



August 5, 2026

The Honorable Byan Bedford
Administrator
Federal Aviation Administration
Washington, D.C. 20591

Dear Administrator Bedford,

We write regarding the proposed Phoenix Area Modernization Project and Draft Environmental Assessment released by the Federal Aviation Administration (FAA) on April 29, 2026. While we share the goals of ensuring a safe and efficient airspace in the Phoenix area, we are concerned that the FAA's proposed flight procedure changes will have significant adverse effects for neighborhoods, communities, and airports across the Phoenix area. To rectify these concerns, we urge the FAA to publish a revised Draft Environmental Assessment that addresses the concerns raised during the recently closed public comment period prior to implementing the Phoenix Area Modernization Plan.

As you know, proposed modifications to eastbound and westbound flight paths for Sky Harbor International Airport (PHX) in 2014 led to nearly a decade's worth of litigation involving the City of Phoenix, the City of Scottsdale, and impacted historic neighborhoods. This process led to a 2017 ruling requiring the FAA to redesign the westbound flight paths and take other corrective actions, which both required extra time and resources of the FAA, and led to increased distrust of FAA decision-making throughout the Phoenix area. Regrettably, rather than learn the lessons from this experience, the FAA's proposed Phoenix Area Modernization Project fails to address long-standing concerns raised by key regional stakeholders, ignores requirements of the 2017 Court of Appeals ruling in *Phoenix v. Huerta*, and exposes an additional 86,384 people in North Phoenix, Scottsdale, and Chandler to new and unnecessary noise pollution.

We note and appreciate that modernizing airspace procedures are important. The combination of outdated existing RNAV procedures and a lack of new satellite-based air traffic procedures in the Phoenix area result in traffic management sector overload and increased controller workload. Resolving these issues would ensure a safer airspace. However, geometric airspace changes should only ever be made as a last resort, and any proposed changes must be clearly justified and accompanied by robust public engagement.

By that measure, the current process followed by the FAA has fallen short. Flight path changes near several regional airports are proposed to be modified in ways which have significant, adverse consequences for tens of thousands of Phoenix-area residents, despite less disruptive

alternatives existing. There are several aspects of the Phoenix Area Modernization Project which should be re-evaluated to address community concerns. These concerns are enumerated below:

North Phoenix Community Noise Impacts:

The Phoenix Area Modernization Project proposes to modify the departure routes from Scottsdale Airport (SDL), which would result in more traffic flying over residential areas and the Phoenix Mountain Preserve in North Phoenix. Data from the FAA indicates that 86,384 people in the Phoenix Area will experience a reportable noise increase and 65,475 will be exposed to noise increases of 5 decibels or more, with most of that population in the North Phoenix region. Given that much of the projected noise increase will be experienced by a narrow band of residential areas directly beneath the hyper-concentrated RNAV flight paths, the Phoenix Area Modernization Project should be modified to incorporate track dispersion, alternating headings, and schedule-based track rotation for flights into and out of SDL to distribute the volume of traffic across multiple areas, rather than placing the entire noise load on a single community.

Mesa Gateway Modified North Departure Procedure:

The Phoenix Area Modernization Project proposes a new northbound departure procedure from Mesa Gateway Airport (IWA) that would route turbojet and turboprop aircraft over established residential neighborhoods north of the airport that have never been beneath a defined departure flight corridor. Since the airport began civil aviation flights in the mid-1990s, aircraft departures have remained south of the east-west high voltage power transmission lines near Guadalupe Road. This boundary was affirmed in IWA's Part 150 study, approved by FAA in 2000, and for decades the city has made zoning and land-use decisions under the assumption that aircraft traffic would not be routed south of this dividing line. Despite this longstanding practice, the Phoenix Area Modernization Project proposes to now route northbound departures out of IWA north of the transmission lines and route departing turboprop and jet aircraft over residential communities in Mesa. The Phoenix Area Modernization Project should revise the northbound departure procedures to maintain the long-standing operational buffer south of the power line corridor.

Sky Harbor Group B Aircraft Departure Procedures:

The Phoenix Area Modernization Project includes new standard instrument departures for general aviation, turboprops, and small commuter planes (Group B aircraft) from Sky Harbor International Airport (PHX) which do not require such aircraft to adhere to noise abatement gates described below. This change would result in new air traffic flows which differ significantly from current operations – and would have the effect of requiring more aircraft to fly over communities which are more noise sensitive. In particular, the implementation of the proposed

procedures would directly impact Phoenix Historic Districts to the northwest of Sky Harbor, as well as residential areas to the southeast, northeast, and southwest of the airport. The Phoenix Area Modernization Project should be revised to either require Group B aircraft to adhere to the PHX noise abatement gates or include dispersion, diffusion, or rotational routing for the Group B departure corridors to mitigate noise impacts for Group B aircraft.

Maintenance of Sky Harbor Noise Abatement Procedures:

Following the 2017 U.S. Court of Appeals ruling in *Phoenix v. Huerta* and the subsequent settlement agreement between the FAA and City of Phoenix, the FAA implemented a noise abatement procedure for western standard instrument departures from Sky Harbor International Airport (PHX) known as the 43rd Avenue Gate. A similar agreement was entered into by the FAA in 1994 between the cities of Phoenix and Tempe, which established a noise abatement procedure for eastern standard instrument departures from PHX known as the 4DME gate. While we understand the FAA has indicated during outreach sessions that there were no immediate plans to change either noise abatement procedure, the Phoenix Area Modernization Project should explicitly commit to maintaining both noise abatement procedures. Failing to do so undermines community trust in the FAA's modernization process by failing to recognize longstanding community concerns.

Ensuring the safety, efficacy, and reliability of the national airspace system is critical, and we appreciate the work that FAA is doing to modernize airspace management strategies through the Phoenix Area Modernization Plan. However, such efforts must account for the impacts that flight routing decisions have on affected communities, recognize and respect prior arrangements reached between the FAA and affected communities regarding noise impacts, and meaningfully incorporate community feedback.

We appreciate that in response to feedback received from the public and local agencies during the Draft Environmental Assessment comment period, the FAA has delayed its timeline to implement the Phoenix Area FAA Modernization Project to fully address the comments received. But we urge the FAA to go further and commit to making meaningful changes to the Phoenix Area Modernization Project to address the serious concerns raised by impacted communities prior to finalizing or implementing any new air traffic procedures. We also request that FAA leadership schedule a meeting with our offices to explain how the agency plans to work collaboratively with community leaders to address the substantive concerns they've identified.

We would welcome the opportunity to discuss the concerns we have heard from the community with you directly. Thank you for your ongoing leadership to maintain a safe and responsible national airspace system.

Sincerely,

A handwritten signature in blue ink that reads "Mark Kelly". The signature is fluid and cursive, with the first name "Mark" and last name "Kelly" clearly distinguishable.

Mark Kelly
United States Senator

A handwritten signature in black ink that reads "Ruben Gallego". The signature is fluid and cursive, with the first name "Ruben" and last name "Gallego" clearly distinguishable.

Ruben Gallego
United States Senator

CC: Sean Duffy, Secretary of Transportation
Raquel Girvin, FAA Western-Pacific Regional Administrator