



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

Mission Support Services
800 Independence Avenue, SW
Washington, DC 20591

NOV 21 2017

Mr. Lance Brasher
Chairman, DC Metroplex BWI Community Roundtable
c/o Maryland Aviation Administration
P.O. Box 8766
BWI Airport, MD 21240-0766

Dear Mr. Brasher:

Administrator Huerta asked me to respond to your letter of September 8, 2017 concerning Performance Based Navigation (PBN) procedures at the Baltimore/Washington International Thurgood Marshall Airport (BWI).

The Federal Aviation Administration (FAA) is pleased to work with the DC Metroplex BWI Community Roundtable, which has representatives from the Maryland Aviation Administration (MAA), communities, and industry, to consider the concerns from communities around BWI and proposed solutions. However, FAA's involvement and this letter do not constitute either a final decision of the FAA or a re-opening of the FAA's Record of Decision for the Washington D.C. Optimization of the Airspace and Procedures in the Metroplex (DC Metroplex Project), issued December 30, 2013.

Congress has expressly directed the FAA to implement PBN procedures throughout the National Airspace System (NAS). The most recently enacted long-term authorization, adopted in 2012, directed the FAA to accelerate deployment of these satellite based navigation procedures in several provisions of Title II, Next Gen Air Transportation System and Air Traffic Control Modernization in the FAA Modernization and Reform Act of 2012, H.R. 658, P.L. 112-95.

The PBN Standard Terminal Arrivals (STARS), Standard Instrument Departures (SIDS), and Air Traffic Service (ATS) routes adopted as part of the DC Metroplex Project make flight-routes safer, more efficient, repeatable, and more predictable. As aircraft avionics improves, the FAA is replacing conventional legacy flight-route procedures to take advantage of satellite-based navigation technology. This advanced technology guides air traffic more precisely and efficiently, and the PBN procedures in question were adopted to support it. The procedures designed and implemented for the DC Metroplex were either new or amended. These procedures were evaluated for a myriad of flight procedures criteria including, but not limited to, compliance with the environmental review processes mandated by the National Environmental Policy Act (NEPA) and other applicable federal environmental laws, design, quality control and assurance (QA/QC), fly-ability and safety.

The original pre-Metroplex procedures, flight paths, and altitudes are no longer published on navigational charts or loaded onto aircraft navigation computers. These procedures are not maintained in our procedures inventory. Additionally, the network of departure and arrival procedures and overflights that were implemented at BWI are interconnected, interdependent

and designed to improve safety and efficiency within the National Airspace System (NAS), as well as with other airport procedures and flows such as Ronald Reagan Washington National (DCA) and Washington Dulles International Airports (IAD). Therefore, for a host of reasons, the FAA cannot “go back to” the conventional system in place prior to Metroplex.

As the FAA executes directives from Congress, it remains a high priority for the FAA to ensure we proactively engage with communities, airports, and all stakeholders of the NAS as we consider, analyze and evaluate potential new PBN procedures and as larger airspace redesign projects occur. In the course of our outreach, we have heard from members of the public that the FAA’s methodology for calculating noise is unfair. The FAA will consider that feedback when we consider potential refinements, if any, to our methodologies.

Your September 8th letter raised a number of issues, and additional issues were raised in your September 19, 2017 email to FAA staff-member Robert Owens. Please keep in mind that the FAA’s involvement with the Roundtable does not constitute either a final decision or a re-opening of the FAA’s Record of Decision for the D.C. Metroplex, issued December 30, 2013. Any changes to procedures would be a new action and must be subjected to safety and environmental reviews. We have provided corresponding responses to those letters for the following categories: Request to Increase Dispersion, Concerns About New Flight Paths, Concerns About Aircraft Altitude, and Additional Considerations.

1) Request to Increase Dispersion

The FAA recognizes that, in some instances, aircraft tracks associated with the new/amended procedures are more concentrated than previous procedures. As a result, the FAA is considering whether there are ways to add dispersion in our procedures and, if so, whether the FAA should propose a new action to achieve the dispersion.

The Roundtable asked that a waiver be requested to allow air traffic controllers the ability to vector Runway 28 and Runway 15R departures to create dispersion. No such waiver is needed for controllers to vector. However, these procedures were designed to reduce risk within the NAS through repeatable/predictable paths that require less human interaction. Air traffic controllers vector aircraft as needed for safety and spacing purposes.

A PBN Full Working Group (FWG) was formed on August 22, 2017 to consider a number of issues, including whether it is possible to increase dispersion for the BWI surrounding communities. Before deciding whether the FAA can add dispersion, the FAA must first consider safety of the NAS as well as airspace complexity, national security and airport interconnectivity. Any changes to the procedures would be a “new action” and would trigger requirements to ensure compliance with NEPA and any other applicable special purpose laws. The FAA is also committed to inform and involve the public and to give meaningful consideration to community concerns and views as the FAA makes aviation decisions that affect them. Prior to adopting any procedure changes recommended by the Roundtable, outreach to the broader public would be conducted.

2) Concerns About New Flight Paths

Your letter refers specifically to new flight paths associated with Runway 28 departures, Runway 15 Right (R) departures, Runway 10 arrivals and Runway 33 Left (L) arrivals at BWI. All of these changes enhance safety and efficiency and were considered as part of the FAA's Environmental Assessment (EA) for the Washington, D.C. Optimization of Airspace and Procedures in the Metroplex. In accordance with NEPA, the FAA released and made the EA available for public review. Representatives from the FAA met with the Maryland Aviation Administration (MAA) staff to discuss the proposed project prior to implementation. The DC Metroplex EA provides information on the noise metrics and noise methodology used in the EA. The FAA approved the procedures in a Record of Decision, issued on December 20, 2013.

3) Altitudes

Your letter also asserted that FAA procedures allow aircraft to fly too low and at unsafe altitudes. Minimum Vector Altitudes (MVA) are established through complex formulas that account for terrain and obstructions. Air traffic procedures are also subject to rigorous safety analysis to ensure proper elevation. FAA regulations and Operator policies dictate that aircraft must join the final approach at specified altitudes to execute a stabilized approach. Operators on a visual approach must comply with Federal Aviation Regulations (FAR) with regard to altitudes and a stabilized descent. The DC Metroplex Project considered the operations of DCA, BWI, and IAD, as well as other airports and designed procedures to accommodate for any existing interdependencies within that airspace.

4) Additional Considerations

In your letter you stated a desire to have an agreement on procedural compliance that is "binding," "enforceable," "subject to monitoring," that calls for FAA "reporting to demonstrate compliance." FAA's Air Traffic Controllers are subject to a strenuous Quality Assurance/Quality Control (QA/QC) process that includes over-the-shoulder observation by supervisors and random audits of both the spoken control instructions and the radar data. Air Traffic Controllers must comply with all applicable regulations and use appropriate tools that allows for the safe, orderly and expeditious movement of air traffic consistent with published procedures.

In conclusion, the FAA continues to work with MAA and BWI Roundtable, and remains committed to transparency. We have initiated a PBN project for DCA, BWI, and IAD and formed a PBN FWG which includes members of MAA. The FWG conducted a "technical exchange" with MAA and members of the BWI Roundtable on August 10, 2017. The PBN FWG met August 22-24, 2017, September 26-28, 2017 and October 17-19, 2017. The FWG provided a Project Update Briefing to the BWI Roundtable on November 7, 2017. The PBN Leads are committed to briefing the BWI Roundtable on any mature notional designs that are

prepared to ensure they have an opportunity to offer their input. Thank you for your interest and input in this process.

Sincerely,



Jodi S. McCarthy

Acting Vice President

Mission Support Services, Air Traffic Organization