

April 23, 2015

Ms. Marina Landis
Environmental Specialist
Western Service Area – Operations Support Group, AJV-W22
Federal Aviation Administration
1601 Lind Avenue, SW
Renton, WA 98057

Re: Notice of Intent to Prepare an Environmental Assessment for the Phoenix Metroplex Project

Dear Ms. Landis:

The owners and operators of several of the public use airports located in the area that the FAA identified as possibly affected by the Phoenix Metroplex Project have reviewed the Federal Aviation Administration's (FAA) Notice of Intent to Prepare an Environmental Assessment for the Phoenix Metroplex Project. We have significant concerns about the scope of the NEPA process, the process by which alternatives will be developed and evaluated, the methodologies that will be employed to determine impacts, and the minimum level of public outreach being conducted for this scoping process.

FAA Order 1050.1E, Change 1, Environmental Impacts: Policies and Procedures, states in Section 208c:

"208c. Public input is important in defining the scope of FAA NEPA documents. Public involvement is required when the FAA prepares an EIS (40 CFR 1501.4(d)). Public involvement must be provided for, to the extent practicable, while an EA is being drafted (40 CFR 1501.4(b)). Although there is no standard approach to public scoping, it is important that FAA facilitate public participation in that process as well. Therefore, the FAA should tailor public scoping processes to match the complexity of the proposal." Highlight added for emphasis

It is clear from FAA Order 1050.1E that, if the FAA decides to conduct scoping, it should be done in a way to obtain meaningful input and should be tailored to the complexity of the situation. Heightened sensitivity to air traffic changes in the Phoenix area since September 2014 has increased the public's desire to engage in the process that will determine the future flight path locations in their community. Therefore, an important way to explain to the community what opportunities they will be given to participate, and to clear up the confusion that exists is to hold formal public scoping meetings.

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Based on the demonstrated complexity and the controversy associated with air traffic changes, we request:

- 1. The FAA conduct formal public scoping meetings to fulfill the specific direction and intent of FAA Order 1050.1E regarding public input for scoping of an EA.**
- 2. The FAA provide a 45-day extension of the scoping comment deadline to afford stakeholders, including the public, the opportunity to meaningfully participate in the NEPA scoping process.**
- 3. The FAA provide the airport's signing this letter an opportunity to participate in all route and procedure design meetings relevant to that airport as representatives of the communities they serve. This is consistent with the provisions of FAA Order 7100.41, which calls for inclusion of the airport operators in the working group process to provide "input on procedure and route design, including any potential operational or environmental impacts to the airport and surrounding communities." FAA Order 7100.41 at A-5.**
- 4. The FAA provide the airport's signing this letter, with a copy of its current stakeholder scoping contact distribution list that was used in preparing the Phoenix Metroplex Environmental Assessment.**

Respectfully submitted by a coalition of the following airport owners and operators,

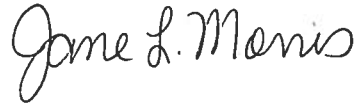
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Sky Harbor International Airport



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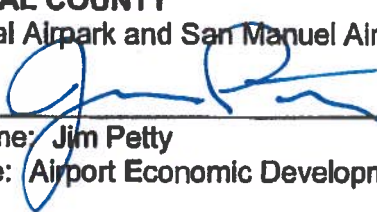
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cc: Mr. Glen A. Martin, Regional Administrator, FAA
Ms. Donna Warren, Manager, Environmental Policy Team, FAA
Mr. Mike Williams, Manager, Phoenix Airports District Office, FAA