**Input Received on Chapter II**
**Duane Clinker**

Here is an official response to the Chapter II draft. Please post it to the SRC members and web site.

Thank you.

Duane Clinker

COMMENTS ON T. F. GREEN AIRPORT MASTER PLAN UPDATE
CHAPTER II DRAFT: FORECASTS OF AVIATION DEMAND
CAPACITY CONSTRAINED FORECASTS
SEPTEMBER 10, 2001 BY LANDRUM & BROWN

Submitted by Duane Clinker, SRC 20 Year Planning Group

It is a good thing that an initial document has been produced including the possibility of actual non-growth or even constrained growth at T. F. Green Airport. However, the LANDRUM & Brown Chapter II Draft is so seriously flawed in its approach and method as to be almost useless in a practical sense. It presents incomplete information, poor scientific methodology, and is saturated with an argumentative and prejudicial approach to information presentation:

LANDRUM & Brown do not provide investigative analysis of the 161 option. The draft cites limited national experience of airports with FAR Part 161 as a tool for limiting growth (II-104; II- 107). Yet, although the experience may be limited, it is experience. But Chapter II won't investigate. Exactly why did airports drop this tool? What exactly were they trying to accomplish when they began the effort? Only when we understand this, will we really be able to understand whether or not 161 is an option. To say that few others have tried and that it is difficult is not enough. Dealing with growth is also difficult. What kind of investigation is this that refuses to examine what is clearly understandable, simply because the process is "difficult"?

LANDRUM & Brown do not examine the real issues or potentials of peak pricing. The report states that DOT "authorizes airports to use a 'properly structured peak pricing system that allocates limited resources using price during periods of congestion.' However, major airports in the US have thus far not adopted peak period pricing as a tool for managing delay and congestion and limiting operations in peak periods." LANDRUM & Brown then again throw up their collective hands and say that all that peak pricing would do is spread the flights around and not reduce them. Interestingly, the report also admits that "higher fares in peak periods could certainly discourage some leisure travelers. . ." (II-104) but then merely states that "it would not directly limit the number of flights," so end of investigation. This is lazy and argumentative. The question isn't whether we can directly limit the number of flights, but whether overall growth can be constrained, (either directly or indirectly). Here there is a hint that it can, but NO real data about how, what pricing structure would be required, what other benefits might accrue if prices were raised, how many passengers or flights might indirectly be lost, etc.

Landrum & Brown refuses to examine a Massport-like campaign to reduce ridership at Green. The report cites Massport's successful campaign to send travelers to Green. It notes that people choose an airport based on, not just proximity, but price, but then again advocates helplessness and implies nothing can be done by us, because of course prices down here are low (II-105). If the option of raising prices hadn't been discounted without investigation in the previous section, perhaps our own campaign to reroute people could have actually been investigated here, rather than simply discounted!

Landrum & Brown do not investigate the potential of public or governmental power to influence growth. The report simply discounts, without investigation, reasoning, or discussion, the option of using public pressure to get airlines to voluntarily agree to limit or restrict operations. (II-107).

Landrum & Brown fail to investigate the option of using general aviation to control growth. In the struggle between general aviation and commercial for the use of the airfield, the report incredibly assumes that the policy should be to limit general aviation! Why? General, small plane aviation is not burdensome to community capacity or quality of life. Why not encourage general aviation, build more hangers, and use that as one more tool to crowd out or limit commercial service to the benefit of planning and community health and safety?

Landrum & Brown fails to fully factor in weather conditions when estimating reductions of use as a result of shortening a runway. When the report looks at reductions in growth or capacity as a result of shortening or eliminating a runway, it does so only in the most cynical of terms because it fails to consider the obvious: the real impact of adverse weather and repair conditions on flight delays and the subsequent potential rescheduling or ultimately elimination of flights and certainly the potential for slowing growth in terms of new airlines & routes.

Landrum & Brown refuses to use a holistic model for evaluating options to limit growth. Despite the consistent tendency to fail to fully assess the potential for limiting growth, nevertheless, the draft cannot help from concluding a lower number of annual operations under a controlled growth scenario. The report must admit, "there is an upper limit of delays at which point airlines will adjust their service in response. . . " (II-113). In other words, if one chooses to retard growth in the interest of quality of life, it ultimately can be accomplished. It is possible to limit growth. The real issue is how soon and how much. But, the draft is fundamentally flawed because as it considers each potential for limiting growth, it insists on only evaluating its potential in terms of the assumption that it would be the only action attempted.

The draft does not use an ecological model of intervention in which multiple strategies are used for a combined affect. It suggests a "six to nine percent " reduction in capacity if airfield capacity is reduced (II-125). It suggests a "10 percent reduction in passengers served and a seven percent reduction in annual aircraft operations" (II-126) if the terminal is not expanded. It suggests a "14 percent reduction in passengers served and an eight percent reduction in operations" if landslide facilities are not improved (II-126). But, the draft never considers the impact of things done together, except when predicting market demand. Sadly, the draft document uses a holistic on only on the market side of its work. It carefully avoids a similar holistic evaluation of how various policy changes (peak use fees, runway shortening, promotion of general aviation, Part 161 studies, control of terminal expansion, restrictions on parking, etc.), might work together to offer a healthy and productive alternative to the future of local community destruction that looms before us. The final Table II.5-15 (II-127) seems more an exercise in spin control than science.

A final word. This draft discussion of capacity constraint is a bare beginning. Its usefulness is seriously flawed by its argumentative, cynical, unscientific and narrow discussion and investigation, of the possibilities and options for concerned planners.

It is frustrating for any well-meaning citizen to discuss airport delays as a potentially good thing. We all want a state of the art airport and a livable community. But, the ultimate question is not simply the efficiency of the airport, but the proper sizing of the airport, given local and regional burdens. It is clear that to get to that level of discussion, given forecasts of a doubling of market demand, there must be an ultimate constraint on growth. The sooner we are prepared to really discuss it, (and not shortchange it as Landrum & Brown do) the less damage and the more benefit to all well-meaning citizens.

End of comment