Dear Mr. Huerta and Mr. Langdon:

SMAAC re-engaged with the Minneapolis-St. Paul International Airport (MSP) FAA ATCT after the September 2010 near-mid-air-collision and again after the 2013 NTSB CRO Warning. The FAA participated in two sponsored public meetings (December 2010 and August 2013) to explain the need for route and profile changes and the technology to be applied for “efficiency” as well as safety.

We met with your Government and Industry staff and Rep. Ellison in October 2012, and as a result, opened lines of communications and staff discussions on both national and MSP plans and flight operations. We objected to a series of ATC procedural changes at MSP in October 2010. We held that the changes anticipated use of NextGen technologies and that route and profile changes should not have been applied without reopening or amending the 2010 environmental assessment.

We reported that the MSP 2030 Long-Term Comprehensive Plan (based on the EA Finding) made no quantitative assessment of air pollution or carbon emissions before and after the PA/FAA Finding on GHG emissions. Neither did subsequent environmental assessments.

MSP: Due to the July 2015 FAA CRO Order limiting use of MSP R35 for safety and the FAA/EPA Finding on GHG emissions from commercial aviation harming citizens through (at least) global warming, we respectfully recommend ordering changes in MSP operations, specifically increasing runway use intervals and limiting operations (arrival acceptances) per hour.¹

You have this authority due to uncertain safety-risk management and known harm to the public due to increasing low-altitude maneuvers. In addition, the stated annual flight capacity of MSP, 620,000 operations per year, requires no more than 120 operations/hour peak to smoothly manage 1,700 operations per day.

Once NextGen airport is deployed at MSP and all using aircraft fully equipped, operations can be slightly adjusted hour by hour to balance arrivals and departures without requiring fuel-inefficient or otherwise harmful routes and profiles. However, the current practice of scheduling the first wave of a hub bank early each morning, 5 to 6 AM should be discontinued or otherwise limited by higher fees or other disincentives.

The CRO Order apparently allows some interpretation: MSP flight data (touch-down and lift-off times) reveals too few R30L departure delays (2-minute skips) compared to R35 arrivals at peak hours to have avoided losses of separation, incursions and synchronized with R35 arrivals.
NAS: Due to the current air routes via hubs that add hundreds of airport operations and thousands of air miles unnecessarily, we respectfully recommend that you **propose changes to many NAS routes to reduce carbon emissions**. Ground and air traffic congestion at other hub airports use or waste fuel, for reasons similar to the MSP situation: departure procedures require low altitude maneuvers many times a day, including sharp turns immediately after lift-off.

To avoid schedule delays during congested hours, most hubs strain to control runway use, routes and profiles. More fuel is burned per airport operation than at other hours. Travelers and taxpayers are crowded and security lines are long. Eventually, travelers and taxpayers pay for more carbon being released., more noise, and more health risks.

It is unjust to noisily overfly schools while exempt from taxes funding the school district... It is unjust to increase carbon emissions by airport operations and distances flown indirectly, because these increase public health risks without much attention, much less liability. It is unjust to overfly a few neighborhoods more often OR to spread more pollution all around the airport.

Thank you for your attention to these injustices and planning for changes.

Sincerely,

FOR THE BOARD OF DIRECTORS

James R. Spensley

South Metro Airport Action Council,

By James R. Spensley, President,
PO Box 19036, Minneapolis, MN 55419-0036

See Distribution in cover message.

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1. The MSP airspace management plan is restrained by the CRO Order, asymmetrical runways and common sense and costs. The theoretical maximum hourly safe capacity in westerly flow (100 arrivals and 60 departures) is a restraint, not a goal. More instrumented operations for minimum separations, currently unsafe, was not the best plan. However, peak-hours supporting more than 75 arrivals in westerly flow is unwise as a plan today, considering the increased cost for airport facilities, safety-risk management, and unknown public health and environmental impacts, as well as the cost-per-passerger for Federal agencies at MSP (surge capacity).

2. A mile-per-gallon standard gains only leg-by-leg, and slightly fewer hours in flight or more direct airport-to-airport legs using PBN. A much larger reduction in fuel use per passenger would result from re-routing city-hub-city passengers through more hubs. One would expect airlines would cooperate for fuel-savings and environmental reasons. We believe the carbon treaty obligations and public welfare authorities apply to negotiating NAS route changes or fee penalties or other means to affect commercial routes and schedules for significant GHG and carbon footprint reductions.