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October 29, 2021

Colleen D'Alessandro  
New England Regional Administrator  
Federal Aviation Administration  
1200 District Avenue  
Burlington, MA 01803-5299  
[Colleen.DAlessandro@faa.gov](mailto:Colleen.DAlessandro@faa.gov)

Dear Ms. D'Alessandro,

The Town of Belmont has been subjected to three concentrated flight paths implemented by the FAA in June of 2013 with the implementation of the 33L RNAV departure procedure. Since the fall of 2013, our residents, Town leadership, State Legislators and Congressional delegation have been asking the FAA to provide some form of relief to those residents who were impacted by the new concentrated flight tracks. We were hopeful that the RNAV Study commissioned by Massport would yield some solutions. We were led to believe that the goal of the Study was to find alternatives or modifications to procedures such as 33L RNAV that would seek to address the negative impacts of concentration through dispersion. Concentrated flight paths not only create repetitive noise but also can have negative health impacts from pollution or sleep disturbance. The pre-RNAV procedure (Logan Six) and operations had a high-level of variability because air traffic controllers (ATC) were directing the flights, therefore no one neighborhood or community was getting a disproportionate share of the impact.

We were disappointed that after years of effort by MIT – that the multiple Block 2 alternatives for 33L dispersion resulted in no feasible options after being reviewed by the FAA and your stakeholders. Unfortunately, the most recent 2D-2 proposal for 33L departures does not decrease the number of tracks over Belmont and more concerning is that it appears - based on

the data provided - to actually increase the noise impact to the Grove Street neighborhood. This area close to Fresh Pond is already heavily impacted by 33L southbound departures. The 2D-2 proposal does not mimic the pre-RNAV dispersion, nor does it create a more equitable sharing of burden. It retains the use of a small number of concentrated RNAV flight paths which are merely moved or shifted to other neighborhoods. Because of this, we are rejecting the 2D-2 proposal.

Though the current RNAV Study may be concluding; we demand that the FAA continue to apply its flight procedure design expertise and use of NextGen to develop feasible dispersion alternatives. These alternatives should focus on decreasing the negative impacts of flight path concentration through greater path variability, rotation of paths and/or dispersion through ATC control or use of advanced navigation technology. We will be asking Congresswoman Clark, Senators Markey and Warren and our State Legislators to support this request as our residents continue to want a solution to this problem.

Sincerely,

  
Patrice Garvin  
Town Administrator

Cc:

Congresswoman Katherine Clark  
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Senator Edward Markey  
975 JFK Federal Building  
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