

Mayor Avedisian's Comments to the Rhode Island Airport Corporation and the Federal Aviation Administration

The City of Warwick is currently preparing a detailed technical response for the Federal Aviation Administration regarding these proposals.

Presently, however, I would like to speak to our initial review of these alternatives.

I would like to say that it is a pleasure to be here, but in all honesty, despite all of the City of Warwick's comments regarding airport expansion to several RIAC administrations over the past six years, these proposals continue to demonstrate a general lack of understanding and/or consideration of community concerns and the role of T.F. Green Airport within the City of Warwick.

Nonetheless, I appreciate the opportunity to offer my comments for the record.

What are being presented tonight are five of the most costly and environmentally insensitive alternatives available to meet what has become essentially a single, no-holds-barred attempt to provide non-stop West Coast service to 100 percent of the future fleet mix. The alternatives presented for study are, quite simply, out of step with the social, environmental and fiscal accountability that I pledged to uphold as Mayor of Rhode Island's second largest city.

I do not need a six million-dollar study to understand that Alternatives A, C and D will demolish 360 homes – for a yet unproven financial benefit. At the very least, this represents a displacement of families and loss of millions of dollars in revenue from the tax rolls.

Infinitely more important than the loss in tax base is the disruption of several generations in family and community. The loss of children from local elementary and secondary schools. The loss of individuals from their churches, their neighborhood associations, their Little League fields. The loss of untold revenue from the pockets of small business owners as people are forced to move away. A potential loss of wildlife habitat, increased air and water pollution and adverse health effects.

In short, the loss of a vital piece of Warwick's societal, cultural and historical fabric. They may be "lines on a map" to VHB, FAA and RIAC. They are families to me.

There are some in the media, and, indeed, many in the business community, who view these concerns and Warwick's continued opposition to expansion plans as "parochial."

I would argue, however, that proponents of expansion are seeing only unsubstantiated promises of an economic windfall, and are not considering issues upon which we base our local opposition, which represent a broader scope of very real concerns to people throughout Rhode Island.

Before you dismiss our opposition to the project as an insular point of view, please take a step back and review the facts of the proposals presented to date.

- Is it "parochial" to seek a review of the least costly alternative that meets RIAC's goal to provide West Coast service? - A shorter 8600-foot runway could provide West Coast service for a majority of Green's fleet mix by 2012 with significantly less cost and impact than the five alternatives proposed. Why not include this in the alternatives at this time?
- Is it "parochial" to be concerned that a lack of affordable housing stock throughout Rhode Island is affecting a greater number of individuals, families and children each year, and placing an ever increasing burden on our social service agencies?

Beyond the alternatives that suggest wholesale filling of wetlands, the remaining proposals will result in the removal of some 360 “affordable homes” from our statewide inventory. Those who support the project from the comfort of their homes outside Warwick, then, should be ready to support a bill that would increase the minimum percentage of affordable housing required in every Rhode Island community to offset these so-called “parochial” concerns.

Those who speak on behalf of commercial interests, should, when faced with the demolition of 360 affordable homes here, be ready to commit significant financial resources and assistance to help mitigate the affordable housing crisis throughout Rhode Island. Since they clearly eschew even the hint of parochialism, committing these funds to benefit the entire state should not be a problem.

- It was only weeks ago when we were made aware of constraints to area fishery stocks. Is it parochial of us to urge that the FAA and RIAC seek alternatives that pose the least impact on water resources, such as Buckeye Brook, that are a vital component in maintaining Narragansett Bay’s fisheries and related marine economies?
- Is it “parochial” to desire an improvement in air quality in a state that is classified as Non-attainment for ozone?
- Following other fare increases, Southwest Airlines decided this week to raise the cost of a one-way fare by \$10 in order to compete with other airlines trying to offset the rising cost of fuel. Is it “parochial” to desire an alternative that would have the least impact on the landing and lease fees necessary to pay the debt service of the proposed infrastructure at T.F Green? Let’s not forget that RIAC is a quasi-public corporation whose bonded indebtedness is, at the end of the day, borne by all of Rhode Island’s hardworking taxpayers.

Asking that RIAC and the FAA provide an independent, concrete and unbiased fiscal analysis of this billion-dollar project in my judgment is prudent, not parochial.

These issues are larger than expansion proponents’ continued drumbeat regarding economic benefits. We should not be asked to blindly accept these proposals. For instance, a careful study of the alternatives – not blind faith – will lead one to the realization that the proposed terminal roadway, as designed, eliminates exit onto Post Road for those travelers dropping off passengers. Not a great scenario for businesses located on Post Road and on Metro Center .

For those who sit in this room representing a business alliance or coalition prepared to support the alternatives set forth tonight, I ask: Would any single business person within your alliance operate, accept or support a roll out of the most costly infrastructure solution for his or her own company without first directing resources to study the most cost-effective strategy to attain a specific goal?

Absent the appropriate due diligence of less costly alternatives, the scheduled impact analysis is meaningless because the FAA and RIAC are studying the impact and mitigation of the worst of the available alternatives.

To date, this process has in part been a sales and marketing pitch solely to accomplish the larger regional goals of FAA and specific perceived market conditions of RIAC.

While these suggested alternatives are in keeping with these agencies’ respective missions, they are nonetheless based on specific goals and not representative of the larger perspective of competing dollars and long-term impacts on society and the environment.

It is not enough to accept the “bigger picture” if it is painted solely with the brush of perceived economic impact.

Analyzing the big picture – environmental, societal, health and economic impacts – starts here. It is the collective responsibility of federal, state, and local government, residents, environmental groups and the business community to come to the table and present a range of alternatives that fulfills the varied interests of all stakeholders. Only then can an impartial analysis of the alternatives begin.

Requested changes

This process affects real people and businesses and should be conducted in a manner that studies *reasonable* West Coast service as provided by alternatives that provide such service, with the least amount of impact on the community and environment. The only way to accomplish this is to request an immediate halt to the process until the No-Build alternative and 8,600 LF – R5/23 alternative are included within the range of alternatives presented for study within the impact

analysis stage of the draft EIS.

In addition, we request further study in the VHB runway length analysis to include the 737-700 with winglets as the design aircraft that will – by your own consultant’s admission – represent the majority of fleet mix serving T.F. Green Airport by 2012.

The City does not accept the notion forwarded by the FAA that hybrid alternatives “*may be provided*” in the future during the impact analysis position of this study. These alternatives must be included now in the document as alternatives F and G to allow for adequate study of mitigation and to ensure a process that truly allows for informed public participation in this process.

The “no-build” alternative must be studied as the airport land use already imposes onto the residents of the City unbearable air and noise pollution, while the 8,600 lf 5/23-runway alternative is based on operational data.

According to the aircraft forecast included within the *T.F Green Airport Improvement Program Environmental Impact Statement*, 26.7 percent of total airport operations and approximately 54 percent of all forecasted West Coast service by 2012 will be flown by 737-700 type of aircraft, which, when equipped with winglets, will require only a 8,600 lf. runway.

The second most used aircraft type as forecasted would be a Boeing 757-200, which will account for 7 percent of total airport operations and approximately 14 percent of all forecasted West Coast service by 2012. Depending on its configuration, this aircraft will require only a 7,800 lf. runway length at maximum take off weight.

Together, the Boeing 737-700 and 757-200 can easily accommodate non-stop West Coast service and as projected will comprise approximately 68 percent of the fleet mix forecasted to fly to the West Coast by 2012. Instead of using the majority fleet mix, the FAA and VHB have chosen to justify the 9,350-lf runway by using the 767-300 aircraft data, which represents merely 7 percent of all forecasted West Coast service by 2012.

In short, the justification for the 9,350 lf runway length included in all the alternatives before you is based on a 767-300 aircraft that is forecasted to be used in only 7 percent of all operations serving the West Coast by 2012.

This methodology, in our opinion, is fiscally irresponsible and flies in the face of the EIS process itself, which seeks reasonable alternatives that meet a defined goal (in this case West Coast service) in a manner that minimizes environmental and community impact.

Therefore, we would challenge anyone in this room to present credible evidence why this study should not include an alternative for a runway of a maximum length of 8,600 feet, which would be capable of serving at least 68 percent of the fleet mix forecasted to fly to the West Coast by 2012.

Finally, the alternatives proposed to date must also be amended to include a terminal roadway that provides egress onto Post Road to serve area businesses as well as an alternate location for the integrated cargo facility.

I would also respectfully request a 10-day extension to the 20-day comment period because the time allotted is wholly inadequate to thoroughly study and comment on the alternatives presented.

The failure to include the City’s repeated concern for protecting the quality of life for our residents within the screening process used by VHB has resulted in the omission of several alternatives that would have provided more reasonable and balanced alternatives for study.

The residents of the City reject the premise that adverse environmental conditions imposed on them and their families are necessary for the “greater good” of our state. That term appears to be defined by those who do not live in the shadow of the airport. The process owes every resident of this City a fair, honest and objective set of alternatives prior to initiation of the impact analysis segment of the EIS process.

The residents of this City deserve better. Better than a pat on the back and the evident belief that their family is less important than a family located in another community unaffected by the airport land use, less important than a lower fare to Disneyland or fattening RIAC’s coffers.

The residents of the City will continue to stand up and demand their concerns be heard, thoughtfully considered and addressed within a process that currently appears dominated by shortsighted special interests.

[RETURN TO MAIN](#)