

Bill DePasquale

EXECUTIVE CHAMBER

CITY OF WARWICK



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January 10, 2008

LaVerne F. Reid
Manager, Airports Division
Federal Aviation Administration
New England Region
12 New England Executive Park
Burlington, MA 01803

RE: City of Warwick Response to the FAA removal of the 8,300-length alternative for Runway 5-23 from further study within the Environmental Impact Study Statement (EIS) for T.F Green Airport, Warwick Rhode Island.

I am in receipt of your letter of November 21, 2007, and respectfully disagree with the FAA's position which ignores reasonable facts and rational conclusions for consideration of the 8,300' alternative for runway 5/23. The letter simply reiterates the assumptions and inaccuracies that have been consistently presented by the FAA throughout the Environmental Impact Study Statement (EIS) process.

Contrary to the FAA's pledge to take a more in-depth look at the City of Warwick's many valid concerns, the most recent FAA response simply reiterates its previous position in order to validate a predetermined minimum runway length as desired by the Federal Aviation Administration (FAA) and the Rhode Island Airport Corporation (RIAC) for T.F Green Airport. When one weighs the FAA comments relative to the impact on our Community, it is apparent that the FAA response is intended simply to bolster its continuing arguments in support of the longest possible runway in order to satisfy RIAC and the greater goals of the FAA to expand the length and number of runways within the New England region.

The FAA offers hardly a scintilla of evidence in support this goal. It is disingenuous for the FAA to claim that it has earnestly considered the City's position, which is clearly supported by substantive evidence and facts, when it simply disregards all that the City of Warwick has presented. It is apparent that the FAA response is intended only to fulfill its requirement to respond within framework of the EIS process.

If the FAA was sincerely interested in addressing the City's concerns, it would have conducted an independent analysis to determine whether, as the City contends, its findings have relied too heavily on the use of 737-500 aircraft to serve west-coast destinations. An analysis of actual operations and interviews with air carrier and aviation experts would have been appropriate. Instead, the FAA attempts to refute the City's claim by simply relying upon airplane manufacturer's manuals data which states that a 737-500 *could* [theoretically] be used to fly non-stop to the west coast.

A genuine analytical approach would have attempted to support this theoretic information with actual aircraft operations data in order to provide a statistical probability of aircraft use based on actual operations. Further, the FAA would have also considered the phase out schedule for the B737-500 aircraft in order to gain a realistic assessment and reach a reasonable conclusion regarding the use of the aircraft for the 2007 to 2020 study period.

In place of the technical review promised by the FAA, the City of Warwick has received the same regurgitated response offered several months ago. If the FAA had honestly assessed the data, it would have concluded that (in the real world) air carriers in similar markets are currently employing aircraft such as the Airbus A-320, 321, the Boeing 737-700, 800 as well as some properly configured 767 and 757 aircraft in order to provide non-stop west coast service. These aircraft serve this role in a more cost-effective, logical manner than the 737-500; a claim clearly supported by the fact that the 737-500 does not fly a single non-stop coast-to-coast route. However, the FAA ignores this fact and continues its support for the use of the B737-500 aircraft in order to justify its argument for a longer-than-necessary runway.

The City would surmise that the FAA did not broaden its analysis because it could not find one single aircraft in the New England Region that actually flies the 2100-2300 nautical mile non-stop leg necessary to provide non-stop coast-to-coast service.

How is it that the FAA's technical staff could ignore the significance of this data, which non-aviation professionals in the City of Warwick easily acquired? The facts presented by the City of Warwick have not been acknowledged in the FAA response, within the larger EIS process, or in our meetings with RIAC and FAA officials. Instead, the facts are simply ignored and the FAA relies on the argument that because the manual states a 737-500 could [theoretically] fly nonstop coast to coast that it must consider the aircraft in its analysis.

The reality is that the second generation B737-500 is an out-of-production aircraft used on routes consisting of no more than 1400 nautical miles, only half of that required to serve the west coast non-stop. Older models like the B737-500 will continue to be phased out making it unlikely that this aircraft, which is not used for non-stop flights, will be used in this role by 2020.

In response to the FAA response the City of Warwick would like to directly address the following statements.

- ***“The airline industry has undergone tremendous changes in the past and changes are likely to continue into the future.”***

Laverne F. Reid Manager, Airports Division Federal Aviation Administration November 21, 2007

The City agrees with this perspective but for very different reasons. Regarding the issue of aircraft fleets serving RIAC's self-defined "Purpose and Need," to attract non-stop coast-to-coast service, the air carriers are the ones who determine which aircraft within their fleets are best suited to provide profitable efficient service not the Boeing Technical Manual which the FAA exclusively relied upon in its analysis.

Dynamic energy markets and competition within the aviation industry are major factors on how air carriers serve passenger demand in different markets. Current industry trends indicate that air carriers are reallocating aircraft in a manner that maximizes efficiency and profitability within their networks. This trend does not include the use of the 737-500 for non-stop coast-to-coast service. Further, recent experience proves that the mere presence of west coast demand in a particular market does not translate into the initiation non-stop coast-to-coast service by air carriers.

Even with healthy west coast demand and active promotion of its longer runway, Manchester International Airport has been unsuccessful in attracting a single non-stop coast-to-coast flight even though all forecasts claimed that the market had sufficient demand to attract and support the service. Today, the furthest leg flown by air carriers serving Manchester International Airport is identical to those serving T.F. Green Airport from its current runway configuration. These facts have not been addressed in the FAA's response, nor are the substantial technological advancements in new more fuel efficient aircraft providing greater lift and payload capacity while at the same time requiring less overall runway length. These factors strongly support studying the less destructive and less expensive 8,300' runway option.

The FAA's continued insistence that the B737-500 must be used in the fleet mix for non-stop coast-to-coast legs is technically flawed; it is not accepted by most industry professionals and defies common sense. Please note that the City of Warwick will continue its fervent objection to this aircraft being included in any analysis of non-stop west coast capable flights, as the City believes this is a substantive fault in the ongoing EIS process and therefore ripe for litigation.

The FAA's prediction of operational inefficiency and economic harm resulting from an 8,300' runway alternative is unfounded. The FAA's analysis is apparently structured to support the 8,700' and 9,350' alternatives as the only means of achieving the operational and financial success of the airport while at the same time dismissing the environmental and community impacts from additional runway length not necessary to achieve the goals of T.F. Green Airport.

The City also strongly disagrees with the FAA's arguments that removal of cargo from the 737-500 will limit both productivity and revenue production capabilities. How is it possible to limit the revenue production capabilities of an aircraft that is not utilized for non-stop coast-to-coast service? Upon initial review of this statement, one may be inclined to believe the alleged adverse financial impact presented in your letter. The City believes these statements are intended to mislead the public in order to cause anxiety, a common tactic used throughout the EIS process to gain support for the longest, most costly and most destructive runway alternative.

A forthright and through review would find no lost revenue because the 737-500 does not require a cargo penalty due to the fact that it is exclusively a medium haul aircraft which seldom exceeds 1300 nautical miles. The 8,300' alternative will easily support the B737-500 aircraft for medium-haul flights without a cargo payload reduction.

The methodology used to justify the FAA's decision not to continue study of the 8,300' runway is unacceptable to the City of Warwick. The FAA's response is simply designed to be posted on a website in order to minimize Warwick's legitimate concerns and to confuse and mislead those not intimately involved with the technical aspects of this matter.

The findings presented in the FAA's letter constitute an incomplete response to the concerns which face the City of Warwick. Your position which is based on such unreasonable assumptions of fleet mix is puzzling especially considering the tremendous impact of the project in financial, environmental and social terms. It is more disturbing that the FAA removed the 8,300' alternative even as it acknowledges that this alternative contains the least amount of environmental impact of all the build alternatives.

The FAA affirms that the EIS team calculated significant reductions in environmental impact and cost would be obtained with an 8300' runway but it quickly dismisses these findings because it claims that the 8,300' runway would result in a significant reduction in the utility of the runway.

Competitive dynamics within the air service market suggest utility of the 8,300' runway alternative will be similar to that of the 8,700' option with far less environmental and social impact. Nevertheless, the FAA asserts that the 8,300' alternative would provide only a somewhat limited reduction in environmental impact. The City of Warwick strongly disagrees with this subjective, misleading characterization of "somewhat limited" and "relatively similar" when discussing the 8700' and 8300' runways.

The 8,300' runway option that includes a shifted Main Avenue with EMAS and runway grading would result in a \$44 million dollar or 9% savings over the 8,700' option. In the best of economic times \$44 million dollars could hardly be described as "similar" when comparing the cost of projects but certainly not under the economic conditions that the State of Rhode Island is currently experiencing.

Also, an 8,300' runway would conservatively impact 24% less wetlands, a figure that will increase substantially as the study of wetland impact continues for the proposed relocation of Airport Road. The 8,300' alternatives would also destroy 10% percent fewer homes and businesses, a figure that grows dramatically as the assessment continues for the relocation of the "new" Airport Road. Distorting the direct negative impact on air service with the 8,300' option is not only inaccurate and misleading but is also disingenuous to the general public and ultimately taints the EIS process.

- *"... the 8,700-foot runway extension could accommodate more aircraft than the 8,300-foot runway extension, and that these additional aircraft would allow the airport to accommodate an additional 700,000 passengers over an 8-year period."*
- *"The factors that contributed against considering an 8,300-foot runway option center around the substantial loss of passengers (over 700,000 in an eight-year period) that would not be accommodated as compared with an 8,700-foot runway. The implications of this passenger differential are:*

Continued diversion of substantial numbers of passengers within the primary service area to Logan due to the inability of T. F. Green to meet market demands. (Logan is a capacity constrained airport currently ranked seventh nationally in terms arrival delays. Travelers would continue to be served out of Logan Airport despite originating in the T.F. Green service area. This is inconsistent with the goals of the New England Region Airport System Plan.)

Laverne F. Reid Manager, Airports Division Federal Aviation Administration November 21, 2007

If a more than elementary analysis had been completed, the FAA would find that the 700,000 passenger reduction forecasted by 2020 is deceptive and incorrect as a result of inaccurate passenger forecasts used in the EIS as well as the fact that a large majority of the "so-called" loss in utility is attributed to the 737-500 aircraft, an aircraft that does not fly the non-stop coast-to-coast route.

One must question why the FAA continues to persist in using the B737-500 in its calculations. It appears that the facts presented in the FAA analysis regarding this aircrafts use and demand is included simply to support the argument for an 8,700' runway. This option requires an increase in more than 600 feet of additional pavement, a larger than necessary footprint for the airport thereby extending the airport fence well into the community and would lay the foundation for future runway expansion including the 9,350' alternative which easily fits within the airport footprint proposed for the 8,700' alternative.

If the B737-500 aircraft was to be removed from the analysis the FAA would realize nearly the same service levels between the 8,300' and 8,700' runway options with the major difference being that the 8,300' option would result in less social, environmental and community impact while at the same time saving millions in additional cost.

With a steady 3% decline in passenger traffic at T.F Green Airport the forecasted passenger payload used to plan this runway over a 20-year period is already outdated. Furthermore, understanding that the 737-500 does not fly non-stop coast-to-coast the assumed passenger loss if an 8700' runway was not built is based on inaccurate and unrealistic data. Higher payload aircraft such as the 757, some 767's, A320 and 737-700 flying from an 8,300' runway and will easily accommodate the projected passenger loss. It is estimated that it would take only one daily flight of a B757 to accommodate the estimated 700,000 passenger loss which the FAA response relies so heavily upon.

This is not only a feasible scenario but probable since many of the carriers with 737-500's in their fleet also own 757 aircraft. The Boeing 757 aircraft is routinely used to fly non-stop from Boston Logan to Los Angeles International Airport because its payload and class configuration provide a perfect balance between the larger B767-300 and the smaller B737-700.

All but one carrier serving T.F Green Airport maintains a substantial fleet of the B757 and 737-700 aircraft. A review of air carriers servicing T.F. Green Airport finds that the fleet mix of all air carriers maintain large inventories of B737-600/700 and B757 aircraft which are capable of flying non-stop coast to coast in a more cost-effective and efficient manner than the short-to-medium-haul B737-500.

Many factors are in play at T.F. Green Airport most of which have nothing to do with runway length. To suggest that runway length directly relates to passenger traffic constitutes a distortion of facts. Technology, economy and financial consideration are all greater factors than runway length especially if an 8,300' runway is sufficient to serve non-stop coast-to-coast service for the majority of the existing fleet mix.

During the approaching 20-year planning period there will be many uncertainties but one thing is certain, the airline industry will continue to see technological advances in fuel efficiency and performance as well as increased energy costs both of which support the City's assertion that the B737-500 will never be utilized to fly non-stop coast-to-coast. These factors clearly support an 8,300' runway as the most desirable alternative; the alternative with the least environmental, fiscal and social impacts and no discernable difference in the percentage of fleet served by 2020.

One must ask, why does the FAA refuse to accept the fact that an 8,300' runway adequately accommodates T.F. Green's needs with far less environmental, social and economic impact and is just as effective as the longest runway under consideration in the EIS. T.F. Green Airport does not currently have the capability to support non-stop west coast flights, so why would the FAA not consider a practical alternative that minimizes the social and environmental impact, one which is more in harmony with the surrounding community and affordable housing needs of the State of Rhode Island. Real world market dynamics, permanent adverse environmental impact and the current financial condition of the State demand that this public infrastructure project, with its \$600 million price tag, be weighed fairly against all viable alternatives.

What good is it to spend millions of taxpayer dollars performing a EIS when the merits of the most practical alternative, the 8,300' runway, can be subjectively prior to an in-depth study and assessment of all four alternatives (8,300' with EMAS and a realigned Main Avenue, an 8,700' and 9,350' north both with a Airport Road relocation and the "no build" scenario). The City believes that the EIS process is not intended to simply address minimum federal guidelines but that it is intended to accommodate a thoughtful, logical and thorough analysis of all feasible options.

- *"The T.F. Green Airport Runway Length Analysis follows the procedures set forth in the relevant FAA Advisory Circular to determine recommended runway lengths for critical design aircraft at particular airports. The Advisory Circular is a planning tool that provides context, based upon FAA's technical expertise and collective experience. It is used to assess the anticipated facility infrastructure necessary to meet service needs and demand, and the related aircraft fleet mix, over an extended period."*

LaVerne F. Reid Manager, Airports Division Federal Aviation Administration

It is especially disconcerting that the FAA's analyses and responses continue to discount the residents of this community. The FAA persists with the now familiar reference to its Advisory Circular as regulations instead of properly referring to them as guidelines. The Advisory Circular, the guidance documents referred to in this letter and routinely in previous FAA correspondence, are being presented rigid federal requirements when they are actually nothing more than guidance documents.

To hide behind a guidance document ignores the community's very real and legitimate public health, safety and welfare concerns and effectively avoids an honest assessment of the existing data and facts. To dismiss community's concerns because of operational considerations and/or presumed uncorroborated economic consequences thereby removing the 8,300' alternative is unfair to the community and circumvents the public input that the EIS process is intended to encourage and consider.

Furthermore, the Advisory Circular is continually being selectively invoked in order to protect the FAA and RIAC from criticism. However, it should be known that these guidelines have already been compromised by the FAA on several occasions for this project. For example, the FAA overlooked the guidelines in its runway length analysis when it eliminated its 10,500' alternative which at the time was the only alternative that fully met T.F. Green's defined purpose and need.

One must ask if a 10,500 runway can be eliminated from consideration when it was determined to be fully compliant with the FAA Advisory Circular, why is it that that anything less than an 8,700' runway can not be considered feasible. The City of Warwick would appreciate the FAA's acknowledging that it is possible to consider the 8,300' runway alternative without contradicting the Advisory Circular.

If the advisory circular was intended to consider only the technical specifications of an aircraft regardless of real world constraints and dynamics the exercise would be as simple as designating a standard runway length for all similarly-sized airports. The City understands this is simply not the case. Therefore the suggestion that community blindly accept this proposal and design for an aircraft that is being phased out and will not be used to service non-stop coast-to-coast flights is simply unacceptable.

It is suggested in the FAA response that the 8,300' alternative has greater *"implications of causing as passenger differential"* and would, *"Continue[d] diversion of substantial numbers of passengers within the primary service area to Logan due to the inability of T. F. Green to meet market demands."*

Laverne F. Reid Manager, Airports Division Federal Aviation Administration November 21, 2007

These conclusions are simply incorrect and constitute a misrepresentation of the facts. As the City has repeatedly maintained, the FAA is attempting to control the outcome of the EIS to allow construction of the longest runway feasible. The fact that the social, environmental and fiscal benefits of the shorter 8,300' runway are not addressed in the FAA's conclusion is testament to its faulty findings and conclusions.

To attribute the loss of passengers exclusively to pavement length is patently false and misleading and would lead one to believe the 8,300' alternative should not be further considered within the EIS process. This position is extremely troublesome because the FAA fully understands that the loss of passengers is not exclusively tied to runway length as proven at the Manchester International Airport. Furthermore, the FAA position makes one believe that an 8,300' runway is not capable of providing non-stop west coast service. This position is absolutely incorrect, coast-to-coast service can be easily achieved with either the 8,300' or the 8,700' runway option.

- *“Passengers within the T.F. Green primary service area would incur additional costs and inconvenience due to the service deficiency.”*
- *“Passengers within the T.F. Green primary service area would incur additional costs and inconvenience due to the service deficiency.”*

Laverne F. Reid Manager, Airports Division Federal Aviation Administration November 21, 2007

The claim that passengers would *“incur additional costs”* with the 8,300' runway option is illogical especially given the fact that the FAA has already publicly stated that there is no current demand for coast to coast non-stop service but that there is latent demand. Additional cost is more likely to occur as a result of increased infrastructure costs associated with an 8,700' or 9,350' runway alternative with their greater environmental, social and fiscal impacts. These additional costs will be funded through increases in Passenger Facility Charges (PFC's), gate leases, landing fees, etc. These fees are traditionally transferred to the air traveling public through increased airfares and parking fees; these factors more than any other will adversely affect the principal elements that have made T.F. Green Airport successful, low cost and convenience.

An 8,300' runway results less environmental, social and fiscal impact and reduced project cost which translates into fewer revenue bonds and lower passenger facility charges (PFC's) reducing the likelihood of increasing airfares. Increasing the already high PFC's at T.F Green Airport along with additional bonded indebtedness will result in increasing the already rising airfares making T.F. Green less attractive in the market making passenger diversion to Logan more likely.

Contrary to the FAA's assertion, the City believes that T.F Green Airport already provides excellent cost efficient convenient service that exceeds current market demand. The City would submit that it is not the inability of T.F. Green Airport to meet market demand that diverts passengers to Logan but dynamic market conditions imposed upon air carriers which limit passenger seats.

The FAA chooses not to include these factors in its brief declaration that the 8,300' alternative should be removed from study. Omitting these elementary details and presenting misinformation concerning service is an apparent attempt to convince the general public that without the longest runway alternative the T.F. Green would decline into fiscal ruin.

In closing, I would like to say that the City of Warwick was initially encouraged by FAA assurances that that the federal EIS process would be less supportive of the singular desires of the airport operator, RIAC, and would provide an independent assessment of key environmental, social and fiscal impacts in a fair and equitable manner by studying all viable alternatives while considering the constraints and impact on the host community.

Unfortunately, it appears that the FAA is now supporting a predetermined runway length of no less than 8700'. The FAA's response to the City's request for consideration of the 8,300' alternative has resulted in an indefensible dismissal of a less costly, less environmentally destructive, socially disruptive alternative. Embracing the unnecessary destruction of wetlands and community and authorizing an unwarranted expenditure of millions in additional tax dollars during austere economic times based on a theoretic hypothesis is a decision that the public can not afford.

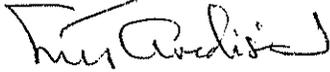
The FAA has a responsibility under NEPA to study all viable options that satisfy the purpose and need while minimizing adverse impact on the community and the environment. Eliminating the 8,300' runway alternative based on the subjective assertions presented in the FAA response is contrary to the standards established for the completion of an EIS.

The City of Warwick respectfully requests that this letter be accepted as a formal objection to the runway length analysis and alternatives sections of the EIS. Please include this letter as an objection for the record to be posted on the VHB website as the City of Warwick response to the FAA November 21, 2007 letter dismissing the 8,300' alternative from consideration.

FAA Letter
10 January 2008
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The City of Warwick hereby submits the 8,300' option with elevated runway, EMAS and a realigned Main Avenue as a reasonable alternative for continued review and analysis within the EIS process and insists this alternative be reinstated and receive the same detailed analysis as the 8,700' and 9,350' north and the "no build" alternatives.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Avedisian". The signature is fluid and cursive, with a prominent initial "S" and a long, sweeping underline.

Scott Avedisian
Mayor