



**Chandler • Arizona**  
*Where Values Make The Difference*

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April 22, 2015

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

**RE: PHOENIX METROPLEX ENVIRONMENTAL ASSESSMENT NOTICE OF INTENT**

**Ms. Landis:**

The City of Chandler, Arizona (City) was recently informed about your notification letters to several airports in the Phoenix metropolitan area regarding the Federal Aviation Administration's (FAA's) intent to prepare an Environmental Assessment (EA) for the Phoenix Metroplex project. Your letter provided the opportunity for communities to provide any background information regarding the study area and to advise the FAA of any issues, concerns, policies, or regulations by April 27, 2015.

The City is a municipality within the Metroplex study area, the Owner and Sponsor of the Chandler Municipal Airport (CHD), and is close to Phoenix Sky Harbor International Airport (PHX) and Phoenix Mesa Gateway Airport (IWA). Therefore, we are an affected party and a direct stakeholder of the Phoenix Metroplex and to the National Environmental Policy Act (NEPA) process. The City of Chandler was not directly notified of this NOI by the FAA; however, given the short time frame that we have to respond, the City's initial comments are as follows:

1. Because the City of Chandler was not directly notified of this NOI by the FAA, we request a forty-five day (45) day extension of the April 27, 2015 deadline. This extension will also provide an opportunity for other communities and stakeholders that may not have been sufficiently notified.
2. We request to be formally notified of all future opportunities for the public, affected agency, and participating Sponsor input.



3. We request that the FAA provide future notifications to both the Chandler City Manager and the CHD Airport Administrator. The Airport Administrator is Chandler's designated Point of Contact (POC) for the Phoenix Metroplex Project. The mailing addresses are:

RICH DLUGAS  
CITY MANAGER  
City of Chandler  
Mail Stop 605  
PO Box 4008  
Chandler, AZ 85244-4008

CHRIS ANDRES  
AIRPORT ADMINISTRATOR  
City of Chandler  
Mail Stop 802  
PO Box 4008  
Chandler, AZ 85244-4008

4. We request that the EA fully consider the potential for permanent significant impacts to the Chandler community in several environmental categories. We have many concerns with the proposed action as it relates to potentially "significant impacts" under NEPA. During the NEPA process, we will focus on potential impacts to the community's noise exposure, aircraft hazard exposure, degradation of Section 4(f) properties, degradation of air quality standards, environmental justice concerns, and cumulative impacts of the Metroplex system in relation to the proposed action.
5. We request that the FAA schedule and facilitate a public workshop at a location within the City of Chandler as part of the scheduled draft EA public review.
6. We request electronic copies of the FAA's most current enroute "T-routes" and Terminal Procedure Plates in effect for PHX, IWA, and CHD.
7. We request the responsible FAA Air Traffic Organization Environmental Protection Specialist and/or the FAA Phoenix Airport District Office staff be available and participate in meetings with Chandler staff at key intervals throughout this process.
8. We request that the FAA permit Chandler staff to participate in all route and procedure design meetings relevant to the Chandler Municipal Airport as representatives of the Chandler community.
9. We request that the FAA's physical and electronic materials that are presented to the public and stakeholders conform to the FAA's official *Plain Language Writing Manual* to facilitate meaningful input and minimize technical jargon.
10. We request that the FAA engage professional aviation organizations in this process including, without limitation, the Arizona Business Aviation Association, the Aircraft Owners and Pilots Association, and the Arizona Airports Association.
11. We request a copy of the FAA's stakeholder scoping contact distribution list that was used in preparing this EA.

In our discussion with other airports, we recognize that other communities have identified technical concerns regarding the EA process. We share many of those concerns, including, without limitation:

12. The proposed action appears to alter noise exposure in the City of Chandler as additional performance-based navigation approaches and departures (including RNAV) within the area of potential effect will disperse noise immediately around CHD and IWA. Have any reasonable alternatives been identified through pre-scoping? It is our understanding that the approving FAA official must determine that there are no unresolved conflicts concerning alternative uses of available resources in presenting a single-action EA. We are concerned that the proposed action may affect extraordinary circumstances.
13. It is not clear if the proposed action has been evaluated per the FAA's Safety Management System Policy. If so, please provide us with the final Safety Risk Management determination or other documentation supporting this analysis.
14. Is the proposed action EA subject to, or being conducted under, the Aviation Streamlining Approval Process Act of 2003? If so, please provide us with documentation supporting this decision.
15. City-owned Section 4(f) lands and facilities within the area of potential effect and in proximity to CHD and IWA are likely to be impacted by the proposed action. Therefore, we request EA analysis for these areas at or below 18,000 feet above ground level.
16. Will the FAA issue an Administrative Draft EA before the Draft EA? If so, when is the Administrative Draft expected to be completed?

We are happy to provide the FAA with our adopted policies and plans relative to the proposed action. To help us provide the best information for your analysis, please provide the information requested in this letter at your earliest convenience.

We recognize the importance of the NextGen system in modernizing our nation's air transportation system and the anticipated social, environmental, and economic benefits. We appreciate the opportunity to provide input to the NEPA process and look forward to working with the FAA throughout this process. If you have further questions, please contact Chandler's point of contact, Chris Andres, at (480) 782-3540 or [Chris.Andres@chandleraz.gov](mailto:Chris.Andres@chandleraz.gov).

Sincerely,



Jay Tibshraeny  
Mayor

cc: Mr. Dlugas, City Manager  
Ms. Reed, Assistant City Manager  
Mr. Andres, CHD Airport Administrator  
Mr. Mike Williams, Manager FAA AWP PHX ADO  
Mr. Mike Klein, Manager, ADOT Aeronautics  
Ms. Jane Morris, Manager, Phoenix Mesa Gateway Airport