



**Massport Community Advisory Committee**  
One Broadway, 14<sup>th</sup> Floor  
Cambridge, MA 02142

May 18, 2020

(VIA ELECTRONIC MAIL)

Colleen D'Alessandro, ANE-1, FAA New England Regional Administrator  
[Colleen.Dalessandro@faa.gov](mailto:Colleen.Dalessandro@faa.gov)

**RE: Proposed Runway 4L Environmental Assessment Timeline and Process**

Dear Ms. D'Alessandro:

Thank you for your continued engagement with the Massport Community Advisory Committee (MCAC), as well as the participation of your fellow colleagues at the Federal Aviation Administration (FAA), especially during these extraordinary circumstances. Due to this unprecedented health crisis and the resulting changes in standard business practices across the nation, I have been asked to request that FAA delay an upcoming environmental review process.

As you presented at our MCAC General Meeting in January, the FAA had tentatively scheduled the Environmental Assessment (EA) process for the proposed Boston Logan International (Logan) Airport Runway 4 Left (4L) Approach Procedure for the third quarter of calendar year 2020. This proposed process included a draft EA 30-day public comment period during which the FAA would hold two public workshops. Furthermore, FAA staff proposed to hold a public workshop separate from and prior to the formal public workshops following an MCAC General Meeting. We discussed the issue with our membership and determined that while a workshop prior to the formal EA comment period was important, a more appropriate venue would be within the communities and neighborhoods affected by this proposed change. The MCAC membership also expressed reservations at the FAA's proposed use of a workshop format versus a formal public hearing and questioned the ability of commenters to effect any meaningful change on a proposed procedure. In response to a request for an update on the timeline for the 4L EA process, you indicated on May 6, 2020 that the FAA is tentatively planning to begin the 30-day public comment period on September 21, 2020.

On May 14, 2020, the MCAC's Milton representative, Tom Dougherty, brought forward the request to delay the 4L EA process citing three main reasons:

First, the neighborhoods impacted by the proposed 4L RNAV flight path include two densely populated areas – Mattapan (82% African American) and Dorchester (43% African American) – where residents are dealing with high incidence of COVID-19 health and economic impacts. There are many working in the area – healthcare workers at Carney Hospital, a COVID-19 dedicated facility, mass transit employees – that are essential employees working to provide basic services to the region. Other families are dealing with unemployment, small business loss, food stamp needs, and home childcare issues. These families need to focus on these urgent needs.

Second, due to the COVID-19 restrictions related to group gatherings and urging social distancing, residents have been unable to have their own preparatory meetings among affected community members to address and ready collective thought on the EA issues.



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The 4L EA has previously been deferred by FAA for several years for other reasons. The need for safety review of a 4L RNAV track is less at present given the very few flights occurring. For those reasons, awaiting a time when such preparatory meetings can occur would be advisable.

Third, residents likely will not be in a position to do the field work and analyses for which they have engaged an independent consultant because so few planes are flying now. That field work and analyses will aim to compare actual flight activity with FAA model assumptions over the course of the 4L arrival path.

As you and I have discussed over email, there are serious equity concerns over the use of virtual meetings with residents in lieu of the originally planned in-person public meetings. Virtual meetings are especially problematic for low income communities whose residents may lack the resources to participate; moreover, there is ongoing debate about whether a virtual meeting would be an adequate substitute for a community gathering such as this.

At a virtual meeting on May 14, 2020, the MCAC Executive Committee directed me to request that the FAA defer the 4L EA process until the later of either January 1, 2021 or two months after flights to and from Logan Airport resume with volume and frequency similar to what can be expected in future years.

As previously mentioned, at the January 2020 MCAC meeting, we requested that the FAA meet with 4L EA affected residents prior to the comment period to provide information (such as the EA Documentation itself and Volpe Center or other analyses) and to allow residents to provide input before FAA finalizes and submits its EA for public comment. We reiterate that request, adding now that considering the COVID-19 guidelines, such pre-comment period meetings should occur at the start of the deferred schedule as proposed above.

We appreciate the FAA's commitment to conduct a full Environmental Assessment process after the initial 2015 public meeting on this proposal and its recognition that conducting this enhanced review process properly and thoroughly will provide a meaningful benefit to the affected communities, businesses, and residents.

I look forward to working with you on this matter moving forward.

Sincerely,

Matthew A. Romero  
Massport CAC Executive Director

cc: David Carlon, MCAC Chairman  
Thomas Dougherty, MCAC Milton Representative and Treasurer  
Flavio Leo, Massport Director of Aviation Planning and Strategy  
Anthony Gallagher, Massport Community Relations



U.S. Department  
of Transportation

**Federal Aviation  
Administration**

Office of the Regional Administrator  
New England Region

1200 District Avenue  
Burlington, MA 01803-5299

June 11, 2020

Mr. Matthew A. Romero, Executive Director  
Massport Community Advisory Committee  
One Broadway, 14th Floor  
Cambridge, MA 02142

Dear Mr. Romero:

Thank you for your May 18, 2020, correspondence on behalf of the Massport Community Advisory Committee (MCAC). This letter is in response to MCAC's request to delay the environmental review process for the proposed General Edward Lawrence Logan International (BOS) Area Navigation (RNAV) Global Positioning System (GPS) Runway (RWY) 4 Left (4L) [RNAV (GPS) RWY 4L] approach procedure. The proposed action will establish an instrument approach procedure to Runway 4L, where no instrument approach procedure is currently published, that will enhance both safety and efficiency at BOS and in the National Airspace System (NAS). As a result of the expected benefits and with recent proven success conducting virtual public workshops for other initiatives, the FAA intends to proceed with the project as currently scheduled.

The implementation of the RNAV (GPS) RWY 4L will enhance safety specifically by:

- 1) Allowing air traffic control to more precisely monitor each aircraft both vertically and laterally along the arrival track;
- 2) Enable air traffic control and operators to conduct instrument approaches to Runway 4L when Runway 4 Right (R) is not available and;
- 3) Significantly reduce the need to use the Instrument Landing System (ILS) approach to Runway 15R with a transition to a Visual Approach (VA) to Runway 4L (ILS 15R VA 4L) procedure.

The implementation of the RNAV (GPS) RWY 4L will enhance efficiency by improving aircraft arrival rates and will reduce pushing delays incurred during the daytime into the nighttime, particularly during inclement weather.

The FAA first notified the community of its intent to conduct an Environmental Assessment (EA) in 2015 as a result of input from community members and elected officials regarding the level of environmental review planned for the project. After securing funding and procuring contract support, the FAA notified MCAC that the EA process had begun in October 2019. Continuing the EA for the proposed RNAV (GPS) RWY 4L during this time is important to increasing flight safety, and the FAA has determined that realizing the procedure's benefits are an operational necessity for BOS and the NAS. The FAA will follow its normal process to

analyze the impacts of the proposed procedure by using historical radar track data to model the baseline conditions and compare them to the expected changes from the proposed action. Since historical data will be used, the reduced operations caused by COVID-19 will not inhibit the FAA's ability to assess the environmental impacts of the procedure. Furthermore, BOS operations have increased the first week of June to a total of 2,215 operations from a total of 1,709 during the first week of May, representing an increase of nearly 30 percent; a trend we expect to continue further justifying the need for the procedure.

The FAA's environmental analysis will first be shared with the public in the form of a Draft EA, at which time the public can submit any comments or concerns they might have about the FAA's analysis. Ensuring the appropriate level of public notification about a Draft EA through interactive virtual public workshops has proven successful in achieving the desired outreach with the communities potentially affected by proposed changes to instrument flight procedures. Recently, as part of the EA process for the South Florida Metroplex project, virtual public workshops, attended by tens of thousands, were held via Zoom, Facebook, Twitter and YouTube to notify the public of the Draft EA. During the live virtual public workshops, participants could submit their questions through any one of the platforms, using a mobile device or PC, or submit inquiries through the dedicated website created for the virtual events. Community members have access to the site as a source for more information related to the Draft EA, access to recorded live question and answer sessions, and may submit comments through the site during the open comment period. Establishing this new technology-enabled environment and offering multiple opportunities for community members to attend events increased the quality and rigor of our communications and allowed the FAA to reach a much broader audience. In addition, copies of the Draft EA will be available at local libraries, which are expected to be open prior to the release of the Draft EA. These libraries allow public access to the Internet, where the public can view the website for the project and submit comments. If libraries do not open by the time the Draft EA is released, then physical copies can be mailed to residents upon request.

We appreciate MCAC sharing potential accessibility concerns with the FAA. We look forward to working with MCAC members and local community leaders to identify other accommodations that may help address specific community challenges. While the FAA understands that the COVID-19 pandemic has caused massive disruptions within communities across the world, we must continue our mission to improve safety and enhance efficiency in the National Airspace System. As a result, we intend to proceed with the project as scheduled with virtual public workshops conducted in early fall 2020.

Sincerely,

**COLLEEN M  
D'ALESSANDRO**

Colleen D'Alessandro

Regional Administrator, New England Region

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**Massport Community Advisory Committee**  
One Broadway, 14<sup>th</sup> Floor  
Cambridge, MA 02142

July 14, 2020

(VIA ELECTRONIC MAIL)

Colleen D'Alessandro, ANE-1, FAA New England Regional Administrator  
[Colleen.Dalessandro@faa.gov](mailto:Colleen.Dalessandro@faa.gov)

**RE: Proposed Runway 4L Environmental Assessment Follow Up Procedural Request**

Dear Ms. D'Alessandro:

Thank you for your response to my letter dated May 18, 2020 regarding the Environmental Assessment (EA) process and timeline for the proposed Boston Logan International (Logan) Airport Runway 4 Left (4L) Approach Procedure. I would also like to thank you and FAA staff for attending our virtual Massport Community Advisory Committee (MCAC) meeting on June 11, 2020 to discuss this matter further. We were disappointed that FAA denied our request to delay the timing of the 4L EA process considering the ongoing COVID-19 pandemic and the effect upon the communities, neighborhoods, and residents that would be impacted by this process. We urge FAA to reconsider our request for the delay as stated in my initial letter. Barring that, however, I would put forward some follow up requests for the Proposed 4L EA process.

As discussed at our virtual meeting, the current FAA process would release the draft EA upon the commencement of the public comment period, during which the public workshops would be conducted. We request that the Draft Proposed 4L EA be provided to members of the public no less than 30 days prior to the commencement of the public comment period. Furthermore, any online resources like those presented at the Southern Florida Metroplex virtual workshop (e.g. interactive maps, video representations of flight paths, etc.) should also be made available no less than 30 days prior to the commencement of the public comment period. This would ensure adequate time to review the Draft EA and supporting materials prior to both the workshops and the public comment period.

Your letter indicated that the FAA plans to conduct the 4L EA public workshops virtually using a format and platforms like the recent South Florida Metroplex project virtual workshops. Having attended these virtual workshops, we maintain our belief that the virtual workshop format is not an adequate substitute for in person meetings. In particular, we remain concerned for impacted communities and neighborhoods with higher proportions of residents lacking sufficient resources and availability to attend virtual meetings in a meaningful way. Adequate access to information and the ability for impacted residents to participate is critical for any environmental review process. To address these concerns, we request that the comment period be extended from the currently planned 30 days to 90 days to allow for greater participation and engagement by the impacted communities and their residents given the anticipated use of the virtual workshops format.



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We appreciate the FAA's participation with the MCAC on matters relating to Boston Logan International Airport, and especially for your further consideration of our requests as it relates to the 4L EA. Ensuring the impacted communities, neighborhoods, and residents are fully briefed and aware of the proposed procedure and can participate and comment in a meaningful way is our primary concern on this issue.

We are also aware that some of the communities and neighborhoods plan to commit both time and monetary resources to further evaluate and study this matter and its effect on their residents. We expect they will submit follow up questions directly to FAA as well as specific recommendations or requests regarding the 4L EA process. We respectfully request that these questions and requests be fully considered and responded to by FAA as needed.

I look forward to working with you on this matter moving forward.

Sincerely,

Matthew A. Romero  
Massport CAC Executive Director

cc: David Carlon, MCAC Chairman  
Thomas Dougherty, MCAC Milton Representative and Treasurer  
Flavio Leo, Massport Director of Aviation Planning and Strategy  
Anthony Gallagher, Massport Community Relations



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August 7, 2020

Mr. Matthew A. Romero, Executive Director  
Massport Community Advisory Committee  
One Broadway, 14th Floor  
Cambridge, MA 02142

Dear Mr. Romero:

Thank you for your July 14, 2020 correspondence regarding the proposed Runway (RWY) 4 Left (L) environmental assessment (EA) follow-up procedural request on behalf of the Massport Community Advisory Committee (MCAC).

In your letter, you requested the Federal Aviation Administration (FAA) delay the environmental review process for the proposed General Edward Lawrence Logan International Airport (BOS) Area Navigation (RNAV) Global Positioning System (GPS) RWY 4L [RNAV (GPS) RWY 4L] approach procedure. However, the FAA intends to proceed with the project as scheduled, with virtual public workshops to be conducted in the fall 2020 for the reasons cited in our June 11, 2020 letter.

You also requested to extend the comment period from 30 days to 90 days. After careful consideration, we have determined that we are able to extend the comment period for an additional 30 days for a total of 60 days. The draft proposed 4L EA will be provided to members of the public no less than 30 days prior to the commencement of the virtual public workshop. The draft EA and supporting information will be made available in the fall 2020. The public and stakeholders may begin to provide comments at that time for 60 days.


Finally, you requested that the FAA provide adequate access to information and the ability for impacted residents to participate in the environmental review process. The FAA plans to host two virtual workshops in the fall 2020, which will be recorded and available on YouTube and the FAA website. The proposed format for these workshops will be similar to the Southern Florida Metroplex. The FAA will consider all comments and respond to them in the final decision document. The final decision is expected to be made in the spring 2021.

We appreciate the continuing dialog with MCAC on this subject and look forward to working with MCAC members and local community leaders to identify other accommodations that may help address specific community challenges. While the FAA understands that the COVID-19 public health emergency has caused massive disruptions within communities across the world, we must continue our mission to improve safety and enhance efficiency in the National Airspace System.

Sincerely,

**COLLEEN M  
D'ALESSANDRO**

Colleen M. D'Alessandro  
Regional Administrator, New England Region

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Date: 2020.08.10 09:55:55 -04'00'

CC: Thomas Dougherty





**Massport Community Advisory Committee**  
One Broadway, 14<sup>th</sup> Floor  
Cambridge, MA 02142

August 17, 2020

(VIA ELECTRONIC MAIL)

Colleen D'Alessandro, ANE-1, FAA New England Regional Administrator  
[Colleen.Dalessandro@faa.gov](mailto:Colleen.Dalessandro@faa.gov)

**RE: Proposed Runway 4L Environmental Assessment Follow Up Procedural Request**

Dear Ms. D'Alessandro:

Thank you for your response to my letter dated May 18, 2020 regarding the Environmental Assessment (EA) process and timeline for the proposed Boston Logan International (Logan) Airport Runway 4 Left (4L) Approach Procedure. I would also like to thank the FAA for its willingness to provide the draft EA and materials ahead of the public comment period, as well as its willingness to extend the comment period further.

However, I hereby renew our request to delay the 4L EA until January 1, 2021 or later if appropriate due to the ongoing COVID-19 pandemic for the reasons listed below.

Residents affected by this proposed change would like to meet to discuss their concerns and issues related to the new flight path but are unable to do so due to the pandemic. As noted in my previous correspondence, the neighborhoods impacted by the proposed 4L RNAV flight path continue to struggle with both the health and economic impacts of the pandemic. These areas are also disproportionately impacted by the required technology and services required to participate in virtual meetings. While public libraries are usually an option for internet access, they are currently unavailable for this purpose. The FAA has noted that hard copies of the draft EA can be mailed to residents, but this puts them at a severe disadvantage compared to others with access to the technology and services to participate.

Secondly, the virtual modality of the public workshops being conducted by the FAA are not sufficient compared to an in-person workshop. While questions may be asked, there is no ability for an individual to ask direct follow up questions immediately upon a response by the FAA to fully explore a line of questioning. Follow up questions get added to the queue and answered far later, out of order, and only if there is sufficient time. The virtual workshops also allow participants from outside of the area to attend and ask questions virtually, as we saw during the South Florida Metroplex workshop. These questions being asked by these remote participants further limits full participation of the residents impacted by the proposed flight path change.



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Finally, one of the primary reasons stated for proceeding with the 4L EA is due to safety concerns. However, due to the pandemic 4L is seeing an extremely low volume of flights compared to earlier this year. This suggests that the urgency of proceeding with this process due to safety concerns is similarly reduced, and therefore a delay would be warranted.

Sincerely,

A handwritten signature in black ink, appearing to read 'Matthew A. Romero'.

Matthew A. Romero  
Massport CAC Executive Director

cc: (via electronic mail)

Congressman Stephen F. Lynch  
David Carlon, MCAC Chairman  
Tom Dougherty, MCAC Milton Representative  
Anthony Gallagher, Massport Community Relations