

July 22, 2002

Mr. Sheldon Whitehouse, Exq.

P.O. Box 6765

Providence, RI 02940

Dear Mr. Whitehouse,

I am in receipt of a copy of a letter to you dated July 19, 2002 from Mary Soderstrum, AIA, Deputy Executive Director, Rhode Island Airport Corporation (RIAC).

I would take issue with several of Ms. Soderstrum's comments and viewpoints:

"The Federal Aviation Administration (FAA) requirement is for one public meeting for master plans."

This form of reasoning is at the core of the SRC citizen-representative belief that the planning process for the expansion of the airport at T.F. Green has been fatally flawed for years. It raises several immediate issues. We cannot find anything in FAA literature to support Ms. Soderstrum's claim that FAA requires only one public meeting. According to FAA Advisory Circular 150-5070-6A:

"...The master planning process must consider airport tenants and users as well as the general public who may be affected by its results. Their involvement throughout the master planning process avoids "surprises" and helps develop a consensus. Early progress towards consensus on master plan recommendations can pave the way for effective environmental assessment and impact statement reviews. Public involvement in master planning can also lead to productive public hearings when they are required to determine the consistency of individual projects with a community's goals and objectives..." (FAA Advisory Circular 150-5070-6A, pg. 5)

"Usually, master plans will look at three forecasts of growth based on indicators taken from the history of growth at the airport, the economic health and viability of the region, the national economy, and trends in the airline industry..."

T.F. Green airport is an unusual situation. Again, according to FAA:

"...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." (FAA Advisory Circular 150-5070-6A, pg. 13)

It is obvious to the citizens that RIAC has essentially ignored our "critical environmental problems" in the pre-planning and planning stages and is prematurely moving on to the Environmental Impact Statement (EIS) phase based on incomplete information and consideration.

"RIAC is not aware of this type of analysis having been done before within any master plan."

RIAC's limited experience and general lack of awareness has been a concern to the citizenry.

"The crosswind runway is another matter. The crosswind runway is over twenty years old and is deteriorating quickly... In order to rehabilitate this runway, we are obliged to bring the runway up to current runway design standards..."

It has been known since at least 1990 that the crosswind runway did not meet FAA runway design standards. It has also been known that the city was unanimously against any disturbance of the Buckeye Brook wetlands system. Despite this knowledge, and with full awareness of potential problems, RIAC, with FAA approval and oversight, tripled the size of the existing terminal in the early 90's. The crosswind runway situation is a problem of their own making. Again, according to FAA Advisory Circular 150-5070-6A, fully in effect at the time of their previous decision-making:

"Prior to 1970, environmental matters were not a prime consideration in airport master planning. Now, environmental feasibility is as important as economic or engineering feasibility. The phrase "environmental feasibility" means capable of being accomplished from an environmental standpoint, paralleling the meanings of economic or engineering feasibility. There have been cases where there was no question of need, or economic and engineering feasibility, but where the absence of environmental feasibility stopped the proposed development completely.

"There was a time, also, when the environmental documentation was considered as merely another justification document to be prepared after the development decision had been made. Today, environmental considerations begin to play a role when the scope of work of a master plan is developed, and this early input provides an opportunity for not only avoiding, or mitigating impacts, but also for developing innovative and creative approaches for enhancement of the environment..."

"Environmental feasibility has several components. A major component, often not adequately recognized, is political acceptability. The master plan, whether it contemplates a new airport or improvements to an existing airport, must be acceptable to the public and the public's representatives if it is to be useful. The "public" includes the public at large, the airport neighbors, and the airport users.

"The other obvious component of environmental feasibility is compliance with regulatory and statutory requirements. However, there have been cases where proposals

documented by fully approved environmental impact statements, and judged in complete compliance with these requirements have failed because of public opposition based on the public's perception of environmental impacts...

"The responsible airport master planner must recognize both of these factors and design a program through which the public is completely and truthfully informed. A creative approach to environmental considerations, results in a better overall design, and a greater possibility of public support, rather than just meeting the statutory requirements." (FAA Advisory Circular 150-5070-6A, pgs. 47,48)

"The last scheduled meeting of the Study Resource Committee was held the evening of July 11, 2002. The Master Plan will be going into an "on hold" phase while the Environmental Impact Statement (EIS) process studies the environmental issues related to the near-term projects of the master plan. This includes the crosswind runway."

The master plan, at this point, includes little else other than proposals for the extension of the crosswind runway. It certainly has not met FAA's expectations for public involvement. Based on this fact, the citizens feel the EIS is premature. Once again, from FAA Advisory Circular 150-5070-6A:

"...Just as a proposal can be halted by economic or engineering feasibility, so also can it be halted by environmental infeasibility. Consequently, the environmental investigations must proceed, at an appropriate level, in parallel with the other investigations. The environmental task is not something to be undertaken after other tasks have been completed, or completed before other tasks can be started.

"It follows that, in preparing a scope and schedule of work, environmental tasks must be integrated with the whole planning process. At the same time, the environmental effort should be sized and resources allocated appropriately to the expected size and complexity of the planning effort. As will be discussed in section 4, the appropriate effort may range from little or no effort to an examination of several alternatives and mitigation measures to eliminate significant impacts." (FAA Advisory Circular 150-5070-6A, pg. 48)

The SRC citizen representatives truly appreciate your support of our reasonable request for extended master planning studies to consider our critical environmental concerns in detail. I hope this presentation, including direct reference to FAA documentation, helps raise questions about RIAC's apparent rush toward an EIS at this time. It has been the opinion of the citizenry that justice is not being served, nor proper due diligence being applied, throughout the current master planning process. We believe FAA's own official documentation supports our position. Recent official attempts by FAA to explain away FAA Advisory Circular 105-5070-6A as mere dated guiding principles is unacceptable to us. It is our belief that the pending EIS is not properly focused and should be delayed under the existing documented circumstances.

Please do not hesitate to contact me for further information, or if you would appreciate a formal or informal meeting with the SRC citizen representatives who are united in the belief that the current planning process is fatally flawed. We have obviously learned a lot about airport master planning. We would like to put this knowledge to good use in addressing our environmental concerns resulting from the operations of a commercial airport in the heart of a densely residential land use area.

Sincerely,

Raleigh M. Jenkins

SRC Citizen Representative, At Large