

T. F. Green Airport

Feedback to the SRC on Input Received

April 10, 2002

Rhode Island Airport Corporation (RIAC) received comments and questions from Study Resource Committee (SRC) members on a variety of topics; these comments are summarized below. Feedback is provided for those comments that pertain to the **Master Plan** and SRC process and quality of life issues. A response to the input on the draft **Environmental Impact Statement (EIS)** Affected Environment chapter was provided in a separate letter to Reverend Duane Clinker which is included in this package.

Summary of Input	Feedback
There needs to be an expanded effort to study quality of life issues. Huge efforts are underway to document travel demand, forecasts, land facilities, and the like. No similar effort addresses quality of life issues. There is no attempt to balance between the needs of the airport and those who live around it.	Community and environmental impacts will be considered in the Master Plan alternatives evaluation. The EIS will also consider community and environmental impacts. Further, RIAC has studied the noise wall and will soon restart the air quality study. See also RIAC's response on the website to the citizen statement made at the March fifth meeting .
The planning process continues to have a "canned" flavor.	Any planning process follows the same basic steps, and the Master Plan is further guided by FAA. RIAC has undertaken significant additional analysis in response to the SRC's concerns, most notably the constrained forecast analysis.

<p>The Federal Aviation Administration (FAA) has been more concerned with the appearance of security and safety than actual security and safety. This is consistent with findings highlighted through the tragic events of September 11. The recent grandfathering of Runway 16-34 rather than requiring shortening of the runway is a perfect example of FAA's demonstrated lack of placing "the highest degree of safety" as its "principal purpose".</p>	<p>See FAA's clarification on this issue in the March 5 meeting summary (section entitled <i>Runway Safety Area Clarification</i>). Also see the March 11 letter from FAA to RIAC on this issue that is included in this package. In addition, Federal Aviation Regulation (FAR) Part 139.309 (a) provides the standards that T. F. Green must follow regarding safety areas: "To the extent practicable, each certificate holder shall provide and maintain for each runway and taxiway which is available for air carrier use: (1) If the runway or taxiway had a safety area on December 31, 1987, and if no reconstruction or significant expansion of the runway or taxiway was begun on or after January 1, 1988, a safety area of at least the dimensions that existed on December 31, 1987; or (2) If construction, reconstruction, or significant expansion of the runway or taxiway began on or after January 1, 1988, a safety area which conforms to the dimensions acceptable to the Administrator at the time construction, reconstruction, or expansion began."</p>
<p>RIAC should not be in business without first protecting the people that are suffering from airport activity. How can RIAC be allowed to spend only \$10 million on property acquisition and attempt to float \$160 million in bonds to produce the people mover/parking garage complex. We would like an accounting of the \$10 million to ensure that RIAC is referring exclusively to residential purchases.</p>	<p>RIAC has committed to the voluntary sound insulation of homes within the 65 DNL contours around the airport and to the acquisition of homes within the 70 DNL contour. RIAC has issued \$10.5 million dollars in bonds on its own initiative to accelerate the purchase of these homes as FAA New England policy does not allow the purchase of residences that have received Federal assistance in sound insulation within the last 10 years. As homes around T. F. Green reach the 10 year mark (beginning in 2003), money from FAA can also be used to purchase residences. RIAC will continue to pursue options to accelerate the voluntary purchase of residences. It is true that the debt capacity of RIAC is limited, especially in light of the security demands that must be addressed after September 11, 2001. It is also true that the issuance of bonds for the Warwick Intermodal Center could potentially affect that debt. However, RIAC is working with the Governor's Office, the bonding agencies, and our financial consultant to determine the best possible method of achieving as many of our goals as possible with our resources.</p>

<p>What is the status of the John Brown Francis school, which has experienced increased air traffic this year including direct fly-overs, and was being considered?</p>	<p>The John Brown Francis school has been designated for sound insulation. RIAC obtained bids in March 2002 which will go before the RIAC Board on April 17, 2002. It is expected that the contract will be approved. Construction is scheduled to start on June 17, 2002 with completion by August 23, 2002.</p>
<p>RIAC's refusal to broaden the scope of the SRC process is in apparent direct conflict with the FAA's own Airport Environmental Handbook, Order 5050.4A, October 8, 1985, Chapter 2.</p>	<p>The EIS will follow FAA Order 5050.4A. The SRC process goes well beyond the FAA's requirements for public participation in a Master Plan.</p>
<p>RIAC has consistently failed to indicate a willingness or ability to utilize "a systematic interdisciplinary approach" or to involve appropriate additional "individuals having expertise". They have refused to bring in HUD even though they and their consultants lack urban planning experience. They have omitted inclusion of the Narragansetts, the Historical society, the school department, the Realtors, and others. Involve the Department of Environmental Management and the Environmental Protection Agency in the planning process.</p>	<p>Any of these parties are welcome to participate in the SRC if they so choose. These parties will be invited to the EIS scoping meeting.</p>
<p>A study is needed that carefully considers and weighs "environmental amenities and values in a timely manner" as required by FAA.</p>	<p>The EIS will do just that as required by FAA.</p>
<p>The FAA needs to step in and restructure the SRC process to ensure equal protection for the citizens under these circumstances. The SRC process is inadequate and unsafe.</p>	<p>The FAA has been part of the SRC process since its inception and has indicated to RIAC that the process far exceeds what is required (only one public information meeting is required).</p>
<p>We question RIAC's ability to continue as airport administrator. It may be time for our leaders to end the "quasi'-governmental" experiment.</p>	<p>Comment noted.</p>

<p>The failure of RIAC or their consultants to supply available data to the Quality of Life subcommittee is a serious concern.</p>	<p>There have been four requests for data from SRC members:</p> <ul style="list-style-type: none"> (1) Hot day contour: The FAA INM noise model mathematically models and represents annual average conditions. Attempts to use it instead to represent a shorter period or seasonal conditions are not a valid use of the model, and therefore are not acceptable to the FAA. (2) 60 and 55 DNL contours: These contours have not been run and RIAC has no plans to create these contours. (3) Previous studies: The planning studies that have been produced to date have been compiled in one place, and are now available for review in the RIAC Engineering and Planning department. Contact Mary Soderstrum if you would like to view any of these studies. (4) Previously created noise contour input files: Any information or data related to previously created noise contours is available. Contact Mary Soderstrum for this data.
<p>RIAC is moving forward in an apparent hurry with the planning process.</p>	<p>RIAC recently put the study on hold after September 11 and slowed the study schedule to allow for an additional meeting on the forecast-as requested by the SRC.</p>
<p>A no-growth option would seem to be the only realistic option. The “growth is inevitable” premise is unfounded.</p>	<p>While a no growth option was considered, it was found not to be achievable because (1) RIAC has no jurisdiction to stop growth, and (2) almost all the growth would materialize even if RIAC chose not to build or expand its facilities. The associated congestion and delay levels would be extreme and most likely make the airport a worse neighbor. We understand that some members of the SRC do not agree with this conclusion, however it is based on expert analysis and past industry trends. The fact that the RIAC Board chose a particular forecast will not cause growth to happen. Rather, RIAC has chosen to plan to accommodate growth at reasonable levels of congestion and delay if it does occur.</p>
<p>RIAC should not rush forward with a marketing plan that could result in increased stressors.</p>	<p>The RIAC Board has chosen not to pursue an aggressive marketing plan by not adopting the Augmented Market Share forecast scenario.</p>

<p>RIAC faces potentially serious financial liabilities from damages the public is experiencing. RIAC actively encourages these damages even though there is evidence that they could harm citizens. Evidence that RIAC is aware of these damages can be seen in the aviation easement language which includes dust, fumes, and particle damages. Be more specific on FAA guidelines related to the aviation easement language.</p>	<p>The easement language was typical and similar to that used by many airports. When we researched this issue, we found that it was broader than required by FAA. The language has been changed to read: "The easement grants privilege of passage of all lawful flight operations and all noise appurtenant thereto which may constitute a nuisance of trespass resulting directly or indirectly therefrom..." in exchange for the insulation of a home against noise.</p>
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For feedback to comments on the EIS preliminary draft Affected Environment Chapter, please refer to the enclosed April 10 letter to Reverend Duane Clinker