

CLT Airport Community Roundtable - Reaction Document to FAA Presentation on June 9th 2021

The CLT Airport Community Roundtable (ACR) membership is incredibly disappointed with the response from the Federal Aviation Administration (FAA) and CLT Air Traffic Controllers (ATC) to our noise reduction recommendations received on June 9. We are some twenty residents (a total over 30 since the ACR was founded in 2017) who are both personally impacted and representative of our broader community. The ACR has worked collaboratively to develop and propose solutions for the aircraft noise that negatively impact the quality of life for many residents of Charlotte and its surrounding areas. Our efforts involved having our members educating and moderating the public response to aircraft noise and included dozens of hours each, beyond our meetings for additional research, communication and education. With the help of Gene Reindel with Harris Miller, Miller and Hanson Consultants (HMMH) and CLT Airport staff we worked to create practical realistic recommendations, not as a group of community activists but as community partners. The total hours and costs spent over the last three years on this endeavor are staggering. That said, the ACR was basically told that every well researched suggestion was a "non-starter" or would be reviewed in the future.

This Reaction Document is organized primarily around the ACR's six recommendations in order. It is intended to illustrate our reactions to the FAA's response, list specific member questions to each recommendation, and to summarize our expectations on the next steps of the FAA and ACR.

The exact words of the ACR members themselves will best convey the depth of betrayal and to the futility we felt –

"Frustrated, disappointed, dismissed . . . the FAA has NOT acted in good faith to help solve the problems . . . the response appeared to be the FAA justifying the rationale for the current flight operations."

"I was absolutely shocked, stunned and amazed that they didn't accept or seem to consider any of our recommendations. It was truly heartbreaking."

"Shocking! Over the top. It felt like they had the response ready before they even got it."

"Very disappointing! Appears there was little real analysis by the FAA as they summarily rejected our recommendations as 'non-starters.'"

"I am still angry and disappointed in the FAA's disrespect towards the ACR. My overall impression is that they have no intent to work with the ACR."

"Very disappointing! I felt the FAA has patronized the ACR throughout this process and has never joined us as a fellow team member, trying to improve people's lives."

"They gave no evidence of the reasons for not using a recommendation, they got nowhere near the rigor and discipline we showed. We took this seriously, why didn't they?"

"Their approach seemed that they had no expectation of helping to reduce noise. . . they just wanted to identify why they could not do anything and some of those reasons did not appear valid."

It appears there has been a major failing on the FAA's part to adequately explain their opinions about these six ACR recommendations nor recommend alternative solutions to solve the problems of aircraft noise. The lone exception is in our third recommendation which asks to raise the CAATT and possibly other waypoints. A tremendous amount of data analysis was conducted by HMMH with each recommendation to ensure the overall impact of noise was more evenly distributed and or reduced. With this said we have questions that we would like to have answered. As instructed, we have compiled them here in writing for a response by the FAA at our September 8, 2021 meeting.

Recommendation 1: Greater Use of Continuous Descent Approaches –

Per our original Submittal of Six Recommendations on July 9, 2020, we asked for the following - Implement Continuous Descent Approaches (CDA) under 12,000 feet. Expected to reduce noise levels along current arrival flight paths until aircraft intercept the final approach. In 2019, the FAA indicated that CLT would be receiving TSAS (Terminal Sequencing and Spacing) and EOR (Established on RNAV) procedures estimated for calendar year 2021. The ACR would like the FAA to examine other methods of implementing continuous descent approaches in lieu of having aircraft hold at low altitudes for miles on the downwind phase of flight. Under preliminary analysis using the above ACR criteria this recommendation is expected to have a net benefit in noise reduction to over 276,000 residents in the Charlotte Metropolitan area. More details can be found in **Appendix pg. 34**.

Per the FAA response Dated June 4, 2021 –

Our preliminary analysis of the use of Continuous Descent Approaches (CDA) at CLT indicates that the use of CDAs is not feasible at CLT for the following reasons: 1) CDAs would not be an effective tool for maintaining safety and efficiency at the airport due to the complexity of the operation and the lack of a sequencing and spacing mechanism, such as Terminal Sequencing and Spacing (TSAS), which is not planned for CLT at this time; 2) CDAs would increase track miles due to aircraft being placed in a holding stack until being sequenced to final; and 3) the FAA would not implement CDAs prior to conducting an operations model and safety assessment to determine the effect of its use on the operation and industry at locations with triple runways, during heavy traffic volumes, and with mixed CDA and non-CDA traffic. This type of model is not planned at this time and has not been conducted previously for any similar environment, world-wide.

ACR Member Questions –

1. Why does the FAA repeatedly mischaracterize our request about the CDA? We are initially recommending this for night- or off-peak-time utilization.
2. The analysis the ACR performed used CDAs from 9:30 p.m. - 5:30 a.m. and for only those aircraft equipped to support CDAs (which reflected in 18% of total arrivals according to HMMH). What time of day did you use in your analysis? What aircraft did you use in the analysis? What total percentage of arrivals did you analyze?
 - a. Also, what is the number of track miles increased if used during just these times?
 - b. What are specific measures of safety and efficiency at these times if CDAs were to be used compared to current measures of safety and efficiency?
 - c. What percentage of the time during these hours are triple runways in use?
3. Why are controllers clearing aircraft to the lowest possible sector altitude as soon as possible, regardless of the direction of operation? This is the direct cause of the 3,800' MSL (3,000' AGL) overflights in outlying areas.
4. Why won't FAA implement a "management policy", (a written legal regulation is not required), for local FAA management to tell controllers to delay descents until as late as safely comfortable, rather than as soon as possible?
5. What can we work on together to respect higher altitudes until joining the final approach course? It's our understanding that even if we change the altitudes on the procedures ATC can still assign aircraft to lower altitudes?

6. When will TSAS be available for use in the Charlotte airspace?
7. In the June 2021 meeting, the FAA mentioned that CDAs could not be done for several reasons:
 - a. Emissions – please share what data proved that our recommendation increases emissions, even though planes are in continuous descent.
 - b. Efficiency – please show data on the change in efficiency.
 - c. Safety – please show data on the level of impact on safety.
 - d. Track miles – please show data on the number of net additional track miles.

Recommendation 2: Maintain 6,000' Arrival Minimum Altitude until Final Approach Course

[Per our original Submittal of Six Recommendations on July 9, 2020, we asked for the following –](#)

Raise the minimum altitude for aircraft to maintain 6,000 feet when on an extended downwind. Raising the minimum altitude on the downwind arrival legs is expected to reduce noise levels along the downwind leg, particularly for those aircraft at high power to maintain level flight.

Currently arrivals to CLT often fly extended downwind arrival legs for upwards of 20 miles. Due to the unpredictability of aircraft being able to join final, air traffic controllers often direct aircraft down to 4800 feet so that the arrival can turn base at first availability.

Per the understanding of the ACR, this was not always the case at CLT. Previously there had been a preference for controllers to 'keep the aircraft high' as much as possible on the downwind, and part of this recommendation is that this preference be returned.

*The ACR is proposing that no aircraft be permitted to descend below 6,000 feet until a reasonable estimate of joining the final can be made. This adjustment to arrival procedures would provide a clear, demonstrable reduction in noise levels in areas along the existing downwind approach, which encompasses nearly 320 square miles. **Further details can be found in Appendix pg. 35.***

Per the FAA response Dated June 4, 2021 –

Due to the volume of aircraft arriving at triple parallel runways, and an often lengthy approach course (occurs regularly), Air Traffic Control (ATC) needs a full range of level altitudes between 4,000 and 9,000 feet (ft) to sequence aircraft to final. Using 4,000 ft and above ensures aircraft remain in the Class B airspace. Using 9,000 ft and below is needed to de-conflict approaches from departures; to protect adjacent airspace. This also provides the number of level altitudes needed to safely and efficiently sequence aircraft to three final segments. Eliminating the use of 4,000 and 5,000 ft for sequencing to final would be a significant operational change resulting in increased holding and/or increased track miles. This is not feasible at CLT without significant negative impact to the air traffic operation, industry operations, and the community. Specifically, the recommended change would cause delays, resulting in reduced airport arrival rates. The increased track miles would likely increase noise over areas currently impacted by air traffic, while potentially introducing noise over new areas not currently impacted by air traffic.

ACR Member Questions –

8. The FAA quotes an altitude of 4000 ft, yet most planes are at 3,700 ft on the downwind. Why the difference?

9. When FAA leadership noted “significant negative impact (on)...the community,” share data that proves the impact. - If you are referring to “potentially introducing noise over new areas not currently impacted by air traffic,” show specific data that illustrates where noise will be moved to, moved from, and the updated level of noise for all affected areas.
10. We would like to see an explanation of the analysis including:
 - (a) Show us the documentation of the impact of changes that proved what you presented. Please show the specific number of additional track miles, the specific amount of increased holding, the specific level of delays projected, and the economic impact.
 - (b) FAA response didn’t relate to our analysis; they should say “this is the analysis you - the ACR - showed; this is what we - the FAA - found in our analysis.” We request that an adequate review is performed against the assessments. The ACR provided in depth analysis to support the proposal.
 - (c) Show independent analysis - they provided nothing compared to the level of detail we provided.
 - (d) Their analysis appeared to be – “we got experienced controllers around the table and asked if they’d like to change something.” The response, understandably, is “no, we don’t want to change.” There is no appetite - whatsoever - for ATCs to do anything to change procedures. Did they take expert opinion, or did they actually do analysis?

Recommendation 3: Return CAATT Waypoint to Pre-Metroplex location

[Per our original Submittal of Six Recommendations on July 9, 2020, we asked for the following –](#)

Bring altitude on CHSLY waypoint arrival closer to pre-Metroplex altitudes. As noted in Recommendation 2, raising the altitude on the downwind arrival legs is expected to reduce noise levels along the downwind leg, particularly for those aircraft at high power to maintain level flight.

Note: a memo detailing the requested changes was forwarded to the FAA by the City of Charlotte Aviation Department dated November 7th, 2018. To the understanding of the ACR this recommendation was previously accepted by the FAA, but the preference of the Administration is to also include this recommendation with all other ACR recommendations.

*Under preliminary analysis using the above ACR criteria this recommendation is expected to have a net benefit in noise reduction to over 80,000 residents in the Charlotte Metropolitan area. More details can be found in **Appendix pg. 36.***

Per the FAA response Dated June 4, 2021 –

As shared previously, moving the CAATT waypoint to its pre-Metroplex location is not feasible due to the increased track miles that would result and the potential for increased noise over parts of the community where traffic is not currently expected. Amending procedures to mitigate noise typically results in moving noise from one area to another. However, after collaboration with the appropriate stakeholders and considering the most prudent design for the airspace, ATC

determined that higher altitudes over the waypoints would be feasible and might deliver one of the stated goals of the ACR to keep aircraft arrivals higher.

The ACR is pleased that this recommendation is considered viable and possibly could be expanded to include other Way Points. The ACR would like to understand the tradeoffs and possible implications of increasing waypoint altitudes along other routes as described in the FAA's response. Can the FAA please provide their analysis and the details on which waypoints will be modified in their proposal? Once the ACR understands the FAA's proposal, it can make a recommendation on moving this option forward for formal FAA review.

ACR Member Questions –

11. Please share the noise effects on the community of changing altitudes at the Waypoints other than CAATT and EPAYE.

Departure Recommendations

Recommendation 4: Remove the 2-Mile Restriction on Departure

Recommendation 5: Utilize Divergent Departure Headings

Recommendation 6: Change Headings of First Turns off Runways 18L and 18C

Per the FAA response Dated June 4, 2021 –

The reason for postponing the review of recommendations that would affect departures is the core team's belief that the anticipated Part 150 study will provide an appropriate framework for consideration and possible implementation of the ACR's departure recommendations 4, 5 and 6.

ACR Member Questions –

In discussion with CLT staff, it is understood that the Environmental Assessment for CLT expansion and the Part 150 update will not be completed until Q3 2023. That being said, this means that the FAA will not even consider these three departure recommendations until after that date. Is this correct? If so we feel this is an unreasonable delay in the proposed recommendations.

12. Is the FAA stating that they will do no analysis on the 3 Departure recommendations until the Part 150 is complete? If so, that is not acceptable. The Part 150 will focus on the 65 DNL contour area, and our analysis and focus, as well, is far broader than that; what analysis will the FAA provide – and when – on the 3 Departure recommendations that fully addresses areas outside of the 65 DNL contour area and represented by members.

Summary and Next Steps

In conclusion, we have tried to convey the actual reactions, the questions, and the positions of the ACR to the FAA's response to our recommendations to reduce aircraft noise in Charlotte. We are seeking clarity to understand how the FAA has conducted analysis and determined their responses. We understand that we have asked many questions. Here are four additional general questions we would like answered –

1. Please show the FAA data and objective analysis of your responses to our slate items. We did extensive analysis, which is countered by some of the FAA verbal responses, but without evidence.
2. Does the FAA have any interest at all in reducing the noise in the CLT area? If so, what steps is the FAA taking on its own to accomplish that end?
3. May we see the impact analysis completed to support their conclusions and show a comparison against the ACR/HMMH analysis?
4. Weather in Charlotte - why did the FAA present an example of how a weather incident impacts arrivals? How did this relate to the arrival proposals? The ACR understands that a weather event would cause an override of standard operating procedures. In other words, weather events are special situations so why would a special situation be used to support the objection to a change in procedures?

In terms of next steps, we invite the FAA to join the Charlotte ACR at our next meeting (in person) on September 8 at the CLT airport. At that time, we hope to hear your answers to our questions and discuss where we can go from here to improve the aircraft noise issues in Charlotte. The CLT ACR remains committed to finding an equitable compromise to the currently excessive aviation noise in our region.