

July 7, 2002

Mr. Michael Cheston, Executive Director

Rhode Island Airport Corporation

T.F. Green Airport

Warwick, RI, 02886

Dear Mr. Cheston:

I am writing as the At-Large citizen representative of the Study Resource Committee (SRC), appointed by yourself, and as the endorsed and unopposed Democrat Candidate for Mayor of Warwick in the upcoming election. I am writing to request that you do not allow the SRC process to end at this time. Many citizens believe that doing so would be premature. We are not adequately prepared for the start of an Environmental Impact Study (E.I.S.). There is no justifiable reason to do an E.I.S. when a master plan based on a complete consideration and study of existing environmental concerns has not been adequately completed. It would be an obvious waste of federal funds

Upon review of FAA's own guidelines, one learns that an airport master plan is to be **based on obvious existing or potential shortcomings. These deficiencies may be the result of: 1) demand exceeding capacity; 2) the introduction of more demanding aircraft, or; 3) the emergence of a critical environmental problem.** According to FAA's own guidelines, therefore, a critical environmental problem would qualify in and of itself as a just cause for a Master Plan to be initiated. It would not be "new science" as we have been told.

The current SRC process has been heavily biased toward the consideration of #'s 1 & 2, above, to the effective exclusion of #3. This is in spite of the fact that airport affected citizens have expressed environmental concerns at length at every public hearing for the past ten or twelve years. The issues related to existing critical environmental problems have been clearly expressed by the public. The refusal of the airport corporation to fully consider these concerns was the basis for the citizen representative walk-out from the SRC process on the grounds that the planning process was unsafe without due consideration. Nothing has been done to make the process any safer since the return of the citizen representatives to the planning table. **We still have a critical environmental problem on our hands as a direct result of recent attempts to operate a commercial airport located in the center or a densely residential land use area and abutting sensitive wetlands.** We have not fully examined nor resolved any of these environmental problems within the scoping or planning processes to date. The proposals put forward for consideration do not adequately address the existing "critical environmental problems". We are simply not ready for an Environmental Impact Study (EIS) when the master planning itself has inadequately considered existing environmental problems.

That being the case, we are now faced with two apparent reasonable options:

1) The current SRC process can be lengthened and continued with an attempt made to incorporate and examine to the fullest extent possible the critical environmental problems, or:

2) The current SRC process can be aborted and a new 20 Year Master Plan immediately initiated that primarily focuses on the critical environmental problems and appropriate solutions.

For financial reasons, and to capitalize on the experience of the SRC members, I would recommend option 1.

We could begin the process of reorganization of the current SRC process by expanding the "stakeholders" to include those noted as missing at the first meeting: the U.S. Department of Housing and Urban Development (HUD) which has an undeniable stake in our community development; our Federal Legislators who must safe-guard the citizenry and expenditure of federal dollars; the Narragansett Indians who have an identified historical stake in the wetlands abutting the airport; the Rhode Island Association of Realtors (RIAR) who have concerns about property values, land use and disclosure of deed easements; Save the Bay and other environmental groups who have both knowledge and concern about the environment. In hindsight, it has become obvious that they should have been included from day one of planning. We need to go back and incorporate their vested environmental concerns and significant expertise into the planning process. Additionally, we should now include representatives of: the Department of Health to ensure that our already "F" - rated air quality is addressed in the planning process; real estate title attorneys who need to understand and communicate effectively the implications of restrictive deed easements; property & casualty insurance agents & underwriters who need to fully assess the risks to homes and homeowners in the vicinity of the airport's operations; and home mortgage lenders, appraisers & private mortgage insurers who may be affected by the environmental effects of airport operations on property and its value. I am also certain there are additional as yet unidentified "stakeholders" who should be included in any master plan based in full or in part on critical environmental concerns.

It is unfortunate that the Rhode Island Airport Corporation (RIAC)'s current consultants apparently were incapable of designing and implementing a comprehensive master planning process that adequately integrated and addressed all of the expressed concerns raised by the current and proposed future operation of T.F. Green. This failure, however, need not prevent us from attempting to do what is right, now that we have additional information.

We do not need additional public forums at this time as much as we need the process itself to be corrected to adequately and completely address all of the existing realities. What we have accomplished to date simply does not meet FAA's own guidelines. I am attaching a brief overview of what I believe to be some pertinent sections of FAA's Advisory with comments from the perspective of the citizenry. We appear to have veered off course with the process. However, I have been assured that the citizens and their representatives are up for the task of correcting the current situation. We do need your support, and the support of all of the other stakeholders, to do so.

Sincerely,

Raleigh M. Jenkins

At-Large SRC Citizen Representative

Endorsed Democratic Candidate for Mayor of Warwick

T.F. Green Airport's Master Planning: A Fatally Flawed Process

Raleigh M. Jenkins, SRC Citizen Representative, At-Large

June 25, 2002

"The goal of a master plan is to provide guidelines for future airport development which will satisfy aviation demand in a financially feasible manner, while at the same time resolving the aviation, environmental and socioeconomic issues existing in the community..."

"The steps in a master planning process are not necessarily mutually exclusive. There are certain considerations, particularly financial and environmental, which must be accounted for throughout the process. While this AC treats them in separate chapters, they are not intended to be applied piecemeal or sequentially, but in an iterative way throughout the planning process..."

- FAA Advisory Circular #150/5070-6A: Airport Master Plans

From Day 1 of the Study Resource Committee (SRC) process the resident citizens have made the claim that the planning process was fatally flawed. From designed limited participation in the actual planning process to the structured ordering of the items to be considered we have been faced with a piecemeal and sequentially applied planning process. Financial (economic) and environmental considerations have been avoided in a timely fashion. Public input has been structurally limited.

"The information presented in this AC covers the planning requirements for all airports, regardless of size, complexity or role. However, the scope of the study must be tailored to the individual airport, with the level of effort limited to its specific needs and problems..."

"In using this AC, it should be remembered that the guiding principle of the planning process is the development of a safe and efficient airport through the use of acceptable standards..."

"...Study elements for complex, busy airports may involve sophistication beyond that detailed in this AC. For example, off airport land use planning strategies and public participation processes may require highly innovative approaches. Environmental impact assessments may require techniques not discussed here, and evaluation criteria for alternatives analysis may be predicated on circumstances not covered in the AC."

- FAA Advisory Circular #150/5070-6A: Airport Master Plans

The SRC stake-holder members were not made aware of FAA's advisory on Airport Master Plans until there were only two meetings left to the process. A quick review of FAA's own guidelines only serves to confirm our belief that the process is fatally flawed by design and implementation. The scope of the planning process has been woefully limited. The failure of the airport administrator to adequately address quality of life considerations led to a citizen-member walk-out toward the end of the process. The specific needs and problems created by the attempt to operate and expand a commercial airport in the center of a

densely residential area have simply not been adequately defined nor addressed. While safety of the passengers has been trumpeted as a reason to expand facilities, the safety of the residents remains essentially unconsidered, never having been fully evaluated.

"...The need for a master planning study will have been identified by the airport operator based on obvious existing or potential shortcomings. These deficiencies may be the result of demand exceeding capacity, the introduction of more demanding aircraft, or the emergence of a critical environmental problem..."

"...Before soliciting technical proposals and interviewing consultants, the airport operator should have a clear understanding of the issues and why the airport needs a master plan. The consultant is hired to provide the technical expertise which the airport operator cannot supply, not to manage totally the master planning process and control its results, or on the other hand, to justify a decision already made. The airport operator must take responsibility for the overall policy direction, management and control of the planning process, including the study."

- FAA Advisory Circular #150/5070-6A: Airport Master Plans

It has become abundantly clear that the SRC process was predicated on concerns involving the first two shortcomings: "demand exceeding capacity" and "the (desired) introduction of more demanding aircraft". The airport administrators (RIAC) have obviously overlooked "the emergence of a critical environmental problem". Since this is the primary concern of the resident citizens, the short-sighted SRC process has been essentially frustrating and clearly inadequate for them. The citizens tried to incorporate their quality of life concerns into the process. Rather than correct the scope of the process, the airport administrators have allowed their hired consultants to plow forward with their limited, unbalanced concerns. The predictable result has been public dissatisfaction with the conclusions drawn from insufficient considerations.

"Land uses on the airport property and adjacent to it must be reviewed together because the planning does not end at the airport property line...Also it is important to know the land uses in those environs which will be exposed to the airport's negative impacts or noise and air pollution..."

"...General property values based on recent sales figures and tax assessments should be identified..."

- FAA Advisory Circular #150/5070-6A: Airport Master Plans

The master planning process has been marred by a lack of full consideration of the environs "exposed to the impacts of noise and air pollution". Too much planning has been done in an informational vacuum, without due diligence or concern about its effects beyond "the airport property line". We questioned the make-up of the SRC "stake-holders" on day one of the SRC process. At the very first meeting, we asked why there was no representative from the U.S. Department of Housing and Urban Development (HUD). We asked where the Narragansett Indians were based on their historical vested concerns for the wetlands surrounding the airport. These obvious stakeholders were not added. As we got into the planning process, the need for more, not less expertise became readily apparent. Now at the conclusion of the SRC process we can see that there were other identifiable stakeholders that should have been involved from day one of any planning process for airport expansion. These would include representation from real estate agents, title attorney's, the department of health, homeowners insurance agents, manufacturing warranty agents and members from local environmental and planning groups like Save the Bay, the Sierra Club and Grow Smart. This need was simply not met.

"... Important to recommending practical land use strategies will be an understanding of the contemporary political context and local preference regarding potential land use projects."

- FAA Advisory Circular #150/5070-6A: Airport Master Plans

The City of Warwick, particularly the land around the airport, is of a densely residential nature. We have been unable to find a comparable airport to compare T.F. Green to when the factors of both size and distance from the resident population is considered. Couple this with the failure of the last two City Hall administrations to have developed a current, up to date, state approved comprehensive plan for the second largest city and you have a formula for failed planning.

Warwick's woefully outdated and inadequate existing comprehensive plan called for a thorough consideration of alternative sites and a proper sizing of the existing airport before building a new terminal in Warwick. It also called for the creation of a locally controlled airport administrator. Since the existing comprehensive plan was essentially ignored by the state when they allowed the tripling of the size of the old terminal and created the Rhode Island Airport Corporation (RIAC) to manage the airport, it holds little value under our current circumstances.

This is now a problem not only for the city of Warwick, but for the airport corporation and the FAA, as it is currently not possible to ascertain any "local preference regarding potential land use projects" other than the clearly expressed public cry for the reduction of the negative effects of the airport's operations. Constructive land use planning is just not possible under current circumstances. The wishes of the local population to protect their quality of life were ignored ten years ago and cannot be ignored any longer. It may just be possible that there is no compatible airport land use plan because the airport's expanded operations are fundamentally incompatible with the residential character of the land surrounding it.

The political context is also currently heavily weighted against airport expansion. The City Council has been explicitly clear that they are not inclined to rush forth with any airport expansion, but instead intend to apply all appropriate due diligence to any airport planning, especially where it may affect sensitive wetlands or negatively impact on our already airport-stressed traffic patterns within the city. Our state representatives have clearly demonstrated that they will not tolerate any circumventing of our local authority to protect our environment. The current Mayor has also adopted a public stand against runway expansion. Additionally, on the political front, we now have an endorsed candidate for Mayor who is running on a platform which includes a calling for a moratorium on airport growth until the substantial negative effects of the airport's operations can be fully assessed and adequately addressed.

The FAA needs to be made fully aware of the extent of the local political opposition to unsafe, uncontrolled or inadequately planned airport expansion at T.F. Green Airport.

"In order to determine the financial feasibility of the master plan's recommendations and to develop a financial plan, it is necessary to assemble current financial data. A compilation of current revenues and costs should be available from airport management."

- FAA Advisory Circular #150/5070-6A: Airport Master Plans

Current, comprehensive financial data has never been provided. Revenues have been projected without factoring in the negative externalities associated with running an airport and violating citizen airspace. It has been determined during the SRC process that restrictive deed easements have been extracted from thousands of citizens under false pretenses, yet the value to be charged against the bottom line of the airport upon the future return of these valuable easements to their rightful property owners has not been openly discussed. The train station /parking garage / people-mover plans have never been reviewed by the

SRC stakeholders for their feedback. A proposed new freight terminal popped up out of nowhere outside of the SRC process. The effects of 9-11 were hastily projected and presented without serious discussion or fact-finding. Without a thorough examination of the current financial condition of the airport, comprehensive planning is impossible. There are many potential negative effects against the airport's financial condition that can be expected to be assessed upon a thorough examination of the airport's current negative effects upon the environment. To attempt to move forward with planning without having attempted a thorough and open examination of these conditions is irresponsible at best.

The airport corporation has plowed through the planning process to date with their frequently expressed claim that "growth is inevitable" seemingly serving as a horn to blast us out of the way. However, to our knowledge, there is nothing in nature to support this claim. There is certainly nothing in the FAA Advisory on Airport Master Planning.

The SRC process is now coming to its premature close. From a citizen standpoint it has been a huge disappointment. Throughout the process we have discovered we have been manipulated, mis-informed and under-informed. We have not been allowed to adequately consider what we clearly believed needed to be considered. It is the opinion of many that money and time has been wasted on the planning process to date. Square pegs do not logically fit in round holes without force that creates damage. An airport expanded in a densely residential area is an easily recognizable square peg.

We must now, apparently also prematurely, move on to the Environmental Impact Statement (E.I.S.) process beginning July 25. Hopefully, we will be able to refocus that process onto the overlooked areas of concern. This process cannot be hurried. The answers to our city-wide environmental questions may well help to make the proper sizing of the airport a possibility at long last. For this we will need our citizens' collective thoughtful input.