions designed to reverse the flawed design and implementation of NextGen.

Sincerely,



Mary Reese
Chair
D.C. Metroplex BWI Community Roundtable

cc: Mr. Daniel K. Elwell, Acting Administrator, FAA
Mr. Ricky Smith, Executive Director/CEO MAA
Mr. Paul Shank, P.E. Chief Engineer, Div. of Planning & Engineering, MAA
Ms. Robin Bowie, Director, Office of Environmental Services, MAA
Mr. Jesse Chancellor, D.C. Metroplex BWI Community Roundtable Vice Chair