

PHILADELPHIA INTERNATIONAL AIRPORT

# Runway 17-35 Extension Project

## Final Environmental Impact Statement



credit: Rick McMullin, Philadelphia Airport System

MARCH 2005

VOLUME 3

PART 1: DEIS COMMENTS  
AND RESPONSES



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# Federal Comments and Responses

**RICK SANTORUM**  
PENNSYLVANIA

REPUBLICAN CONFERENCE  
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WASHINGTON, DC  
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# United States Senate

<http://santorum.senate.gov>

COMMITTEES:  
FINANCE  
BANKING, HOUSING, AND URBAN AFFAIRS  
RULES AND ADMINISTRATION  
SPECIAL COMMITTEE ON AGING

November 19, 2004

Mr. Quentin Burgess  
Deputy Assistant Secretary for Governmental Affairs  
Federal Aviation Administration  
400 7th Street Southwest, Rm 1022  
Washington, D.C. 20590

Dear Mr. Burgess:

I have recently received correspondence from Donna Howarth of Newtown Square, Pennsylvania.

Ms. Howarth is concerned about a proposed runway expansion at the Philadelphia International Airport. Any information your office could provide regarding this matter would be greatly appreciated. A copy of Ms. Howarth's correspondence is enclosed for your review.

The staff contact for this referral is Maryanne Laager who can be reached at 202-224-6324. Thank you for your assistance.

Sincerely,



Rick Santorum  
United States Senate

RJS:mxl

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U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Office of the Associate  
Administrator for Airports

Response to Letter #1

800 Independence Ave., SW.  
Washington, DC 20591

DEC 14 2004

The Honorable Rick Santorum  
United States Senate  
Washington, DC 20510

Dear Senator Santorum:

Thank you for your letter of November 19 on behalf of Ms. Donna Howarth regarding the Philadelphia International Airport Runway 17-35 Extension Project.

The city of Philadelphia has proposed to extend Runway 17-35 to reduce delays at the airport. Consequently, the Federal Aviation Administration (FAA) is preparing an Environmental Impact Statement (EIS) for this project.

In October, the FAA released the Draft EIS (DEIS) for public comment. The DEIS discusses potential environmental impacts that could result from the project. The public comment period for the DEIS closed on December 1, 2004. Ms. Howarth's letter will be included in the Administrative Record of the EIS and responses to Ms. Howarth's letter and other comment letters will be included in the Final EIS (FEIS). We expect to publish the FEIS in late February 2005.

Also, the FAA will include Ms. Howarth on our mailing list and provide her a copy of the Executive Summary and compact disk for the DEIS. Once on the mailing list, Ms. Howarth will automatically receive copies of any future newsletters, announcements, or EIS-related materials, as well as a copy of the FEIS.

If you or your staff need further help, please contact Mr. David Balloff, Assistant Administrator for Government and Industry Affairs, at (202) 267-3277.

Sincerely,

Original Signed by:  
Woodie Woodward

Woodie Woodward  
Associate Administrator  
for Airports

Enclosure  
Transmitted Correspondence

Congress of the United States  
Washington, DC 20510

November 22, 2004

Ms. Marion C. Blakey  
Administrator  
Federal Aviation Administration  
800 Independence Avenue  
Washington, D.C. 20591

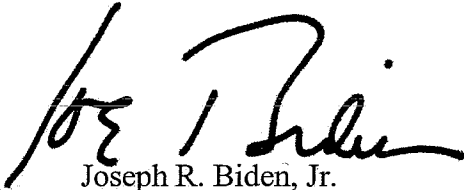
Dear Ms. Blakey:

We are writing on behalf of the Philadelphia Airport Air Traffic and Quality of Life Issues Action Group to request that the public comment period for the Federal Aviation Administration's Philadelphia International Airport Runway 17-35 Extension Project Draft Environmental Impact Statement (DEIS) be extended into the next calendar year.

The expansion of the Philadelphia International Airport (PHL) is an extremely important issue to our constituents. For this reason, the Action Group believes that more time should be given for the public to be able to review and comment on this proposal. We are aware that the proposed PHL improvements, including the Runway 17-35 Project and the Capacity Enhancement Program, have been chosen as one of 13 transportation projects by the U.S. Secretary of Transportation (the Secretary) as high priority projects for expedited environmental review (environmental streamlining) under Executive Order 13274, "Environmental Stewardship and Transportation Infrastructure Project Review"; however, we believe the potential negative impact on the quality of life in the communities surrounding PHL warrants additional time for review and comment on the proposed project. Our community, through Delaware's Action Group, has asked to be given additional time to review this document and we urge you to grant this request.

We appreciate your consideration. Please contact us through our respective staffs: Ms. Tonya Baker, Senator Biden's office at (302) 573-6345, Ms. Carrie Casey, Senator Carper's office at (302) 573-6291 and Mr. Patrick McGrory, Congressman Castle's office at (302) 428-1901. We look forward to hearing from you.

Sincerely,



Joseph R. Biden, Jr.  
United States Senator



Thomas R. Carper  
United States Senator



Michael N. Castle  
Member of Congress

cc: Ms. Sue McDonald, FAA Environmental Protection Specialist



U.S. Department  
of Transportation  
Federal Aviation  
Administration

Office of the Administrator

Response to Letter #2

800 Independence Ave., SW.  
Washington, DC 20581

NOV 30 2004

The Honorable Joseph R. Biden, Jr.  
United States Senate  
Washington, DC 20510

Dear Senator Biden:

Thank you for your letter, cosigned by your congressional colleagues, about the Philadelphia International Airport (PHL) Runway 17-35 Extension Project. On behalf of the Philadelphia Air Traffic and Quality of Life Issues Action Group (Action Group), you asked the Federal Aviation Administration (FAA) to extend the Draft Environmental Impact Statement (DEIS) public comment period. The Action Group did not believe enough time had been provided to enable public review and comment.

As you are aware, this project is one of only a few selected by the Secretary of Transportation for environmental streamlining under Executive Order 13274, "Environmental Stewardship and Transportation Infrastructure Project Review." Despite the project's streamlined nature, we conducted procedures and analyses to the same rigorous standards prescribed by the Council on Environmental Quality (CEQ). CEQ standards include a minimum 45-day public comment period. This project has a 47-day comment period.

The Federal Aviation Administration (FAA) has worked to engage State and Federal agencies and the public throughout the project process. On July 24, 2003, 16 State and Federal agencies from Pennsylvania, New Jersey, and Delaware coauthored and signed a streamlining agreement. These agencies committed to prompt review and notice to the FAA of any environmental issue within their area of expertise. Our next step was to publish a Notice of Intent in the Federal Register on August 1, 2003. Since then, we established a project Web site ([www.phlrunway17-35eis.com](http://www.phlrunway17-35eis.com)) and published several newsletters. We also conducted a public scoping meeting on August 12, 2003 and held three sets of public outreach meetings in April, May, and September 2004 in Pennsylvania, Delaware, and New Jersey. At every meeting, we let the attendees know about scheduled future events, the DEIS schedule, ways to get information, and how to get a copy of the DEIS. We also provided this information on the project Web site.

We also briefed congressional members on November 5, 2004 and held public hearings on November 15, 16, 17, and 18, 2004 at locations recommended by congressional members. We asked for comments from State and Federal agencies.

We released copies of the DEIS on October 14, 2004, one month before the public hearings. We mailed Executive Summaries, compact disks of the full DEIS, and technical studies to over 1,000 households. We also sent copies to local, State, and Federal officials. We gave out hard copies of the entire six-volume set to 40 public libraries. We made available Executive Summaries and compact disks at the hearings to anyone who asked for one. They were available via the project Web site, e-mail, telephone, fax, or letter.

The CEQ regulations (section 1506.10 (d)) allow the lead Federal agency or the Environmental Protection Agency to extend the public comment period if "compelling reasons of national policy" are shown. It also states "failure to file timely comments shall not be a sufficient reason for extending a period." Because the DEIS has shown there is limited potential impact that could result from the project and given the scope and nature of the project, the FAA believes the 47-day public comment period is satisfactory.

Even though we do not think an extension is justified, we will make every reasonable effort to consider comments filed after December 1 and before publishing the Final Environmental Impact Statement (FEIS). We expect to publish the FEIS in late February 2005.

If I can be of further help, please contact me or Mr. David Balloff, Assistant Administrator of Government and Industry Affairs, at (202) 267-3277.

We have sent an identical letter to each cosigner of your letter.

Sincerely,

**Original Signed By**

Marion C. Blalock  
Administrator

# United States Senate

WASHINGTON, DC 20510

November 10, 2004

Susan McDonald  
FAA Environmental Protection Specialist  
c/o VHB  
101 Walnut Street  
PO Box 9151  
Watertown, MA 02471-9151

Dear Ms. McDonald:

We are writing with respect to the Draft Environmental Impact Statement on the proposed Runway Extension Project at Philadelphia International Airport. This project has raised significant concerns in communities we represent in southern New Jersey whose health, welfare and quality-of-life may suffer from the change in airplanes flying overhead.

Philadelphia International Airport is a key partner in commerce for both sides of the Delaware River and we recognize the need to address the growth in air traffic at the Airport. However, we urge the FAA to seriously consider the impact of a change in flight patterns on the quality of life of neighboring communities. In particular, increases in noise due to aircraft flying at a lower altitude could have a significant impact on people who live and work in these homes, schools and businesses. Many representatives from these communities have contacted the FAA about these quality of life concerns in public hearings and in written correspondence. Their communications need to be carefully considered before any change in flight pattern is implemented.

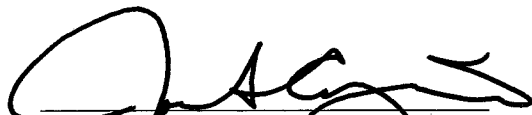
Residents and elected officials throughout the region are also concerned about the impact a change in flight patterns would have on shipping activity at the Delaware River Port Authority, a major economic engine for southern New Jersey. This activity consists mainly of large container ships and fuel tankers which travel on the Delaware River. Currently, the passage of such large ships near Philadelphia International Airport results in the temporary suspension of Runway 35 arrivals, in order to ensure a smooth flow of commerce. Elected officials and residents are understandably concerned that port traffic might be adversely affected under future flight patterns.

We urge the FAA to make sure that all concerns raised during the public comment period are adequately addressed before a final decision is reached. It is important that any decision that changes flight patterns over the airport also minimizes any adverse impact



on communities in the paths of those planes, and on the port and related businesses. We look forward to working with you toward these goals.

Sincerely,



JON S. CORZINE  
United States Senator



FRANK R. LAUTENBERG  
United States Senator

JON S. CORZINE  
NEW JERSEY

COMMITTEES:  
BANKING, HOUSING, AND  
URBAN AFFAIRS  
BUDGET  
FOREIGN RELATIONS

# United States Senate

WASHINGTON, DC 20510-3004

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BARRINGTON, NJ 08007  
(856) 757-5353

February 10, 2005

Susan McDonald  
FAA Environmental Protection Specialist  
c/o VHB  
101 Walnut Street  
PO Box 9151  
Watertown, MA 02471-9151

Dear Ms. McDonald:

I am writing to submit additional comments on the Draft Environmental Impact Statement (DEIS) on the Philadelphia International Airport Runway 17-35 Extension Project. As you recall, along with my colleague Senator Lautenberg I sent a letter to your office on November 22, 2004 that expressed serious concerns regarding the impact of this project on the health, welfare and quality of life in communities in southern New Jersey. Since that letter, I have spoken further with my constituents regarding the severe hardship this project will have on their lives. I now must now formally oppose this project.

The Federal Aviation Administration is considering a runway extension as well as other capacity enhancements at the airport in an effort to reduce existing and forecasted delays in the arrival and departure of flights. As I stated previously, I do recognize the need to address the growth in air traffic that has occurred at the Airport. However, I feel that the runway extensions proposed will do this at the expense of residents of southern New Jersey. Alternative 1 of the DEIS would extend Runway 17-35 to the north by 640 feet and to the south by 400 feet from its existing length of 5,460 feet to a proposed total length of 6,500 feet. Alternative 2 would extend Runway 17-35 to the north by 1,140 feet and to the south by 400 feet from its existing length of 5,460 feet to a proposed total length of 7,000 feet. I believe that both of these alternatives would bring aircraft activity too close to my constituents and urge the FAA to reject them.

According to the DEIS, both runway extension alternatives are being considered first and separate from the other capacity enhancements. I believe that is a mistake as it precludes the FAA from fully considering all measures that can relieve air traffic, including those that do not impact quality of life. I urge the FAA to reject any interim measure that will extend Runway 17-35 and instead work with all stakeholders, including those on the eastern side of the Delaware River, in order to come to a more equitable solution.

Letter to the Federal Aviation Administration  
February 10, 2005  
Page Two of Two

Thank you for your consideration in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Jon S. Conzine", is written over a horizontal line.

JON S. CONZINE  
United States Senator

## Letter 3

U.S. Congress - Senator J. Corzine, Senator F. Lautenberg

Comment Number	Comment	Response
3.1	Philadelphia International Airport is a key partner in commerce for both sides of the Delaware River and we recognize the need to address the growth in air traffic at the Airport. However, we urge the FAA to seriously consider the impact of a change in flight patterns on the quality of life of neighboring communities. In particular, increases in noise due to aircraft flying at a low altitude could have a significant impact on people who live and work in these homes, schools and businesses. Many representatives from these communities have contacted the FAA about these quality of life concerns in public hearings and in written correspondence. Their communications needs to be carefully considered before any change in flight pattern is implemented.	The FAA has noted and considered your comment, and has carefully considered all comments submitted on the DEIS. The Proposed Project will not result in any noticeable change in flight tracks, which are determined by the location of the centerline of the runway. The number of aircraft using Runway 17-35 is anticipated to increase, but will not result in significant noise impacts at any location, nor will the elevation at which aircraft approach the runway change substantially as a result of the runway extension. Altitudes of aircraft on approach to or departure from Runway 17 will be slightly different because aircraft will begin their takeoff roll on the extended pavement (thereby passing areas to the north at a slightly higher altitude than under the No-Action Alternative), and will approach slightly lower. The amount of increase or decrease depends on the climb capability of each individual aircraft.
3.2	Residents and elected officials throughout the region are also concerned about the impacts a change in flight patterns would have on shipping activity at the Delaware River Port Authority, a major economic engine for southern New Jersey. This activity consists mainly of large container ships and fuel tankers which travel on the Delaware River. Currently, the passage of such large ships near the Philadelphia International Airport results in the temporary suspension of Runway 35 arrivals, in order to ensure a smooth flow of commerce. Elected officials and residents are understandably concerned that port traffic might be adversely affected under future flight patterns.	By federal law, waterborne vessels have the right-of-way in occurrences where they encounter other modes of transportation. Therefore, aircraft have to yield the right-of-way to watercraft and this is the current condition. Thus, it is the airport, rather than the port traffic, that is impeded. This EIS estimated that landings on Runway 35 would be suspended on average 4 times per day for 15 minutes as a result of ships in the channel, and this is included in the delay analysis presented in this EIS.  The proposed Runway 17-35 Extension, would not affect ship traffic in the Delaware River.
3.3	We urge the FAA to make sure that all concerns raised during the public comment period are adequately addressed before a final decision is reached. It is important that any decision that changes flight patterns over the airport also minimizes any adverse impact on communities in the paths of those planes, and on the port and related businesses. We look forward to working with you toward these goals.	The FAA has carefully considered all concerns raised during the review of the DEIS, and addressed those concerns in this FEIS. All comments will be considered before the FAA issues a Record of Decision. We would like to point out that the proposed project will not change flight tracks or patterns in the vicinity of the airport, nor would it change the number of aircraft operations, although the distribution of aircraft among runways would change. The proposed project would have no adverse impacts on ship operations, the Port, or any businesses.
3.4	I believe that both of these alternatives would bring aircraft activity too close to my constituents and urge the FAA to reject them.	For the two Build Alternatives, pages 4-12 and 4-13 of this EIS explain that the only differences between the existing modeled tracks and those of the Build Alternatives are where each aircraft begins its takeoff roll -- the starting point for each track is effectively shifted north or southward the distance of the extension. Thus, for example, the 400 foot extension at the south end of Runway 35 for Build Alternatives 1 and 2 means that departures from that runway will start their takeoff 400 feet closer to the Delaware River and begin any turns after takeoff 400 feet closer to the airport than they would without the extension. That difference on the two flight track figures would be so small (only a few hundred feet several miles from the runway) as to be difficult to discern. On departure from Runway 17, aircraft may be slightly higher than under the No-Action Alternative, as they would start their departure roll slightly further to the south. Aircraft arriving on Runway 17 would be slightly lower, as the landing threshold would be slightly further north. This will not result in any substantial change in altitude over residential areas.

## Letter 3

U.S. Congress - Senator J. Corzine, Senator F. Lautenberg

Comment Number	Comment	Response
3.5	<p>According to the DEIS, both runway extension alternatives are being considered first and separate from the other capacity enhancements. I believe that is a mistake as it precludes the FAA from fully considering all measures that can relieve air traffic, including those that do not impact quality of life. I urge the FAA to reject any interim measure that will extend Runway 17-35 and instead work with all stakeholders, including those on the eastern side of the Delaware River, in order to come to a more equitable solution.</p>	<p>As demonstrated in Chapter 2 of the EIS, there is an immediate need for delay reduction at PHL. The Runway 17-35 Extension Project, which would accomplish this goal, is an independent project with independent utility. FAA is also proceeding with the Capacity Enhancement Program (CEP) as noted in Chapter 1. CEP is a long-term, major redevelopment project that would result in additional capacity and, as a result, more comprehensive and longer-term delay reduction. The Runway 17-35 Extension Project EIS meets the requirements of the National Environmental Policy Act by fully considering all measures available to the FAA, including many alternatives that do not require construction (see Chapter 3 of the EIS), which could reduce delay at PHL. The proposed extension does not preclude the FAA from considering any alternatives for the CEP. The FAA is also committed to continuing to work with all of the Delaware Valley communities during preparation of the CEP EIS.</p>

CURT WELDON

7TH DISTRICT, PENNSYLVANIA

2486 RANDOLPH HOUSE OFFICE BUILDING  
WASHINGTON, DC 20515-3807  
(202) 225-2071

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[www.house.gov/cwrtw07](http://www.house.gov/cwrtw07)

MIGRATORY BIRD  
CONSERVATION COMMISSION  
REPUBLICAN POLICY COMMITTEE



**Congress of the United States**  
**House of Representatives**  
**Washington, DC 20515-3807**

COMMITTEE ON ARMED SERVICES  
TACTICAL AIR AND LAND FORCES, CHAIRMAN  
STRATEGIC FORCES

COMMITTEE ON SCIENCE  
SPACE AND AERONAUTICS  
ENERGY

SELECT COMMITTEE ON  
HOMELAND SECURITY

CO-CHAIRMAN:  
CONGRESSIONAL FIRE SERVICES GROUP  
DUNIA - CONGRESS STUDY GROUP  
GLOBE SOUL PROTECTION TASK FORCE  
CONGRESSIONAL DIABETES CAUSE  
HOMELAND SECURITY CAUSE

November 6, 2004

Ms. Marion Blakey  
Administrator, Federal Aviation Administration  
U.S. Department of Transportation  
800 Independence Ave, SW  
Washington, DC 20591

Dear Administrator Blakey:

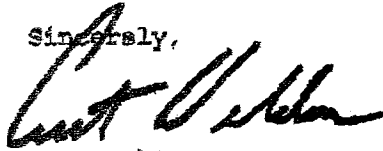
By way of this correspondence I am requesting an extension for the public comment period on the extension of Philadelphia International Airport Runway 17-35 project from the current deadline of December 1, 2004 to January 15, 2005.

The consideration of the Runway project has been placed on a fast track pace leaving Delaware County as well as the local municipalities with insufficient time to analyze all the information relevant to this project. At the same time, the County and municipalities are monitoring another proposed project at the Philadelphia International Airport, referred to as the Capacity Enhancement Program, placing a heavy burden on these governing bodies to keep pace with the FAA. Simply put, the County needs more time to digest the information specific to the most recent publication, the Draft Environmental Impact Statement. Without this additional time, the County cannot properly analyze the DEIS, leaving many people without proper representation.

Two thirds of the airport resides in Delaware County and over twenty seven municipalities are directly affected by air traffic heading to and leaving from the Philadelphia International Airport, therefore any activities that take place at the airport have significant implications for Delaware County residents. Currently, residents, local municipal and state officials have been very vocal with their opposition to this project. Therefore, any cooperative action by the FAA would only help to mend some of this local apprehension.

Your immediate attention to this request would be very much appreciated.

Sincerely,



Curt Waldon  
MEMBER OF CONGRESS

Cc: Susan McDonald, Environmental Specialist  
Harrisburg Airports District Office

CW:kc



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Office of the Administrator

800 Independence Ave., S.W.  
Washington, D.C. 20591

NOV 30 2004

The Honorable Curt Weldon  
House of Representatives  
Washington, DC 20515

Dear Congressman Weldon:

Thank you for your call today and your earlier letter of November 6 about the Philadelphia International Airport (PHL) Runway 17-35 Extension Project. You expressed concern that residents in Delaware County and surrounding municipalities did not have enough time to analyze properly the project documents. Therefore, you asked for an extension to the Draft Environmental Impact Statement (DEIS) public comment period.

The Federal Aviation Administration (FAA) is very sensitive to the concerns of residents surrounding PHL. Because of this, we have conducted extensive public outreach to keep the public informed and to hear their concerns. Our first step in this process was to publish a Notice of Intent in the Federal Register on August 1, 2003. Since then, we established a project Web site ([www.phlrunway17-35eis.com](http://www.phlrunway17-35eis.com)) and published several newsletters. We also conducted a public scoping meeting on August 12, 2003 and held three sets of public outreach meetings in April, May, and September 2004 in Pennsylvania, Delaware, and New Jersey.

We also briefed congressional members on November 5, 2004 and held public hearings on November 15, 16, 17, and 18, 2004 at locations recommended by congressional members. At every meeting, we let the attendees know about upcoming events, the DEIS schedule, ways to get information, and how to get a copy of the DEIS. We also provided this information on the project Web site.

We released copies of the DEIS on October 14, 2004, one month before the public hearings. We mailed Executive Summaries, compact disks of the full DEIS, and technical studies to over 1,000 households. We also sent copies to local, State, and Federal officials. We gave out hard copies of the entire six-volume set to 40 public libraries. We made available Executive Summaries and compact disks at the hearings to anyone who asked for one. They were available via the project Web site, e-mail, telephone, fax, or letter.

The FAA also asked for comments from State and Federal agencies. On July 24, 2003, 16 State and Federal agencies from Pennsylvania, New Jersey, and Delaware coauthored and signed a streamlining agreement. These agencies committed to prompt review and notice to the FAA of any environmental issue within their area of expertise.



As you are aware, this project is one of only a few selected by the Secretary of Transportation for environmental streamlining under Executive Order 13274, "Environmental Stewardship and Transportation Infrastructure Project Review." Despite the project's streamlined nature, we conducted procedures and analyses to the same rigorous standards prescribed by the Council on Environmental Quality (CEQ). CEQ standards include a minimum 45-day public comment period. This project has a 47-day comment period.

The CEQ regulations (section 1506.10 (d)) allow the lead Federal agency or the Environmental Protection Agency to extend the public comment period if "compelling reasons of national policy" are shown. Considering the extensive public involvement outlined above, the FAA believes the 47-day public comment period is satisfactory.

After the comment period closes, the FAA will make every reasonable effort to consider comments filed after that deadline and before we publish the Final Environmental Impact Statement (FEIS). We expect to publish the FEIS in late February 2005.

I enjoyed talking with you today. If I can be of further help, please contact me or Mr. David Balloff, Assistant Administrator of Government and Industry Affairs, at (202) 267-3277.

Sincerely,



Marion C. Blakey  
Administrator

JIM GERLACH  
6TH DISTRICT, PENNSYLVANIA

COMMITTEES:  
TRANSPORTATION AND INFRASTRUCTURE  
SMALL BUSINESS

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WASHINGTON, DC 20515  
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FAX: (202) 225-8440

**Congress of the United States**  
**House of Representatives**  
Washington, DC 20515-3806

December 13, 2004

Ms. Marion Blakey  
Administrator  
Federal Aviation Administration  
800 Independence Ave, SW  
Washington, DC 20591

Dear Administrator Blakey:

I write to you regarding a matter of great concern to me and many of my constituents in the Township of Lower Merion, Montgomery County. I appreciate your attention in this regard.

My constituents fear that the proposed expansion of Runway 17-35 at Philadelphia International Airport (PHL) will have an unacceptable impact on their quality of life. Specifically, many are concerned about increased aircraft noise, particularly in the southern portion of Lower Merion which lies just a few miles from PHL, as a result of the expansion of Runway 17-35.

I am aware that the Lower Merion Township Board of Supervisors have requested Federal Aviation Administration (FAA) officials to better inform citizens of the community on the project and these invitations have been declined. Further, I am aware that the Lower Merion Board of Supervisors have been informed by FAA officials that the impact of the Runway 17-35 expansion would only be felt in Delaware and Chester Counties in Pennsylvania and New Castle County in Delaware.

The Draft Environmental Impact Statement (DEIS) issued by the FAA for this project does not assess impacts in Lower Merion. However, officials from PHL recently attended a Lower Merion Township Commissioners meeting to explain the project to the assembled Commissioners and public. Mr. Calvin Davenger, of PHL, presented information on impacts in Lower Merion, which he said was extrapolated from FAA noise studies, that showed there would be minor noise impacts in parts of Lower Merion as a result of the Runway 17-35 expansion. If this is true, why was Lower Merion not included in the DEIS?

I respectfully request that any noise impacts in Lower Merion be fully reviewed and documented in the Final Environment Impact Statement for this project or in writing in some other way. If there will be impacts in Lower Merion, those impacts must be fully explained to the community.

DISTRICT OFFICES:

**BERKS COUNTY**  
501 NORTH PARK ROAD  
WYOMISSING, PA 19610  
(610) 376-7630  
FAX: (610) 376-7633

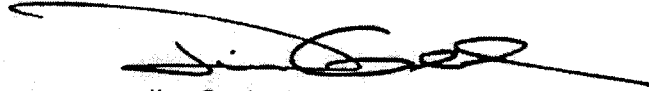
**CHESTER COUNTY**  
1230 POTTSTOWN PIKE, SUITE 4  
GLENMOORE, PA 19343  
(610) 458-8010  
FAX: (610) 458-8393

**MONTGOMERY COUNTY**  
580 MAIN STREET, SUITE 4  
TRAPPE, PA 19426  
(610) 409-2780  
FAX: (610) 409-7989

I look forward to your prompt response. If you should have any questions, please feel free to contact me.

With kind regards, I am

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Gerlach", with a long horizontal flourish extending to the right.

Jim Gerlach  
Member of Congress

Cc: Lower Merion Board of Commissioners  
The Hon. Don Young  
The Hon. John Mica



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Office of the Associate  
Administrator for Airports

Response to Letter #5

80  
Washington, DC 20591

JAN 12 2005

The Honorable Jim Gerlach  
House of Representatives  
Washington, DC 20515

Dear Congressman Gerlach:

Administrator Blakey has asked me to respond to your letter of December 13 about the Philadelphia International Airport (PHL) Runway 17-35 Extension Project. In your letter you stated that you had concerns about how the project would impact residents in the Township of Lower Merion and how impacts are disclosed. You asked that we review and document noise impacts in the Township of Lower Merion.

During our environmental analysis process, we studied a large geographic area for possible noise impacts. We determined that study area from radar data by following flight paths for aircraft using each runway at PHL. This path began from the farthest distance of either the start of takeoff to one of two points. We selected the point at which departing aircraft reached 10,000 feet aboveground level or 7,000 feet aboveground level on arrival. To ensure we included noise affects from new flight tracks and climb profiles, we developed a preliminary set of future flight tracks for the forecast aircraft fleet and for the two Build Alternatives.

The resulting circular study area had a radius of nearly 27 miles. The Township of Lower Merion fell within this area. We modeled existing and future aircraft noise levels using the Integrated Noise Model and plotted the noise contours. Our results showed that most of the Township of Lower Merion would experience a slight, though generally not noticeable, decrease in noise exposure if Runway 17-35 was extended when compared to the No Action Alternative. A small portion of the Township may experience up to 0.7-decibel increase. Scientific studies show that a 0.7-decibel increase is imperceptible to the human ear. We summarized the results of this analysis by locality in the enclosed table. We also show them in the Draft Environmental Impact Statement (DEIS). This table is identical to ones we presented at several public meetings.

We also conducted extensive public outreach for this project before we issued the DEIS. Since it is not possible for us to meet individually with all townships and local communities in the project area, we made every effort to tell communities of upcoming events and to conduct public meetings in centralized locations. The first step we took was to publish a Notice of Intent to prepare an EIS in the Federal Register on August 1, 2003.

Since then, we kept a project Web site and published several newsletters. In addition, we conducted a public scoping meeting on August 12, 2003 and held three sets of public outreach meetings in April, May, and September 2004 in Pennsylvania, Delaware, and New Jersey. At every meeting, we told attendees about the DEIS schedule, ways to get and provide information, and how to get a copy of the DEIS.

In September 2004, we held a public meeting in Delaware County to present the findings of our noise analysis. At that meeting, we presented the changes in noise levels that could result over many communities surrounding PHL for the three alternatives we are considering. The data we presented included the potential effect on aircraft noise levels over the Township of Lower Merion.

We released the DEIS on October 14, 2004 for public comment, which closed on December 1, 2004. We mailed Executive Summaries and compact disks of the full DEIS and technical studies to over 1,000 households. We also sent copies to local, State, and Federal officials. We sent out hard copies of the entire six-volume set to 40 public libraries. We made this same information available at the hearings to anyone who asked for it via the Web site, e-mail, telephone, fax, or letter.

We expect to release the Final Environmental Impact Statement (FEIS) in early March 2005. The FEIS will differ from the DEIS because it will address all comments received before December 1, 2004 and identify the preferred alternative. Because there are no significant impacts to the Township of Lower Merion, the Township is not specifically highlighted in the text of the DEIS or the FEIS, but is shown on several maps and figures.

If you or your staff need further assistance, please contact Mr. David Balloff, Assistant Administrator for Government and Industry Affairs, at (202) 267-3277.

Sincerely,

**Original Signed by:**  
**Catherine M. Lang**

Woodie Woodward  
Associate Administrator  
for Airports

Enclosure

# Philadelphia International Airport Runway 17-35 Extension Project DEIS

## Computed DNLs in PENNSYLVANIA

LOCALITY	2003 No Action DNL			2007 No Action Avg. DNL	Alt. 1 Change in DNL	Alt. 2 Change in DNL	2015 No Action Avg. DNL	Alt. 1 Change in DNL	Alt. 2 Change in DNL
	Ranges		Average						
	From..	To...							
ALDAN BORO	44.8	45.6	45.1	49.0	0.9	1.6	50.3	0.4	1.1
ASTON TWP	46.9	51.1	49.0	47.6	-0.5	-0.6	49.0	-0.4	-0.5
BETHEL TWP	45.8	49.9	48.5	47.5	-0.9	-0.9	48.9	-0.9	-0.9
BIRMINGHAM TWP	44.7	45.8	45.3	43.5	-4.6	-4.5	44.9	-4.8	-4.8
BROOKHAVEN BORO	48.5	51.3	49.8	48.6	-0.1	-0.2	50.0	0.0	-0.2
CHADDS FORD TWP	44.0	46.6	45.6	44.2	-3.6	-3.5	45.6	-3.7	-3.7
CHESTER CITY	48.8	62.1	56.8	56.6	-0.1	-0.1	58.0	0.0	-0.1
CHESTER HEIGHTS BORO	45.3	47.5	46.4	45.4	-1.4	-1.3	46.8	-1.4	-1.4
CHESTER TWP	51.8	55.2	53.2	52.2	-0.1	-0.1	53.7	0.0	-0.2
CLIFTON HEIGHTS BORO	44.3	44.5	44.4	48.1	0.5	1.2	49.3	0.0	0.7
COLLINGDALE BORO	46.3	47.7	46.8	51.2	1.0	1.7	52.6	0.5	1.2
COLWYN BORO	53.1	53.1	53.1	56.6	1.0	1.6	58.0	0.5	1.1
CONCORD TWP	44.5	48.3	46.6	45.1	-2.1	-2.1	46.5	-2.2	-2.3
DARBY BORO	47.6	47.6	47.6	51.9	0.8	1.5	53.3	0.2	1.0
DARBY TWP	45.2	54.0	49.5	53.8	1.3	2.1	55.2	0.9	1.6
EAST GOSHEN TWP	34.8	40.5	37.7	36.9	-7.6	-7.8	38.1	-8.3	-8.2
EAST LANSDOWNE BORO	48.3	48.3	48.3	48.9	1.4	1.6	49.7	1.3	1.5
EAST WHITELAND TWP	34.8	39.8	36.7	35.6	-9.5	-9.7	36.9	-10.3	-10.2
EASTTOWN TWP	40.2	43.5	42.4	42.0	-4.2	-4.1	43.3	-4.7	-4.4
EDDYSTONE BORO	51.6	63.8	58.2	58.3	-0.2	-0.2	59.7	-0.1	-0.2
EDGMONT TWP	42.7	46.0	44.7	44.1	-3.2	-3.1	45.4	-3.4	-3.3
FOLCROFT BORO	47.6	53.8	49.7	50.6	0.5	0.7	52.1	0.3	0.6
GLENOLDEN BORO	45.1	46.5	45.8	48.6	1.4	2.1	49.8	1.1	1.7
HAVERTFORD TWP	39.8	45.4	41.8	42.2	-0.8	-0.3	43.1	-1.0	-0.6
LANSDOWNE BORO	44.2	46.0	45.1	47.4	0.8	1.4	48.6	0.5	1.0
LOWER CHICHESTER TWP	52.7	53.6	53.2	53.7	-0.2	-0.1	55.2	-0.2	-0.2
LOWER MERION TWP	40.8	44.4	42.6	42.5	-1.7	-1.7	43.4	-2.2	-2.0
MALVERN BORO	40.9	41.8	41.5	40.5	-8.2	-8.2	41.8	-8.6	-8.6
MARCUS HOOK BORO	51.0	54.1	52.1	52.0	-0.1	-0.2	53.5	0.0	-0.1
MARPLE TWP	40.2	44.1	42.5	43.8	-1.0	-0.7	45.0	-1.5	-1.0

# Philadelphia International Airport Runway 17-35 Extension Project DEIS

## Computed DNLs in PENNSYLVANIA

LOCALITY	2003 No Action DNL			2007 No Action Avg. DNL	Alt. 1 Change in DNL	Alt. 2 Change in DNL	2015 No Action Avg. DNL	Alt. 1 Change in DNL	Alt. 2 Change in DNL
	Ranges		Average						
	From..	To...							
MEDIA BORO	45.2	45.7	45.5	46.1	-0.2	0.3	47.4	-0.3	0.0
MIDDLETOWN TWP	44.7	49.5	46.6	46.2	-1.0	-0.8	47.6	-1.0	-1.0
MORTON BORO	43.9	43.9	43.9	47.7	0.4	1.2	49.0	0.0	0.7
NARBERTH BORO	42.3	42.4	42.4	42.4	-1.9	-2.0	43.4	-2.6	-2.3
NETHER PROVIDENCE TWP	44.7	49.1	46.1	46.2	0.0	0.3	47.5	0.0	0.1
NEWTOWN TWP	40.3	44.6	42.6	42.7	-2.4	-2.2	43.9	-2.8	-2.5
NORWOOD BORO	46.6	49.8	48.2	48.3	0.0	0.1	49.7	0.0	0.1
PHILADELPHIA (Balance of)	36.1	68.7	45.9	45.5	-1.3	-1.3	46.8	-1.5	-1.4
PHILADELPHIA (EASTWICK)	42.9	72.0	54.7	56.1	0.3	0.7	57.5	0.1	0.5
PROSPECT PARK BORO	45.3	47.9	46.6	46.5	0.1	0.1	47.8	0.0	0.1
RADNOR TWP	38.9	40.4	39.5	39.5	-1.9	-1.4	40.3	-2.0	-1.6
RIDLEY PARK BORO	45.2	48.0	46.5	46.2	-0.1	-0.1	47.5	-0.1	-0.2
RIDLEY TWP	43.1	63.6	46.5	47.3	0.3	0.7	48.6	0.3	0.5
ROSE VALLEY BORO	46.2	47.2	46.9	46.5	-0.1	0.1	47.8	0.0	0.0
SHARON HILL BORO	48.1	50.4	49.2	54.0	1.3	2.1	55.5	0.8	1.5
SPRINGFIELD TWP	43.4	44.7	43.9	46.7	-0.1	0.4	48.0	-0.6	0.0
SWARTHMORE BORO	44.2	44.3	44.2	46.0	0.3	0.9	47.2	0.1	0.5
THORNBURY TWP	41.3	45.4	43.4	42.6	-4.0	-3.9	43.9	-4.4	-4.3
TINICUM TWP	51.6	72.6	62.2	61.7	-0.1	-0.1	63.2	-0.1	-0.1
TRAINER BORO	53.6	56.5	55.1	54.9	-0.1	-0.1	56.3	0.0	-0.1
UPLAND BORO	53.1	54.0	53.6	52.6	-0.1	-0.2	54.0	0.0	-0.1
UPPER CHICHESTER TWP	49.4	55.5	52.1	51.7	-0.2	-0.3	53.1	-0.2	-0.2
UPPER DARBY TWP	42.2	49.9	44.4	46.7	0.1	0.6	47.9	-0.4	0.2
UPPER PROVIDENCE TWP	44.0	46.7	45.2	45.4	-0.9	-0.7	46.7	-1.1	-0.9
WEST GOSHEN TWP	35.8	39.0	37.7	37.2	-6.0	-6.4	38.2	-6.6	-6.5
WESTTOWN TWP	39.3	42.0	40.7	40.0	-5.5	-5.7	41.2	-6.2	-6.1
WILLISTOWN TWP	38.4	44.5	42.4	41.7	-5.8	-5.8	43.0	-6.2	-6.0
YEADON BORO	43.9	52.8	48.0	49.9	0.8	1.1	51.1	0.4	0.9

**ROBERT E. ANDREWS**

FIRST DISTRICT, NEW JERSEY

COMMITTEES:

**EDUCATION AND THE WORKFORCE**

SENIOR RANKING DEMOCRAT, SUBCOMMITTEE ON  
EMPLOYER-EMPLOYEE RELATIONS

MEMBER, SUBCOMMITTEE ON 21ST CENTURY  
COMPETITIVENESS

**SELECT COMMITTEE ON  
HOMELAND SECURITY**

MEMBER, SUBCOMMITTEE ON CYBERSECURITY, SCIENCE,  
AND RESEARCH & DEVELOPMENT

MEMBER, SUBCOMMITTEE ON INTELLIGENCE  
AND COUNTERTERRORISM

**Congress of the United States**  
**House of Representatives**  
**Washington, DC 20515-3001**

PLEASE REPLY TO:

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WASHINGTON, DC 20515  
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(856) 546-5100
- 63 NORTH BROAD STREET  
WOODBURY, NJ 08096  
(856) 848-3900

E-MAIL:

rob.andrews@mail.house.gov

November 30, 2004

Adm. Marion Blakey, FAA Administrator  
Federal Aviation Administration  
800 Independence Avenue SW  
Washington, DC 20591

RE: Official comments on the Philadelphia Runway 17-35 Extension Project DEIS

Dear Administrator Blakey:

I am opposed to both build alternatives which would extend Runway 17-35 at the Philadelphia International Airport. I strongly urge the Federal Aviation Administration to reject either build alternative.

The FAA's assertion that the Runway 17-35 Extension Project would cause an overall decrease in noise levels (FN1) defies common sense. The proposed runway extension would allow more and larger aircraft to utilize the runway, and common sense dictates that this would result in a substantial appreciation in noise levels for the southern New Jersey communities within the flight paths and directly across the Delaware River from the Philadelphia International Airport.

The information presented in the Draft Environmental Impact Statement (DEIS) indicates that there will be little gain in airport efficiency with either build alternative. The projected average delay per operation in 2007 is 15.3 minutes under the No-Action Alternative. The FAA has indicated that Alternative 1 would cost the taxpayers approximately \$36 Million, yet would only result in a 84 second delay reduction, while Alternative 2 would cost the taxpayers \$56 Million and would result in a 12 second delay reduction. (FN2) It makes no sense to spend this amount of money to get no real benefit. While there is a slightly greater reduction in the 2015 projected delays, with a 7.5 minute delay reduction with Alternative 1, and a 4.1 minute delay reduction with Alternative 2(FN3), I think it would be a better use of taxpayer funds to evaluate the potential installation of a new parallel runway rather than extending Runway 17-35. The FAA has also not released the underlying data used to calculate projected delay reductions, and has indicated that it does not have data on the percentage of delays at Philadelphia International Airport that are a direct result of the airport runway problems. Additionally, the FAA has not disclosed the estimated cost of constructing a parallel runway.

I am greatly discomforted that the FAA has indicated that it does not have specific information as to what percentage of delays at Philadelphia International Airport are caused by runway problems as opposed to other causes. Common sense would indicate that this information is necessary in order to determine that the proposed runway extension would be effective in increasing airport efficiency. I am also concerned that my office was informed at the Public Information Session that the estimated cost for the proposed capacity enhancement Project was \$3 Billion, while costs for recent FAA projects building new runways in Miami, Houston, and



Adm. Marion Blakey, FAA Administrator

November 30, 2004

Page 2

Orlando ranged from \$203 Million to \$298 Million. It is disconcerting that the FAA has not disclosed all relevant facts regarding the potential noise effects on the South Jersey region , and the projected decrease in noise impact delineated in the DEIS defies logic. (FN4)

I strongly urge the FAA to choose the No-Build Alternative, and focus on a potential new parallel runway. The FAA should explore a parallel runway option so that all interested parties can evaluate the relevant facts and form a judgment on the potential benefit a new parallel runway would have to the entire Philadelphia region. I am not taking any position at this time on building a new parallel runway, but would be interested in receiving more information about the feasibility and impacts such a runway might have on the communities surrounding Philadelphia International Airport, including a detailed cost-benefit analysis of the parallel runway construction.

Sincerely,



Robert Andrews  
Member of Congress

REA:ja

Enclosure: Computed DNLs Table

Footnotes:

1. See "Computed DNLs" Table, and DEIS Tables 4.2-15; 4.2-17; 4.2-20; 4.8-2.
2. See Executive Summary, p. S-11, and Table S-2.
3. Id.
4. See "Computed DNLs" Table, and DEIS Tables 4.2-15; 4.2-17; 4.2-20; 4.8-2.



## Philadelphia International Airport Runway 17-35 Extension Project

### Computed DNLs in PENNSYLVANIA

LOCALITY	2003 No Action DNL			2007 No Action Avg. DNL	Alt. 1 Change in DNL	Alt. 2 Change in DNL	2015 No Action Avg. DNL	Alt. 1 Change in DNL	Alt. 2 Change in DNL
	Ranges		Average						
	From...	To...							
ALDAN BORO	44.8	45.6	45.1	49.0	0.9	1.6	50.3	0.4	1.1
ASTON TWP	46.9	51.1	49.0	47.6	-0.5	-0.6	49.0	-0.4	-0.5
BETHEL TWP	45.8	49.9	48.5	47.5	-0.9	-0.9	48.9	-0.9	-0.9
BIRMINGHAM TWP	44.7	45.8	45.3	43.5	-4.6	-4.5	44.9	-4.8	-4.8
BROOKHAVEN BORO	48.5	51.3	49.8	48.6	-0.1	-0.2	50.0	0.0	-0.2
CHADDS FORD TWP	44.0	46.6	45.6	44.2	-3.6	-3.5	45.6	-3.7	-3.7
CHESTER CITY	48.8	62.1	56.8	56.6	-0.1	-0.1	58.0	0.0	-0.1
CHESTER HEIGHTS BORO	45.3	47.5	46.4	45.4	-1.4	-1.3	46.8	-1.4	-1.4
CHESTER TWP	51.8	55.2	53.2	52.2	-0.1	-0.1	53.7	0.0	-0.2
CLIFTON HEIGHTS BORO	44.3	44.5	44.4	48.1	0.5	1.2	49.3	0.0	0.7
COLLINGDALE BORO	46.3	47.7	46.8	51.2	1.0	1.7	52.6	0.5	1.2
COLWYN BORO	53.1	53.1	53.1	56.6	1.0	1.6	58.0	0.5	1.1
CONCORD TWP	44.5	48.3	46.6	45.1	-2.1	-2.1	46.5	-2.2	-2.3
DARBY BORO	47.6	47.6	47.6	51.9	0.8	1.5	53.3	0.2	1.0
DARBY TWP	45.2	54.0	49.5	53.8	1.3	2.1	55.2	0.9	1.6
EAST GOSHEN TWP	34.8	40.5	37.7	36.9	-7.6	-7.8	38.1	-8.3	-8.2
EAST LANSDOWNE BORO	48.3	48.3	48.3	48.9	1.4	1.6	49.7	1.3	1.5
EAST WHITELAND TWP	34.8	39.8	36.7	35.6	-9.5	-9.7	36.9	-10.3	-10.2
EASTTOWN TWP	40.2	43.5	42.4	42.0	-4.2	-4.1	43.3	-4.7	-4.4
EDDYSTONE BORO	51.6	63.8	58.2	58.3	-0.2	-0.2	59.7	-0.1	-0.2
EDGMONT TWP	42.7	46.0	44.7	44.1	-3.2	-3.1	45.4	-3.4	-3.3
FOLCROFT BORO	47.6	53.8	49.7	50.6	0.5	0.7	52.1	0.3	0.6
GLENOLDEN BORO	45.1	46.5	45.8	48.6	1.4	2.1	49.8	1.1	1.7
HVERFORD TWP	39.8	45.4	41.8	42.2	-0.8	-0.3	43.1	-1.0	-0.6
LANSDOWNE BORO	44.2	46.0	45.1	47.4	0.8	1.4	48.6	0.5	1.0
LOWER CHICHESTER TWP	52.7	53.6	53.2	53.7	-0.2	-0.1	55.2	-0.2	-0.2
LOWER MERION TWP	40.8	44.4	42.6	42.5	-1.7	-1.7	43.4	-2.2	-2.0
MALVERN BORO	40.9	41.8	41.5	40.5	-8.2	-8.2	41.8	-8.6	-8.6
MARCUS HOOK BORO	51.0	54.1	52.1	52.0	-0.1	-0.2	53.5	0.0	-0.1



## Philadelphia International Airport Runway 17-35 Extension Project

### Computed DNLs in PENNSYLVANIA

LOCALITY	2003 No Action DNL			2007 No Action Avg. DNL	Alt. 1 Change in DNL	Alt. 2 Change in DNL	2015 No Action Avg. DNL	Alt. 1 Change in DNL	Alt. 2 Change in DNL
	Ranges		Average						
	From...	To...							
MARPLE TWP	40.2	44.1	42.5	43.8	-1.0	-0.7	45.0	-1.5	-1.0
MEDIA BORO	45.2	45.7	45.5	46.1	-0.2	0.3	47.4	-0.3	0.0
MIDDLETOWN TWP	44.7	49.5	46.6	46.2	-1.0	-0.8	47.6	-1.0	-1.0
MORTON BORO	43.9	43.9	43.9	47.7	0.4	1.2	49.0	0.0	0.7
NARBERTH BORO	42.3	42.4	42.4	42.4	-1.9	-2.0	43.4	-2.6	-2.3
NETHER PROVIDENCE TWP	44.7	49.1	46.1	46.2	0.0	0.3	47.5	0.0	0.1
NEWTOWN TWP	40.3	44.6	42.6	42.7	-2.4	-2.2	43.9	-2.8	-2.5
NORWOOD BORO	46.6	49.8	48.2	48.3	0.0	0.1	49.7	0.0	0.1
PHILADELPHIA CITY (EAST)	36.1	84.3	48.1	47.7	-1.1	-1.0	48.9	-1.2	-1.0
PHILADELPHIA CITY (WEST)	42.5	72.2	45.6	45.7	-1.2	-1.1	46.9	-1.5	-1.3
PROSPECT PARK BORO	45.3	47.9	46.6	46.5	0.1	0.1	47.8	0.0	0.1
RADNOR TWP	38.9	40.4	39.5	39.5	-1.9	-1.4	40.3	-2.0	-1.6
RIDLEY PARK BORO	45.2	48.0	46.5	46.2	-0.1	-0.1	47.5	-0.1	-0.2
RIDLEY TWP	43.1	63.6	46.5	47.3	0.3	0.7	48.6	0.3	0.5
ROSE VALLEY BORO	46.2	47.2	46.9	46.5	-0.1	0.1	47.8	0.0	0.0
SHARON HILL BORO	48.1	50.4	49.2	54.0	1.3	2.1	55.5	0.8	1.5
SPRINGFIELD TWP	43.4	44.7	43.9	46.7	-0.1	0.4	48.0	-0.6	0.0
SWARTHMORE BORO	44.2	44.3	44.2	46.0	0.3	0.9	47.2	0.1	0.5
THORNBURY TWP	41.3	45.4	43.4	42.6	-4.0	-3.9	43.9	-4.4	-4.3
TINICUM TWP	51.6	84.7	66.2	65.8	-0.1	-0.1	67.3	-0.1	-0.1
TRAINER BORO	53.6	56.5	55.1	54.9	-0.1	-0.1	56.3	0.0	-0.1
UPLAND BORO	53.1	54.0	53.6	52.6	-0.1	-0.2	54.0	0.0	-0.1
UPPER CHICHESTER TWP	49.4	55.5	52.1	51.7	-0.2	-0.3	53.1	-0.2	-0.2
UPPER DARBY TWP	42.2	49.9	44.4	46.7	0.1	0.6	47.9	-0.4	0.2
UPPER PROVIDENCE TWP	44.0	46.7	45.2	45.4	-0.9	-0.7	46.7	-1.1	-0.9
WEST GOSHEN TWP	35.8	39.0	37.7	37.2	-6.0	-6.4	38.2	-6.6	-6.5
WESTTOWN TWP	39.3	42.0	40.7	40.0	-5.5	-5.7	41.2	-6.2	-6.1
WILLISTOWN TWP	38.4	44.5	42.4	41.7	-5.8	-5.8	43.0	-6.2	-6.0
YEADON BORO	43.9	52.8	48.0	49.9	0.8	1.1	51.1	0.4	0.9



## Philadelphia International Airport Runway 17-35 Extension Project

### Computed DNLs in NEW JERSEY

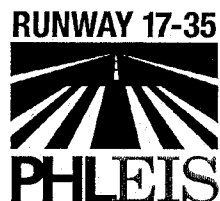
LOCALITY	2003 No Action DNL			2007 No Action Avg. DNL	Alt. 1 Change in DNL	Alt. 2 Change in DNL	2015 No Action Avg. DNL	Alt. 1 Change in DNL	Alt. 2 Change in DNL
	Ranges		Average						
	From..	To...							
AUDUBON BORO	48.9	53.0	50.9	50.5	-0.3	-0.1	51.9	-0.3	-0.1
AUDUBON PARK BORO	56.5	56.5	56.5	56.1	-0.3	-0.1	57.4	-0.3	0.1
BARRINGTON BORO	46.0	47.2	46.5	46.0	-0.4	-0.3	47.4	-0.4	-0.3
BELLMAWR BORO	46.8	51.3	48.6	48.3	-0.3	-0.2	49.7	-0.3	-0.2
BERLIN BORO	37.2	40.4	38.8	37.8	-4.6	-4.2	39.0	-5.3	-5.0
BERLIN TWP	37.9	40.9	39.4	38.7	-4.2	-3.7	39.9	-4.7	-4.4
BROOKLAWN BORO	52.3	53.7	53.0	52.6	-0.2	-0.2	54.0	-0.3	-0.1
CAMDEN CITY	46.7	57.1	50.3	50.1	-0.3	-0.2	51.5	-0.3	-0.1
CARNEYS POINT TWP	36.1	41.2	39.2	38.6	-2.9	-2.8	39.9	-3.0	-3.1
CHERRY HILL TWP	39.1	50.7	44.3	43.7	-0.7	-0.5	44.9	-0.8	-0.5
CINNAMINSON TWP	36.4	42.8	40.3	39.7	-1.9	-1.6	41.0	-2.0	-1.7
CLEMENTON BORO	40.8	42.0	41.4	40.7	-2.4	-1.9	41.9	-2.6	-2.2
COLLINGSWOOD BORO	50.7	55.1	52.9	52.4	-0.3	-0.1	53.7	-0.3	0.0
DELANCO TWP	30.6	30.6	30.6	30.7	-5.1	-5.0	31.9	-5.6	-5.3
DELRAN TWP	32.2	38.1	35.2	34.7	-3.0	-2.8	35.9	-3.3	-2.9
DEPTFORD TWP	43.3	48.9	45.1	44.6	-0.7	-0.6	45.9	-0.9	-0.8
EAST GREENWICH TWP	43.3	46.6	44.4	43.9	-0.8	-0.7	45.1	-0.7	-0.9
EVESHAM TWP	37.1	41.8	39.1	38.5	-1.9	-1.6	39.7	-2.0	-1.7
GIBBSBORO BORO	41.7	42.5	42.2	41.7	-1.9	-1.6	42.9	-2.0	-1.7
GLASSBORO BORO	38.1	40.7	39.5	39.1	-2.3	-3.4	40.1	-2.7	-4.2
GLOUCESTER CITY	51.2	60.6	57.3	56.9	-0.3	-0.1	58.3	-0.3	0.0
GLOUCESTER TWP	37.8	45.2	42.2	41.5	-2.3	-2.0	42.8	-2.5	-2.1
GREENWICH TWP	44.5	67.3	53.9	53.1	-0.2	-0.1	54.5	-0.2	-0.2
HADDON HEIGHTS BORO	46.9	49.6	48.2	47.8	-0.3	-0.2	49.2	-0.3	-0.2
HADDON TWP	49.7	56.5	52.0	51.6	-0.3	-0.1	52.9	-0.3	0.0
HADDONFIELD BORO	45.3	51.6	48.0	47.5	-0.4	-0.2	48.8	-0.4	-0.1
HARRISON TWP	40.3	43.9	42.3	41.9	-1.7	-2.5	43.1	-2.0	-3.1
LAUREL SPRINGS BORO	42.7	42.7	42.7	42.2	-1.5	-1.1	43.5	-1.6	-1.2
LAWNSIDE BORO	44.7	46.0	45.4	44.8	-0.5	-0.4	46.2	-0.6	-0.4
LINDENWOLD BORO	40.8	42.7	42.1	41.5	-1.9	-1.5	42.8	-2.0	-1.6



## Philadelphia International Airport Runway 17-35 Extension Project

### Computed DNLs in NEW JERSEY

LOCALITY	2003 No. Action DNL			2007 No Action Avg. DNL	Alt. 1 Change in DNL	Alt. 2 Change in DNL	2015 No Action Avg. DNL	Alt. 1 Change in DNL	Alt. 2 Change in DNL
	Ranges		Average						
	From..	To...							
LOGAN TWP	45.7	60.8	50.6	49.6	-0.2	-0.2	50.9	-0.1	-0.2
MAGNOLIA BORO	45.1	45.5	45.3	44.8	-0.6	-0.5	46.1	-0.6	-0.4
MANTUA TWP	41.4	46.2	44.1	44.2	0.1	-1.6	45.1	0.1	-2.1
MAPLE SHADE TWP	42.7	46.3	43.6	42.9	-0.7	-0.5	44.1	-0.8	-0.5
MERCHANTVILLE BORO	45.7	45.7	45.7	44.9	-0.5	-0.5	46.3	-0.6	-0.5
MONROE TWP	34.3	38.1	36.4	35.8	-2.8	-2.4	36.9	-2.9	-2.6
MOORESTOWN TWP	34.1	42.5	38.6	37.8	-1.2	-0.9	39.0	-1.3	-1.0
MOUNT EPHRAIM BORO	50.3	52.9	51.6	51.3	-0.3	-0.2	52.7	-0.2	-0.1
MOUNT LAUREL TWP	36.5	45.7	41.1	40.6	-0.6	-0.3	41.6	-0.7	-0.3
NATIONAL PARK BORO	50.8	61.7	55.8	55.7	-0.3	-0.2	57.2	-0.3	-0.1
OAKLYN BORO	54.7	55.9	55.3	55.0	-0.3	-0.1	56.3	-0.4	0.1
OLDMANS TWP	41.4	47.8	44.3	43.6	-1.3	-1.3	45.0	-1.2	-1.4
PALMYRA BORO	41.9	43.7	42.7	42.1	-1.8	-1.6	43.4	-2.0	-1.7
PAULSBORO BORO	45.2	52.9	49.1	48.8	-0.5	-0.2	50.3	-0.4	0.0
PENNS GROVE BORO	38.0	39.4	38.7	38.3	-2.7	-2.6	39.6	-2.8	-2.8
PENNSAUKEN TWP	43.2	50.2	45.5	44.9	-0.7	-0.7	46.3	-0.8	-0.6
PILESGROVE TWP	43.7	43.7	43.7	42.7	-2.4	-2.4	44.1	-2.4	-2.5
PINE HILL BORO	38.8	42.1	40.5	39.5	-3.4	-3.0	40.7	-3.7	-3.3
PINE VALLEY BORO	39.4	40.9	40.2	39.1	-3.6	-3.1	40.3	-4.0	-3.6
PITMAN BORO	40.5	42.2	41.5	41.1	-1.8	-3.1	42.2	-2.1	-3.8
RIVERSIDE TWP	31.2	34.4	32.8	32.6	-4.5	-4.3	33.9	-4.9	-4.6
RIVERTON BORO	40.7	41.2	41.0	40.4	-2.2	-1.9	41.7	-2.3	-2.0
RUNNEMEDE BORO	45.4	46.4	45.9	45.5	-0.4	-0.3	46.9	-0.5	-0.3
SOMERDALE BORO	43.5	44.8	44.3	43.7	-0.9	-0.7	45.1	-0.9	-0.7
SOUTH HARRISON TWP	40.9	41.9	41.3	40.6	-3.2	-3.1	41.8	-3.5	-3.6
STRATFORD BORO	42.9	43.7	43.2	42.8	-1.3	-1.0	44.1	-1.3	-1.0
SWEDESBORO BORO	44.3	44.9	44.5	43.5	-1.3	-1.3	44.8	-1.3	-1.4
VOORHEES TWP	39.4	44.6	41.9	41.4	-2.1	-1.8	42.7	-2.2	-1.9
WASHINGTON TWP	37.0	43.2	40.8	40.1	-3.1	-2.9	41.3	-3.4	-3.2
WENONAH BORO	44.5	44.8	44.7	44.2	-0.2	-0.5	45.4	-0.6	-1.0



## Philadelphia International Airport Runway 17-35 Extension Project

### *Computed DNLs in NEW JERSEY*

LOCALITY	2003 No Action DNL			2007 No Action Avg. DNL	Alt. 1 Change in DNL	Alt. 2 Change in DNL	2015 No Action Avg. DNL	Alt. 1 Change in DNL	Alt. 2 Change in DNL
	Ranges		Average						
	From..	To...							
WEST DEPTFORD TWP	45.0	65.3	50.2	50.6	0.7	0.2	51.7	0.6	-0.1
WESTVILLE BORO	49.8	55.4	51.9	51.5	-0.3	-0.2	52.9	-0.3	-0.2
WILLINGBORO TWP	29.8	32.3	31.0	30.9	-4.5	-4.3	32.0	-4.9	-4.6
WINSLOW TWP	28.5	38.3	34.4	33.5	-5.4	-4.9	34.7	-5.7	-5.3
WOODBURY CITY	45.2	47.5	46.1	45.8	-0.2	0.2	46.9	-0.4	0.0
WOODBURY HEIGHTS BORO	45.2	45.4	45.3	44.9	0.4	0.6	46.1	-0.2	0.1
WOOLWICH TWP	41.7	46.4	44.2	43.2	-1.6	-1.5	44.5	-1.6	-1.7

### *Computed DNLs in DELAWARE*

LOCALITY	2003 No Action DNL			2007 No Action Avg. DNL	Alt. 1 Change in DNL	Alt. 2 Change in DNL	2015 No Action Avg. DNL	Alt. 1 Change in DNL	Alt. 2 Change in DNL
	Ranges		Average						
	From..	To...							
ARDEN	48.6	48.6	48.6	49.8	-0.4	-0.4	51.2	-0.4	-0.4
ARDENCROFT	47.0	47.0	47.0	48.6	-0.5	-0.5	49.9	-0.5	-0.5
ARDENTOWN	47.3	47.3	47.3	48.7	-0.4	-0.3	50.1	-0.4	-0.4
Balance of New Castle County	35.9	51.1	43.2	44.3	-1.1	-1.1	45.7	-1.2	-1.2
BELLEFONTE	39.7	39.7	39.7	40.7	-1.0	-1.0	42.1	-1.1	-1.1
WILMINGTON	36.0	39.4	37.5	37.9	-2.1	-2.0	39.2	-2.2	-2.2

## Letter 6

U.S. Congress - Representative Robert Andrews

Comment Number	Comment	Response
6.1	The FAA's assertion that the Runway 17-35 Extension Project would cause an overall decrease in noise levels (FNI) defies common sense. The proposed runway extension would allow more and larger aircraft to utilize the runway, and common sense dictates that this would result in a substantial appreciation in noise levels for the southern New Jersey communities within the flight paths and directly across the Delaware River from the Philadelphia International Airport.	In FAA's DEIS, we do disclose that some areas in New Jersey and Pennsylvania will experience slight increases in noise if Runway 17-35 is extended. These slight increases in noise do not reach the level a significance that would constitute an impact in accordance with FAA Orders 1050.1 (E) and 5050.4A and Federal Interagency Committee on Noise standards.
6.2	The information presented in the Draft Environmental Impact Statement (DEIS) indicates that there will be little gain in airport efficiency with either build alternative. The projected average delay per operation in 2007 is 15.3 minutes under the No-Action Alternative. The FAA has indicated that Alternative 1 would cost the taxpayers approximately \$36 Million, yet would only result in a 84 second delay reduction, while Alternative 2 would cost the taxpayers \$56 Million and would result in a 12 second delay reduction. It makes no sense to spend this amount of money to get no real benefit. While there is a slightly greater reduction in the 2015 projected delays, with a 7.5 minute delay reduction with Alternative 1, and a 4.1 minute delay reduction with Alternative 2, I think it would be a better use of taxpayer funds to evaluate the potential installation of a new parallel runway rather than extending Runway 17-35.	In the commentors letter, there is the question whether a 4.1 or 6.5 minute delay reduction (2015) is worth the estimated \$36 to \$56 million expenditure. The ability to achieve 4.1 to 6.5 minute delay reductions per operation does not mean that each operation will arrive or depart a minute or two sooner. It means gains in airport efficiency that translate into tremendous savings to passenger and industry and more a effective national air transportation system. With over 446,500 aircraft operations and 25 million passengers a year at PHL, an average delay of 10 minutes per operation amounts significant delays and costs to the industry, consumers, and the traveling public. It is estimated that every hour delay costs the traveler \$26.70. Multiply the number of passengers times the total number of minutes delayed and you will see the cost to the public is significant. In addition to the traveling public, airlines also incur costs in excess of \$50 per minute of delay.
6.3	The FAA has also not released the underlying data used to calculate projected delay reductions, and has indicated that it does not have data on the percentage of delays at Philadelphia International Airport that are a direct result of the airport runway problems.	The commentors letter also expressed concern that FAA did not have specific delay cause information. The FAA uses a variety of highly sophisticated models to simulate conditions and to determine what contributes to delay. All types of information to include: past history, airline performance, weather, airfield layouts, aircraft types, passenger levels, etc. go into these models. So while it true FAA does not keep statistics as to what percentages of delays at PHL are caused by runway problems, that information is certainly factored into and captured by our models.
6.4	The FAA has not disclosed the estimated cost of constructing a parallel runway.	The \$203 to \$298 million spent at other airports was just for the construction of a new runway, nothing else. It should be noted, that prior to release of federal funds, a Benefit Cost Analysis (BCA) will be conducted to ensure this is a fiscally sound project. The FAA will be glad to provide you a copy of the BCA once it has been finalized.
6.5	I am greatly discomfoted that the FAA has indicated that it does not have specific information as to what percentage of delays at Philadelphia International Airport are caused by runway problems as opposed to other causes. Common sense would indicate that this information is necessary in order to determine that the proposed runway extension would be effective in increasing airport efficiency.	The commentors letter also expressed concern that FAA did not have specific delay cause information. The FAA uses a variety of highly sophisticated models to simulate conditions and to determine what contributes to delay. All types of information to include: past history, airline performance, weather, airfield layouts, aircraft types, passenger levels, etc. go into these models. So while it true FAA does not keep statistics as to what percentages of delays at PHL are caused by runway problems, that information is certainly factored into and captured by our models.
6.6	I am also concerned that my office was informed at the Public Information Session that the estimated cost for the proposed capacity enhancement Project was \$3 Billion, while costs for recent FAA projects building new runways in Miami, Houston, and Orlando ranged from \$203 Million to \$298 Million.	The commentor cited costs to build other runways and compared them to the \$3 Billion estimate for CEP. The \$3 Billion estimate includes everything that could be possible under a total reconfiguration of an airport. Costs could include terminal reconfiguration, relocation of support facilities, land acquisition, new or relocated runways, parking facilities, etc.
6.7	It is disconcerting that the FAA has not disclosed all relevant facts regarding the potential noise effects on the South Jersey region, and the projected decrease in noise impact delineated in the DEIS defies logic.	In FAA's DEIS, we do disclose that some areas in New Jersey and Pennsylvania will experience slight increases in noise if Runway 17-35 is extended. These slight increases in noise do not reach the level a significance that would constitute an impact in accordance with FAA Orders 1050.1 (E) and 5050.4A and Federal Interagency Committee on Noise standards.

## Letter 6

U.S. Congress - Representative Robert Andrews

Comment Number	Comment	Response
6.8	I strongly urge the FAA to choose the No-Build Alternative, and focus on a potential new parallel runway. The FAA should explore a parallel runway option so that all interested parties can evaluate the relevant facts and form a judgment on the potential benefit a new parallel runway would have to the entire Philadelphia region.	The DEIS considered all viable alternatives, both on and off airport, and analyzed all potential impacts to the natural and human environment that could result from the project. Because of the short-term need many of the more complex alternatives, such as construction of new parallel runway, did not qualify for further study under the Runway 17-35 Extension project EIS. These types of alternatives, as well as all other reasonable alternatives, will be studied under the EIS for the CEP.



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**From:** Jenkins, William H NAP  
**Sent:** Tuesday, November 30, 2004 11:17 AM  
**To:** 'Smcdonald.faa.17-35@vzb.com'  
**Cc:** Hassel, Richard A NAP; Cianfrani, Frank J NAP  
**Subject:** FW: Runway 17-35 DEIS

Sue,

Here are the brief comments of the Philadelphia District Corps of Engineers for the Runway 17-35 Extension Project Draft Environmental Impact Statement:

1. EXECUTIVE SUMMARY: S.6 Project Purpose and Need, Table S-1. The entry under "Approval or Permit" for "U.S. Army Corps of Engineers (USACE)" should read:

"Joint Permit Application (coordinates review of state PA DEP Water Obstruction & Encroachment Permit (Chapter 105 Permit) & Federal USACE Section 404 Permit)".

The reference should not be to a "joint permit", it is a joint permit application process. Even if the project is deemed eligible for authorization under the Pennsylvania State Program General Permit - 2 (PA-SPGP-2), there are separate authorizations issued for the state and federal government.

2. VOLUME 1 TEXT: 4.12.5 Regulatory Coordination and Required Permits, second paragraph: The second sentence in this paragraph should read: "The JPA coordinates the review of the state PA DEP Water Obstruction & Encroachment Permit application and the Federal USACE Section 404 permit application. The remaining part of the sentence, "...into one document, intended to cover requirements for both the Pennsylvania Chapter 105 and Chapter 106 Waterway Obstruction and Encroachment Permits", should be eliminated.

This concludes our comments.

As a matter of clarification separate from the DEIS, the following comment is offered: At the time of submission of the joint permit application, at Corps request or by virtue of the total impact area in waters or wetlands exceeding 0.25 acre, PA DEP will forward the application to the Corps with a determination of eligibility for authorization under the PA-SPGP-2. At that time, the Corps will determine whether to review the project for Federal authorization with the PA-SPGP-2 or with a Department of the Army Individual Permit. We will likely review the project for authorization by Individual Permit, but do not wish to foreclose at this time the possibility of review for authorization under the PA-SPGP-2.

Thank You,

Bill Jenkins  
Corps of Engineers

## Letter 7

U.S. Army Corps of Engineers - Bill Jenkins

Comment Number	Comment	Response
7.1	EXECUTIVE SUMMARY: S.6 Project Purpose and Need, Table S-1. The entry under "Approval or Permit" for "U.S. Army Corps of Engineers (USACE)" should read: "Joint Permit Application (coordinates review of state PA DEP Water Obstruction & Encroachment Permit (Chapter 105 Permit) & Federal USACE Section 404 Permit)." The reference should not be to a "joint permit", it is a joint permit application process. Even if the project is deemed eligible for authorization under the Pennsylvania State Program General Permit - 2 (PA-SPGP-2), there are separate authorizations issued for the state and federal government.	Your comment has been addressed in the appropriate EIS Section(s).
7.2	VOLUME 1 TEXT: 4.12.5 Regulatory Coordination and Required Permits, second paragraph. The second sentence in this paragraph should read: "The JPA coordinates the review of the state PA DEP Water Obstruction & Encroachment Permit application and the Federal USACE Section 404 permit application. The remaining part of the sentence, "...into one document, intended to cover requirements for both the Pennsylvania Chapter 105 and Chapter 106 Waterway Obstruction and Encroachment Permits" should be eliminated.	Your comment has been addressed in the appropriate EIS Section(s).



# United States Department of the Interior

OFFICE OF THE SECRETARY  
Office of Environmental Policy and Compliance  
Custom House, Room 244  
200 Chestnut Street  
Philadelphia, Pennsylvania 19106-2904



IN REPLY REFER TO:

November 29, 2004

ER-04/0751

Susan McDonald  
Federal Aviation Administration  
Harrisburg Airports District Office  
3905 Hartzdale Drive, Suite 508  
Camp Hill, Pennsylvania 17011

Dear Ms. McDonald:

The U.S. Department of the Interior (Department) has reviewed the Draft Environmental Impact Statement (DEIS) for the Philadelphia International Airport (PHL), Runway 17-35 Extension Project. The Department, as represented by the National Park Service (NPS) and Fish and Wildlife Service (FWS), has been involved in an interagency review of the alternatives and various technical reports prepared in advance of the DEIS. As a consequence, many of our comments and concerns have been addressed through this interagency process. Nonetheless, as discussed below, the Department continues to have some remaining questions and concerns that we believe should be addressed in the final environmental document for this project.

## Environmental Impact Assessment

The Northeast Region Rivers and Trails Program has been involved for years in the development of the current recreational bike trails within the project area, and continues to participate in planning for future bikeways. We are concerned that the DEIS does not fully address additional noise and public safety impacts on the bikeways as a result of the proposed runway expansion. These concerns have previously been voiced during interagency meetings held in 2004 between the Federal Aviation Administration (FAA) and the federal agencies participating in the PHL Streamlining Agreement.

Several NPS-assisted and officially designated recreational bike trails exist within the project area. At present, the trails occupy the same public rights-of-way as motor vehicles; however, Tincicum Township and other parties have started land acquisition and plan to create separate dedicated bike trail alignments. In the meantime, the proposed rerouting of more traffic onto the roadways with trails is likely to create additional safety hazards and unfavorable cycling conditions for recreational cyclists, as well as additional noise impacts. Detailed information on our concerns regarding these impacts is provided below.

In addition to the comments provided here, the Rivers and Trails Program requests a role in FAA efforts to enhance public safety and in planning any minor changes to alignment, bike trail signage and other existing trails features that may be necessary.

Current and future NPS-assisted bikeways within the area of potential effect include:

- Pennsylvania Bicycle Route E is a State designated trail whose primary purpose is recreational. It is located within the public right-of-way along Route 291 and Bartram's Avenue. PA Bike Route E also serves as the temporary route for the East Coast Greenway, a National Millennium Trail, until such time as a separate dedicated pathway is constructed along Route 291. Heavier vehicular traffic on Bartram's Avenue is likely to create additional safety hazards for recreational bicyclists. This change can be addressed through signage, striping and other means to avoid accidents and enhance cycling conditions.
- The NPS is currently participating in the design for an off-road route for the East Coast Greenway as well as one of its segments, the Tincum-Fort Mifflin Trail, and the Route 291 Beautification Corridor. Construction is anticipated as early as 2007 (A Trail Development Study for the Tincum-Fort Mifflin Trail (June 2003, pp. 128-129).
- The Route 291/Route 13 corridor is associated with the Washington-Rochambeau Revolutionary Route. The nine-state historic route is currently under study by the NPS for potential eligibility as a National Historic Trail.

### Noise

**Page 4-101.** Relative to noise, noise levels of up to 75 db DNL are not compatible with outdoor recreation uses. According to Appendix A of 14 CFR Part 150 (Sec A150.101), all land uses are considered to be generally compatible with "noise levels less than Ldn 65 dB. Local needs or values may dictate further delineation based on local requirements or determinations." Land use compatibility varies according to the type of outdoor recreation activity. Outdoor music shells and amphitheaters are incompatible with noise levels above 65 db DNL, while nature exhibits and zoos are incompatible with noise levels above 70 db DNL, and golf courses, riding stables and water recreation may be compatible with noise levels above 70 db DNL only if measures to achieve NLR of 25, 30, or 35 dB are incorporated into the design and construction of the facility.

Unfortunately, while 14 C.F.R. Part 150, Appendix A, establishes standards for the compatibility of designated land uses with various levels of noise, beginning with 65 db DNL, the recreational category includes active recreation such as outdoor sports areas and water parks and such. Standards do not yet exist for the passive recreational uses that typify wildlife refuges, state parks, and the recreational bike trails present in the project area.

The Environmental Protection Agency has identified a DNL of 55 dB outdoors as the maximum level that will have no effects on public health and welfare relative to interference with speech and other activities. Conditions greater than DNL of 70 dB are recognized as leading to eventual loss of hearing if exposure is frequent and of relatively long duration.

Without proximity to an airport, the noise levels relative to the bikeways would be lower and in keeping with recreational experiences defined for natural areas. The bikeways in the project area are already impacted by flyovers from the airport, and although there is no way to avoid this scenario, we believe the anticipated increases in noise will affect the current bikeways and those planned.

### Public Safety on Bikeways

**Page 4-101.** The rerouting of additional vehicular traffic onto Bartram Avenue with its shared-use bikeway will have an impact on the safety of bicyclists using the current PA Bicycle Route E, and the planned off-road route for the East Coast Greenway and Tinicum-Fort Mifflin Trail. The increased risks to bicyclists need to be addressed through signage, striping of lanes, separation of uses and other bicycle route awareness techniques.

Please note that 84<sup>th</sup> Street, proposed for a left turn lane, is a designated part of the Philadelphia Bicycle Network, as is Bartram Avenue. Bike lanes exist along 84<sup>th</sup> Street, connecting Bartram Avenue with Lindbergh Boulevard and providing access to the northern entrance of John Heinz National Wildlife Refuge (NWR).

### Impacts on Existing Bikeway Signage and Features

The proposed closure of Route 291 and the diversion of additional traffic onto Bartram Avenue may impact the current alignment of the recreational bike lanes and sidewalks. The circulation changes might necessitate altering bikeway signage, signaling, curb cuts or other features placed to guide and secure use of the road corridors by pedestrians and bicyclists. Bartram Avenue has narrow bike lanes on both sides of the road from the Route 291 intersection north to Island Avenue (PA Bicycle Route E). Route 291 to the Bartram Avenue intersection and Bartram Avenue itself have signage recognizing their designation as part of PennDOT's Bicycle PA Program. If changes are necessary to these NPS-assisted features, NPS RTCA requests notice and review of new designs.

### Changes in Circulation and Potential Vehicular/Bicycle Conflicts

The potential changes to the intersection at Bartram Avenue and Route 291 would impact the bike system, given the proposed addition of a left turn lane. Reducing the shoulders or the cartway width would impact the bikeways and require mitigation.

The proposal for a left turn lane along Bartram Avenue within the existing cartway would effectively eliminate one of the bicycle lanes along this street and affect bicyclists' use of the Bartram Avenue-Route 291 intersection. Bartram Avenue is identified as a segment of the Philadelphia Bicycle Network, and mitigation would need to include the relocation of the bicycle path. Mitigation of Rt 291 intersections at Essington/Industrial Highway and Bartram Avenue/Scott Way would not change the existing curb-to-curb width, but may yet impact the use of Rt 291 as part of the regional trails system, because of changes in traffic volumes and signage, signaling, curb cuts or other features that may alter the use of the road corridors by pedestrians and bicyclists. The existing Bartram Avenue-Rt 291 intersection is already hazardous for

bicyclists due to the lack of a shoulder along the left side of Rt 291 (facing north). Therefore, the cyclist must either cross two lanes of traffic from the right shoulder or ride in high-speed traffic using the left lane. "Share the Road" signs, reduction in speed and other forms of mitigation may be appropriate to address increased safety hazards for bicyclists on Route 291.

#### Public Funding for Future Bike Trails in Motion

**Pages 4-162/163.** Several segments of the East Coast Greenway and Tincum-Fort Mifflin Trail have advanced to the design and land acquisition stage, according to the Delaware County Planning Department and Clean Air Council:

The Clean Air Council recently received \$75,000 in funding from the William Penn Foundation and a \$50,000 Coastal Zone Management grant through the Pennsylvania Department of Environmental Protection to determine the specific route and provide preliminary design guidance for two off-road segments of the Tincum-Fort Mifflin Trail – the Cobbs Creek to John Heinz NWR segment and the Hog Island Road segment. The feasibility and preliminary design process for the Hog Island Road segment (2<sup>nd</sup> Street in Tincum Township to Fort Mifflin in Philadelphia) is under way, to be completed in 2005, while the John Heinz NWR to Cobbs Creek segment design process will likely be completed in 2006, upon the securing of additional funding through the Pennsylvania Department of Conservation and Natural Resources.

Tincum Township has approved funding for two trail segments of the Tincum-Fort Mifflin Trail and East Coast Greenway. The Route 291/Powhatan Avenue segment (Darby Creek to Wanamaker Avenue) of the East Coast Greenway includes \$584,000 in CMAQ funds for construction, \$120,000 local match for final design and right-of-way acquisition, and an additional \$146,000 as part of a federal match. The project will be completing the final design phase in 2005 and right-of-way acquisition is expected to proceed this year.

The 2<sup>nd</sup> Street segment of the Tincum-Fort Mifflin Trail includes \$70,000 Transportation Enhancements funding for design and right-of-way acquisition, \$243,000 in local match for pre-construction, and \$730,313 in construction funds through PA DEP Coastal Zone Management. The project is under way, without a specific construction date available as yet.

#### Clarification of Greenway Designations for Future FAA Planning:

The East Coast Greenway (ECG) is characterized as proposed, but approximately 20% of the Greenway exists as off-road segments. Approximately 80% of the Greenway is anticipated to be off-road when completed in 2010. In the vicinity of the airport, the interim route for the East Coast Greenway is PA Bicycle Route E, an on-road alignment. The long-term primary route for the ECG will be a separate path along Route 291, NOT Hog Island Road. A final long-term route for the ECG through the City of Philadelphia has not been determined.

The Washington-Rochambeau Revolutionary Route is the historical route of the combined allied French and American forces in 1781, following various land and water routes from Providence, Rhode Island to Yorktown, Virginia. The Washington-Rochambeau Revolutionary Route is NOT currently proposed to be a mixed-use trail – the historic resources that comprise the route are under study by the NPS for potential management options to preserve and interpret them. One of the management options MAY include National Historic Trail designation. In Pennsylvania, the potential trail could follow the same route as the proposed East Coast Greenway.

The Tincum-Fort Mifflin Trail is a 20-mile multiple use trail envisioned in the long-term as a loop following the west bank of the Schuylkill River, to Fort Mifflin, then south along Hog Island Road, and onto 2<sup>nd</sup> Street in Tincum Township. The loop would have connections with Route 291 and the John Heinz NWR, and between the wildlife refuge and Cobbs Creek Parkway.

Certain segments of the Cobbs Creek Bikeway are under construction, rather than proposed; contact the Fairmount Park Commission for more information. The name of the trail is the Cobbs Creek Recreation Trail. The 10.4-mile trail runs along the length of the Cobbs Creek Parkway in Philadelphia, from City Line Avenue south to 70<sup>th</sup> Street and Cobbs Creek Parkway. Here, the trail leaves Cobbs Creek temporarily to follow Philadelphia bicycle lanes south to 77<sup>th</sup> and Elmwood Avenue, eventually extending to the foot of Bartram Avenue and Route 291. As far as NPS is aware, the Cobbs Creek Recreation Trail does not follow Island Avenue, Enterprise Avenue or Fort Mifflin Road.

**Pages 4-166/167.** Alternatives 1 and 2 anticipate the rerouting of the substantial vehicular traffic that currently uses Route 291, potentially 15,000 to 25,000 vehicles according to the draft EIS (4-160). This increase in traffic will be nearly double the existing volume along Bartram Avenue, which ranges from about 18,000 near Scott Way to about 30,000 near Island Avenue. The increase in traffic could have substantial impacts on the usability and safety of the existing bicycle lanes along Bartram Avenue. While the bicycle lanes may not be physically altered, the increased vehicular traffic impacts all bicyclists using the lanes. Increases in air and noise pollution caused by automobiles would make the route less desirable to recreational bicyclists, as would the immediate proximity of volumes of fast-moving traffic. Increased vehicular traffic would conflict with bicyclists, particularly at intersections dependent on signing and signals.

Indirect impacts from Alternatives 1 and 2 may include the future need to widen or otherwise modify Bartram Avenue to accommodate the increase in traffic volumes, should traffic be diverted from Route 291. Other long-term, indirect impacts to the trails system of the proposed closure of Rt 291 and diversion of traffic onto Bartram Avenue relate to changing levels of service (LOS). Future changes to improve LOS could include altering the disposition of the existing bike lanes and sidewalks, and changes in signage, signaling, curb cuts or other features that may affect the use of the road corridors by pedestrians and bicyclists. Other indirect impacts to the road system may include deterioration of the road surface due to increased traffic, further reducing the suitability of the roadway as a bike route.

**Page 4-170.** Please note that 84<sup>th</sup> Street, proposed for an additional left turn lane, is a designated part of the Philadelphia Bicycle Network, as is Bartram Avenue. Bike lanes exist along 84<sup>th</sup> Street, connecting Bartram Avenue with Lindbergh Boulevard and providing access to the northern entrance of John Heinz NWR. Bartram Avenue has bike lanes on both sides of the road from the Rt 291 intersection north to Island Avenue. Bicycle lanes in both directions along 84<sup>th</sup> Street were to be developed as of 2004—for the current status of their development, please contact Thomas Branigan of the Philadelphia Streets Department.

Mitigation is noted for the Bartram Avenue-Rt 291 intersection. It is unclear but one may assume that the proposal for a left turn lane affects Bartram Avenue, since there are no bike lanes along Route 291 in this area. It is also unclear as to the total length of the left turn lane and the width as it affects the existing shoulder and bike lane. The proposal for a left turn lane along Bartram Avenue would effectively eliminate one of the bicycle lanes along this street and affect bicyclists' use of the Bartram Avenue-Route 291 intersection. The following mitigative alternatives should be considered:

- Alternative routing of the bicycle lanes onto streets or pathways less heavily trafficked or not traversed by motor vehicles (for instance, Route 291 to the old Chester Shortline trolley bed passing under I-95 into John Heinz NWR, and then connecting to local roads via the wildlife refuge)
- Incorporating a new on-road bicycle lane into the proposal, to replace the existing bicycle lane that will be eliminated
- Incorporating a separate, off-road bicycle facility into the proposal

Even if one of the bicycle lanes along Bartram Avenue were not eliminated, mitigation for impacts to the trail system from the additional volume of motor vehicle traffic along Bartram Avenue should be addressed. As noted above, direct and indirect impacts from Alternatives 1 and 2 would likely cause a reduction in the use of the existing bicycle lanes along Bartram Avenue, contrary to the goals of the Philadelphia Bicycle Network and regional trail planning efforts. The FAA and Philadelphia Division of Aviation should work with PennDOT, the Philadelphia Streets Department, Delaware County Planning Department, and trail interests in addressing potential mitigation strategies. In addition to the potential alternatives for mitigation noted above, signaling, curb cuts, signage and other trail features relating to pedestrian and bicycle use should be considered.

### National Wildlife Refuges

The John Heinz NWR, a Transportation Act section 4(f) resource, lies immediately to the northwest of the proposed project area, and is expected to experience some increase in noise levels under all of the action and no action alternatives under consideration. As we have noted in past comments on the technical report on noise impacts, the focus on DNL averages is not adequate to address impacts on wildlife or visitors. DNL is a number which evaluates community annoyance to chronic noise levels over a 24-hour period. Evaluating SEL would be more relevant to determine the impacts on wildlife and visitors. Although the difference in DNL may be small; higher and more frequent SEL could significantly affect resting, loafing and



feeding birds, and diminish visitor enjoyment. Future studies and the final EIS should examine SEL impacts on the refuge.

### Federally Listed Species

Although not present within the project area, the federally listed, threatened bald eagle (*Haliaeetus leucocephalus*) nests and forages within the area of its potential indirect effects (i.e., the project action area). The DEIS does not include a final FAA determination pursuant to section 7 of the Endangered Species Act; however, the document does adequately evaluate the effects of the proposed federal action on the bald eagle. Based on this information, the FWS concludes that the project is not likely to adversely affect this species.

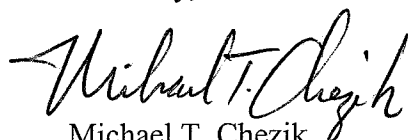
We would also like to reiterate that the FWS proposed to remove the bald eagle from the federal *List of Endangered and Threatened Wildlife* on July 6, 1999 (*Federal Register*, Vol. 64, No. 128), but final action on that proposal has not been taken. The bald eagle, therefore, continues to be listed under the Endangered Species Act. Any changes in the regulatory status of the bald eagle can be monitored by accessing the FWS web site ([www.fws.gov](http://www.fws.gov)).

If the bald eagle is de-listed, the Bald and Golden Eagle Protection Act (BGEPA) (16 U.S.C. 668-668d) will become the primary law protecting bald eagles. This Act prohibits the take of bald and golden eagles, and provides a statutory definition of "take" that includes "disturb." Currently, there is no regulatory mechanism under the BGEPA to permit disturbance of the bald eagle. However, the FWS is in the process of drafting regulations that would authorize disturbance of bald eagles in certain circumstances, provided that the taking is consistent with the preservation of the bald eagle.

This Endangered Species Act determination is valid for two years from the date of this letter. If the proposed project has not been fully implemented prior to this, an additional review by the FWS is recommended. Should project plans change, or if additional information on listed or proposed species becomes available, this determination may be reconsidered. The FWS further recommends that the FAA continue to monitor bald eagle use of the greater PHL area in anticipation of additional information needs and effects analyses for the upcoming PHL Capacity Enhancement Project.

We appreciate the opportunity to provide these comments. If you have any questions regarding the comments on bikeways and related subjects, please contact Shaun Eyring, Manager, Resource Planning and Compliance, NPS, at 215-597-8850. Questions regarding comments on impacts to fish, wildlife, and federally listed species should be directed to David Densmore, FWS Field Supervisor, at 814-234-4090.

Sincerely,



Michael T. Chezik  
Regional Environmental Officer

Letter 8

U.S. Dept. of the Interior, Nat'l Park Service - Michael Chezik

Comment Number	Comment	Response
8.1	We are concerned that the DEIS does not fully address additional noise and public safety impacts on the bikeways as a result of the proposed runway expansion.	The proposed Runway 17-35 Extension Project will shift traffic from a portion of State Route 291 onto Bartram Avenue as documented in Section 4.14 of the EIS. This section of Bartram Avenue is designated as a bicycle route (Route E), with appropriate signage and the shoulder lane is marked as a bike lane. Bartram Avenue, under existing and No-Action conditions, conveys relatively high volumes of automobiles, trucks and buses at relatively high speeds. As shown on figures 4.14-2 and 4.14-4, average daily traffic volumes on Bartram Avenue between SR 291 and Island Avenue in 2007 are predicted to be between 7,750 and 15,280 vehicles per day (SB) and between 10,710 and 17,500 vehicles per day (NB) in the No-Action Alternative in 2007. Alternative 1 would not increase average volumes in the southbound direction, but would increase the average volume in the northbound direction by 7,172 vehicles per day (a 52 percent increase) with the two most-traveled stretches increasing by 44 percent or less. This increase in traffic would result in increased noise for bicyclists, but would not decrease bicycle safety and would not be expected to deter bicyclists from using the designated bike lane.
8.2	The Rivers and Trails Program requests a role in FAA efforts to enhance public safety and in planning any minor changes to alignment, bike trail signage and other existing trails features that may be necessary.	The need for additional signing or striping will be evaluated during the design process. The Rivers and Trails Program will be invited to participate, if needed.
8.3	Pennsylvania Bicycle Route E is a State designated trail whose primary purpose is recreational. It is located within the public right-of-way along Route 291 and Bartram's Avenue. PA Bike Route E also serves as the temporary route for the East Coast Greenway, a National Millennium Trail, until such time as a separate dedicated pathway is constructed along Route 291. Heavier vehicular traffic on Bartram Avenue is likely to create additional safety hazards for recreational bicyclists. This change can be addressed through signage, striping and other means to avoid accidents, and enhance cycling conditions.	Additional traffic volumes along Bartram Avenue are not expected to create a hazard for the bicycle traveler in the striped bike lane. The need for additional signing or striping will be evaluated during the design process. The proposed Runway 17-35 Extension Project will shift traffic from a portion of State Route 291 onto Bartram Avenue. This section of Bartram Avenue is designated as a bicycle route (Route E), with appropriate signage and the shoulder lane is marked as a bike lane. Bartram Avenue, under existing and No-Action conditions, conveys relatively high volumes of automobiles, trucks and buses at relatively high speeds. As shown on Figures 4.14-2 and 4.14-4, average daily traffic volumes on Bartram Avenue between SR 291 and Island Avenue in 2007 are predicted to be 10,234 vehicles per day (SB) and 13,638 vehicles per day (NB) in the No-Action Alternative. Alternative 1 would not increase the average volume in the northbound direction by 7,172 vehicles per day (a 52 percent increase). This increase in traffic would result in increased noise and vehicle air quality emissions for bicyclists on the existing urban route and would increase localized vehicle exhaust emissions on Bartram Avenue but would not decrease bicycle safety and would not be expected to deter bicyclists from using the designated bike lane. Changes in air quality do not exceed the NAAQS and noise levels do not warrant abatement. The NPS Rivers and Trails Program is encouraged to coordinate with PennDOT and the City of Philadelphia on issues related to the design of bicycle facilities along Bartram Avenue.

## Letter 8

U.S. Dept. of the Interior, Nat'l Park Service - Michael Chezik

Comment Number	Comment	Response
8.4	<p>Page 4-101. Relative to noise, noise levels of up to 75 dB DNL are not compatible with outdoor recreation uses. According to Appendix A of 14 CFR Part 150 (See A150.101), all land uses are considered to be generally compatible with "noise levels less than Ldn 65 dB. Local needs or values may dictate further delineation based on local requirements or determinations." Land use compatibility varies according to the type of outdoor recreation activity. Outdoor music shells and amphitheaters are incompatible with noise levels above 55 dB DNL, while nature exhibits and zoos are incompatible with noise levels above 70 dB DNL, and golf courses, riding stables and water recreation may be compatible with noise levels above 70 dB DNL only if measures to achieve NLR of 25, 30, or 35 dB are incorporated into the design and construction of the facility.</p> <p>Unfortunately, while 14 C.F.R. Part 150, Appendix A, establishes standards for the compatibility of designated land uses with various levels of noise, beginning with 65 dB DNL, the recreational category includes active recreation such as outdoor sports areas and water parks and such. Standards do not yet exist for the passive recreational uses that typify wildlife refuges, state parks, and the recreational bike trails present in the project area.</p> <p>The Environmental Protection Agency has identified a DNL of 55 dB outdoors as the maximum level that will have no effects on public health and welfare relative to interference with speech and other activities. Conditions greater than DNL of 70 dB are recognized as leading to eventual loss of hearing if exposure is frequent and of relatively long duration.</p>	<p>As Section 4.2 of this EIS shows, the proposed project is compatible with existing land uses in the vicinity of the Philadelphia International Airport. The noise levels at the John Heinz National Wildlife Refuge would be less than 60 dB DNL for Alternative 1 in both 2007 and 2015, as would the noise levels at the Riverwinds amphitheater and recreational areas in West Deptford. Title 14 CFR Part 150.35 Table 1 indicates that outdoor music shells and amphitheaters are acceptable below 65 dB DNL. The FAA disagrees with the DOI's statement that the EPA has identified a DNL of 55 dB outdoors as the maximum level that can occur with no effects on public health or welfare. While very high, chronic noise levels have been documented to result in loss of hearing, these noise levels do not occur outside of airport property except in limited industrial areas with compatible land uses. The proposed project, as shown on Figures 4.2-6 and 4.2-7, will not change the 70 dB DNL exposure in comparison to the No-Action Alternative.</p>
8.5	<p>The bikeways in the project area are already impacted by flyovers from the airport and although there is no way to avoid this scenario, we believe the anticipated increases in noise will affect the current bikeways and those planned.</p>	<p>Although not explicitly identified in Table 4.3-1 of this EIS, bikeways are considered recreational land use which are considered compatible with aircraft noise exposure levels up to 70 dB DNL (Title 14 CFR Part 150.35 Table 1). The proposed project will not change noise levels on the existing bike lanes on SR 291 west of the airport, or on Bartram Avenue or 84th Street. Noise levels in these areas will remain below 60 dB DNL for all analysis years for Alternative 1, as shown on Figures 4.2-6 and 4.2-7.</p>
8.6	<p>Page 4-101. The rerouting of additional vehicular traffic onto Bartram Avenue with its shared-use bikeway will have an impact on the safety of bicyclists using the current PA Bicycle Route E, and the planned off-road route for the East Coast Greenway and Tinicum-Fort Mifflin Trail. The increased risks to bicyclists need to be addressed through signage, striping of lanes, separation of uses, and other bicycle route awareness techniques.</p>	<p>Additional traffic volumes along Bartram Avenue are not expected to create a hazard for the bicycle traveler in the striped bike lane. The need for additional signing or striping will be evaluated during the design process. The proposed Runway 17-35 Extension Project will shift traffic from a portion of State Route 291 onto Bartram Avenue. This section of Bartram Avenue is designated as a bicycle route (Route E), with appropriate signage and the shoulder lane is marked as a bike lane. Bartram Avenue, under existing and No-Action conditions, conveys relatively high volumes of automobiles, trucks and buses at relatively high speeds. As shown on Figures 4.14-2 and 4.14-4, average daily traffic volumes on Bartram Avenue between SR 291 and Island Avenue in 2007 are predicted to be 10,234 vehicles per day (SB) and 13,638 vehicles per day (NB) in the No-Action Alternative. Alternative 1 would not increase the average volume in the northbound direction by 7,172 vehicles per day (a 52 percent increase). This increase in traffic would result in increased noise and vehicle air quality emissions for bicyclists on the existing urban route and would increase localized vehicle exhaust emissions on Bartram Avenue but would not decrease bicycle safety and would not be expected to deter bicyclists from using the designated bike lane. Changes in air quality do not exceed the NAAQS and noise levels do not warrant abatement. The NPS Rivers and Trails Program is encouraged to coordinate with PennDOT and the City of Philadelphia on issues related to the design of bicycle facilities along Bartram Avenue.</p>

## Letter 8

U.S. Dept. of the Interior, Nat'l Park Service - Michael Chezik

Comment Number	Comment	Response
8.7	Note that 84th Street, proposed for a left turn lane, is a designated part of the Philadelphia Bicycle Network, as is Bartram Avenue. Bike lanes exist along 84th Street, connecting Bartram Avenue with Lindbergh Boulevard and providing access to the northern entrance of John Heinz National Wildlife Refuge (NWR).	The comment regarding the Philadelphia Bicycle network has been noted and will be incorporated into the appropriate section of this EIS. 84th Street in the vicinity of Bartram Avenue is not currently striped with a bicycle lane. Furthermore, the left-turn lane proposed for southbound 84th Street would be created from an existing through lane rather than expanding along the right side of the roadway. This action would not affect a shoulder-side bike lane along 84th Street.
8.8	The proposed closure of Route 291 and the diversion of additional traffic onto Bartram Avenue may impact the current alignment of the recreational bike lanes and sidewalks. The circulation changes might necessitate altering bikeway signage, signaling, curb cuts, or other features placed to guide and secure use of the road corridors by pedestrians and bicyclists. Bartram Avenue has narrow bike lanes on both sides of the road from the Route 291 intersection north to Island Avenue (PA Bicycle Route E). Route 291 to the Bartram Avenue intersection and Bartram Avenue itself has signage recognizing their designation as part of PennDOT's Bicycle PA Program. If changes are necessary to these NPS-assisted features, NPS RTCA requests notice and review of new designs.	The proposed project is not anticipated to require changes to designated bicycle facilities or signage. The need for additional signage or striping will be evaluated during the design process and would be coordinated with the NPS through PennDOT.
8.9	The potential changes to the intersection at Bartram Avenue and Route 291 would impact the bike system, given the proposed addition of a left turn lane. Reducing the shoulders or the cartway width would impact the bikeways and require mitigation.	The additional left-turn lane is proposed for eastbound SR 291(Essington Avenue) to northbound Bartram Avenue and would not affect the existing bike lane along Bartram Avenue.
8.10	The proposal for a left turn lane along Bartram Avenue within the existing cartway would effectively eliminate one of the bicycle lanes along this street and affect bicyclists' use of the Bartram Avenue-Route 291 intersection. Bartram Avenue is identified as a segment of the Philadelphia Bicycle Network and mitigation would need to include the relocation of the bicycle path. Mitigation of Rt 291 intersections at Essington/Industrial Highway and Bartram Avenue/Scott Way would not change the existing curb-to-curb width, but may yet impact the use of Rt 291 as part of the regional trails system, because of changes in traffic volumes and signage, signaling, curb cuts or other features that may alter the use of the road corridors by pedestrians and bicyclists.	There are no proposed mitigation measures that would add a left-turn lane along Bartram Avenue. No relocation of bicycle lanes is anticipated. Mitigation measures, developed during the subsequent design process, could include signal modifications to better accommodate bicyclists.
8.11	"Share the Road" signs, reduction in speed and other forms of mitigation may be appropriate to address increased safety hazards for bicyclists on Route 291.	Only a small portion of existing SR 291 within the study area (south of Scott Way) is a signed bicycle route and this section is not affected by the Project. The portion of SR 291 east of Ramp F would be closed as it would be within the Object Free Area (OFA). As a result, there would be no increased safety hazards to bicycle traffic along this section SR 291. Bartram Avenue proposed to be designated as SR 291 currently has a striped bicycle lane. It is not expected that there would be an increased hazard due to this action. However, any signing, striping, signal or physical changes required to the roadway and/or intersections will be reviewed by PennDOT and other relevant organizations during the preliminary engineering and final design process.

## Letter 8

U.S. Dept. of the Interior, Nat'l Park Service - Michael Chezik

Comment Number	Comment	Response
8.12	Pages 4-162/163. Several segments of the East Coast Greenway and Tinicum-Fort Mifflin Trail have advanced to the design and land acquisition stage, according to the Delaware County Planning Department and Clean Air Council. The Clean Air Council recently received \$75,000 in funding from the William Penn Foundation (and a \$56,000 Coastal Zone Management grant through the Pennsylvania Department of Environmental Protection to determine the specific route and provide preliminary design guidance for two off-road segments of the Tinicum-Fort Mifflin Trail; the Cobbs Creek to John Heinz NWR segment and the Hog Island Road segment. Tinicum Township has approved finding for two trail segments of the Tinicum-Fort Mifflin Trail and East Coast Greenway; the Route 291 Rowhatan Avenue segment (Darby Creek to Wanamaker Avenue) and the 2nd Street segment of the Tinicum-Fort Mifflin Trail.	The FAA has noted and considered your comment. The appropriate section of this EIS has been revised. The Department of the Interior did not make this information available during preparation of the DEIS.
8.13	The East Coast Greenway (ECG) is characterized as proposed, but approximately 20% of the Greenway exists as off-road segments. Approximately 80% of the Greenway is anticipated to be off-road when completed in 2010. In the vicinity of the airport, the interim route for the East Coast Greenway is the PA Bicycle Route E, an on-road alignment. The long-term primary route for the ECG will be a separate path along Route 291, not Hog Island Road. A final long-term route for the ECG through the City of Philadelphia has not been determined.	The FAA has noted and considered your comment. This has been added to this EIS.
8.14	The Washington-Rochambeau Revolutionary Route is not currently proposed to be a mixed-use trail. The historic resources that comprise the route are under study by the NPS for potential management options to preserve and interpret them. One of the management options may include National Historic Trail designation. In Pennsylvania, the potential trail could follow the same route as the proposed East Coast Greenway.	The FAA has noted and considered your comment. This has been added to this EIS.
8.15	The Tinicum-Fort Mifflin Trail is a 20-mile multiple use trail envisioned in the long-term as a loop following the west bank of the Schuylkill River, to Fort Mifflin, then south along Hog Island Road, and onto 2nd Street in Tinicum Township. The loop would have connections with Route 291 and the John Heinz NWR, and between the wildlife refuge and Cobbs Creek Parkway.	The FAA has noted and considered your comment. This has been added to this EIS.
8.16	Certain segments of the Cobbs Creek Bikeway are under construction, rather than proposed. As far as NPS is aware, the Cobbs Creek Recreation Trail does not follow Island Avenue, Enterprise Avenue or Fort Mifflin Road.	The FAA has noted and considered your comment. This has been added to this EIS.
8.17	Alternatives 1 and 2 anticipate the rerouting of the substantial vehicular traffic that currently uses Route 291, potentially 15,000 to 25,000 vehicles according to the draft EIS (4-160). This increase in traffic will be nearly double the existing volume along Bartram Avenue, which ranges from about 18,000 near Scott Way to about 30,000 near Island Avenue. The increase in traffic could have substantial impacts on the usability and safety of the existing bicycle lanes along Bartram Avenue. While the bicycle lanes may not be physically altered the increased vehicular traffic impacts all bicyclists using the lanes. Increases in air and noise pollution caused by automobiles would make the route less desirable to recreational bicyclists, as would the immediate proximity of volumes of fast-moving traffic. Increased vehicular traffic would conflict with bicyclists, particularly at intersections dependent on signing and signals.	The proposed Runway 17-35 Extension Project will shift traffic from a portion of State Route 291 onto Bartram Avenue. This section of Bartram Avenue is designated as a bicycle route (Route E), with appropriate signage and the shoulder lane is marked as a bike lane. Bartram Avenue, under existing and No-Action conditions, conveys relatively high volumes of automobiles, trucks and buses at relatively high speeds. As shown on figures 4.14-2 and 4.14-4, average daily traffic volumes on Bartram Avenue between SR 291 and Island Avenue in 2007 are predicted to be 10,234 vehicles per day (SB) and 13,638 vehicles per day (NB) in the No-Action Alternative. Alternative 1 would not increase average volumes in the southbound direction, but would increase the average volume in the northbound direction by 7,172 vehicles per day (a 52 percent increase). This increase in traffic would result in increased noise and vehicle air quality emissions for bicyclists and would increase localized vehicle exhaust emissions on Bartram Avenue on the existing urban route, but would not decrease bicycle safety and would not be expected to deter bicyclists from using the designated bike lane.

## Letter 8

U.S. Dept. of the Interior, Nat'l Park Service - Michael Chezik

Comment Number	Comment	Response
8.18	Indirect impacts from Alternatives 1 and 2 may include the future need to widen or otherwise modify Bartram Avenue to accommodate the increase in traffic volumes, should traffic be diverted from Route 291. Other long-term, indirect impacts to the trails system of the proposed closure of Rt 291 and diversion of traffic onto Bartram Avenue relate to changing levels of service (LOS). Future changes to improve LOS could include altering the disposition of the existing bike lanes and sidewalks, and changes in signage, signaling, curb cuts or other features that may affect the use of the road corridors by pedestrians and bicyclists. Other indirect impacts to the road system may include deterioration of the road surface due to increased traffic, further reducing the suitability of the roadway as a bike route.	The EIS does not anticipate widening Bartram to accommodate additional traffic volumes now or in the foreseeable future. No vehicular traffic is anticipated to use the striped, designated bike lane. In any event, maintenance of Bartram Avenue relative to the roadway surface is not expected to be impacted as a result of this project. Any future changes to the roadway would require review and approval by the appropriate state and local agencies responsible for vehicular, pedestrian and bicycle mobility and safety.
8.19	Page 4-170. Please note that 84th Street, proposed for an additional left turn lane, is a designated part of the Philadelphia Bicycle Network, as is Bartram Avenue. Bike lanes exist along 84th Street, connecting Bartram Avenue with Lindbergh Boulevard and providing access to the northern entrance of John Heinz NWR.	The 84th Street southbound left-turn lane is proposed to be created from an existing through lane along the median rather than expanding along the right side of the roadway. This action would not affect a shoulder-side bike lane along 84th Street. In this vicinity of Bartram Avenue, 84th Street is signed for "share the road" and is not currently striped with a bicycle lane.
8.20	It is unclear but one may assume that the proposal for a left turn lane affects Bartram Avenue, since there are no bike lanes along Route 291 in this area. It is also unclear as to the total length of the left turn lane and the width as it affects the existing shoulder and bike lane. The proposal for a left turn lane along Bartram Avenue would effectively eliminate one of the bicycle lanes along this street and affect bicyclists' use of the Bartram Avenue-Route 291 intersection.	The additional left-turn lane is proposed for eastbound SR 291(Essington Avenue) to northbound Bartram Avenue and would not affect the existing bike lane along Bartram Avenue.
8.21	The following mitigative alternatives should be considered: (1) Alternative routing of the bicycle lanes onto streets or pathways less heavily trafficked or not traversed by motor vehicles (for instance, Route 291 to the old Chester Shortline trolley bed passing under 1-95 into John Heinz NWR and then connecting to local roads via the wildlife refuge); (2) Incorporating a new on-road bicycle lane into the proposal to replace the existing bicycle lane that will be eliminated; and (3) Incorporating a separate, off-road bicycle facility into the proposal.	No bicycle lanes would be re-routed or eliminated as a result of the proposed project. Bartram Avenue, proposed to be designated as SR 291, currently has a striped bicycle lane. It is not expected that there would be an increased hazard due to this action. However, any signing, striping, signal or physical changes required to the roadway and/or intersections will be reviewed by PennDOT and other relevant organizations during the preliminary engineering and final design process. FAA would consider other mitigation as necessary.
8.22	Even if one of the bicycle lanes along Bartram Avenue were not eliminated, mitigation for impacts to the trail system from the additional volume of motor vehicle traffic along Bartram Avenue should be addressed.	It is not expected that the additional traffic volume along Bartram Avenue will negatively affect bicycle travelers in the bike lane.
8.23	The FAA and Philadelphia Division of Aviation should work with PennDOT, the Philadelphia Streets Department, Delaware County Planning Department, and trail interests in addressing potential mitigation strategies.	Required roadway mitigation measures will be refined during the design process and reviewed with the appropriate agencies. The proposed mitigation measures have been reviewed by City Streets and approved by PennDOT.
8.24	In addition to the potential alternatives for mitigation noted above, signaling, curb cuts, signage and other trail features relating to pedestrian and bicycle use should be considered.	Appropriate measures will be considered during the design process.

## Letter 8

U.S. Dept. of the Interior, Nat'l Park Service - Michael Chezik

Comment Number	Comment	Response
8.25	The John Heinz NWR, a Transportation Act Section 4(f) resource, lies immediately to the northwest of the proposed project area, and is expected to experience some increase in noise levels under all of the action and no action alternatives under consideration. As we have noted in past comments on the technical report on noise impacts, the focus on DNL averages is not adequate to address impacts on wildlife or visitors. DNL is a number which evaluates community annoyance to chronic noise levels over a 24-hour period. Evaluating SEL would be more relevant to determine the impacts on wildlife and visitors. Although the difference in DNL may be small; higher and more frequent SEL could significantly affect resting, loafing and feeding birds, and diminishes visitor enjoyment. Future studies and the final EIS should examine SEL impacts on the refuge.	The EIS, in addition to the DNL analysis, compares the Lmax (the maximum noise level) for many sites in the Study Area. One of the monitoring stations used to develop this metric was at the John Heinz National Wildlife Refuge (Site ST-1). As Table 4.2-21 shows, the maximum noise level at the John Heinz NWR in both 2007 and 2015 is predicted to increase from 97.8 dBA in the No-Action Alternative to 98.4 dBA for Alternative 1, an 0.6-dBA increase. This minor increase is imperceptible to the human ear and would not affect visitor usage of the refuge, nor is it anticipated to affect bird behavior or use of the refuge, because it does not introduce any new noise or louder noise and does not change flight paths.
8.26	The document does adequately evaluate the effects of the proposed federal action on the bald eagle. Based on this information, the FWS concludes that the project is not likely to adversely affect this species.	The FAA has noted and considered your comment.
8.27	This Endangered Species Act determination is valid for two years from the date of this letter. If the proposed project has not been fully implemented prior to this, an additional review by the FWS is recommended. Should project plans change, or if additional information on listed or proposed species becomes available, this determination may be reconsidered.	The FAA has noted and considered your comment.
8.28	FWS further recommends that the FAA continue to monitor bald eagle use of the greater PHL area in anticipation of additional information needs and effects analyses for the upcoming PHL Capacity Enhancement Project.	The FAA has not undertaken any monitoring of bald eagle use of the airport area in conjunction with the Runway 17-35 Extension Project, but has identified active eagle nests in the vicinity of the airport. Additional coordination with USFWS will be undertaken to identify data needs and analyses required for the CEP.

DEC-01-2004 16:20

P.02/06



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

December 1, 2004

Susan McDonald  
Harrisburg Airports District Office  
Federal Aviation Administration  
3905 Hartzdale Drive, Ste. 508  
Camp Hill, PA 17011

Re: Philadelphia International Airport Runway 17-35 Extension Project, Draft  
Environmental Impact Statement, Philadelphia, PA October 2004, CEQ # 040478

Dear Ms. McDonald:

In accordance with the National Environmental Policy Act (NEPA), the Council on Environmental Quality (CEQ) regulations (40 CFR 1500-1508), Section 309 of the Clean Air Act and Section 404 of the Clean Water Act, the Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the above referenced proposal. Based on our review of the DEIS, EPA has rated the environmental impacts of the two build alternatives as "EC" (Environmental Concerns) and the adequacy of the impact statement as "1" (Adequate). A copy of EPA's ranking system is enclosed for your reference. The basis for these ratings are contained in the remainder of this letter and in the attached detailed comments.

The DEIS evaluates alternatives designed to provide short-term delay reduction. The major cause of delays at the Philadelphia International Airport (PHL) are the current airport configuration and the fleet mix. Analyses of the forecast passenger and aircraft activity levels determined that the numbers and duration of delayed operations at PHL would continue to increase from their current average level of nearly 10 minutes per operation to nearly 19 minutes per operation in 2010. Federal Aviation Administration (FAA) considers an airport with average delay in excess of five minutes to be congested. Because PHL is a pacing airport, it contributes to delays throughout the national airport system.

Three alternatives are considered in detail in this DEIS: No Action Alternative; Alternative 1, which would extend Runway 17-35 640 feet to the north and 400 feet to the south for a total length of 6,500 feet; and Alternative 2, which would extend Runway 17-35 1,140 feet to the north and 400 feet to the south for a total length of 7,000 feet. Both build alternatives would include reconfiguring the Economy Parking Lot, relocating the vehicle service road south of Runway 17-35, and closing State Route 291 from Interstate 95 Ramp F to Island Road (approximately 3,000 feet). Both build alternatives also include extending the taxiways associated with Runway 17-35 and relocating navigational aids. Based on the evaluation in the DEIS, both build alternatives have similar environmental impacts as well, with Alternative 2



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having a slightly greater area of disturbance, amount of impervious surface, waterway impacts (0.42 acres compared to 0.37 acres), and floodplain impacts (54,600 cubic yards compared to 50,600 cubic yards).

While FAA and EPA did reach consensus on the approach used for the DEIS and the studies involved, we offer the accompanying detailed comments for consideration. We expect that FAA will be able to respond to these comments as part of the Final EIS.

Thank you for the opportunity to offer these comments. If you have any questions, please contact Barbara Okorn at (215)814-3330.

Sincerely,



William Arguto  
NEPA Team Leader

Enclosures

**Appendix A - Detailed Comments**  
**Draft EIS - Philadelphia International Airport Runway 17-35 Extension**  
**October, 2004**

**General Comments**

Page S-6 states that FAA does not expect the US Airways Chapter 11 issue to affect the delays analysis or need for this project because they believe that other airlines would increase service to meet the demand. Further information should be provided on the fleet mix and ways that this demand could be met.

Further details should be provided regarding the methods used to determine the 10 minute delay calculation at PHL.

Alternatives that were dismissed for this DEIS should be reevaluated for the Capacity Enhancement Program (CEP) DEIS (i.e. peak period pricing).

The project team should continue to work closely with state and federal agencies as well as the communities and public to minimize impacts associated with this project.

**Wetlands**

Section 4.12 , Wetlands and Waterways, should clearly distinguish between wetlands and waterways. The size of the wetland should be described in terms of the impacted area and the remaining portions. The text only indicates that "the 2004 investigation confirmed that the waterway boundaries are the same as indicated in the 1993 Wetland Determination Report". A map in this section would also be helpful. The Figures in Volume 2 should map wetlands and waterways, not "wetland or waterway" as the same feature. Figure 4-10-3 indicates *Phragmites* stands (non-wetland) and *Phragmites* stands (possible wetlands associated). All wetlands should be clearly identified

The impacts to wetlands and waterways after minimization should be clearly described. The project team should work closely with the state and federal agencies to develop an appropriate mitigation plan for any impacts associated with this project.

**Air Quality Analysis/Assessment**

The October 2004 DEIS does not provide enough information for EPA to perform a thorough review and analysis of the air quality assessment performed by the project team. For example, the DEIS excludes information relative to the actual air model inputs or outputs used to complete the assessment. In order for EPA to perform an adequate review of a project of this type, the report needs to be detailed enough so that our air modeling staff can independently replicate the results.

## A-2

The air modeling analysis presented in the report has examined only one year of meteorological data. EPA requests that a 5-year record of meteorological data be used to capture expected temporal variability.

The receptors chosen do not appear to be dense enough to capture the appropriate spatial maxima for comparison against the National Ambient Air Quality Standards of the Clean Air Act. Also, the report states that receptor locations were chosen to evaluate those areas where "... the general public has reasonable access." Based on EPA's definition of ambient air, any area in which the public "has access" not "has reasonable access" needs to be considered. Unless the public is precluded from an area, it needs to be considered.

It is expected that this information will confirm the opinion that air quality impact is not significant.

The report states that the emissions emanating from the airport garage (multilayer) were configured as an elevated area source. A source of this nature should be modeled as a volume source.

#### 2003 Estimated Concentrations from Roadway Intersections

Page 4-59 - 4-60. The report has identified and analyzed for carbon monoxide (CO) hot spots from traffic emissions in accordance with EPA guidance. Additional information is required, including identification of the method used to perform the analysis and the assumptions used in performing the analysis, i.e., traffic counts temperature humidity etc.

While emissions from on road motor vehicle sources are covered under General Conformity within the fence line of the airport operations, any increased mobile emissions for those motor vehicles coming to the airport from other locations must also be considered. If implementation of the proposed alternatives will result in increased mobile emissions beyond the no-action alternative, they must be considered in the travel demand model for the region. While the Delaware Valley Regional Planning Commission (DVRPC) is responsible for doing such analysis and including it in their Transportation Improvement Program and their Transportation Plan, it should be explained in the DEIS what the expected future traffic increases might be in the future if implementation of any alternative does occur. It should also note that these any new increases would be then evaluated as part of a future transportation conformity determination done by DVRPC during their regular transportation planning process.

#### General Conformity Assessment

Based on a review of the information described in Section 4.5.4 (pages 4-71 through 4-73), this project complies with the General Conformity Rule of 40 CFR Part 51, Subpart W.

A-3

### Environmental Justice

The minority and low income data for the study area should be compared to the state data. This comparison should be used to determine if the project is having a disproportionate impact.

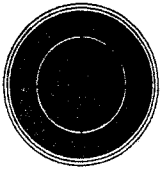
Hispanic populations should be added to the definition of minority.

For clarification, environmental justice should be added to the discussion in the Executive Summary, since it is an integral part of the EIS process.

### Sole Source Aquifer

Attention should be given to protecting the groundwater and aquifer from contamination. More information should be provided on runoff collection systems, retention basins, and any changes that may occur in runoff collection and retention basins as a result of these alternatives.

The language in the Sole Source Aquifer Section should be clarified. While it is true that the "Delaware River" does not have a significant impact on pumping wells in NJ, it has been shown by several USGS studies, and is widely accepted that there is ground water moving from PA to NJ under the river which does have an impact.



Response to Letter #9

U.S. Department  
of Transportation

**Federal Aviation  
Administration**

Harrisburg Airports District Office  
3905 Hartzdale Drive, Ste. 508  
Camp Hill, PA 17011  
(717) 730-2830 phone  
(717) 730-2838 FAX

January 3, 2005

William Arguto  
United States Environmental Protection Agency  
Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

REFERENCE: Philadelphia International Airport Runway 17-35 Extension Project  
EPA DEIS Comment Letter, November 30, 2004

Dear Mr. Arguto,

Thank you for comments on the Philadelphia International Airport Runway 17-35 Extension Project Draft Environmental Impact Statement. Responses to your comments are provided on the attached matrix and will be incorporated into the Final Environmental Impact Statement.

The Federal Aviation Administration appreciates the Environmental Protection Agency's involvement and cooperation in this project. Your dedication and personal involvement has resulted in a streamlined project that meets or exceeds Council of Environmental Quality standards. As we begin work on the Capacity Enhancement Project we look forward to your continued support and assistance.

Should you have any questions or concerns, please contact Sue McDonald at 717-730-2841.

Sincerely,

A handwritten signature in black ink, appearing to read "Wayne Helbeck".

Wayne Helbeck, Manager  
Harrisburg Airports District Office



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

Susan McDonald  
Harrisburg Airports District Office  
Federal Aviation Administration  
3905 Hartzdale Drive, STE. 508  
Camp Hill, PA 17011

February 2, 2005

Re: Philadelphia International Airport Runway 17-35 Extension Project, Draft Environmental Impact Statement, Philadelphia Pa, Response to Comments

Dear Ms. McDonald:

Thank you for your January 3, 2005 response to EPA's, December 1, 2004, comments on the the subject document. We have no further comments on this document. We look forward to working with you for the remainder of this project and the upcoming Capacity Enhancement Project.

Sincerely,

A handwritten signature in black ink, appearing to read "William Arguto".

William Arguto  
NEPA Team Leader



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## Letter 9

## U.S. Environmental Protection Agency-Region III - William Arguto

Comment Number	Comment	Response
9.1	Page S-6 states that FAA does not expect the US Airways Chapter 11 issue to affect the delays analysis or need for this project because they believe that other airlines would increase service to meet the demand. Further information should be provided on the fleet mix and ways that this demand could be met.	As noted in Chapter 2, FAA does not expect that the financial position of any airline will affect the need for the project. PHL is a heavy origin-destination market with a considerable demand for air carrier services. If US Airways were to cancel services, other airlines would be expected to increase services to meet this demand, using similar regional jets or narrowbody aircraft. The markets served from Philadelphia are driven in large part by the origin-destination demand, which is independent which particular airline serves the airport. However, please note that US Airways has recently increased service at PHL.
9.2	Further details should be provided regarding the methods used to determine the 10 minute delay calculation at PHL.	The delay calculations are simulated by a computer-based simulation model, Total Airspace and Airport Modeler (TAAM), as discussed in Chapter 2 and furthermore in the Master Plan Update, Final Technical Report 2004.17.
9.3	Alternatives that were dismissed for this DEIS should be re-evaluated for the Capacity Enhancement Program (CEP) DEIS (i.e. peak period pricing).	The alternatives analysis prepared for the CEP DEIS will include the alternatives evaluated for the Runway 17-35 EIS (and subsequently dismissed because they could not be accomplished in the short-term) to the extent they meet the project purpose and need.
9.4	The project team should continue to work closely with state and federal agencies as well as the communities and public to minimize impacts associated with this project.	Early in the environmental process, the FAA began coordinated with Federal, state and local officials (see Appendix D for the Interagency Stewardship and Streamlining Agreement). This agreement details the roles and responsibilities on the Project. The agencies with responsibility for issuing permits (see Section 1.5) also have jurisdiction over portions of the project. The project team will continue to consult with local, state and Federal agencies in the future, including any subsequent permit applications.
9.5	Section 4.12, Wetlands and Waterways, should clearly distinguish between wetlands and waterways. The size of the wetland should be described in terms of the impacts area and the remaining portions. The text only indicates that "the 2004 investigation confirmed that the waterway boundaries are the same as indicated in the 1993 Wetlands Determination Report". A map in this section would also be helpful.	Section 4.12 has been revised to respond to this comment.
9.6	The Figures in Volume 2 should map wetlands and waterways, not "wetland or waterway" as the same feature.	Your comment has been addressed in the appropriate EIS Section(s).
9.7	Figure 4.10-3 indicates Phragmites stands (non-wetland) and Phragmites stands (possible wetlands associated). All wetlands should be clearly identified.	This figure correctly identifies all wetlands within the Runway 17-35 Project Area. Those areas identified as "Phragmites stands (possible wetlands associated)" based on the vegetation cover analysis are not wetlands.
9.8	The impacts to wetlands and waterways after minimization should be clearly described.	Section 4.12 of this EIS describes the wetland impacts and potential mitigation measures for the Proposed Project.
9.9	The project team should work closely with the state and federal agencies to develop an appropriate mitigation plan for any impacts associated with this project.	The Streamlining agencies (Corps of Engineers, EPA, PA DEP, PFBC, USFWS and NPS) have reviewed the proposed mitigation concepts and concurred with the proposed mitigation. The project team will continue to consult with local, state and Federal agencies in the future, including any subsequent permit applications.
9.10	The October 2004 DEIS does not provide enough information for EPA to perform a thorough review and analysis of the air quality assessment performed by the project team. For example, the DEIS excludes information relative to the actual air model inputs or outputs used to complete the assessment. In order for EPA to perform an adequate review of a project of this type, the report needs to be detailed enough so that our air modeling staff can independently replicate the results.	Appendix A.2 (Air Quality Technical Report) of the EIS contains Appendices A through I which provide all the input data used in the analyses, and include the detailed results not included in the main body of the EIS. Copies of the computer input and output files are available on request.

## Letter 9

## U.S. Environmental Protection Agency-Region III - William Arguto

Comment Number	Comment	Response
9.11	EPA requests that a 5-year record of meteorological data be used to capture expected temporal variability.	FAA's reading of the guidance in Section 9.3.1.2(b) of the U.S. EPA's Guideline on Air Quality Models is that only "1 year of site specific data is required" to perform air quality modeling, and that up to five years of data is preferred. Since Philadelphia Airport data is "onsite" data, only the last full year of data available from the National Weather Service was used in the modeling analysis. Moreover, Philadelphia Airport is located on the banks of the Delaware River, in the Delaware River Valley. Due to the local geography and the flat terrain, variations in the wind field and the atmospheric stability are relatively minor and do not exhibit wide variations from year to year. Therefore, one year of "onsite" data in this environment should be sufficiently representative of the conditions that would generate worst case pollutant concentrations. Please note that after further consultation, the EPA has now concurred with the methodology used in this EIS.
9.12	The receptors chosen do not appear to be dense enough to capture the appropriate spatial maxima for comparison against the National Ambient Air Quality Standards of the Clean Air Act.	As described in the Appendix A (Final Air Quality Analysis Protocol) of the Air Quality Technical Report (Appendix A.2 of the DEIS), it is true that the preliminary set of receptors appears to be sparse (from the perspective of New Source Review modeling), however, there are several reasons for using this approach. The overwhelming majority of airport-related emission sources, primarily aircraft taxiing and idling, motor vehicle traffic, and ground support equipment, operate at or near ground level and have relatively low plume rise due, in part, to the plumes being emitted horizontally. Consequently, in dispersion modeling terms, the airport is essentially an extensive collection of large ground-level area and volume sources. In addition, of necessity, the area around an airport is generally flat terrain, thus eliminating complex terrain as a complicating influence. For such ground-level emission sources in flat terrain with low plume rise, the maximum predicted pollutant concentrations occur at the receptors closest to the source. Additionally, there are practical reasons for limiting the number of receptors in the analysis. The excessive computer run time of the EDMS/AERMOD model increases directly as the number of modeled receptors increases. As excessive run times are already a limiting factor in modeling study resources (particularly because the number of total sources being modeled exceeds 4,000), the number of receptors must be limited to a relatively small number of strategically placed locations which would provide useful information on the maximum concentrations due to airport-related sources for the NEPA process and documentation. Finally, this receptor siting approach for analyses at airports is the current accepted industry practice and has been accepted and used in numerous other jurisdictions.
9.13	Also, the report states that receptor locations were chosen to evaluate those areas where "... the general public has reasonable access." Based on EPA's definition of ambient air, any area in which the public "has access" not "reasonable access" needs to be considered. Unless the public is precluded from an area, it needs to be considered. It is expected that this information will confirm the opinion that air quality impact is not significant.	The definition of "reasonable access" in the DEIS was not restrictive. Receptors were placed in any areas where the general public has access (curbsides, property boundaries, parking facilities, etc.) and not just in areas where the public has access. Any areas that are not physically restricted (e.g., fenced) where maximum concentrations could occur were included in the receptor network. This has been changed in this EIS to say "access".
9.14	The report states that the emissions emanating from the airport garage (multilayer) were configured as an elevated area source.	The multi-layer parking garages were modeled as a stack of individual area sources, with elevations of the each area source corresponding to the wall openings of each garage level.
9.15	2003 Estimated Concentrations from Roadway Intersections Page 4-59 - 4-60. The report has identified and analyzed for carbon monoxide (CO) hot spots from traffic emissions in accordance with EPA guidance. Additional information is required, including identification of the method used to perform the analysis and the assumptions used in performing the analysis, i.e. traffic counts, temperature, humidity, etc.	All technical assumptions with respect to the intersection modeling analysis can be found in Appendix A (Final Air Quality Analysis Protocol) of Appendix A.2 (Air Quality Technical Report) in the DEIS. Traffic data and signal cycle data can be found in Appendix E (Intersection Data and Detailed Results) of Appendix A.2 (Air Quality Technical Report) in the DEIS.



## Letter 9

## U.S. Environmental Protection Agency-Region III - William Arguto

Comment Number	Comment	Response
9.16	While emissions from on road motor vehicle sources are covered under General Conformity within the fence line of the airport operations, any increased mobile emissions for those motor vehicles coming to the airport from other locations must also be considered. If implementation of the proposed alternatives will result in increased mobile emissions beyond the no-action alternative, they must be considered in the travel demand model for the region.	The Proposed Project is not a capacity enhancement project and will not cause an increase in air passengers or airport operations, and therefore, will not result in increased motor vehicle volumes accessing the Airport. Thus, emissions from motor vehicles will not increase, except for a slight effect due to the closing of SR 291. Traffic will be rerouted onto Bartram Avenue, resulting in a slight increase in travel distances and emissions. It is expected that any changes in the route and configuration of SR 291 will be accounted for in the DVRPC regional travel demand model and any subsequent transportation conformity determinations that are based on the travel demand model.
9.17	While the Delaware Valley Regional Planning Commission (DVRPC) is responsible for doing such analysis and including it in their Transportation Improvement Program and their Transportation Plan, it should be explained in the DEIS what the expected future traffic increase might be in the future if implementation of any alternative does occur. It should also note that these any new increases would be then evaluated as part of a future transportation conformity determination done by DVRPC during their regular transportation planning process.	The Proposed Project is not a capacity enhancement project and will not cause an increase in air passengers or airport operations, and therefore, will not result in increased motor vehicle volumes accessing the Airport. Thus, emissions from motor vehicles will not increase, except for a slight effect due to the closing of SR 291. Traffic will be rerouted onto Bartram Avenue, resulting in a slight increase in travel distances and emissions. It is expected that any changes in the route and configuration of SR 291 will be accounted for in the DVRPC regional travel demand model and any subsequent transportation conformity determinations that are based on the travel demand model.
9.18	General Conformity Assessment Based on a review of the information described in Section 4.5.4 (pages 4-71 through 4-73), this project complies with the General Conformity Rule of 40 CFR Part 51, Subpart W.	The FAA has noted and considered your comment.
9.19	Environmental Justice. The minority and low income data of the study area should be compared to the state data. This comparison should be used to determine if the project is having a disproportionate impact.	The methodology used to assess the impacts to minority and low income populations is appropriate. The environmental justice analysis was prepared in accordance with the guidance provided in EO 12898 and FAA Order 1050.1E.
9.20	Hispanic populations should be added to the definition of minority.	Hispanic is included in the Minority classification documented in this EIS, but the document does not separate out a Hispanic only category. The U.S. 2000 Census 'Hispanic or Latino' category includes people of any race who define their heritage, nationality group, lineage, or country of birth of Spanish, Hispanic, or Latino ( <a href="http://www.census.gov/pubinfo/www/NEWhispML1.html">http://www.census.gov/pubinfo/www/NEWhispML1.html</a> ).
9.21	...environmental justice should be added to the discussion in the Executive Summary, since it is an integral part of the EIS process.	Environmental justice is included in Section S.8.5 of the Executive Summary.
9.22	Sole Source Aquifer Attention should be given to protecting the groundwater and aquifer from contamination.	While the data show that the majority of the airport is over the coastal aquifer, it is outside the mapped limits of the sole source aquifer. Because of the sand and clay layers in the aquifer, the airport contributes to the surficial aquifer but is unlikely to contribute to the lower aquifer layers. As documented in Section 4.7 of this EIS, appropriate mitigation measures would be incorporated into the Proposed Project to protect groundwater. The proposed extended runway would not be a source of potential groundwater contaminants.
9.23	More information should be provided on runoff collection systems, retention basins, and any changes that may occur in runoff collection and retention basins as a result of these alternatives.	Section 4.7 of the EIS provides information on the proposed water quality mitigation measures. This EIS presents the conceptual level of project design. More detailed engineering information will be available if the Proposed Project is advanced into the design process.
9.24	The language in the Sole Source Aquifer Section should be clarified. While it is true that the "Delaware River" does not have a significant impact on pumping wells in NJ, it has been shown by several USGS studies, and is widely accepted that there is groundwater moving from PA to NJ under the river which does have an impact.	While the data show that the majority of the airport is over the coastal aquifer, it is outside the mapped limits of the sole source aquifer. Because of the sand and clay layers in the aquifer, the airport contributes to the surficial aquifer but is unlikely to contribute to the lower aquifer layers. As shown in Section 4.7 of this EIS, the proposed project will not have an adverse effect on either the local surficial aquifer or the regional sole source aquifer, as there will be no discharge of contaminants to groundwater.



# State Comments and Responses



STATE OF DELAWARE  
OFFICE OF THE GOVERNOR

RUTH ANN MINNER  
GOVERNOR

Via email and facsimile

December 1, 2004

ATTN: Susan McDonald  
Harrisburg Airports District Office  
Federal Aviation Administration  
3905 Hartzdale Avenue, Suite 508  
Camp Hill, Pennsylvania 17011

Subject: Philadelphia International Airport Runway 17-35 Extension Project  
Draft Environmental Impact Statement

Dear Ms. McDonald,

I would like to thank the Federal Aviation Administration (FAA) for including Delaware in the Philadelphia Airport Expansion study. This was the first step in acknowledging the potential impacts on residents in the northern part of the State. As expressed in my letter to the FAA on April 14<sup>th</sup>, my interest is to ensure that noise pollution, environmental impacts, and potential adverse health effects are minimized and mitigated.

The proposed extension of Runway 17-35 at the Philadelphia International Airport and the potential for increased air traffic over the northernmost city and suburban residential neighborhoods in Delaware are a major concern for people who live there. The residents are frustrated by the current level of noise, air and light pollution resulting from flights approaching and departing over that region.

It is unfortunate that the request to extend the comment period for this Draft Environmental Impact Statement (DEIS) was not granted, given the technical and complex nature of the document. However, upon review of the DEIS, I would like to offer the following comments specifically related to noise measurements and assessments:

Susan McDonald  
December 1, 2004  
Page Two

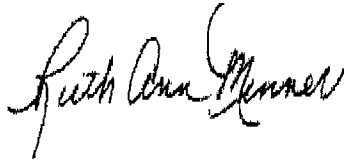
- **Day Night Logarithm (DNL) measurement.** Although the FAA uses the Day Night Logarithm (DNL) measurement, which is recognized as the industry standard, it only presents a yearly average measurement of noise level changes. It would be beneficial for the FAA to provide detailed noise measurements for each monitoring location in Delaware, including maximums for representative single events and monthly averages for peak periods.

Modeling data presented in the Runway 17-35 Extension DEIS was verified by "short-term" monitoring (191 days) on Parish Avenue in Brandywine Hundred and "long-term" monitoring (12.87 days) on Lancashire Drive also in Brandywine Hundred during the last two weeks of January – a slow travel period. We do not believe that these monitoring efforts do not yield an accurate assessment of the noise impacts on northern Delaware. As the Capacity Enhancement Project moves forward, I would respectfully request that the FAA make a more concentrated effort to assess noise impacts in northern Delaware.

- **Long-term noise monitoring technology.** Installation of long-term noise monitors should be utilized south of Philadelphia Airport within the Brandywine intercept flight path in Arden, Delaware and Brandywine Hundred, Delaware, respectively. This will allow for better collection of data and provide a more accurate assessment of the noise impact on Delaware.

I hope that you will thoughtfully consider Delaware's concerns and recommendations as you move forward with the Runway 17-35 Extension Project and the Capacity Enhancement Project at the Philadelphia International Airport.

Sincerely,



Ruth Ann Minner  
Governor

Comment Number	Comment	Response
10.1	The proposed extension of Runway 17-35 at the Philadelphia International Airport and the potential for increased air traffic over the northernmost city and suburban residential neighborhoods in Delaware are a major concern for people who live there. The residents are frustrated by the current level of noise, air and light pollution resulting from flights approaching and departing over that region.	As the analysis in this EIS shows, the proposed project will not result in increased noise (see Section 4.2), air pollution (see Section 4.5) or light pollution (see Section 4.16.6) over northern Delaware.
10.2	Although the FAA uses the Day Night Logarithm (DNL) measurement, which is recognized as the industry standard, it only presents a yearly average measurement of noise level changes. It would be beneficial for the FAA to provide detailed noise measurements for each monitoring location in Delaware, including maximums for representative single events and monthly averages for peak periods.	<p>The analysis of noise impacts presented in this EIS uses the FAA standard methodology, which compares noise impacts based on the DNL. In addition, FAA voluntarily considered other measures of noise to provide a more complete picture of the changes in the noise environment associated with the proposed project. The analysis (Section 4.2) demonstrates that the proposed project would not increase noise over northern Delaware. At the request of residents of the Ardens, temporary noise monitoring was conducted at two locations in the state of Delaware during a two-week period in January 2004. Those two sites are identified as LT-4 and ST-9 in this EIS. Because those two sites were considered to be not applicable to the Runway 17-35 Extension Project, certain noise measurement data (such as Aircraft DNL and measured single event noise metrics) were not reported for those sites. Sites LT-4 and ST-9 are considered applicable to the upcoming Capacity Enhancement Program (CEP) EIS. Additional noise measurement data for those sites will be reported in the CEP EIS.</p> <p>While measured single event noise metrics were not reported for LT-4 and ST-9, Appendix E of the Noise Technical Report (Appendix A.1 of the DEIS) contains tables of INM-computed noise metrics at each of the measurement sites, including DNL, NDNL, Lmax, SEL, and Time Above Sound Levels of 65, 75, and 85 dB.</p>
10.3	Modeling data presented in the Runway 17-35 Extension DEIS was verified by "short-term" monitoring (1.91 days) on Parish Avenue in Brandywine Hundred and "long-term" monitoring (12.87 days) on Lancashire Drive also in Brandywine Hundred during the last two weeks of January-a slow travel period. We do not believe that these monitoring efforts yield an accurate assessment of the noise impacts on northern Delaware. As the Capacity Enhancement Project moves forward, I would respectfully request that the FAA [concentrate on] noise impacts in northern Delaware.	FAA relies on modeling to provide an appropriate and consistent basis for comparison of the effects of the projected No-Action Alternative and proposed conditions. The INM has been tested and verified to accurately project existing and future conditions. Actual monitoring data are provided for information and does not allow FAA to forecast any potential impacts. The noise analysis that will be conducted for the CEP will analyze changes in the noise environment in northern Delaware.
10.4	Installation of long-term noise monitors should be utilized south of Philadelphia Airport within the Brandywine intercept flight path in Arden, Delaware and Brandywine Hundred, Delaware, respectively. This will allow for better collection of data and provide a more accurate assessment of the noise impact on Delaware.	The noise analysis was conducted in accordance with FAA standards. Long-term noise monitoring would not provide a more accurate assessment of future noise levels.



STATE OF NEW JERSEY  
OFFICE OF THE GOVERNOR  
PO BOX 001  
TRENTON  
08646

RICHARD J. CODEY  
ACTING GOVERNOR

November 18, 2004

Arlene B. Feldman, Regional Administrator  
Federal Aviation Administration  
1 Aviation Plaza  
Jamaica, NY 11434

Dear Ms. Feldman:

I am reaching out to you during my first week as New Jersey's Acting Governor, to make sure your office and the FAA remain aware of New Jersey residents' concerns about the plans to extend Runway 17-35 at Philadelphia International Airport, and about the planned Capacity Enhancement Program at the airport.

I am aware that these projects are intended to help address the airport's capacity needs. But I insist that the FAA review both of these projects very carefully, and with respect for the feelings and needs of the airport's neighbors – the residents of Gloucester, Camden and other counties in South Jersey.

Many residents have reservations about the FAA's plan. They believe extending this runway will create more air traffic and noise in their neighborhoods.

Planning for future traffic needs is not easy, but the well being of the airport's neighbors must take priority. Their quality of life must not be sacrificed as Philadelphia International Airport plans for its future.

I am sure a balance can be reached – one that will meet the airport's needs without channeling extra traffic and extra noise over New Jersey homes.

Thank you for this attention to this matter. If my Administration can help in any way, please feel free to contact my office.

With regards,

RICHARD J. CODEY  
Acting Governor of New Jersey

CC: Federal Aviation Administrator Marion C. Blakey  
Secretary of Transportation Norman Y. Mineta

**Letter 11**

New Jersey, State of - Acting Governor Richard Codey

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
11.1	Many New Jersey residents have reservations about the FAA's plan. They believe extending this runway will create more air traffic and noise in their neighborhoods. Planning for future traffic needs is not easy, but the well being of the airport's neighbors must take priority. Their quality of life must not be sacrificed as the Philadelphia International Airport plans for its future.	The FAA has noted and considered your comment. As the EIS shows (see Section 4.2) the proposed project would not increase noise over New Jersey and, in fact, would slightly decrease noise over Gloucester City as a result of diverting flights from Runway 9/27.

26TH DISTRICT  
EDWIN B. ERICKSON

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WEBSITE: <http://erickson.psenategop.com>



## Senate of Pennsylvania

November 30, 2004

Marion C. Blakey, Administrator  
Federal Aviation Administration  
800 Independence Avenue, SW  
Washington, DC 20591

Dear Ms. Blakey:

As you are aware, the majority of the physical facilities of the Philadelphia International Airport (PHL) is located in Tincum Township, Delaware County, Pennsylvania. As PHL continues to expand, Tincum Township continues to feel the impact in terms of the quality of life of its residents, most of whom have lived in the area prior to the continued expansions. While I recognize that there is a positive economic impact of PHL to our region, I am concerned that the negative impacts associated with the expansion of Runway 17-35 will outweigh any positive aspects. I note that the "Vision" of the Federal Aviation Administration includes "being responsive to our customers and accountable to the public." I would request that you keep this in mind as you proceed forward with your plans to extend Runway 17-35.

Your "Draft Environmental Impact Statement" (Draft EIS) regarding the Runway 17-35 Extension Project appears to reach a conclusion and to then justify the conclusion to extend the runway through the EIS process. I believe that the extension alternative **will** have a negative impact on this region and would therefore urge you to reconsider your alternatives.

You indicate that "Integrity is our character," and that "We do the right thing, even if no one is looking." Please do the "right thing" and scrap your ill-considered plans to extend Runway 17-35.

Sincerely,

A handwritten signature in cursive script that reads "Edwin B. Erickson".

EDWIN B. ERICKSON  
STATE SENATOR

EBE/tg

CC: Hon. Curt Weldon, Member of Congress  
Hon. Ron Raymond, PA House of Representatives  
Hon. Tim Murtaugh, Chairman, Delaware County Council

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U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

JAN - 3 2005

Office of the Associate  
Administrator for Airports

Response to Letter #12

800 Independence Ave., SW.  
Washington, DC 20591

The Honorable Edwin B. Erickson  
Pennsylvania Senate  
5037 Township Line Road  
Drexel Hill, PA 19025

Dear Mr. Erickson:

Administrator Blakey has asked me to respond to your November 30 letter about the Philadelphia International Airport (PHL) Runway 17-35 Extension Project. The Federal Aviation Administration (FAA) issued its Draft Environmental Impact Statement (DEIS) for the proposed Runway 17-35 Extension Project on October 14, 2004.

In your letter you requested that the FAA consider the impacts to residents in Tinicum Township, Delaware County, Pennsylvania, and end plans to extend Runway 17-35.

The FAA is sensitive to the concerns of the communities surrounding PHL. We have made every reasonable effort to identify development alternatives and potential impacts to the surrounding communities and the natural environment. One alternative considered addressed the impacts of not extending the runway. Our environmental study followed the rigorous standards prescribed by the Council on Environmental Quality and the National Environmental Policy Act. We also asked for comments from State and Federal agencies. We coordinated our environmental studies with the agencies, and we presented these results to the public on several occasions.

We conducted public outreach before we issued the DEIS. It was not possible for us to meet individually with all townships and local communities in the project area. Because of this, we made every effort to notify communities of upcoming events and to conduct public meetings in centralized locations. The first step we took was to publish a Notice of Intent to prepare an environmental impact statement in the Federal Register on August 1, 2003. Since then, we kept a project Web site and published several newsletters. We conducted a public scoping meeting on August 12, 2003 and held three sets of public outreach meetings in April, May, and September 2004 in Pennsylvania, Delaware, and New Jersey. At every meeting, we informed attendees of upcoming events, the DEIS schedule, ways to get and provide information, and how to get a copy of the DEIS.

When we released the DEIS for public comment on October 14, 2004, we mailed Executive Summaries and compact disks of the full DEIS and of the technical studies to over 1,000 households. We also sent copies to local, State, and Federal officials. We delivered hard copies of the entire 6-volume set to 40 public libraries. We also made Executive Summaries and compact disks available at the hearings to anyone who asked for one through our Web site, e-mail, telephone, fax, or letter. The public comment period closed on December 1, 2004.

After we consider all the comments received, including your letter, we will complete our analysis of the proposed project's potential impacts and benefits. We will then release a Final Environmental Impact Statement (FEIS) for agency and public review. In the FEIS, we will address all substantive comments received and we will select the preferred alternative.

We expect to release the FEIS in late March or early April 2005. After a minimum of 30 days from the time we release the FEIS, FAA will publish its Record of Decision. The Record of Decision will provide the rationale for the final, preferred alternative and any mitigation requirements.

Throughout this process, FAA will continue to consider all local, State, and national implications that could potentially result from the alternative that is finally selected.

If I can be of further help, please let me know.

Sincerely,

**Original Signed by:  
Woodie Woodward**

Woodie Woodward  
Associate Administrator  
for Airports

17TH DISTRICT  
CONSTANCE H. WILLIAMS



Senate of Pennsylvania

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WEBSITE: [www.pasenate.com/cwilliams](http://www.pasenate.com/cwilliams)

October 21, 2004

James B. Byers, Environmental Specialist  
Federal Aviation Administration  
Airports District Office  
3905 Hartzdale Dr., Suite 508  
Camp Hill, PA 17011

Dear Mr. Byers:

I left the public meeting on the Philadelphia Airport Expansion Project (Runway 17-35 extension) that was held in Upper Darby on September 29<sup>th</sup> with continuing concerns about how the proposed expansion would impact residents in the 17<sup>th</sup> Senatorial District, specifically in Lower Merion and Haverford townships.

In August 2003, I had written to you about a number of these concerns and I haven't received a response. Of primary concern in the townships of Haverford and Lower Merion is an increase in air traffic, resulting in additional noise and air pollution, and a reduction in residents' quality of life. As I noted last year in August, there are already several existing complaints about low-flying turbo-prop aircrafts. Additionally, I had requested the study area to include areas in the approach patterns.

While preliminary studies on the noise levels have been completed, these two communities (which already experience a high level of noise from airplanes), have been left out of later studies. It is imperative that any proposal takes into consideration the environmental impact on every community that is part of the expansion plan, or that is located in a flight path.

It is equally important that careful consideration be given to the potential for increased air pollution and the economic impact on our local communities – not only in terms of increased funding to train and prepare fire departments to handle airplane crashes, but also the impact increased flights will have on local property values.

I have heard from many residents who are opposed to the expansion and until solid evidence is presented that address the concerns people have expressed, I will not support advancing the project.

I understand there are alternatives to the expansion that can be studied. These options, which could impact our communities in so many ways must be considered.

Sincerely,

*Connie Williams*

Constance H. Williams  
State Senator  
17<sup>th</sup> District

CHW/eahb

Cc: Susan McDonald, FAA Environmental Protection Specialist



Response to Letter #13

U S Department  
of Transportation

Federal Aviation  
Administration

Harrisburg Airports District Office  
3905 Hartzdale Drive, Ste 508  
Camp Hill, PA 17011  
(717) 730-2830 phone  
(717) 730-2838 FAX

November 26, 2004

The Honorable Constance H. Williams  
State Senator, 17<sup>th</sup> District  
Senate Box 203017  
The State Capital  
Harrisburg, PA 17120-3017

Dear Senator Williams:

Thank you for attending the September 29, 2004 Philadelphia (PHL) Runway 17-35 Extension Project public meeting. I am sorry that you left the meeting with continuing concerns. Hopefully this letter will help clarify issues and address your concerns.

In your letter you stated that you had concerns regarding how the project would impact residents in the Lower Merion and Haverford townships. You indicated that these communities had been left out of the study area and that the study area should include every community located in the flight path. Lastly you stated concern for potential increases air pollution, economic impacts and safety impacts due to increased flights.


The geographic study area for noise effects was determined from radar data by following flight paths for aircraft using each runway at PHL, from their start of takeoff to the points at which they reach 10,000 feet above ground level on departure or 7,000 feet on arrival, whichever is the farther distance. In addition, to assure inclusion of noise effects from new flight tracks and climb profiles, a preliminary set of future flight tracks were developed to reflect the forecast fleet of aircraft and the two Build Alternatives. The resulting study area was a circular area with a radius of approximately 27 miles. Lower Merion and Haverford townships both fell within this study area. Existing and future aircraft noise levels were modeled using the INM model and noise contours were plotted. Our results indicate that Lower Merion and Haverford townships will experience a slight, though not noticeable, decrease in noise exposure if Runway 17-35 is extended as compared to the No Action alternative.

The results of this analysis by locality are summarized in the attached table.

Air quality was also analyzed on a regional basis using the PA Department of Environmental Protection protocol. Lower Merion and Haverford townships were also included in this study area. Our results have shown that this project actually improves local and regional air quality slightly as compared to the No Action alternative. This slight improvement is attributed to reduced idling at the gates of aircraft awaiting runway availability.

A copy of the Executive Summary and a compact disk of the DEIS and technical studies has been mailed to your office. The DEIS and technical studies provide the rationale for dismissing various on and off airport alternatives as well as the detailed analysis of all environmental resources, to include cultural, social and economic resources within the study area for the Philadelphia Runway 17-35 Extension Project. Should you have any questions regarding the DEIS please contact me at (717) 730-2841.

Sincerely,



Susan L. McDonald  
Environmental Protection Specialist  
Federal Aviation Administration



## Philadelphia International Airport Runway 17-35 Extension Project

### Computed DNLs in PENNSYLVANIA

LOCALITY	2003 No Action DNL			2007 No Action Avg. DNL	Alt. 1 Change in DNL	Alt. 2 Change in DNL	2015 No Action Avg. DNL	Alt. 1 Change in DNL	Alt. 2 Change in DNL
	Ranges		Average						
	From..	To...							
ALDAN BORO	44.8	45.6	45.1	49.0	0.9	1.6	50.3	0.4	1.1
ASTON TWP	46.9	51.1	49.0	47.6	-0.5	-0.6	49.0	-0.4	-0.5
BETHEL TWP	45.8	49.9	48.5	47.5	-0.9	-0.9	48.9	-0.9	-0.9
BIRMINGHAM TWP	44.7	45.8	45.3	43.5	-4.6	-4.5	44.9	-4.8	-4.8
BROOKHAVEN BORO	48.5	51.3	49.8	48.6	-0.1	-0.2	50.0	0.0	-0.2
CHADDS FORD TWP	44.0	46.6	45.6	44.2	-3.6	-3.5	45.6	-3.7	-3.7
CHESTER CITY	48.8	62.1	56.8	56.6	-0.1	-0.1	58.0	0.0	-0.1
CHESTER HEIGHTS BORO	45.3	47.5	46.4	45.4	-1.4	-1.3	46.8	-1.4	-1.4
CHESTER TWP	51.8	55.2	53.2	52.2	-0.1	-0.1	53.7	0.0	-0.2
CLIFTON HEIGHTS BORO	44.3	44.5	44.4	48.1	0.5	1.2	49.3	0.0	0.7
COLLINGDALE BORO	46.3	47.7	46.8	51.2	1.0	1.7	52.6	0.5	1.2
COLWYN BORO	53.1	53.1	53.1	56.6	1.0	1.6	58.0	0.5	1.1
CONCORD TWP	44.5	48.3	46.6	45.1	-2.1	-2.1	46.5	-2.2	-2.3
DARBY BORO	47.6	47.6	47.6	51.9	0.8	1.5	53.3	0.2	1.0
DARBY TWP	45.2	54.0	49.5	53.8	1.3	2.1	55.2	0.9	1.6
EAST GOSHEN TWP	34.8	40.5	37.7	36.9	-7.6	-7.8	38.1	-8.3	-8.2
EAST LANSDOWNE BORO	48.3	48.3	48.3	48.9	1.4	1.6	49.7	1.3	1.5
EAST WHITELAND TWP	34.8	39.8	36.7	35.6	-9.5	-9.7	36.9	-10.3	-10.2
EASTTOWN TWP	40.2	43.5	42.4	42.0	-4.2	-4.1	43.3	-4.7	-4.4
EDDYSTONE BORO	51.6	63.8	58.2	58.3	-0.2	-0.2	59.7	-0.1	-0.2
EDGMONT TWP	42.7	46.0	44.7	44.1	-3.2	-3.1	45.4	-3.4	-3.3
FOLCROFT BORO	47.6	53.8	49.7	50.6	0.5	0.7	52.1	0.3	0.6
GLENOLDEN BORO	45.1	46.5	45.8	48.6	1.4	2.1	49.8	1.1	1.7
HAVERFORD TWP	39.8	45.4	41.8	42.2	-0.8	-0.3	43.1	-1.0	-0.6
LANSDOWNE BORO	44.2	46.0	45.1	47.4	0.8	1.4	48.6	0.5	1.0
LOWER CHICHESTER TWP	52.7	53.6	53.2	53.7	-0.2	-0.1	55.2	-0.2	-0.2
LOWER MERION TWP	40.8	44.4	42.6	42.5	-1.7	-1.7	43.4	-2.2	-2.0
MALVERN BORO	40.9	41.8	41.5	40.5	-8.2	-8.2	41.8	-8.6	-8.6
MARCUS HOOK BORO	51.0	54.1	52.1	52.0	-0.1	-0.2	53.5	0.0	-0.1
MARPLE TWP	40.2	44.1	42.5	43.8	-1.0	-0.7	45.0	-1.5	-1.0



## Philadelphia International Airport Runway 17-35 Extension Project

### Computed DNLs in PENNSYLVANIA

LOCALITY	2003 No Action DNL			2007 No Action Avg. DNL	Alt. 1 Change in DNL	Alt. 2 Change in DNL	2015 No Action Avg. DNL	Alt. 1 Change in DNL	Alt. 2 Change in DNL
	Ranges		Average						
	From..	To...							
MEDIA BORO	45.2	45.7	45.5	46.1	-0.2	0.3	47.4	-0.3	0.0
MIDDLETOWN TWP	44.7	49.5	46.6	46.2	-1.0	-0.8	47.6	-1.0	-1.0
MORTON BORO	43.9	43.9	43.9	47.7	0.4	1.2	49.0	0.0	0.7
NARBERTH BORO	42.3	42.4	42.4	42.4	-1.9	-2.0	43.4	-2.6	-2.3
NETHER PROVIDENCE TWP	44.7	49.1	46.1	46.2	0.0	0.3	47.5	0.0	0.1
NEWTOWN TWP	40.3	44.6	42.6	42.7	-2.4	-2.2	43.9	-2.8	-2.5
NORWOOD BORO	46.6	49.8	48.2	48.3	0.0	0.1	49.7	0.0	0.1
PHILADELPHIA CITY (EAST)	36.1	84.3	48.1	47.7	-1.1	-1.0	48.9	-1.2	-1.0
PHILADELPHIA CITY (WEST)	42.5	72.2	45.6	45.7	-1.2	-1.1	46.9	-1.5	-1.3
PROSPECT PARK BORO	45.3	47.9	46.6	46.5	0.1	0.1	47.8	0.0	0.1
RADNOR TWP	38.9	40.4	39.5	39.5	-1.9	-1.4	40.3	-2.0	-1.6
RIDLEY PARK BORO	45.2	48.0	46.5	46.2	-0.1	-0.1	47.5	-0.1	-0.2
RIDLEY TWP	43.1	63.6	46.5	47.3	0.3	0.7	48.6	0.3	0.5
ROSE VALLEY BORO	46.2	47.2	46.9	46.5	-0.1	0.1	47.8	0.0	0.0
SHARON HILL BORO	48.1	50.4	49.2	54.0	1.3	2.1	55.5	0.8	1.5
SPRINGFIELD TWP	43.4	44.7	43.9	46.7	-0.1	0.4	48.0	-0.6	0.0
SWARTHMORE BORO	44.2	44.3	44.2	46.0	0.3	0.9	47.2	0.1	0.5
THORNBURY TWP	41.3	45.4	43.4	42.6	-4.0	-3.9	43.9	-4.4	-4.3
TINICUM TWP	51.6	84.7	66.2	65.8	-0.1	-0.1	67.3	-0.1	-0.1
TRAINER BORO	53.6	56.5	55.1	54.9	-0.1	-0.1	56.3	0.0	-0.1
UPLAND BORO	53.1	54.0	53.6	52.6	-0.1	-0.2	54.0	0.0	-0.1
UPPER CHICHESTER TWP	49.4	55.5	52.1	51.7	-0.2	-0.3	53.1	-0.2	-0.2
UPPER DARBY TWP	42.2	49.9	44.4	46.7	0.1	0.6	47.9	-0.4	0.2
UPPER PROVIDENCE TWP	44.0	46.7	45.2	45.4	-0.9	-0.7	46.7	-1.1	-0.9
WEST GOSHEN TWP	35.8	39.0	37.7	37.2	-6.0	-6.4	38.2	-6.6	-6.5
WESTTOWN TWP	39.3	42.0	40.7	40.0	-5.5	-5.7	41.2	-6.2	-6.1
WILLISTOWN TWP	38.4	44.5	42.4	41.7	-5.8	-5.8	43.0	-6.2	-6.0
YEADON BORO	43.9	52.8	48.0	49.9	0.8	1.1	51.1	0.4	0.9



# Philadelphia International Airport Runway 17-35 Extension Project DEIS

## Computed DNLs in NEW JERSEY

LOCALITY	2003 No Action DNL			2007 No Action Avg. DNL	Alt. 1 Change in DNL	Alt. 2 Change in DNL	2015 No Action Avg. DNL	Alt. 1 Change in DNL	Alt. 2 Change in DNL
	Ranges		Average						
	From..	To...							
AUDUBON BORO	48.9	53.0	50.9	50.5	-0.3	-0.1	51.9	-0.3	-0.1
AUDUBON PARK BORO	56.5	56.5	56.5	56.1	-0.3	-0.1	57.4	-0.3	0.1
BARRINGTON BORO	46.0	47.2	46.5	46.0	-0.4	-0.3	47.4	-0.4	-0.3
BELLMAWR BORO	46.8	51.3	48.6	48.3	-0.3	-0.2	49.7	-0.3	-0.2
BERLIN BORO	37.2	40.4	38.8	37.8	-4.6	-4.2	39.0	-5.3	-5.0
BERLIN TWP	37.9	40.9	39.4	38.7	-4.2	-3.7	39.9	-4.7	-4.4
BROOKLAWN BORO	52.3	53.7	53.0	52.6	-0.2	-0.2	54.0	-0.3	-0.1
CAMDEN CITY	46.7	57.1	50.3	50.1	-0.3	-0.2	51.5	-0.3	-0.1
CARNEYS POINT TWP	36.1	41.2	39.2	38.6	-2.9	-2.8	39.9	-3.0	-3.1
CHERRY HILL TWP	39.1	50.7	44.3	43.7	-0.7	-0.5	44.9	-0.8	-0.5
CINNAMINSON TWP	36.4	42.8	40.3	39.7	-1.9	-1.6	41.0	-2.0	-1.7
CLEMENTON BORO	40.8	42.0	41.4	40.7	-2.4	-1.9	41.9	-2.6	-2.2
COLLINGSWOOD BORO	50.7	55.1	52.9	52.4	-0.3	-0.1	53.7	-0.3	0.0
DELANCO TWP	30.6	30.6	30.6	30.7	-5.1	-5.0	31.9	-5.6	-5.3
DELTRAN TWP	32.2	38.1	35.2	34.7	-3.0	-2.8	35.9	-3.3	-2.9
DEPTFORD TWP	43.3	48.9	45.1	44.6	-0.7	-0.6	45.9	-0.9	-0.8
EAST GREENWICH TWP	43.3	46.6	44.4	43.9	-0.8	-0.7	45.1	-0.7	-0.9
EVESHAM TWP	37.1	41.8	39.1	38.5	-1.9	-1.6	39.7	-2.0	-1.7
GIBBSBORO BORO	41.7	42.5	42.2	41.7	-1.9	-1.6	42.9	-2.0	-1.7
GLASSBORO BORO	38.1	40.7	39.5	39.1	-2.3	-3.4	40.1	-2.7	-4.2
GLOUCESTER CITY	51.2	60.6	57.3	56.9	-0.3	-0.1	58.3	-0.3	0.0
GLOUCESTER TWP	37.8	45.2	42.2	41.5	-2.3	-2.0	42.8	-2.5	-2.1
GREENWICH TWP	44.5	67.3	53.9	53.1	-0.2	-0.1	54.5	-0.2	-0.2
HADDON HEIGHTS BORO	46.9	49.6	48.2	47.8	-0.3	-0.2	49.2	-0.3	-0.2
HADDON TWP	49.7	56.5	52.0	51.6	-0.3	-0.1	52.9	-0.3	0.0
HADDONFIELD BORO	45.3	51.6	48.0	47.5	-0.4	-0.2	48.8	-0.4	-0.1
HARRISON TWP	40.3	43.9	42.3	41.9	-1.7	-2.5	43.1	-2.0	-3.1
LAUREL SPRINGS BORO	42.7	42.7	42.7	42.2	-1.5	-1.1	43.5	-1.6	-1.2
LAWNSIDE BORO	44.7	46.0	45.4	44.8	-0.5	-0.4	46.2	-0.6	-0.4
LINDENWOLD BORO	40.8	42.7	42.1	41.5	-1.9	-1.5	42.8	-2.0	-1.6

# Philadelphia International Airport Runway 17-35 Extension Project DEIS

## Computed DNLs in NEW JERSEY

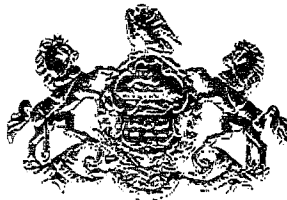
LOCALITY	2003 No Action DNL			2007 No Action Avg. DNL	Alt. 1 Change in DNL	Alt. 2 Change in DNL	2015 No Action Avg. DNL	Alt. 1 Change in DNL	Alt. 2 Change in DNL
	Ranges		Average						
	From..	To...							
LOGAN TWP	45.7	60.8	50.6	49.6	-0.2	-0.2	50.9	-0.1	-0.2
MAGNOLIA BORO	45.1	45.5	45.3	44.8	-0.6	-0.5	46.1	-0.6	-0.4
MANTUA TWP	41.4	46.2	44.1	44.2	0.1	-1.6	45.1	0.1	-2.1
MAPLE SHADE TWP	42.7	46.3	43.6	42.9	-0.7	-0.5	44.1	-0.8	-0.5
MERCHANTVILLE BORO	45.7	45.7	45.7	44.9	-0.5	-0.5	46.3	-0.6	-0.5
MONROE TWP	34.3	38.1	36.4	35.8	-2.8	-2.4	36.9	-2.9	-2.6
MOORESTOWN TWP	34.1	42.5	38.6	37.8	-1.2	-0.9	39.0	-1.3	-1.0
MOUNT EPHRAIM BORO	50.3	52.9	51.6	51.3	-0.3	-0.2	52.7	-0.2	-0.1
MOUNT LAUREL TWP	36.5	45.7	41.1	40.6	-0.6	-0.3	41.6	-0.7	-0.3
NATIONAL PARK BORO	50.8	61.7	55.8	55.7	-0.3	-0.2	57.2	-0.3	-0.1
OAKLYN BORO	54.7	55.9	55.3	55.0	-0.3	-0.1	56.3	-0.4	0.1
OLDMANS TWP	41.4	47.8	44.3	43.6	-1.3	-1.3	45.0	-1.2	-1.4
PALMYRA BORO	41.9	43.7	42.7	42.1	-1.8	-1.6	43.4	-2.0	-1.7
PAULSBORO BORO	45.2	52.9	49.1	48.8	-0.5	-0.2	50.3	-0.4	0.0
PENNS GROVE BORO	38.0	39.4	38.7	38.3	-2.7	-2.6	39.6	-2.8	-2.8
PENNSAUKEN TWP	43.2	50.2	45.5	44.9	-0.7	-0.7	46.3	-0.8	-0.6
PILESGROVE TWP	43.7	43.7	43.7	42.7	-2.4	-2.4	44.1	-2.4	-2.5
PINE HILL BORO	38.8	42.1	40.5	39.5	-3.4	-3.0	40.7	-3.7	-3.3
PINE VALLEY BORO	39.4	40.9	40.2	39.1	-3.6	-3.1	40.3	-4.0	-3.6
PITMAN BORO	40.5	42.2	41.5	41.1	-1.8	-3.1	42.2	-2.1	-3.8
RIVERSIDE TWP	31.2	34.4	32.8	32.6	-4.5	-4.3	33.9	-4.9	-4.6
RIVERTON BORO	40.7	41.2	41.0	40.4	-2.2	-1.9	41.7	-2.3	-2.0
RUNNEMEDE BORO	45.4	46.4	45.9	45.5	-0.4	-0.3	46.9	-0.5	-0.3
SOMERDALE BORO	43.5	44.8	44.3	43.7	-0.9	-0.7	45.1	-0.9	-0.7
SOUTH HARRISON TWP	40.9	41.9	41.3	40.6	-3.2	-3.1	41.8	-3.5	-3.6
STRATFORD BORO	42.9	43.7	43.2	42.8	-1.3	-1.0	44.1	-1.3	-1.0
SWEDESBORO BORO	44.3	44.9	44.5	43.5	-1.3	-1.3	44.8	-1.3	-1.4
VOORHEES TWP	39.4	44.6	41.9	41.4	-2.1	-1.8	42.7	-2.2	-1.9
WASHINGTON TWP	37.0	43.2	40.8	40.1	-3.1	-2.9	41.3	-3.4	-3.2
WENONAH BORO	44.5	44.8	44.7	44.2	-0.2	-0.5	45.4	-0.6	-1.0

# Philadelphia International Airport Runway 17-35 Extension Project DEIS

## Computed DNLs in NEW JERSEY

LOCALITY	2003 No Action DNL			2007 No Action Avg. DNL	Alt. 1 Change in DNL	Alt. 2 Change in DNL	2015 No Action Avg. DNL	Alt. 1 Change in DNL	Alt. 2 Change in DNL
	Ranges		Average						
	From..	To...							
WEST DEPTFORD TWP	45.0	65.3	50.2	50.6	0.7	0.2	51.7	0.6	-0.1
WESTVILLE BORO	49.8	55.4	51.9	51.5	-0.3	-0.2	52.9	-0.3	-0.2
WILLINGBORO TWP	29.8	32.3	31.0	30.9	-4.5	-4.3	32.0	-4.9	-4.6
WINSLOW TWP	28.5	38.3	34.4	33.5	-5.4	-4.9	34.7	-5.7	-5.3
WOODBURY CITY	45.2	47.5	46.1	45.8	-0.2	0.2	46.9	-0.4	0.0
WOODBURY HEIGHTS BORO	45.2	45.4	45.3	44.9	0.4	0.6	46.1	-0.2	0.1
WOOLWICH TWP	41.7	46.4	44.2	43.2	-1.6	-1.5	44.5	-1.6	-1.7

17TH DISTRICT  
CONSTANCE H. WILLIAMS



Senate of Pennsylvania

COMMITTEES

DEMOCRATIC CHAIR  
COMMUNICATIONS AND TECHNOLOGY  
AGING AND YOUTH  
EDUCATION  
FINANCE

PENNSYLVANIA PUBLIC TELEVISION  
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ARTHRITIS AND OSTEOPOROSIS CAUCUS  
SENATE FIREFIGHTERS AND EMERGENCY  
SERVICES CAUCUS  
JOINT HOUSE AND SENATE AUTISM CAUCUS

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WEBSITE: [www.pasenate.com/cwilliams](http://www.pasenate.com/cwilliams)

December 6, 2004

Susan L. McDonald  
Environmental Specialist  
Federal Aviation Administration  
Harrisburg Airports District Office  
3905 Hartzdale Drive, Ste. 508  
Camp Hill, PA 17011

Dear Ms. McDonald:

Thank you for your Nov. 26<sup>th</sup> response to my earlier letter concerning the Philadelphia Runway 17-35 Extension Project and for sending the executive summary and a compact disc of the DEIS and technical studies to my office. I will take a closer look at these items.

I write to you today regarding a subsequent meeting, which was held on Dec. 1st in the Lower Merion Township Building. Calvin M. Davenger Jr., Deputy Director of Aviation and Planning and Environmental Stewardship Division of Aviation at Philadelphia International Airport and an airport consultant were in attendance to answer questions on the expansion project. Following the meeting, I again heard from constituents about the issues of sound and air pollution, as well as frequency of flights over the Main Line if the project moves forward. I remain concerned that while technical studies may indicate that these are not problem areas, residents are not having their questions about these particular issues addressed directly by FAA officials.

I propose that the FAA meet directly with residents of the impacted communities once again and respond to their questions and concerns. Short of that, I would ask that you provide direct responses to the issues posed to me and to other elected officials by Ross Engelman in the e-mail that I will attach to this letter. These concerns are representative of numerous residents in my Legislative District.

While this may seem a tedious exercise to you, I can assure you it is a serious concern for everyone who lives in the area who potentially will be affected by the Runway 17-35 Extension Project. As their state Senator, I am committed to ensuring their needs are served and their concerns addressed.

Sincerely,

*Connie Williams*

Constance H. Williams  
State Senator  
17<sup>th</sup> District

CHW/eahb

Cc: Congressman Arlen Specter  
Congressman Rick Santorum  
Congressman Jim Gerlach  
Congressman Curt Weldon  
Representative Kathy Manderino  
Representative Greg Vitali  
Representative Daylin Leach  
Representative Mike Gerber  
Doug Cleland, Lower Merion Township Manager  
Mike English, Haverford Township Manager  
Ross Engelman

Attachment

>>> "Engelman, Ross" <Ross.Engelman@ironmountain.com> 12/03/04 08:09AM >>>  
To:

The Entire Board of Commissioners, Lower Merion Township (via [etrainer@lowermerion.org](mailto:etrainer@lowermerion.org) <<mailto:etrainer@lowermerion.org>> )  
Congressman Gerlach (via [Bill.Tighe@mail.house.gov](mailto:Bill.Tighe@mail.house.gov) <<mailto:Bill.Tighe@mail.house.gov>> )  
State Representative Connie Williams

From: Ross Engelman, Resident of Bryn Mawr

I would like to give you my thoughts on the meeting last night with the representatives from Philadelphia International Airport regarding the proposed extension of PHL runway 17-35:

First of all, I feel that it would have been far more effective for the residents to be able to voice our concerns and questions directly to the Airport officials, so that we could finally get real answers. Additionally, given our lengthy involvement, members of our community coalition have far more understanding and details of the 17-35 proposal than the Board of Commissioners have been able to develop yet. I was greatly disappointed that, once again, nobody from the FAA or Airport will directly answer our residents most pressing concerns!

The airport officials presented the information from a point of view that is very biased towards the airports' and FAA's position. They did not give you the detailed facts, the real story, as to what the real impact could be to Lower Merion Township.

Based on our research on detailed information provided directly by the FAA, the concerns are summarized as follows:

Sound impact:

- A 737 jet directly overhead at landing altitudes can have a sound level of 85-96 (decibels) (Otherwise know as the single point load occurrence)
- A turbo prop at this same altitude is about 60db
- To give you a point of reference, a diesel train passing by at 45 mph is 83db, put your head next to a lawnmower and it is about 96db
- These jet planes that will be landing will be far noisier than our current turbo prop traffic, and way too loud for this densely populated a residential area
- The FAA and airport, after repeated requests, will conveniently NOT give the above single point occurrence values I listed above. Even though this is critical information to convey to the communities involved for us to

honestly assess the impact. So we had to find the attached study and buy sound meters to measure this for ourselves.

- The FAA only tells you the DNL level which is the average daily decibel level for Lower Merion. This number is useless to really convey the impact and disturbance that could occur here if the extension goes through. Don't be fooled by this DNL number as it is a way to confuse everyone and push through what the FAA wants.

Frequency:

The FAA gives the frequency information in Average Daily Operations. This gives the absolute lowest level, best case scenario of potential traffic, instead of the peak traffic that we could expect on a normal Tuesday with Northern Operations. I am giving the Peak Levels of Commercial and Regional Jet traffic extrapolated from the FAA EIS document (Table 3-11) so you can see the real potential frequency of flights below.

I discussed this extrapolation with the Noise Officer of the Airport for reasonableness and can explain where it came from in an honest and open discussion with anyone from FAA or the Airport, when (and if) they are ready to be forthright.

Given what we have modeled, I hope I am wrong because the numbers are disturbing:

Extension	17-35 Extension	No Extension Alternative	17-35
Alternative-1	Alternative-2		
- Peak Daytime Jet Arrivals 78		2	174
- Peak Cargo Jet Arrivals ?		?	?
- Peak Nighttime Jet Arrivals 13		0	21
- Peak Total Jet Arrivals 91		2	195
- Peak Daytime Departures 117		0	91
- Peak Cargo Jet Departures ?		?	?
- Peak Nighttime Departures 12		0	10
- Peak Total Departures 129		0	101

So not only will the planes be much louder than the turboprops that we have now, there will be substantially more of them as well. Can you imagine almost 200 jet planes at 90db landing over the Main Line vs. only 2 if no extension is done! That is about 1 every 90 seconds for almost 5 hours straight. The people from the airport (and the FAA) presented a very one sided view of this potential volume in showing you the best case scenario volume, instead of the worst case volume! Somebody please prove me wrong on this.

Additionally, we found out last night, from the airport officials, that the volumes above do not include cargo jet traffic that could now use those runways. Stay tuned on that one.

I approached the airport officials outside the meeting last night with this volume and sound information. I described how they did not convey the potential real case vs. the best case scenario. I also asked if they could see where we would have a concern if the above volumes and sound levels were true. Their answer was "Yes". That was the first time I have ever gotten a truthful answer from these guys. Unfortunately, I wish the answer really could be different.

#### Pollution:

There was no mention of the increase in air pollution in our area with 200 jet planes landing under the 3,000 foot level in our neighborhood vs. only 2 jets. Jets give off far more pollutants than turbo prop planes. Jet fumes under 3,000 foot altitude are considered in the mixing zone where it will impact our community's air quality. My sense is that it is likely that our air pollution will get much worse rather than much better.

#### Delay improvement and cost:

According to the EIS the extension of the runway will be a temporary solution and only save from 4 - 6 minutes of delay on flights that last on average 2.5 - 3 hours. Add in time to get through security, get your luggage, etc. and this is 4 - 6 minute savings on a 5 hour event.

This will cost the taxpayer between \$36 million and \$56 million for the "Temporary Solution". What a deal! Why are we wasting our money on a solution that the airport controllers don't even want vs. investing in more parallel runways, and flight paths over the river, which will not impact Montgomery County and probably improve the quality of life for the people in the other current direct flight paths?

#### Compromise:

I asked the question last night of the airport officials if we could reach a compromise: Would they be willing to curtail flight operations landing on 17 and taking off from 35 to the hours of 8 am to 5.30 pm on Monday through Friday, so at least we could have some level of relief. This would meet their needs of off-loading the peak period wait times onto this runway. They even admitted that they currently have a noise abatement program in place where there are no flights arriving on runway 17 between the hours of 11 pm and 6 am already.

Their answer was a well rehearsed one, but not an accurate response to the question. "We cannot dictate to the airlines what hours the airline carriers will operate under". That is correct but does not answer the question. The airport CAN dictate what runways where airlines take off and land on and CAN dictate that the current noise abatement be extended to the hours and days above that I have listed. This is yet another example of a level of arrogance and evasion that is indicative of the FAA and Airports response to anything that resembles a real question.



Summary:

So, in summary, there could be almost 200 jet planes, sounding like a train at 45 mph, polluting our community, directly over our heads instead of none currently. Apparently that is considered as no impact to our community under the FAA guidelines.

Or there could be no jets or very little - if we do something.

Can someone answer me as to how do we, as impacted residents, ever get a fair opportunity to ask these questions first hand and actually get an answer? Additionally, how do we, as the impacted residents and taxpayers, change this decision?

I would ask you, as our elected officials, to demand a forum where all of this is discussed by informed residents, face to face with the FAA and airport, and have them actually give us answers before any decision is made to extend the runway 17-35. I also ask that you each let me know how, through our elected officials, we can change this decision (which seems already to be a done deal). Please let me know when that can occur and please allow our community group to have input into the format of that meeting.

Thank you all very much for your time. I'm just trying to keep my community a great place to live.

Regards,

Ross Engelman  
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## Letter 13

## Pennsylvania State Senate - Senator Constance Williams

Comment Number	Comment	Response
13.1	First of all, I feel that it would have been far more effective for the residents to be able to voice our concerns and questions directly to the Airport officials, so that we could finally get real answers. Additionally, given our lengthy involvement members of the community coalition have far more understanding and details of the 17-35 proposal than the Board of Commissioners have been able to develop yet. I was greatly disappointed that, once again, nobody from the FAA or Airport will directly answer our residents most pressing concerns!	The FAA has held a series of public information meetings during preparation of the DEIS, as described in Chapter 1 of this EIS. There have been significant opportunities for the public to ask questions of FAA and City officials. In addition, the project has a website to allow the public to submit questions to the FAA.
13.2	The airport officials presented the information from a point of view that is very biased towards the airports' and FAA's position. They did not give you the detailed facts, the real story, as to what the real impact could be to Lower Merion Township.	The FAA is not aware of the information the commentor is referring to. The EIS provides the detailed information on environmental impacts of the proposed project, and accurately assesses the potential for impacts to Lower Merion Township. As the EIS documents, there will be no significant increase in noise in Lower Merion or any other community within the study area.
13.3	These jet planes that will be landing will be far noisier than our current turbo prop traffic, and way too loud for this densely populated a residential area.	<p>As documented in Chapter 2 of this EIS, the shift from turbo props to regional jets will occur even if no action is taken. Noise impacts as a result of the Proposed Action were assessed in accordance with FAA Order 1050.1E. Noise analysis compares the future No-Action Alternative to the future build scenarios.</p> <p>Figures 4.2-14 through 4.2-17 of this EIS show the changed noise exposure for areas of Pennsylvania that would experience noise exposure from 45 to 60 dB DNL as a result of Alternatives 1 and 2, including Swarthmore.</p> <p>However, it is important to note that while areas in Pennsylvania to the north of the Airport experience increase in aircraft noise exposures, no one in these areas would experience significant noise impact according to criteria established by the FAA in Order 1050.1E. In fact no one in Swarthmore would even fall within the 60 DNL noise contour. While Swarthmore falls in the area with noise levels of 45 to 60 dB, this area would not experience a change as a result of the project of 5 dB or greater. Such a change is considered a slight to moderate impact.</p> <p>Single event noise metrics were addressed in Section 4.2, Noise, of this EIS, and the Appendices of the Noise Technical Report contain tables of computed single event noise metrics for the measurements sites, cultural resources, 4(f) resources, and historic sites. The statement that single noise events "would increase many fold with the expansion project" is not quite right. The number of single noise events would increase over Delaware County insofar as the number of operations on Runway 17-35 would increase. However, the value of a single event noise metric, such as Lmax, evaluated at a given location in the community may not necessarily increase. The actual values of a single event noise metric, like Lmax, would be dependent upon the type of aircraft flying over the location of interest and the position of the aircraft during its points of closest approach to the location of interest.</p>

Comment Number	Comment	Response
13.4	<p>The FAA only tells you the DNL level which is the average daily decibel level for Lower Merion. This number is useless to really convey the impact and disturbance that could occur here if the extension goes through. Don't be fooled by this DNL number as it is a way to confuse everyone and push through what the FAA wants.</p>	<p>FAA Order 1050.1E requires that the DNL noise metric be used to identify the significant impacts. As described in Section 4.2, Noise, of this EIS, additional noise metrics were computed at a large number of noise-sensitive locations in the Study Area including the Night DNL, the Maximum A-weighted Sound Level (Lmax), the Time Above Sound Levels of 65, 75, and 85 dB for a 24-hour day (TA-24), and the Sound Exposure Level (SEL).</p> <p>The last significant governmental review of the use of DNL for determining aircraft noise / land use compatibility in the U.S. was conducted by the Federal Interagency Committee on Noise (FICON) and published in 1992. At that time, the Committee recommended the continued "...use of the DNL metric as the principal means for describing long-term noise exposure for civil and military aircraft operations." [Federal Interagency Committee on Noise, "Federal Agency Review of Selected Airport Noise Analysis Issues," August 1992] Though there are more flights now and greater population densities than when the DNL metric was originally proposed, the development of the original relationship between aircraft sound exposure and effects on people was based solely on sound levels and percent of people affected. Hence, increasing numbers of flights or increasing populations were incorporated to the extent that the increased operations raise the sound levels in terms of DNL in residential areas.</p> <p>This same FICON study also recommended that other metrics, in addition to DNL, be used to help characterize specific noise effects. These additional or "supplemental" metrics were to be used at the discretion of the agency as an aid "...to determine noise impacts at specific noise-sensitive locations...." [FICON, 1992] Finally, the FICON report also recommended that if "...noise-sensitive areas will be at or above DNL 65 dB and will have an increase of DNL 1.5 dB or more, further analysis should be conducted of noise sensitive areas between DNL 60-65 dB having an increase of DNL 3 dB or more due to the proposed airport noise exposure." [FICON, 1992] All these recommendations were directed at improving public understanding of the effects of changes in aircraft noise. The current study has made use of these recommendations and provided supplemental metrics and analyses.</p> <p>Any promulgation of standards would be subject to public review.</p>
13.5	<p>The FAA gives the frequency information in Average Daily Operations. This gives the absolute lowest level, best case scenario of potential traffic, instead of the peak traffic that we could expect on a normal Tuesday with Northern Operations. I am giving the Peak Levels of Commercial and Regional Jet traffic extrapolated from the FAA EIS document (Table 3-11) so you can see the real potential frequency of flights below. I discussed this extrapolation with the Noise Officer of the Airport for reasonableness and can explain where it came from in an honest and open discussion with anyone from FAA or the Airport, when (and if) they are ready to be forthright. Given what we have modeled, I hope I am wrong because the numbers are disturbing. So not only will the planes be much louder than the turboprops that we have now, there will be substantially more of them as well. Can you imagine almost 200 jet planes at 90 dB landing over the Main Line vs. only 2 if no extension is done! That is about 1 every 90 seconds for almost 5 hours straight. The people from the airport (and the FAA) presented a very one sided view of this potential volume in showing you the best case scenario volume, instead of the worst case volume! Somebody please prove me wrong on this.</p>	<p>The FAA evaluates the impacts of a proposed project using average annual daily operations, which is not the lowest level but an average day calculated using the actual operations information from the airport. Peak period levels are not used in assessing project impacts by the FAA or any other federal agency, as they do not present a realistic picture of the normal levels of impact. The commentator is incorrect with respect to the number of operations. As Table 4.2-7, 4.2-8 and 4.2-9 show, there will be, on average, 25 arrivals per day on Runway 17 in 2007, which will increase to 30 arrivals per day with Alternative 1.</p>

## Letter 13

## Pennsylvania State Senate - Senator Constance Williams

Comment Number	Comment	Response
13.6	Additionally, we found out last night, from the airport officials, that the volumes above do not include cargo jet traffic that could now use those runways. Stay tuned on that one.	The FAA is not aware of any specific information communicated by Airport officials. The aircraft operations evaluated in the EIS include all operations; dedicated cargo jets, commercial passenger jets, corporate jets, turboprop aircraft, and smaller general aviation aircraft.
13.7	I approached the airport officials outside the meeting last night with this volume and sound information. I described how they did not convey the potential real case vs. base case scenario. I also asked if they could see where we would have a concern if the above volumes and sounds levels were true. Their answer was "Yes". That was the first time I have ever gotten a truthful answer from these guys. Unfortunately, I wish the answer really could be different.	The FAA is unaware of any information communicated by Airport officials. The FAA believes that the information provided in the EIS relative to noise levels and impacts is correct, and was assessed using standard, tested, FAA methods.
13.8	Pollution: There was a mention of the increase in air pollution in our area with 200 jet planes landing under the 3,000 foot level in our neighborhood vs. only 2 jets. Jets give off more pollutants in the mixing zone where it will impact our community's air quality. My sense is that it is likely that our air pollution will get much worse rather than much better.	Aircraft which are taking off are using full thrust and thus are emitting the highest levels of pollutants. This action is called "climbout" in EDMS and the emissions and concentrations presented in the DEIS include these effects explicitly. Aircraft which are landing are using the lowest thrust level that will keep them in the air and thus have relatively low pollutant emission levels. This action is called "approach" in EDMS and the emissions and concentrations presented in the DEIS include these effects explicitly. The impact on ground level concentrations caused by aircraft in flight modes (climbout and approach) has been shown (by others) to be negligible. And, regardless of their thrust setting, the pollutants emitted by the engines are dispersed in the atmosphere very quickly and over such long travel distances that the resulting concentrations are nearly unmeasurable. This means that the highest concentrations from aircraft in flight modes would be lower farther from the airport. Since all of the estimated pollutant concentrations presented in the DEIS are below the NAAQS, the concentrations in neighborhoods farther away from the airport would be lower than those reported in the DEIS.
13.9	Delay improvement and cost: According to the EIS the extension of the runway will be temporary solution and only save from 4-6 minutes of delay on flights that last an average 2.5-3 hours. Add in time to get through security, get your luggage, etc. and this is 4-6 minute savings on a 5 hour event.	The numbers are annual averages, reflecting many on-time flights and some delays that are significantly longer than the stated averages. Alternative 1, the preferred alternative, would result in 1.4 minutes reduction in average annual delay per aircraft in 2007 and 6.5 minutes in 2015. This is a total savings of 12,329 hours annually in 2007 and 66,733 hours in 2015.
13.10	This will cost the taxpayer between \$36 million and \$56 million for the "Temporary Solution". What a deal! Why are we wasting our money on a solution that the airport controllers don't even want vs. investing in more parallel runways, and flight paths over the river, which will not impact Montgomery County and probably improve the quality of life for the people in the other current direct flight paths?	As demonstrated in Chapter 2 of the EIS, there is an immediate need for delay reduction at PHL. The Runway 17-35 Extension project, which would accomplish this goal, is an independent project with independent utility and is not an interim measure. The FAA is also proceeding with the Capacity Enhancement Program (CEP) as defined in Chapter 1 of the EIS. CEP is a long-term, major redevelopment project that would result in additional capacity and, as a result, more comprehensive and longer-term delay reduction. Although many persons north of the airport favor one of the CEP alternatives that would construct additional parallel runways, those alternatives could have significant adverse effects to the communities located east and west of the airport. The Runway 17-35 Extension Project, as documented in the EIS, will not result in significant adverse effects to any residential areas.

Comment Number	Comment	Response
13.11	<p>Compromise: I asked the question last night of the airport officials if we could reach a compromise: Would they be willing to curtail flight operations landing on 17 and taking off from 35 to the hours of 8am to 5:30 pm on Monday through Friday, so at least we could have some level of relief. This would meet their needs of off-loading the peak period wait times onto this runway. They even admitted that they currently have a noise abatement program in place where there are no flights arriving on runway 17 between the hours of 11 pm and 6 am already. Their answer was a well rehearsed one, but not an accurate response to the question. "We cannot dictate to the airlines what hours the airline carriers will operate under." That is correct but does not answer the question. The airport can dictate that the current noise abatement be extended to the hours and days above that I have listed. This is yet another example of a level of arrogance and evasion that is indicative of the FAA and Airports response to anything that resembles a real question.</p>	<p>There is an existing voluntary noise abatement procedure in place for Runway 17-35. Every attempt is made to limit departures on Runway 35 (to the north) and arrivals on Runway 17 (from the north) between the hours of 11 PM and 6 AM. However, from time to time, the noise abatement procedure may not be used based on operational safety criteria conditions (weather/wind, visibility, volume of traffic, delays, pilot discretion, construction, etc.). This existing noise abatement procedure is voluntary and will remain so in the future. The Part 150 Study further describes the nature of the night time runway use plan. Any permanent access restriction would need to be considered as part of a FAR Part 161 Study, which can only be initiated by the airport sponsor.</p> <p>Philadelphia International Airport is fundamentally an air carrier airport serving combined passenger, cargo, and general aviation needs, all of which produce nighttime operations. However, this EIS is not being conducted for the purpose of evaluating a major change in the nighttime or cargo activity; rather it examines the effects of proposed extensions to a short crosswind runway that will help to reduce delays during heavy demand periods throughout the day. In that context, nighttime operations are still considered sensitive and this EIS addresses them in a variety of different ways:</p> <p>Nighttime operations are summarized by different categories of aircraft in Table 4.2-2 for existing activity levels and again in Table 4.2-6 for projected future alternatives. Appendices B.2, B.3, and B.4 further subdivide the daytime and nighttime operations by aircraft category into landings and takeoffs by stage length (i.e. distance to destination -- an indicator of climb performance). Runway utilizations are also subdivided into daytime and nighttime percentages separately for takeoffs and landings to show how the airport operates differently at night when demand decreases; these are reported in Table 4.2-3 for existing operations and in Tables 4.2-8 through 4.2-13 for the future scenarios, and are subdivided into still greater detail in Appendix C of the DEIS.</p> <p>These operational inputs are then used by the INM to compute not just standard DNL values but a series of supplemental noise metrics that are helpful in interpreting nighttime activity. For example, Table 4.2-20 is a summary of the nighttime portion of total DNL that is attributable to nighttime operations by themselves (referred to as the Nighttime DNL, or NDNL). Values are computed at the measurement locations analyzed in the EIS for each study alternative and each study year, and also at additional noise-sensitive cultural resource locations reported in Appendices G.1 through G.7. Maximum sound levels and maximum SEL values are also computed and reported for each of these sites and are also of use in evaluating sleep disturbance.</p> <p>To help interpret these results, Appendix A of the DEIS presents background information on sleep interference, including the dose-response relationship between indoor SEL and number of awakenings, which has been published by the Federal Interagency Committee on Aviation Noise (FICAN) as a conservative indicator of sleep disturbance. Page 4-31 of the DEIS summarizes the FICAN position and shows how the relationship is useful for interpreting where awakenings are likely to occur. In short, the DEIS presents considerable information on nighttime noise and how it is expected to change with each of the No-Action and Build Alternatives.</p>

## Letter 13

## Pennsylvania State Senate - Senator Constance Williams

Comment Number	Comment	Response
13.12	So, in summary, there could be almost 200 jet planes, sounding like a train at 45 mph, polluting our community, directly over our heads instead of none currently. Apparently that is considered as no impact to our community under the FAA guidelines.	<p>The first statement by the commentor is inaccurate. A review of the flight tracks in Figure 4.3-3 indicates that there are existing aircraft the periodically fly over Lower Merion Township.</p> <p>While the number of aircraft using Runway 17-35 would increase with the proposed action, the noise analysis documented that there would be no significant noise increase as a result of this Project. The magnitude of the change in noise exposure would be less than 5 dB in Lower Merion Township for both Alternatives in both future years of 2007 and 2015. As noted in Section 4.2, Noise, of this EIS, a 5 dB change in noise exposure between 45 and 60 dB DNL is considered a "slight-to-moderate" change by FAA. While a 5 dB increase in noise at these exposure levels is enough to be noticeable and potentially disturbing to some people, the cumulative noise level is not high enough to constitute a significant impact. Changes of this magnitude are not expected to occur in Lower Merion Township as a result of the Project.</p>
13.13	Can someone answer me as to how do we, as impacted residents, ever get a fair opportunity to ask these questions first hand and actually get an answer? Additionally, how do we, as the impacted residents and taxpayers, change this decision?	During the preparation of the DEIS, the FAA held numerous public meetings throughout the Study Area to allow residents the opportunity to ask questions and obtain information about the proposed project, and established a website to share information with the public and allow residents to send questions via email. The purpose of the proposed project is to reduce delay at the Philadelphia International Airport, an action which would have benefits to all users of the airport, and would benefit the regional and national airspace system.



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November 30, 2004

Susan McDonald, FAA Environmental Protection Specialist  
c/o VHB, 101 Walnut Street  
P. O. Box 9151  
Watertown, MA 02471-9151

Dear Ms. McDonald:

Thank you for the opportunity allowing me to make comments regarding the Philadelphia Airports proposed extension of Runway 17-35. I am pleased to voice my opinion and objection to the proposed project to extend Runway 17-35.

Upper Darby Township is approximately fifteen to sixteen miles from the Philadelphia International Airport and I know that the airport is a strong regional economic source for the entire Philadelphia/Delaware County region. Unfortunately, having this runway lengthened to approximately 6,500 or 7,000 feet would have an environmental impact on the municipality which I represent, which is Upper Darby Township.

As I read some of the review statements concerning Runway 17-35, I believe that there are two alternatives. One alternative would bring larger aircraft through the pattern which would greatly increase the current noise level over the entire area of Haverford Township as well as Upper Darby Township. This is unacceptable. Haverford Township has a population of approximately 50,000 people and Upper Darby Township has a population of approximately 84,000 people. Not only are we describing what would be bad for the reason of the environmental impact, but what about the safety of our residents?

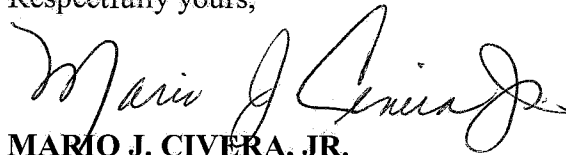
I am well aware of the delays that the FAA is presently trying to correct at the airport. However, it does not appear that either Alternative 1 or Alternative 2 can provide a truly significant drop in current delay times to justify the expense, the increased noise, and the increased traffic which will occur under either plan. I would be greatly interested in obtaining more perspective regarding solutions to delay which have been achieved by other airports that have experienced the same "growing pains" as Philadelphia.

November 30, 2004  
Page 2

I am vehemently opposed to such an approval and it should be denied by the FAA and further studies should be made. To have aircraft fly over heavily populated areas, to my point of view, is extremely dangerous not only environmentally, but in respect to public safety.

Thanking you for allowing me the opportunity to submit my testimony, I am

Respectfully yours,

A handwritten signature in cursive script that reads "Mario J. Civera, Jr." The signature is written in black ink and is positioned above the printed name.

**MARIO J. CIVERA, JR.**  
164th Legislative District

MJC: md



## Letter 14

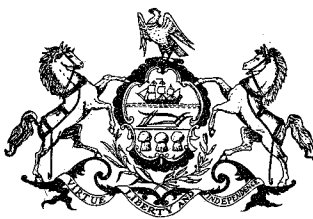
## Pennsylvania House of Representatives - Mario Civera, Jr.

Comment Number	Comment	Response
14.1	One alternative would bring larger aircrafts through the pattern which would greatly increase the current noise level over the entire area of Haverford Township as well as Upper Darby Township. This is unacceptable.	Figures 4.2-14 through 4.2-17 of this EIS summarize the changed noise exposure for areas that would experience aircraft noise levels between 45 and 60 dB DNL, with each alternative and for each future forecast year. As shown in those figures, more areas to the north of the Airport would experience an increase in noise exposure with Alternative 2 than with Alternative 1; however, in those areas that would experience an increase in aircraft noise exposure, the magnitude of the increase would be less than 5 dB in all cases. As noted in Section 4.2 of this EIS, a 5 dB change in noise exposure between 45 and 60 dB DNL is considered a "slight-to-moderate" change by FAA. While a 5 dB increase in noise at these exposure levels is enough to be noticeable and potentially disturbing to some people, the cumulative noise level is not high enough to constitute a significant impact.
14.2	Not only are we describing what would be bad for the reason of the environmental impact, but what about the safety of our residents?	Safety is the FAA's highest priority, and the agency will ensure that the design of the Runway 17-35 Extension Project properly protects the public safety. The Preferred Alternative will meet all FAA safety standards and design criteria. The extended runway will reduce congestion in the current primary east-west operating direction, and will reduce the reliance on Runways 9L/27R and 9R/27L during heavy demand. This will enhance safety.
14.3	It does not appear that either Alternative 1 or Alternative 2 can provide a truly significant drop in current delay times to justify the expense, the increased noise, and the increased traffic which will occur under either plan.	The Runway 17-35 Extension Project reduces delay in the short term to allow more time to evaluate and implement long term delay solution.
14.4	I would be greatly interested in obtaining more perspective regarding solutions to delays, which have been achieved by other airports that have experienced the same "growing pains" as Philadelphia.	Airport delays are caused by a range of factors, including weather, operations at other airports, and scheduling as well as the configuration and capacity of an airport's runways and taxiways. Because each airport has a unique runway configuration, causes of delay - and ways to reduce delay - vary substantially among airports. Logan International Airport recently completed the planning and NEPA process to add a new runway to reduce delays that result from certain weather conditions. O'Hare International Airport has recently published a Draft EIS to solicit public comments on its plan to reduce delays, which includes changes to arrival routes, adding new runways, and changing the runway configuration.
14.5	To have aircraft fly over heavily populated areas, to my point of view, is extremely dangerous not only environmentally, but in respect to public safety.	Safety is the FAA's highest priority, and the agency will ensure that the design of the Runway 17-35 Extension Project properly protects the public safety. The Preferred Alternative will meet all FAA safety standards and design criteria. The extended runway will reduce congestion in the current primary east-west operating direction, and will reduce the reliance on Runways 9L/27R and 9R/27L during heavy demand. This will enhance safety.

**ROBERT W. GODSHALL, MEMBER**  
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## *House of Representatives*

COMMONWEALTH OF PENNSYLVANIA  
HARRISBURG

### COMMITTEES

TOURISM AND RECREATIONAL  
DEVELOPMENT  
MAJORITY CHAIRMAN

INSURANCE  
LEGISLATIVE BUDGET AND FINANCE

November 10, 2004

Susan McDonald  
Environmental Protection Specialist  
Federal Aviation Administration  
Harrisburg Airports District Office  
3905 Hartzdale Drive, Suite 508  
Camp Hill, PA 17011

Dear Ms. McDonald:

I am writing to add my voice to the chorus of individuals and organizations that support extending Runway 17-35 at the Philadelphia International Airport.

As Chairman of the Tourism and Recreational Development Committee of the Pennsylvania House of Representatives, I understand the importance of travel and tourism to economic development. Philadelphia, in particular, has been an excellent example of what increased tourism can do for a city's economy. The tourism infrastructure development of the past 10 years has created jobs, helped revitalize the downtown and increased the public's positive perception of the City of Brotherly Love.

The extension of the runway could help reduce delays at the airport and contribute to the city's ability to promote the area as a convention spot and tourist destination to business and leisure travelers across the nation and around the world. Potential visitors love to hear about places where there are fewer airport delays and a more efficient transportation infrastructure.

Again, I support extending Runway 17-35 and am in favor of a "Build" alternative. Please feel free to contact me if you have any questions or comments.

Sincerely,

A handwritten signature in black ink that reads "Bob".

Robert W. Godshall, Chairman  
Tourism & Recreational  
Development Committee

RWG:jh  
cc: Tom Muldoon, PCVB



**Letter 15****Pennsylvania House of Representatives - Robert Godshall**

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
15.1	The extension of the runway could help reduce delays at the airport and contribute to the city's ability to promote the area as a convention spot and tourist destination to business and leisure travelers across the nation and around the world.	The FAA has noted and considered your comment.

GREG VITALI, MEMBER  
1001 EAST DARBY ROAD  
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PHONE: (610) 789-3900  
FAX: (215) 560-4197

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House of Representatives  
COMMONWEALTH OF PENNSYLVANIA  
HARRISBURG

COMMITTEES

ENVIRONMENTAL RESOURCES AND ENERGY  
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STATE GOVERNMENT  
JOINT LEGISLATIVE AIR AND WATER POLLUTION  
CONTROL AND CONSERVATION  
RECYCLING FUND ADVISORY COMMITTEE

Susan McDonald  
FAA Environmental Protection Specialist  
c/o VHB  
101 Walnut Street  
PO Box 9151  
Watertown, MA 02471-9151

November 30, 2004

Dear Ms. McDonald,

I am writing in opposition to the proposed expansion of Runway 17-35 at Philadelphia International Airport.

The northern end of the runway is about seven miles from Haverford Township, whose residents are concerned about the increased size and number of jet aircraft that would be taking off and landing overtop of the township if the runway is extended to allow its use by more aircraft.

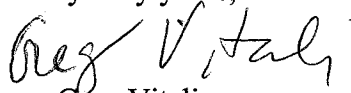
Even without the runway extension, use of Runway 17-35 is already projected to increase from the current 13 percent of all flights to as much as 19 percent of all flights taking off and landing at the airport. The runway extension could push that figure to as high as 26 percent, and would allow jet aircraft of almost any size to use this secondary runway.

The airport has argued that the runway extension is needed to cut down on delay times for arriving and departing flights, which currently average about 10 minutes, and could be as much as 20 minutes by the end of the next decade. However, the Federal Aviation Administration's own estimates suggest that extending Runway 17-35 would reduce these delays by only about 1 to 2 minutes.

The reduction in flight delays that would be realized by extending Runway 17-35 seems negligible when compared to the significant increase in plane traffic – and corresponding noise and air pollution – that Haverford Township and other communities in the runway's flight path would have to endure.

I urge Philadelphia International Airport and the FAA to find an alternative strategy for reducing flight delays at the airport, a strategy that is both more effective for the traveling public, and less detrimental to residents in the communities that surround the airport.

Very truly yours,

A handwritten signature in black ink that reads "Greg Vitali". The signature is written in a cursive style with a large, stylized "G" and "V".

Greg Vitali

166<sup>th</sup> Legislative District

## Letter 16

Pennsylvania House of Representatives - Greg Vitali

Comment Number	Comment	Response
16.1	The airport has argued that the runway extension is needed to cut down on delay times for arriving and departing flights, which currently average about 10 minutes, and could be as much as 20 minutes by the end of the next decade. However, the Federal Aviation Administration's own estimates suggest that extending Runway 17-35 would reduce these delays by only about 1 to 2 minutes.	The numbers are annual averages, reflecting many on-time flights and some delays that are significantly longer than the stated averages. Alternative 1, the preferred alternative, would result in 1.4 minutes reduction in average annual delay per aircraft in 2007 and 6.5 minutes in 2015. This is a total savings of 12,329 hours annually in 2007 and 66,733 hours in 2015.
16.2	The reduction in flight delays that would be realized by extending Runway 17-35 seems negligible when compared to the significant increase in plane traffic--and corresponding noise and air pollution--that Haverford Township and other communities in the runway's flight path would have to endure.	As stated in Section 4.2 of this EIS, there will be no significant increase in noise and air pollution in the surrounding communities as a result of the Proposed Project.
16.3	I urge Philadelphia International Airport and the FAA to find an alternative strategy for reducing flight delays at the airport, a strategy that is both more effective for the traveling public, and less detrimental to residents in the communities that surround the airport.	As described in Chapter 3, a number of alternatives were considered and analyzed for the Project. These alternatives were eliminated because they would not achieve the project's purpose and need.

December 1, 2004

Susan McDonald  
Harrisburg Airports District Office  
Federal Aviation Administration  
3905 Hartzdale Avenue, Suite 508  
Camp Hill, PA, 17011

***RE: Delaware Coastal Management Program review of  
Philadelphia International Airport Runway 17-35 Extension Project (FC#05.001)***

Dear Ms. McDonald,

Upon review of the Philadelphia International Airport Runway 17-35 Extension Project Draft Environmental Impact Statement, the Delaware Coastal Management Program (DCMP) offers the following comments:

1. Although recognized as the industry standard by the FAA, the Day Night Logarithm (DNL) measurement is difficult to decipher and only presents yearly average measurements of noise level changes. The DCMP encourages the FAA to provide detailed noise measurements for each monitoring location in Delaware, including maximums for representative single events and monthly averages for peak periods. Modeling data presented in the Runway 17-35 Extension Project Draft Environmental Impact Statement was verified by "short-term" monitoring (1.91 days) on Parish Avenue in Brandywine Hundred and "long-term" monitoring (12.87 days) on Lancashire Drive also in Brandywine Hundred. The monitoring took place during a slow travel period, the latter two weeks of January 2004, which may not be representative of typical air traffic flight patterns and density. We do not feel that these monitoring efforts are an adequate quality control check of the noise model and we respectfully request a more concentrated effort to assess noise impacts in Delaware particularly for the upcoming Capacity Enhancement Project.
2. Longer term noise monitoring technology should be utilized south of Philadelphia Airport within the Brandywine intercept flight path in Arden, Delaware and Brandywine Hundred,

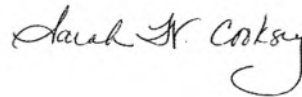
Delaware. Installation of longer term noise monitors and collection of data should begin as soon as possible to assess noise levels and trends for the upcoming Capacity Enhancement Project.

3. The No Action Alternative and Alternative 1 require a ship notification procedure whereby arrivals on Runway 35 may be halted for a period of 15 minutes, up to 4 times per day. The U.S. Army Corps of Engineers has proposed to deepen the main channel of the Delaware River from its current depth of 40 feet to 45 feet. The additional 5 feet depth may result in an increase in the number and size of ships utilizing the Delaware River in the vicinity of the airport. The DCMP suggests that each alternative be evaluated to determine what impact if any this may have on projected delays and possible safety issues.

The DCMP anticipates having the above questions addressed in the Final Environmental Impact Statement for Runway 17-35. We will determine if this project is consistent with our federally approved coastal management program upon receipt and review of the Final EIS.

If you have any questions regarding these comments please do not hesitate to contact me at (302) 739-3451.

Sincerely,



Sarah W. Cooksey, Administrator  
Delaware Coastal Management Program

SWC/tka

cc: File 05.001  
Frank Cianfrani-USACE  
Stan Lulewicz-USACE  
Cheryl Semmel- Governor's office  
Andrea Kriener-Governor's office  
Bill McGlinchey- Chairperson, PHL Action Group



## Letter 17

## Delaware Coastal Management Program - Sarah Cooksey

Comment Number	Comment	Response
17.1	The Day Night Logarithm (DNL) measurement is difficult to decipher and only presents yearly average measurements of noise level changes. The DCMP encourages the FAA to provide detailed noise measurements for each monitoring location in Delaware, including maximums for representative single events and monthly averages for peak periods.	The analysis of noise impacts presented in this EIS uses the FAA standard methodology, which compares noise impacts based on the DNL. In addition, FAA voluntarily considered other measures of noise to provide a more complete picture of the changes in the noise environment associated with the proposed project. The analysis (Section 4.2) demonstrates that the proposed project would not increase noise over northern Delaware. At the request of residents of the Ardens, temporary noise monitoring was conducted at two locations in the state of Delaware during a two-week period in January 2004. Those two sites are identified as LT-4 and ST-9 in this EIS. Because those two sites were considered to be not applicable to the Runway 17-35 Extension Project, certain noise measurement data (such as Aircraft DNL and measured single event noise metrics) were not reported for those sites. Sites LT-4 and ST-9 are considered applicable to the upcoming Capacity Enhancement Program (CEP) EIS. Additional noise measurement data for those sites will be reported in the CEP EIS.
17.2	Modeling data presented in the Runway 17-35 Extension Project Draft Environmental Impact Statement was verified by "short-term" monitoring (1.91 days) on Parish Avenue in Brandywine Hundred and "long-term" monitoring (12.87 days) on Lancashire Drive also in Brandywine Hundred. The monitoring took place during a slow travel period, the latter two weeks of January 2004, which may not be representative of typical air traffic flight patterns and density. We do not feel that these monitoring efforts are an adequate quality control check of the noise model.	FAA relies on modeling to provide an appropriate and consistent basis for comparison of the effects of the projected No-Action Alternative and proposed conditions. The INM has been tested and verified to accurately project existing and future conditions. Actual monitoring data are provided for information and does not allow FAA to forecast any potential impacts. The noise analysis that will be conducted for the CEP will analyze changes in the noise environment in northern Delaware.
17.3	Longer term noise monitoring technology should be utilized south of Philadelphia Airport within the Brandywine intercept flight path in Arden, Delaware and Brandywine Hundred, Delaware.	The noise analysis was conducted in accordance with FAA standards. Long-term noise monitoring would not provide a more accurate assessment of future noise levels.
17.4	The No Action Alternative and Alternative 1 require a ship notification procedure whereby arrivals on Runway 35 may be halted for a period of 15 minutes, up to 4 times per day. The U.S. Army Corps of Engineers has proposed to deepen the main channel of the Delaware River from its current depth of 40 feet to 45 feet. The additional 5 feet depth may result in an increase in the number and size of ships utilizing the Delaware River in the vicinity of the airport. The DCMP suggests that each alternative be evaluated to determine what impact if any this may have on projected delays and possible safety issues.	Ship height is restricted by bridges, not channel depth.



# State of New Jersey

Department of Environmental Protection

**Environmental Regulation  
Office of Pollution Prevention and Right To Know  
401 E. State St., 3<sup>rd</sup> floor, Trenton, NJ 08625-0423  
Tel. (609) 292-3600  
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Richard J. Codey  
*Acting Governor*

Bradley M. Campbell  
Commissioner

November 18, 2004

Ms. Susan McDonald  
Federal Aviation Administration  
Harrisburg Airports District Office  
3905 Hartzdale Drive  
Suite 508  
Camp Hill, PA 17011

**RE: Philadelphia International Airport  
Runway 17-35 Extension Project  
Draft EIS Comments**

Dear Ms. McDonald:

The Office of Permit Coordination and Environmental Review of the New Jersey Department of Environmental Protection (NJDEP) has completed its review of the Draft Environmental Impact Statement (EIS) for the proposed Runway 17-35 Extension Project at the Philadelphia International Airport. Our review has concluded that we concur with finding of the document that the proposed project will have no significant environmental impacts to the State of New Jersey.

Thank you for the opportunity to review the Draft EIS.

Sincerely,

Kenneth C. Koschek  
Office of Permit Coordination and  
Environmental Review

**Letter 18****New Jersey Dept. of Environmental Protection - Kenneth Koschek**

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
18.1	The Office of Permit Coordination and Environmental Review of the New Jersey Department of Environmental Protection (NJDEP) has completed its review of the Draft Environmental impact Statement (EIS) for the proposed Runway 17-35 Extension Project at the Philadelphia International Airport. Our review has concluded that we concur with finding of the document that the proposed project will have no significant environmental impacts to the State of New Jersey.	The FAA has noted and considered your comment.



Pennsylvania Department of Environmental Protection

2 East Main Street  
Norristown, PA 19401  
November 30, 2004

**Southeast Regional Office**

Phone: 484-250-5940  
Fax: 484-250-5951

Ms. Susan McDonald  
Federal Aviation Administration  
Harrisburg Airports District Office  
3905 Hartzdale Drive, Suite 508  
Camp Hill, PA 17011

Re: Draft Environmental Impact Statement for  
Philadelphia International Airport Runway  
17-35 Extension Project, Dated October 2004

Dear Ms. McDonald:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and the July 2003 Interagency Streamlining Agreement, we have reviewed the Draft Environmental Impact Statement (DEIS) for the Runway 17-35 Extension Project at Philadelphia International Airport ("PHL").

The DEIS describes the City of Philadelphia's proposal to extend an existing crosswind runway at PHL to facilitate its use by more and larger aircraft. The City and FAA consider this proposal to be part of a significant effort to address an increasingly severe capacity and delay problem at PHL. According to the city's Master Plan, the extension of Runway 17-35 is intended to provide near-term delay reduction. It is to be followed by a more comprehensive redesign of the airport's runways and other airside resources, which will be intended to provide long-term delay reduction. This larger project, known as the Capacity Enhancement Project, will undergo a separate Environmental Impacts Analysis, scheduled to begin following the selection of a Preferred Alternative for the Runway 17-35 Project.

From March through August of 2004, the Department of Environmental Protection (DEP) has reviewed and provided written commentary on a number of preliminary work products for the DEIS in accordance with the Streamlining Agreement that was signed by FAA, DEP, and the other resource agencies in July 2003. We appreciate the time and attention that FAA has taken to incorporate our comments into the DEIS. We view the DEIS as an important step in the ongoing coordination between agencies, which will continue into the preparation of a Final Environmental Impact Statement (FEIS), and also in any coordination and permitting that will be required to implement the preferred alternative. We look forward to continuing this cooperative working relationship as we move into the agency review process for the Capacity Enhancement Project.

This letter contains DEP's comments on the October 2004 DEIS. Our comments cover a wide range of issues, including some that are intended to improve future regulatory coordination during design and construction, and some that are merely editorial. The comments appear in an order that corresponds to the way the DEIS is organized. For each of our comments, we have tried to provide a reference in terms of the section and also the page of the corresponding language in the DEIS.

### Section 1. Introduction and Background

Table 1-2 on page 1-8, titled "Permits or Approvals" contains some inaccuracies concerning DEP permit requirements. Neither of the first two bullet items in the "PADEP" section ("*Groundwater Discharge Permit*," and "*Dewatering Permit*") is necessary to include in this Table as a separate item. As discussed further in comments below, DEP intends to handle the issue of managing groundwater from construction dewatering in the context of the NPDES Permit for Stormwater Discharges Associated with Construction Activities (the fifth bullet item in Table 1-2, which should remain in the Table). We note that the Text of the DEIS contains numerous references to this issue of groundwater discharge which are in error. The incorrect statements that we found within the DEIS are described in the comments below, within the *Water Quality*, *Hazardous Materials and Solid Waste*, and the *Construction* sections.

The third bullet item in the same section of Table 1-2, which reads "*Water Quality Standards Compliance*," may not be necessary. All activities, whether or not they require a DEP permit, are required to comply with Water Quality Standards. However, there is no separate review or action that is specifically represented by this statement. By contrast, the last three items in this section of the Table ("*Joint Permit*," "*Chapter 102 Permit*," and "*Chapter 106 permit*") should remain in the Table, since they are the applicable permitting requirements under DEP's regulatory authority.

### Section 3.4.2. Screening of Preliminary Alternatives; Alternative C3 – Peak Period Pricing

DEP was encouraged that Peak Period Pricing, a "demand management" strategy, was addressed in this EIS process. In general, DEP wishes to express support for the idea of considering "demand management" measures as part of the long-term solution to delays at PHL.

### Section 4.5. Air Quality/Environmental Consequences – Direct Impacts

The emissions modeling that was done for aircraft sources was apparently done using an average annual taxi/queue time (expressed in minutes per operation), by assigning that same time to the taxi/idle operating mode for all operations for the year (Appendix B "Aircraft Data" of Appendix A.2 "Air Quality Technical Appendix"). This method does not account for any differences between aircraft types. The Department believes that small planes, which are more likely to utilize 17-35 under all scenarios, and particularly under the "build" scenarios, may in fact, have significantly different taxi/idle times as a category, as compared to the larger jets. Small planes also have very different pollutant emission profiles during the taxi/idle mode as compared to large jets. We believe that accounting for

these differences may have significant consequences on the modeled annual emissions. Therefore, we believe it is necessary to re-calculate the pollutant emissions by alternative ("tons per year") using a method that accounts for the different taxi/idle times of different kinds of aircraft, which are a consequence of the lower-than-average taxi/idle times for operations that utilize Runway 17-35. This would result in a more reasonable and realistic assessment of the impacts under each of the future scenarios.

#### Section 4.7.2. Water Quality / Affected Environment

On Page 4-81, the DEIS contains a list of the water quality classifications that apply to the major water bodies adjacent to the Airport, and this list contains an error. Please be advised that "TSF" is not a classification that applies to this area. We acknowledge that within Chapter 93, Drainage list G contains a stream segment on the Darby Creek, given as "Non-Tidal Portion of Main Stem, PA 3 Bridge to Mouth," to which the TSF classification applies. However, the downstream limit of this segment is considered to be the head of tide, which is near the confluence of the Darby and Cobbs Creeks, several miles upriver from the PHL discharges. Because stormwater from the airport discharges to the tidal portions of the basin, only WWF and MF classifications apply.

On page 4-84, there is some discussion of Regional Groundwater Quality and Local Groundwater Quality, but we feel that this discussion is incomplete. The discussion of groundwater degradation by elevated iron, manganese, and sulfates should be expanded to include a statement indicating how this issue could impact the proposed project. DEP believes that large scale, untreated discharges of groundwater from this area during construction activities could result in the precipitation of insoluble oxides of iron, which could potentially cause an aesthetic pollution problem and violations of water quality standards in the receiving waters. This circumstance leads to the need for a groundwater management strategy to be applied to construction dewatering, as discussed later in the DEIS.

On page 4-85, we find the description of the ways in which taxiways, runways, and ramps are deiced to be confusing (See the language "... *when temperatures are at or above 25 degrees . . .*," and "*when temperatures are at or above 20 degrees . . .*"). We request that this paragraph be reviewed to make sure it is accurate, and revised if necessary.

#### Section 4.7.3. Water Quality/Environmental Consequences

On page 4-88, there is a reference to DEP's earlier comment concerning the projected loss of operational capability for oil spill containment and recovery if CMC-3 and CMC-4 are completely enclosed. We return to this issue now because we consider it to be a secondary impact of the project whose importance should not be overlooked. Oil spill containment and recovery requires large areas of water surface to be accessible. When CMC-3 and CMC-4 are no longer open channels, any large spill (several hundred gallons or more) at the terminal area would need to be contained and recovered off airport property, at the Mingo Creek stormwater basin. This change adds some complexity to the issue

of contingency planning and spill response, because it would require coordination with the Philadelphia Water Department, who owns the Mingo property. We acknowledge that Section 4.7.4 addresses this point; however, please note that Table 4.7-2 should be revised; the mitigation measure for Potential Oil/Hazardous Waste Spill should be changed from "*SPCC/PPC Plan Implementation*" to "*SPCC/PPC Plan Revision*," because the Plan(s) would need to be revised.

#### Section 4.7.4. Water Quality/Mitigation

On page 4-92, in the section headed "Water Quality Measures," the first paragraph lists a number of measures that could be used to mitigate the water quality impacts of this project. The Department supports the implementation of any and all such mitigation measures provided that such implementation does not cause or contribute to a violation of some environmental requirement or standard. We note that despite laudable efforts at PHL to capture and control the discharge of aircraft deicing fluids, a considerable quantity of deicer continues to discharge from the airport to the Delaware estuary. The extension of Runway 17-35 would have the effect of increasing the amount of such material discharged.

#### Section 4.11.1. Threatened and Endangered Species/Introduction

The second paragraph on page 4-124 is incorrect. This paragraph will need to be revised. Chapter 102 [Section 102.6(a)(2)] does provide some protection for habitats of threatened or endangered species, but not in the manner described. Chapter 105 [Section 105.17(1)(i)] provides that wetlands that are habitat for threatened and endangered species are to be considered "exceptional value wetlands" within the context of this Chapter. However, please note that there is no connection between such "exceptional value wetlands" and the "exceptional value waters" that are defined and protected by provisions of Chapter 93. We believe that it would be appropriate for this section to list the protections given in both Chapters 102 and 105, to provide the regulatory context. There is no need to cite Chapter 93.

#### Section 4.11.3. Threatened and Endangered Species/Environmental Consequences

Page 4-128 contains a minor typographic error in the first paragraph of Section 4.11.3. The reference to "Table 4.11-3" needs to be changed to "Table 4.11-4."

#### Section 4.12.1. Wetlands and Waterways/Introduction

The final paragraph of the Section titled "Regulatory Context" (the paragraph appears on page 4-138) is incorrect concerning the relationship of Chapters 102, 105, and 93 to this subject. Please see the comments above concerning Chapter 102 and Chapter 105 as they relate to the protection of Threatened and Endangered Species and their habitat. Chapter 93 has no significant role in this context.

#### Section 4.12.4. Wetlands and Waterways / Mitigation

On page 4-149, there are two errors of reference. The second paragraph on that page opens with the following sentence: *"Three crossing locations were evaluated, as described in Table 4.12-3 below."* That reference is to the wrong table. The Table that should be referenced here is Table 4.11-5. Also, in the subsequent paragraph, the reference to *"Table 4.11-4"* should be changed to *"Table 4.11-5."*

On page 4-149, in the section headed *"Mitigation Measures,"* in the second paragraph of that section, a sentence should be added to clarify the following: If it is determined that any wetlands will be impacted by the new crossing of SEPD-2, then the Pennsylvania regulations (Section 105.20a) would require a replacement ratio of 2:1, because of the fact that wetlands in this area are used by the threatened Red-bellied turtle.

#### Section 4.12.5. Wetlands and Waterways / Regulatory Coordination and Required Permits

We noted some omissions in Table 4.12-3 on page 4-151. In Section E. of that Table, Pennsylvania Department of Conservation and Natural Resources (DCNR) should be listed as an agency for review, since they are consulted concerning impacts to threatened and endangered plants. In Section J. of that Table, it should be noted that, because Philadelphia County does not have its own Conservation District, DEP does the Erosion and Sedimentation Plan review for projects in Philadelphia County.

Footnote "(228)" on page 4-151 contains a typographic error. The reference given in the text (correctly) is to 25 Pa. Code Chapter 105, Section 105.16. Therefore, the footnote should be to Chapter 105, not Chapter 93.

#### Section 4.15.3. Hazardous Materials and Solid Waste/Environmental Consequences

There is an issue that is not addressed in the DEIS, but which should be addressed, in our opinion. Furthermore, we suggest that it would be most appropriate to mention it in this section. We are concerned about the importation of a large volume of fill in order to re-grade the runway and taxiway extensions, and about the potential for that fill to contain environmental contaminants. According to the "Floodplains" section of the EIS, either of the "build" alternatives would require the placing of (at least) approximately 50,000 cubic yards of new fill. While the DEIS uses the term "clean fill" when addressing this subject, DEP suggests that it may be unreasonably optimistic to assume that this volume of clean fill will be readily available. The EIS should anticipate the possibility that PHL and/or their construction contractor will propose to use fill that is not assuredly "clean." We make this comment based on past experience with similar circumstances, including with the construction of Runway 8-26 at PHL. DEP may request the right to review the characteristics of such fill materials, and to approve their use. If, for example, there is a question about whether it would be acceptable to use Delaware River dredge material, our response would be that such materials would need to be assessed according to the



applicable DEP policy. In this case, the applicable policy is the "Management of Fill" policy (this policy is referenced in the DEIS; see Section 4.15.4, and footnote "(198)" on page 4-179). While it may be too early for any determination to have been made about where the needed fill would be obtained, we still believe that this contingency should be addressed in the DEIS. If possible, an attempt should be made to list the possible sources of appropriate material.

#### Section 4.15.4. Hazardous Materials and Solid Waste / Mitigation

On page 4-177, under the section heading "Coordination with PA DEP," appears the following: ". . . the PA DEP will be contacted prior to any construction to develop procedures and response plans in accordance with PA DEP and Act 2 regulations." This language seems to suggest that it will be DEP's responsibility to develop the procedures and response plans. In order to correct this, we suggest changing the section to read: ". . . the PA DEP will be contacted prior to any construction, and the project sponsor will develop procedures and response plans in accordance with PA DEP guidance and Pennsylvania regulations."

On page 4-178, in the section headed "Preliminary Investigations," we would like to suggest two changes to make the meaning of the section clearer. First, in the first bullet item, it is not clear what is meant by the use of the term "fill." The reference in the second sentence to "excavated excess fill" suggests that the section is meant to deal with existing site soils that may be excavated or borrowed for placement elsewhere on the site. If this is the intent, then we suggest some clarifying language be added, or the word "fill" be replaced with another term, because the word "fill" has too many other meanings in the context of this project. Suggested alternatives for this paragraph may include "on-site soils" or "historical fill." We include this comment because we are concerned to avoid any potential confusion between the characterization and use of on-site soils (some of which may be "fill" that was placed at some time in the past) and the characterization and use of fill that is imported from offsite to complete this project. Secondly, in the second bullet item, we suggest removing an ambiguity by changing the first sentence from "*A reasonable subsurface investigation of areas potentially excavated . . .*" to "*A reasonable subsurface investigation of areas to be excavated . . .*"

On page 4-179, in the section headed "Contaminated Groundwater Management," there are some inaccuracies. We strongly suggest changing the second sentence, which begins "*If excavation dewatering is to occur in an area of groundwater contamination . . .*" We believe that this sentence is potentially misleading. In our June 18, 2004, comment memo on the Water Quality Technical Report, we indicated to VHB that we believe that all parts of the Runway 17-35 project area should be considered potentially problematic from the standpoint of groundwater contamination. Our concern is as much with the potential presence of reduced ferric iron as it is the potential presence of classic groundwater contaminants such as organic chemicals. Thus, while the proximity of an excavation area to a known release site would be of some interest, it would not be the only reason to be concerned about groundwater quality.

Furthermore, the third sentence of the section is incorrect, because DEP does not intend to use a "Temporary Discharge Approval" letter to coordinate these activities. Instead (per our June 18, 2004, memo to FAA and VHB), we would like for the project sponsor (or contractor) to provide technical information on the control of groundwater contaminants along with the application for the NPDES permit for the discharge of stormwater from construction activities (Chapter 102 permit). After reviewing such information, DEP would then approve any required discharges of groundwater as a special condition within the Chapter 102 permit (We appreciate and support that the DEIS includes an option to consider discharging such flows to the POTW).

On page 4-180, in the section headed "Underground Storage Tank Removals," the first sentence may need to be modified. While it may be true that the closing of the six USTs at the Exxon Service Station should be performed "by the tenant," the closure of any unknown USTs encountered during construction may need to be performed by the project sponsor, and not necessarily by a tenant.

#### Section 4.15.5. Hazardous Materials and Solid Waste/Regulatory Coordination and Required Permits

On page 4-182, under the section headed "Pennsylvania Department of Environmental Protection Regulations," there is another incorrect reference to the "Temporary Discharge Approval" letter. As indicated in comments above, this is not the way DEP intends to administer the issue of excavation dewatering. Instead, this will be addressed by the NPDES permit for the discharge of stormwater from construction activities (Chapter 102 permit).

We found at least three additional places where DEP's intended construction dewatering approval process is incorrectly described. These are located on pages 4-187, 4-195, and at the bottom of 4-197 to the top of 4-198. These should all be changed. We also note that a more correct treatment of the issue has been included within Appendix A-11 (Hazardous Materials Technical Appendix) in the Introduction section at page 1-4.

#### Missing Information that should be added to the DEIS:

In Appendix A.11 (Hazardous Materials Technical Appendix), under Section 3.1 "Environmental Consequences," and under the heading "Lighting, Navigation, Utilities, and Culverts," the following language appears: *"There are also abandoned oil pipelines and water utility lines under proposed runway extension area. These would be cut, removed, and backfilled; or left in place and grouted to eliminate a void beneath the runway extension."* The issue of abandoned oil pipelines should be brought forward in the DEIS, if it is determined that such pipelines will be encountered in this project. DEP's opinion is that any historic out-of-service oil pipelines, which may not have been properly closed, represent a potential source of contamination to soil and groundwater. Any excavation that may encounter such pipelines would have serious environmental implications. Unfortunately, it is not clear from the information presented where such pipelines may be located, or what else may be known about them. No such "abandoned pipe lines" appear on Figure 4.15-2, which is designed to show

pipelines in the vicinity of the project. Therefore, we strongly suggest that the circumstance of abandoned petroleum pipelines should be clarified in the Appendix, and addressed in the DEIS. Also, as indicated in DEP's June 18, 2004, comment memo on the Waste Sites and Contaminated Soils Technical Report, the removal or decommissioning of abandoned oil pipelines requires a consideration of potential pollution, and mitigation of this potential. If abandoned oil pipelines are to be left in place, they should be emptied and cleaned of product. If pipelines are to be removed, the operation should be conducted in a manner that provides for the containment and control of residual product that may be in the pipe. Typically, DEP requests an opportunity to review and comment on a written work plan for such operations.

Also concerning the subject of pipelines, DEP would like to bring the following information to FAA's attention. We are in possession of a figure titled "Philadelphia International Airport – Pipeline Plan," which was apparently prepared by or for the Division of Aviation, and is dated May 15, 2002. This figure shows at least one pipeline in the Runway 17-35 Project Area that is not shown on Figure 4.15-2 of the DEIS. It appears to be a branch of the Tetco pipeline that crosses the runway safety area from Island Avenue on the east to the area of the Bliss Building on the west. It appears to lie parallel to the CMC-3 and CMC-4 waterways. DEP does not know whether this information is accurate, but we recommend that the possible presence of a pipeline at this location should be thoroughly researched before finalizing the EIS.

#### Section 4.17.2. Construction Impacts / Air Quality

On page 4-193, Table 4.17-1, titled "Pollutant Emissions from Construction Activities by Alternative" contains some errors in the numerical values given in the Volatile Organic Compounds (VOC) section for 2006. Although the Total VOC Emissions given in this table appear to be correct, the numerical results for the components of that total ("construction activities" and "asphalt paving") are not correct. The VOC emissions from asphalt paving, recalculated after agency comments during the summer of 2004, have changed. The new recalculated VOC emissions (from asphalt and the other components of the construction emissions total) appear in Table G-8 "Estimated Construction Emissions by Pollutant and Source Component, which is within Appendix G "Construction Data and Detailed Results" of Appendix A.2 "Air Quality Technical Appendix," of the DEIS. Thus, this section of Table 4.17-1 should be changed to include numerical data as follows:

<b>Volatile Organic Compounds</b>	<b>2006 Alternative 1</b>	<b>(Tons per Year) Alternative 2</b>
Construction Activities	1.28	1.43
Asphalt Paving	0.48	0.57
Total VOC Emissions	1.76	2.00

In closing, we thank you for the opportunity to work with you on this Streamlining project, and for the opportunity to submit comments on the DEIS. Please contact me if you have any questions about the contents of this letter.

Sincerely,

A handwritten signature in black ink that reads "David W. Burke". The signature is written in a cursive, slightly slanted style.

David W. Burke  
Watershed Manager  
Regional Director's Office

cc: Mr. Spotts - PFBC  
Mr. Mixon - PGC  
Mr. Miller - DCNR  
Mr. Jenkins - USACOE  
Mr. Arguto - USEPA;  
Mr. Densmore - USFWS  
Mr. Feola  
Mr. Sherman  
Mr. Sieber  
Mr. Trostle  
Re 30 (AR04RDO)328-18

Comment Number	Comment	Response
19.1	Table 1-2 on Page 1-8, titled "Permits or Approvals" contains some inaccuracies concerning DEP permit requirements. Neither of the first two bullet items in the "PADEP" section ("Groundwater Discharge Permit," and "Dewatering Permit") is necessary to include in this Table as a separate item. As discussed further in comments below, DEP intends to handle the issue of managing groundwater from construction dewatering in the context of the NPDES Permit for Stormwater Discharges Associated with Construction Activities (the fifth bullet item in Table 1-2, which should remain in the Table). We note that the Text of the DEIS contains numerous references to this issue of groundwater discharge which are in error.	The text and tables of this EIS have been corrected as noted by the PA DEP.
19.2	The third bullet item in the same section of Table 1-2, which reads "Water Quality Standards Compliance, " may not be necessary. All activities, whether or not they require a DEP permit, are required to comply with Water Quality Standards. However, there is no separate review or action that is specifically represented by this statement.	The FAA has noted and considered your comment. Table 1-2 and related text have been corrected in this EIS.
19.3	DEP was encouraged that Peak Period Pricing, a "demand management" strategy, was addressed in this EIS process. In general, DEP wishes to express support for the idea of considering "demand management" measures as part of the long-term solution to delays at PHL.	The FAA has noted and considered your comment.
19.4	The emissions modeling that was done for aircraft sources was apparently done using an average annual taxi/queue time (expressed in minutes per operation), by assigning that same time to the taxi/idle operating mode for all operations for the year [DEIS Appendix A.2 Air Quality]. This method does not account for my differences between aircraft types. The Department believes that small planes, which are more likely to utilize 17-35 under all scenarios, and particularly under the "build" scenarios, may in fact, have significantly different taxi/idle times as a category, as compared to the larger jets. Small planes also have very different pollutant emission profiles during the taxi/idle mode as compared to large jets. We believe that accounting for these differences may have significant consequences on the modeled annual emissions. Therefore, we believe it is necessary to re-calculate the pollutant emissions by alternative ("tons per year") using a method that accounts for the different taxi/idle times of different kinds of aircraft, which are a consequence of the lower-than-average taxi/idle times for operations that utilize Runway 17-35. This would result in a more reasonable and realistic assessment of the impacts under each of the future scenarios.	DEP reviewed and approved the protocol used for the Air Quality analysis, and concurred with the results of the Air Quality analysis. Table B-4 of Appendix B (Aircraft Data) of the Air Quality Technical Report (Appendix A.2 of the DEIS) presents the "Average Annual Taxi-Delay-Queue Time Per LTO (in minutes)". The data used in this table are an airport-wide annual average time, weighted by aircraft type, operations, and arrivals/departures. The actual data used in the analysis account for the variability in aircraft types. See FEIS Attachment #1 to the Responses to Comments for an example of the data used in the analysis.
19.5	On Page 4-81, the DEIS contains a list of the water quality classifications that apply to the major water bodies adjacent to the Airport, and this list contains an error. Please be advised that "TSF" is not a classification that applies to this area. We acknowledge that within Chapter 93, Drainage list G contains a stream segment on the Darby Creek, given as "Non-Tidal Portion of Main Stem, PA 3 Bridge to Mouth," to which the TSF classification applies. However, the downstream limit of this segment is considered to be the head of tide, which is near the confluence of the Darby and Cobbs Creeks, several miles upriver from the PHL discharges. Because stormwater from the airport discharges to the tidal portions of the basin, only WWF and MF classifications apply.	The text of this EIS has been corrected for clarity. This does not change the analysis or conclusions.

Letter 19

Pennsylvania Dept. of Environmental Protection - David Burke

Comment Number	Comment	Response
19.6	On page 4-84, there is some discussion of Regional Groundwater Quality and Local Groundwater Quality, but we feel that this discussion is incomplete. The discussion of groundwater degradation by elevated iron, manganese, and sulfates should be expanded to include a statement indicating how this issue could impact the proposed project. DEP believes that large scale, untreated discharges of groundwater from this area during construction activities could result in the precipitation of insoluble oxides of iron, which could potentially cause an aesthetic pollution problem and violations of water quality standards in the receiving waters. This circumstance leads to the need for a groundwater management strategy to be applied to construction dewatering, as discussed later in the DEIS.	This issue has been addressed in Section 4.17, construction impacts. The proposed extension of Runway 17-35 is not anticipated to result in a large scale discharge of groundwater, and no groundwater would be discharged without appropriate treatment.
19.7	On page 4-85, we find the description of the ways in which taxiways, runways, and ramps are deiced to be confusing (see the language "... when temperatures are at or above 25 degrees . . . ." and "when temperatures are at or above 20 degrees. . ."). We request that this paragraph be reviewed to make sure it is accurate, and revised if necessary.	The text has been checked and found to be accurate. We have revised the text to eliminate confusion.
19.8	On Page 4-88, there is a reference to DEP's earlier comment concerning the projected loss of operational capability for oil spill containment and recovery if CMC-3 and CMC-4 are completely enclosed. We return to this issue now because we consider it to be a secondary impact of the project whose importance should not be overlooked. Oil spill containment and recovery requires large areas of water surface to be accessible. When CMC-3 and CMC-4 are no longer open channels, any large spill (several hundred gallons or more) at the terminal area would need to be contained and recovered off airport property, at the Mingo Creek stormwater basin. This change adds some complexity to the issue of contingency planning and spill response, because it would require coordination with the Philadelphia Water Department, who owns the Mingo property. We acknowledge that Section 4.7.4 addresses this point.	The FAA has noted and considered your comment. Section 4.7 has been revised to address this issue further.
19.9	Please note that Table 4.7-2 should be revised; the mitigation measure for Potential Oil/Hazardous Waste Spill should be changed from "SPCC/PPC Plan Implementation" to "SPCC/PPC Plan Revision," because the Plan(s) would need to be revised.	Table 4.7-2 has been revised as requested.
19.10	On page 4-92, in the section headed "Water Quality Measures," the first paragraph lists a number of measures that could be used to mitigate the water quality impacts of this project. The Department supports the implementation of any and all such mitigation measures provided that such implementation does not cause or contribute to a violation of some environmental requirement or standard. We note that despite laudable efforts at PHL to capture and control the discharge of aircraft deicing fluids, a considerable quantity of deicer continues to discharge from the airport to the Delaware estuary. The extension of Runway 17-35 would have the effect of increasing the amount of such material discharged.	Section 4.7 identifies the water quality mitigation measures that would be implemented with the Preferred Alternative. As acknowledged in this section, the extension of Runway 17-35 would have a small incremental increase in the amount of deicing fluid used to clear the runway.

Letter 19

Pennsylvania Dept. of Environmental Protection - David Burke

Comment Number	Comment	Response
19.11	The second paragraph on page 4-124 is incorrect. This paragraph will need to be revised. Chapter 102 [Section 102.6(a)(2)] does provide some protection for habitats of threatened or endangered species, but not in the manner described. Chapter 105 [Section 105.17(l)(i)] provides that wetlands that are habitat for threatened and endangered species are to be considered "exceptional value wetlands" within the context of this Chapter. However, please note that there is no connection between such "exceptional value wetlands" and the "exceptional value waters" that are defined and protected by provisions of Chapter 93. We believe that it would be appropriate for this section to list the protections given in both Chapters 102 and 105, to provide the regulatory context. There is no need to cite Chapter 93.	Your comment has been addressed in the appropriate EIS Section(s).
19.12	Page 4-128 contains a minor typographic error in the first paragraph of Section 4.11.3. The reference to "Table 4.11-3" needs to be changed to "Table 4.11-4."	Your comment has been addressed in the appropriate EIS Section(s).
19.13	The final paragraph of the Section titled "Regulatory Context" (the paragraph appears on page 4-138) is incorrect concerning the relationship of Chapters 102, 105, and 93 to this subject. Please see the comments above concerning Chapter 102 and Chapter 105 as they relate to the protection of Threatened and Endangered Species and their habitat. Chapter 93 has no significant role in this context.	Your comment has been addressed in the appropriate EIS Section(s).
19.14	On page 4-149, there are two errors of reference. The second paragraph on that page opens with the following sentence: "Three crossing locations were evaluated, as described in Table 4.12-3 below. " That reference is to the wrong table. The Table that should be referenced here is Table 4.11-5. Also, in the subsequent paragraph, the reference to "Table 4.11-4 " should be changed to "Table 4.11-5. "	Your comment has been addressed in the appropriate EIS Section(s).
19.15	On page 4-149, in the section headed "Mitigation Measures, " in the second paragraph of that section, a sentence should be added to clarify the following: If it is determined that any wetlands will be impacted by the new crossing of SEPD-2, then the Pennsylvania regulations (Section 105.20a) would require a replacement ratio of 2:1, because of the fact that wetlands in this area are used by the threatened Red-bellied turtle.	PA DEP has determined that no wetlands would be impacted by Alternative 1 and, therefore, no compensatory mitigation is required.
19.16	We noted some omissions in Table 4.12-3 on page 4-151. In Section E of that table, Pennsylvania Department of Conservation and Natural Resources (DCNR) should be listed as an agency for review, since they are consulted concerning impacts to threatened and endangered plants. In Section J of that table, it should be noted that, because Philadelphia County does not have its own Conservation District, DEP does the Erosion and Sedimentation Plan review for projects in Philadelphia County.	Your comment has been addressed in the appropriate EIS Section(s).
19.17	Footnote "(228)" on page 4-151 contains a typographic error. The reference given in the text (correctly) is to 25 Pa. Code Chapter 105, Section 105.16. Therefore, the footnote should be to Chapter 105, not Chapter 93.	Your comment has been addressed in the appropriate EIS Section(s).

Comment Number	Comment	Response
19.18	<p>We are concerned about the importation of a large volume of fill in order to re-grade the runway and taxiway extensions, and about the potential for that fill to contain environmental contaminants. According to the "Floodplains" section of the EIS, either of the "build" alternatives would require the placing of (at least) approximately 50,000 cubic yards of new fill. While the DEIS uses the term "clean fill" when addressing this subject, DEP suggests that it may be unreasonably optimistic to assume that this volume of clean fill will be readily available. The EIS should anticipate the possibility that PHL and/or their construction contractor will propose to use fill that is not assuredly "clean." We make this comment based on past experience with similar circumstances, including with the construction of Runway 8-26 at PHL. DEP may request the right to review the characteristics of such fill materials, and to approve their use. If, for example, there is a question about whether it would be acceptable to use Delaware River dredge material, our response would be that such materials would need to be assessed according to the applicable DEP policy. In this case, the applicable policy is the "Management of Fill" policy (this policy is referenced in the DEIS; see Section 4.15.4, and footnote "(198)" on page 4-179). While it may be too early for any determination to have been made about where the needed fill would be obtained, we still believe that this contingency should be addressed in the DEIS. If possible, an attempt should be made to list the possible sources of appropriate material.</p>	<p>All off-site fill materials to be brought to the Project Area will be evaluated in accordance with the PA DEP "Management of Fill" policy. Although it is difficult to predict the sources of fill materials that would be used during the Project, it is possible that soil stockpiled to the east of Runway 17-35 could be used as an on-Site source of fill. This soil stockpile is comprised of excess soil generated during previous excavation projects at the Airport including the construction of Runway 8-26. This material will be tested before reuse on-site.</p>
19.19	<p>On page 4-177, under the section heading "Coordination with PA DEP," appears the following: ". . . the PA DEP will be contacted prior to any construction to develop procedures and response plans in accordance with PA DEP and Act 2 regulations." This language seems to suggest that it will be DEP's responsibility to develop the procedures and response plans. In order to correct this, we suggest changing the section to read: ". . . the PA DEP will be contacted prior to any construction, and the project sponsor will develop procedures and response plans in accordance with PA DEP guidance and Pennsylvania regulations."</p>	<p>The referenced sentence has been changed in this EIS document.</p>
19.20	<p>On page 4-178, in the section headed "Preliminary Investigations," we would like to suggest two changes to make the meaning of the section clearer. First, in the first bullet item, it is not clear what is meant by the use of the term "fill." The reference in the second sentence to "excavated excess fill" suggests that the section is meant to deal with existing site soils that may be excavated or borrowed for placement elsewhere on the site. If this is the intent, then we suggest some clarifying language be added, or the word "fill" be replaced with another term, because the word "fill" has too many other meanings in the context of this project. Suggested alternatives for this paragraph may include "on-site soils" or "historical fill." We include this comment because we are concerned to avoid any potential confusion between the characterization and use of on-site soils (some of which may be "fill" that was placed at some time in the past) and the characterization and use of fill that is imported from offsite to complete this project.</p>	<p>Clarification of the source of fill to be investigated has been added to appropriate sections of this EIS.</p>
19.21	<p>Secondly, in the second bullet item, we suggest removing an ambiguity by changing the first sentence from "A reasonable subsurface investigation of areas potentially excavated. . ." to "A reasonable subsurface investigation of areas to be excavated. . ."</p>	<p>The referenced sentence has been changed in this EIS document.</p>



## Letter 19

## Pennsylvania Dept. of Environmental Protection - David Burke

Comment Number	Comment	Response
19.22	In our June 18,2004, comment memo on the Water Quality Technical Report, we indicated to VHB that we believe that all parts of the Runway 17-35 project area should be considered potentially problematic from the standpoint of groundwater contamination. Our concern is as much with the potential presence of reduced ferric iron as it is the potential presence of classic groundwater contaminants such as organic chemicals. Thus, while the proximity of an excavation area to a known release site would be of some interest, it would not be the only reason to be concerned about groundwater quality.	Encountering contaminated groundwater has been identified as a direct impact within Section 4.15.3. Mitigation measures related to the management of contaminated groundwater during construction are described in Section 4.15.4. The "Contaminated Groundwater Management" mitigation measure text has been changed to clarify that groundwater from dewatered excavations will be sampled for water quality parameters in addition to classic groundwater contaminants.
19.23	DEP does not intend to use a "Temporary Discharge Approval" letter to coordinate these activities. Instead (per our June 18, 2004, memo to FAA and VHB), we would like for the project sponsor (or contractor) to provide technical information on the control of groundwater contaminants along with the application for the NPDES permit for the discharge of stormwater from construction activities (Chapter 102 permit). After reviewing such information, DEP would then approve any required discharges of groundwater as a special condition within the Chapter 102 permit (We appreciate and support that the DEIS includes an option to consider discharging such flows to the POTW).	The description of the DEP approval process for excavation dewatering discharges has been corrected in this EIS document.
19.24	On page 4-180, in the section headed "Underground Storage Tank Removals," the first sentence may need to be modified. While it may be true that the closing of the six USTs at the Exxon Service Station should be performed "by the tenant," the closure of any unknown USTs encountered during construction may need to be performed by the project sponsor, and not necessarily by a tenant.	The referenced sentence has been changed in this EIS document.
19.25	On page 4-182, under the section headed "Pennsylvania Department of Environmental Protection Regulations," there is another incorrect reference to the "Temporary Discharge Approval" letter. As indicated in comments above, this is not the way DEP intends to administer the issue of excavation dewatering. Instead, this will be addressed by the NPDES permit for the discharge of stormwater from construction activities (Chapter 102 permit).	The description of the DEP approval process for excavation dewatering discharges has been corrected in this EIS document.
19.26	We found at least three additional places where DEP's intended construction dewatering approval process is incorrectly described. These are located on pages 4-187, 4-195, and at the bottom of 4-197 to the top of 4-198. These should all be changed. We also note that a more correct treatment of the issue has been included within Appendix A-11 (Hazardous Materials Technical Appendix) in the Introduction section at page 1-4.	The description of the DEP approval process for excavation dewatering discharges has been corrected in this EIS document.

Comment Number	Comment	Response
19.27	<p>In Appendix A.11 (Hazardous Materials Technical Appendix), under Section 3.1 "Environmental Consequences," and under the heading "Lighting, Navigation, Utilities, and Culverts," the following language appears: "There are also abandoned oil pipelines and water utility lines under proposed runway extension area. These would be cut, removed, and backfilled; or left in place and grouted to eliminate a void beneath the runway extension." The issue of abandoned oil pipelines should be brought forward in the DEIS, if it is determined that such pipelines will be encountered in this project. DEP's opinion is that any historic out-of-service oil pipelines, which may not have been properly closed, represent a potential source of contamination to soil and groundwater. Any excavation that may encounter such pipelines would have serious environmental implications. Unfortunately, it is not clear from the information presented where such pipelines may be located, or what else may be known about them. No such "abandoned pipe lines" appear on Figure 4.15-2, which is designed to show pipelines in the vicinity of the project. Therefore, we strongly suggest that the circumstance of abandoned petroleum pipelines should be clarified in the Appendix, and addressed in the DEIS.</p>	<p>There is conflicting information regarding the existence of oil pipelines beneath the northern end of Runway 17-35. Once final construction design and planning is conducted for the Project, additional due diligence investigations will be conducted to determine whether these pipelines exist, their location, and if there has been a release or exists a threat of a release. If an oil pipeline is encountered during construction, it will be abandoned or removed in accordance with all applicable DEP regulations and procedures and any release to soil and/or groundwater will be investigated. Discussion of the location of these potential pipelines and possible mitigation measures during construction has been added to this EIS in Section 4.15.</p>
19.28	<p>As indicated in DEP's June 18,2004, comment memo on the Waste Sites and Contaminated Soils Technical Report, the removal or decommissioning of abandoned oil pipelines requires a consideration of potential pollution, and mitigation of this potential. If abandoned oil pipelines are to be left in place, they should be emptied and cleaned of product. If pipelines are to be removed, the operation should be conducted in a manner that provides for the containment and control of residual product that may be in the pipe. Typically, DEP requests an opportunity to review and comment on a written work plan for such operations.</p>	<p>If an out-of-service oil pipeline is encountered during construction, it will be abandoned or removed in accordance with all applicable DEP regulations and procedures.</p>
19.29	<p>DEP would like to bring the following information to FAA's attention. We are in possession of a figure titled "Philadelphia International Airport-Pipeline Plan," which was apparently prepared by or for the Division of Aviation, and is dated May 15, 2002. This figure shows at least one pipeline in the Runway 17-35 Project Area that is not shown on Figure 4.15-2 of the DEIS. It appears to be a branch of the Tetco pipeline that crosses the runway safety area from Island Avenue on the east to the area of the Bliss Building on the west. It appears to lie parallel to the CMC-3 and CMC-4 waterways. DEP does not know whether this information is accurate, but we recommend that the possible presence of a pipeline at this location should be thoroughly researched before finalizing the EIS.</p>	<p>The source of Figure 4.15-2 is a Utilities Pipeline Plan created for the Philadelphia International Airport, dated May 30, 2003. However, there is evidence that the TETCO pipeline referenced in this comment is beneath the runway safety area for Runway 17-35. Once final construction design and planning is conducted for the Project, additional due diligence investigations will be conducted to determine whether this pipeline exists, its location, and if there has been a release or exists a threat of a release. If an oil pipeline is encountered during construction, it will be abandoned or removed in accordance with all applicable DEP regulations and procedures and any release to soil and/or groundwater will be investigated. Discussion of the location of these potential pipelines and possible mitigation measures during construction has been added to this EIS in Section 4.15.</p>
19.30	<p>On page 4-193, Table 4.17-1, titled "Pollutant Emissions from Construction Activities by Alternative" contains some errors in the numerical values given in the Volatile Organic Compounds (VOC) section for 2006. Although the Total VOC Emissions given in this table appear to be correct, the numerical results for the components of that total ("construction activities" and "asphalt paving") are not correct. The VOC emissions from asphalt paving, recalculated after agency comments during the summer of 2004, have changed. The new recalculated VOC emissions (from asphalt and the other components of the construction emissions total) appear in Table G-8 "Estimated Construction Emissions by Pollutant and Source Component," which is within Appendix G "Construction Data and Detailed Results" of Appendix A.2 "Air Quality Technical Appendix" of the DEIS.</p>	<p>Table 4.17-1 has been corrected to reflect the data from Appendix G.</p>

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**From:** Genua, Vito[SMTP:VGENUA@STATE.PA.US]  
**Sent:** Thursday, December 02, 2004 3:41:46 PM  
**To:** PHL 17-35 EIS  
**Subject:** Phila. International Airport: Runway 17-35 Extension DEIS

We have reviewed the DEIS and have no substantive comments regarding the state highway transportation network. We will continue to coordinate with you and other agencies issues surrounding the abandonment of a portion of Route 291, and rerouting of that traffic route over Bartram Avenue. When you are in a position to discuss preliminary roadway designs and intersection layouts, we will join you and the City of Philadelphia in developing improvements that address the traffic diversion, and at the same time deal with maintenance responsibilities.

**Letter 20****Pennsylvania Department of Transportation - Vito Genua**

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
20.1	We have reviewed the DEIS and have no substantive comments regarding the state highway transportation network. We will continue to coordinate with you and other agencies issues surrounding the abandonment of a portion of Route 291, and rerouting of that traffic route over Bartram Avenue. When you are in a position to discuss preliminary roadway designs and intersection layouts, we will join you and the City of Philadelphia in developing improvements that address the traffic diversion, and at the same time deal with maintenance responsibilities.	The EIS team and City of Philadelphia design consultant have held preliminary discussions regarding these issues. The City of Philadelphia, Department of Commerce, Division of Aviation will continue to coordinate the design schemes and abandonment process with the City of Philadelphia Department of Streets and PennDOT following the FAA's issuance of a Record of Decision on this EIS.



# Pennsylvania Fish & Boat Commission

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Commonwealth of Pennsylvania  
Division of Environmental Services  
450 Robinson Lane  
Bellefonte, PA 16823  
814-359-5115  
November 22, 2004

Ms. Susan McDonald  
Harrisburg Airports District Office  
Federal Aviation Administration  
3905 Hartzdale Avenue, Suite 508  
Camp Hill, PA 17011

Re: Philadelphia International Airport  
Runway 17-35 Extension Project  
Draft Environmental Impact Statement

Dear Ms. McDonald:

Personnel from the Pennsylvania Fish and Boat Commission (PFBC) have participated in a number of field reviews and meetings pertaining to the development of the proposed subject project. We were pleased to see that the Federal Aviation Administration has addressed our major concerns with the construction of either Alternative 1 or 2 for this project. Our recommendations and comments for the Runway 17-35 Extension Project are as follows:

\*The construction of either Alternative 1 or 2 would create approximately 10 acres of additional impervious surface, which will increase storm water flows and pollutants to the receiving waterways. We support the implementation of all of the mitigation measures as outlined within page 4-92 of the DEIS. We also would like the Federal Aviation Administration take a more proactive approach with respect to water quality by "strongly encouraging" the airport authority to initiate storm water treatment prior to discharging into any of the surrounding waterways.

\*As per our 17 August 2004 correspondence, the PFBC has no objections to Crossing Location B and Crossing Type and Dimension No. 2 (Table 4.11-5) for the proposed service road crossing of Wetland SEPD-2. We do however, want to restate our recommendation that the invert of the culvert bottom be depressed at least one foot below the existing wetland bottom elevation and that both upstream and downstream culvert headwalls be constructed to minimize culvert length. We also strongly support the installation of turtle basking platforms and a turtle nesting beech within the lower reaches of Wetland SEPD-2 to help compensate for the wetland habitat impacts associated with this proposed project.

**Our Mission:**

[www.fish.state.pa.us](http://www.fish.state.pa.us)

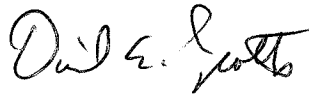
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*To provide fishing and boating opportunities through the protection and management of aquatic resources.*

Philadelphia International Airport  
November 22, 2004  
Page 2

Thank you for providing us the opportunity to comment on the Runway 17-35 Extension Project and please keep us informed as the project progresses through the entire environmental review process.

Sincerely,

A handwritten signature in black ink, appearing to read "David E. Spotts". The signature is written in a cursive style with a large initial "D".

David E. Spotts, Chief  
Watershed Analysis Section

c: FWS - Densmore  
COE - Jenkins  
EPA - Okorn  
DEP - Burke  
PGC - Mixon

## Letter 21

## Pennsylvania Fish &amp; Boat Commission - David Spotts

Comment Number	Comment	Response
21.1	We support the implementation of all of the mitigation measures as outlined within page 4-92 of the DEIS. We also would like the Federal Aviation Administration take a more proactive approach with respect to water quality by "strongly encouraging" the airport authority to initiate storm water treatment prior to discharging into any of the surrounding waterways.	Section 4.7 of this EIS provides additional information on the proposed water quality mitigation measures. The current NPDES permit regulates discharges to surrounding waterways.
21.2	As per our 17 August 2004 correspondence, the PFBC has no objections to Crossing Location B and Crossing Type and Dimension No. 2 (Table 4.1 1-5) for the proposed service road crossing of Wetland SEPD-2. We do however, want to restate our recommendation that the invert of the culvert bottom be depressed at least one foot below the existing wetland bottom elevation and that both upstream and downstream culvert headwalls be constructed to minimize culvert length.	Threatened and Endangered Species Mitigation, Section 4.11 of this EIS, includes this recommendation.
21.3	We also strongly support the installation of turtle basking platforms and a turtle nesting beech within the lower reaches of Wetland SEPD-2 to help compensate for the wetland habitat impacts associated with this proposed project.	Threatened and Endangered Species Mitigation, Section 4.11 of this EIS, includes this recommendation.



COMMONWEALTH OF PENNSYLVANIA  
**PENNSYLVANIA GAME COMMISSION**  
2001 ELMERTON AVENUE, HARRISBURG, PA 17110-9797

October 13, 2004

Ms. Susan McDonald  
Harrisburg Airports District Office  
Federal Aviation Administration  
3905 Hartzdale Avenue, Suite 508  
Camp Hill, PA 17011

In re: Philadelphia International Airport  
Runway 17-35 Draft Environmental Impact Statement  
Philadelphia County, PA

Dear Ms. McDonald:

The Pennsylvania Game Commission (PGC) would like to thank the Federal Aviation Administration (FAA) for the opportunity to review the above referenced Draft Environmental Impact Statement for the Runway 17-35 Project. Due to the lack of natural resources in the project area, the PGC does not have any major concerns in regards to this project.

However, the PGC does have concerns involving the Executive Summary, page S-16, Table S-3 Impact Thresholds for Significant Adverse Effects. The Impact Category for Endangered and Threatened Species states: "Determination by the US Fish and Wildlife Service or National Marine Fisheries Service that the Proposed Project would be likely to jeopardize the continued existence of a Federally-listed species, or result in the destruction or adverse modification of Federally-designated critical habitat." The PGC recommends that impacts to state listed endangered and threatened bird and mammal species be considered as a Significant Adverse Impact on all FAA projects within Pennsylvania.

Several state listed bird species have been identified within the study area for the Capacity Enhancement Project at Philadelphia International Airport and impacts to their habitat will be considered a Significant Adverse Impact by the PGC.

**ADMINISTRATIVE BUREAUS:**

PERSONNEL: 717-787-7836 ADMINISTRATION: 717-787-5670 AUTOMOTIVE AND PROCUREMENT DIVISION: 717-787-6594  
LICENSE DIVISION: 717-787-2084 WILDLIFE MANAGEMENT: 717-787-5529 INFORMATION & EDUCATION: 717-787-6286 LAW ENFORCEMENT: 717-787-5740  
LAND MANAGEMENT: 717-787-6818 REAL ESTATE DIVISION: 717-787-6568 AUTOMATED TECHNOLOGY SYSTEMS: 717-787-4076 FAX: 717-772-2411

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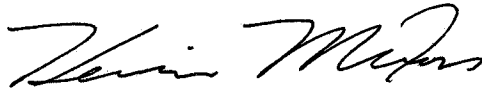
Ms. Susan McDonald

-2-

October 13, 2004

The PGC appreciates the high quality of work that has been conducted on this project and we look forward to working with the team and meeting the expedited time frames. Please contact me directly at (717) 783-5957 if you have any questions.

Very truly yours,



Kevin L. Mixon  
Division of Environmental  
Planning and Habitat Protection  
Bureau of Land Management

Cc: Capouillez, PGC  
Killough, SE PGC  
Brauning, PGC  
Spotts, PFBC  
Anderson, SE DEP  
Densmore, U.S. FWS  
Cianfrani, Philadelphia COE

## Letter 22

Pennsylvania Game Commission - Kevin Mixon

Comment Number	Comment	Response
22.1	Due to the lack of natural resources in the project area, the PGC does not have any major concerns in regards to this project.	The FAA has noted and considered your comment.
22.2	The PGC does have concerns involving the Executive Summary, page S-16, Table S-3 Impact Thresholds for Significant Adverse Effects. The Impact Category for Endangered and Threatened Species states: "Determination by the US Fish and Wildlife Service or National Marine Fisheries Service that the proposed Project would be likely to jeopardize the continued existence of a Federally-listed species, or result in the destruction or adverse modification of Federally-designated critical habitat." The PGC recommends that impacts to listed endangered and threatened bird and mammal species be considered as a Significant Adverse Impact on all FAA projects within Pennsylvania.	FAA Order 1050.1E states that the Proposed Project cannot "jeopardize the continued existence of any Federally listed endangered or threatened species." However, impacts to state-listed species were given careful consideration.



Commonwealth of Pennsylvania  
Pennsylvania Historical and Museum Commission  
**Bureau for Historic Preservation**  
Commonwealth Keystone Building, 2nd Floor  
400 North Street  
Harrisburg, PA 17120-0093  
www.phmc.state.pa.us

Nov. 23, 2004

Federal Aviation Administration  
Harrisburg Aviation District Office  
3905 Hartzdale Drive, Suite 508  
Camp Hill, PA 17011

Re: ER 85-1680-101-Z  
FAA: Philadelphia International Airport, Proposed Extension of  
Runway 17-35, Philadelphia  
Draft Environmental Impact Statement

Dear Sirs:

The Bureau for Historic Preservation (the State Historic Preservation Office) has reviewed the above named project in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended in 1980 and 1992, and the regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation as revised in 1999. These requirements include consideration of the project's potential effect upon both historic and archaeological resources.

The Draft Environmental Impact Statement adequately addresses the cultural resources identification and evaluation undertaken for this project.

If you need further information in this matter please consult Susan Zacher at (717) 783-9920.

Sincerely,

A handwritten signature in black ink that reads "Kurt W. Carr".

Kurt W. Carr, Chief  
Division of Archaeology &  
Protection

KWC/smz

**Letter 23****Pennsylvania Historical & Museum Commission - Kurt Carr**

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
23.1	The Draft Environmental Impact Statement adequately addresses the cultural resources identification and evaluation undertaken for this project.	Concurrence is noted. Section 4.9 details these findings in relation to historic and archaeological resources.



# County/Municipal Comments and Responses

***"You Are Welcome Hither"***

**Arden**

2119 The Highway  
Steve Threefoot

**Ardentown**

2205 Loreley Lane  
Steve Cohen

**Ardencroft**

1500 Upsan Downs  
Bob Pollock

Susan McDonald  
FAA Environmental Protection Specialist  
C/O VHE  
101 Walnut Street  
PO Box 9151  
Watertown, MA 02471-9151

November 29, 2004

Dear Ms. McDonald:


This letter is a comment on the Philadelphia Airport Runway 17-35 Extension Project Environmental Impact Statement. Beverly Barnett entered the content into the verbal record at the November 17, 2004 Public Hearing held at the Brandywine High School.


Section 106 of the national Historic Preservation Act of 1969 as amended requires that any federal undertaking that might have an adverse impact on historic sites must undergo a consultative process to avoid, minimize or mitigate such impacts. We also wish to bring to the record our concerns and comments which stem from the rights given the Public in the National Environmental Policy Act of 1969 and in the implementing Regulations for this law, found in 40 CFR Parts 1500-1508.


The Draft Environmental Impact Statement for Philadelphia Airport Runway 17-35 Extension Project S.6 Purpose and Need is to reduce delay by moving regional jets away from Runways 9L-27R and 9R-27L. Removing regional jets from these Runways allows more use by older, larger, noisier and more-polluting aircraft. Because the Ardens Historic District is in the landing and takeoff pattern of Runways 9L-27R and 9R-27L such increased use negatively impacts us through noise, air quality, land use and cultural resource. Examples of negative impact are contained in numerous submissions to the FAA including a DVD by resident Ron Ozer August 2003, letters by Ardens' residents and the testimony of the Delaware State Historic Preservation Officer Daniel R. Griffith.

As the elected municipal officers of the three Ardens Historic District, we believe that the Philadelphia Airport Runway 17-35 Extension Project Environmental Impact Statement should consider its impact on our community's traditional culture; arts, theatre, land use/plan, and our residents' communication and connection in and with nature.

Sincerely,

  
Steve Threefoot  
Town Chair,  
Village of Arden

  
Steve Cohen  
Town Chair,  
Village of Ardentown

  
Robert Pollock  
Town Chair,  
Village of Ardencroft

cc: **Joseph R. Biden**  
**US Senator, Delaware**  
**1105 N. Market Street, #2000**  
**Wilmington, DE 19801-1233**

**Thomas R. Carper**  
**US Senator, Delaware**  
**302 North Walnut Street #102-L**  
**One Christiana Center, Bank One Building**  
**Wilmington, DE 19801**

**Michael N. Castle**  
**US Representative, Delaware**  
**201 North Walnut Street**  
**Three Christiana Center #107**  
**Wilmington, DE 19801**

**Governor Ruth Ann Minner**  
**State of Delaware**  
**Tatnall Building**  
**Dover, DE 19901**

**Daniel R. Griffith**  
**Delaware State Historic Preservation Officer**  
**Tudor Industrial Park**  
**604 Otis Drive**  
**Dover, Delaware 19901**

**William V. McGlinchey**  
**Chair, Delaware and PHL**  
**State-Federal-Local Government Action Group**  
**HSBC Retail Service**  
**Churchman's Corp. Center, 90 Christiana Road**  
**New Castle, DE 19720**

**Villages files**  
**Archives / Craft Shop and Museum**  
**Ardens Library**

## Letter 24

## Ardens Historic District, DE- Steve Cohen, Robert Pollock, Steve Threefoot

Comment Number	Comment	Response
24.1	The Draft Environmental Impact Statement for Philadelphia Airport Runway 17-35 Extension Project S.6 Purpose and Need is to reduce delay by moving regional jets away from Runways 9L-27R and 9R-27L. Removing regional jets from these Runways allows for more use by older, larger, noisier, and more-polluting aircrafts. Because the Ardens Historic District is in the landing and takeoff pattern of Runways 9L-27R and 9R-27L such increased use negatively impacts us through noise, air quality, land use, and cultural resources.	EIS Sections 4.2 Noise, 4.5 Air Quality, 4.3 Compatible Land Use, and 4.9 Cultural Resources all conclude that there will be no significant impacts to the surrounding communities in the Study Area, which includes the Arden's Historic District. The extension of Runway 17-35 would not change the airspace configuration or the approach/departure patterns for Runway 9L/27R or 9R/27L. No increased use of Runway 9/27 is proposed. In fact, the purpose of the Project is to reduce the number of aircraft on Runway 9/27.
24.2	As the elected municipal officers of the three Ardens Historic District, we believe that the Philadelphia Airport Runway 17-35 Extension Project Environmental Impact Statement should consider its impact on our community's traditional culture; arts, theatre, land use/plan, and our residents' communication and connection in and with nature.	EIS Sections 4.2 Noise, 4.5 Air Quality, 4.3 Compatible Land Use, and 4.9 Cultural Resources all conclude that there will be no significant impacts to the surrounding communities Study Area, which includes the Arden's Historic District.





**DELAWARE COUNTY COUNCIL**

**GOVERNMENT CENTER BUILDING**

201 WEST FRONT STREET  
MEDIA, PENNSYLVANIA 19063

AREA CODE (610) 891-4270

FAX NUMBER (610) 892-9788

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**COUNCIL**  
**TIM MURTAUGH**  
CHAIRMAN

**ANDREW J. REILLY**  
VICE CHAIRMAN

**LINDA A. CARTISANO**  
**MARY ALICE BRENNAN**  
**MICHAEL V. PUPPIO, JR.**

December 15, 2004

Susan McDonald  
Federal Aviation Administration  
Harrisburg Airports District Office  
3905 Hartzdale Drive, Suite 508  
Camp Hill, PA 17011

Dear Ms. McDonald:

Enclosed please find Delaware County's comments on the Philadelphia International Airport Runway 17-35 Extension Draft Environmental Impact Statement.

Very truly yours,

Tim Murtaugh  
Chairman

Andrew J. Reilly  
Vice Chairman

  
Linda A. Cartisano  
Member  
Mary Alice Brennan  
Member  
Michael V. Puppio, Jr.  
Member

**COMMENTS OF DELAWARE COUNTY COUNCIL WITH RESPECT TO THE  
DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE  
PHILADELPHIA INTERNATIONAL AIRPORT RUNWAY 17-35 EXTENSION**

**December 15, 2004**

As the elected officials representing all the residents of Delaware County, County Council's goal has been to ensure that our municipalities and citizens have been provided with information sufficient to allow them to make an informed decision on the proposed runway extension.

Our review of the Draft Environmental Impact Statement (DEIS) has identified the following issues, questions, and concerns:

1. The DEIS concludes that there are no environmental justice issues with either of the build alternatives. We disagree, since the impacts of these alternatives disproportionately affect the predominately low-income, minority areas of southeastern Delaware County and the Eastwick section of Philadelphia.
2. The DEIS does not adequately address public safety issues. In the event of a takeoff or landing incident in the 17-35 flight path, the first responders in the county's most heavily populated communities would be hard-pressed to deal with the impacts of one of the larger aircraft permitted by the runway extension.
3. For both Alternatives 1 and 2, the noise contours at the north end of Runway 17-35 show only a minimal increase for both 2007 and 2015, even though there is a significant increase in both corporate jet traffic and regional jet traffic. Our consultant's preliminary analysis of the noise files finds two reasons for this: (a) the majority of added flights are take-offs, rather than landings and (b) some of the smaller aircraft currently using Runway 17-35 are diverted to the main runways. We would like confirmation of this conclusion.
4. The noise analysis does not appear to adequately reflect the cumulative impact of incremental airport growth over the last several decades, since FAA's methodology compares the design year build alternative to the design year no action alternative for each project phase. This "stepped" procedure yields a finding of "no significant impact" for each phase, when the cumulative findings of all phases taken together likely will be significant.
5. The 65 dB Day-Night Average Sound Level (DNL) does not adequately reflect single noise events and therefore does not present a true picture of noise impacts.

6. The DEIS has promoted the Runway 17-35 extension as the solution to delays at PHL when, in fact, there are numerous other causes of these delays, including the antiquated air traffic control system. It does not appear that the justifications analysis has fully considered this as well as changing trends in the airline industry.

We believe that these issues must be fully addressed before any decision to proceed with the project is made.

## Letter 25

## Delaware County Council - Brennan, Cartisano, Murtaugh, Puppio, Jr., Reilly

Comment Number	Comment	Response
25.1	The DEIS concludes that there are no environmental justice issues with either of the build alternatives. We disagree, since the impacts of these alternatives disproportionately affect the predominantly low-income, minority areas of southeastern Delaware County and the Eastwick section of Philadelphia.	Executive Order 12898 requires federal agencies to identify and address potential disproportionate high and adverse impacts on minority and low income populations. As demonstrated in Section 4.2 and 4.5 of this EIS, the proposed Runway 17-35 Extension would not have significant direct or cumulative adverse effects especially in the areas of noise or air quality in the vicinity of the Philadelphia International Airport, and would not have high or adverse impacts to any population (minority, low income, or otherwise).
25.2	The DEIS does not adequately address public safety issues. In the event of a takeoff or landing incident in the 17-35 flight path, the first responders in the county's most heavily populated communities would be hard-pressed to deal with the impacts of one of the larger aircraft permitted by the runway extension.	Safety is the FAA's highest priority, and the agency will ensure that the design of the Runway 17-35 Extension Project properly protects the public safety. The Preferred Alternative will meet all FAA safety standards and design criteria. The extended runway will reduce congestion in the current primary east-west operating direction, and will reduce the reliance on Runways 9L/27R and 9R/27L during heavy demand. This will enhance safety.
25.3	For both Alternatives 1 and 2, the noise contours at the north end of Runway 17-35 show only a minimal increase for both 2007 and 2015, even though there is a significant increase in both corporate jet traffic and regional jet traffic. Our consultant's preliminary analysis of the noise files finds two reasons for this: (a) the majority of added flights are take-offs, rather than landings and (b) some of the smaller aircraft currently using Runway 17-35 are diverted to the main runways. We would like confirmation of this conclusion.	As shown in Tables 4.2-8 to 4.2-13 of the EIS, and Appendix B1 of the DEIS, the commentor is correct that the majority of increased flights on Runway 35 are departures to the north, and that the percent of corporate jets using Runway 9L/27R and 9R/27L would be higher under Alternative 1 than in the No-Action Alternative.
25.4	The noise analysis does not appear to adequately reflect the cumulative impacts of incremental airport growth over the last several decades, since FAA's methodology compares the design year build alternative to the design year no action alternative for each project phase. This "stepped" procedure yields a finding of "no significant impact" for each phase, when the cumulative findings of all phases taken together likely will be significant.	<p>There are no phases proposed for the Runway 17-35 Extension Project. As documented in this EIS, the noise analysis for this EIS was conducted in accordance with FAA Order 1050.1E, FAA Order 5050.4A, and the National Environmental Policy Act (NEPA) as specified in the Council on Environmental Quality's Regulations for Implementing the National Environmental Policy Act (40 CFR 1500-1508). The methodology and approach to the noise analysis are well-documented therein.</p> <p>Cumulative noise impacts are addressed in Section 4.18 of this EIS. Previous changes in the noise environment were evaluated in the Airport's recent FAR Part 150 study, and appropriate mitigation measures were proposed to address these previous changes in the noise environment.</p>

## Delaware County Council - Brennan, Cartisano, Murtaugh, Puppio, Jr., Reilly

Comment Number	Comment	Response
25.5	The 65 dB Day-Night Average Sound Level (DNL) does not adequately reflect single noise events and therefore does not present a true picture of noise impacts.	<p>FAA Order 1050.1E requires that the DNL noise metric be used to identify the significant impacts. As described in Section 4.2, Noise, of this EIS, additional noise metrics were computed at a large number of noise-sensitive locations in the Study Area including the Night DNL, the Maximum A-weighted Sound Level (Lmax), the Time Above Sound Levels of 65, 75, and 85 dB for a 24-hour day (TA-24), and the Sound Exposure Level (SEL).</p> <p>The last significant governmental review of the use of DNL for determining aircraft noise / land use compatibility in the U.S. was conducted by the Federal Interagency Committee on Noise (FICON) and published in 1992. At that time, the Committee recommended the continued "...use of the DNL metric as the principal means for describing long-term noise exposure for civil and military aircraft operations." [Federal Interagency Committee on Noise, "Federal Agency Review of Selected Airport Noise Analysis Issues," August 1992] Though there are more flights now and greater population densities than when the DNL metric was originally proposed, the development of the original relationship between aircraft sound exposure and effects on people was based solely on sound levels and percent of people affected. Hence, increasing numbers of flights or increasing populations were incorporated to the extent that the increased operations raise the sound levels in terms of DNL in residential areas.</p> <p>This same FICON study also recommended that other metrics, in addition to DNL, be used to help characterize specific noise effects. These additional or "supplemental" metrics were to be used at the discretion of the agency as an aid "...to determine noise impacts at specific noise-sensitive locations...." [FICON, 1992] Finally, the FICON report also recommended that if "...noise-sensitive areas will be at or above DNL 65 dB and will have an increase of DNL 1.5 dB or more, further analysis should be conducted of noise sensitive areas between DNL 60-65 dB having an increase of DNL 3 dB or more due to the proposed airport noise exposure." [FICON, 1992] All these recommendations were directed at improving public understanding of the effects of changes in aircraft noise. The current study has made use of these recommendations and provided supplemental metrics and analyses.</p> <p>Any promulgation of standards would be subject to public review.</p>
25.6	The DEIS has promoted the Runway 17-35 extension as the solution to delays at PHL when, in fact, there are numerous other causes of these delays, including the antiquated air traffic control system. It does not appear that the justifications analysis has fully considered this as well as changing trends in the airline industry.	Chapter 3 of the EIS fully considers all alternatives that have the potential to reduce delays at PHL in the short term, including other modes of transportation, increased use of other airports, and administrative approaches. None were found to meet the project purpose. While there are many causes of delays, the delay analysis demonstrates that the proposed runway extension would reduce annual delay. The TAAM modeling shows that the existing runway configuration would account for 1.4 minutes of average annual delay, based on a comparison of the No-Action Alternative and Alternative 1 in 2007. The TAAM model takes into account all variables affecting airport operations. The analysis held all external causes of delay constant while adjusting only one variable, runway length, and therefore tested the effect of runway configuration on delay. The results show that factors under the airport's control cause delay, and that delay would be reduced by the proposed runway extension.

**RESOLUTION OPPOSING THE PHILADELPHIA INTERNATIONAL RUNWAY  
17-35 EXTENSION PROJECT**

**WHEREAS**, Gloucester County is the fastest growing county for residential growth in the Delaware Valley; and

**WHEREAS**, Gloucester County has achieved the 10<sup>th</sup> greatest growth in jobs of all counties in the United States of America; and

**WHEREAS**, recent focus group studies verified that a major element of this sustained, controlled growth success is due to quality of life issues including the bucolic character of the County; and

**WHEREAS**, due to its renewed quality of life, the Delaware Riverfront Area has experienced significant recent residential, recreational, and mixed use development activity; and

**WHEREAS**, the "Gloucester County Northeast Region Strategic Plan" envisions the opportunity to recapture the edges of the Delaware River as great places to live, work, play and enjoy nature through a cooperative regional approach that will provide for compatible rather than competing initiatives.

**WHEREAS**, the Federal Aviation Administration has released a Draft Environmental Impact Statement for the proposed Runway 17-35 Extension Project at the Philadelphia Airport; and

**WHEREAS**, the Runway 17-35 Extension proposal conflicts with the County's smart growth and the "Gloucester County, Northeast Region Strategy Plan's" goal to enhance the Delaware Riverfront Area's role as an environmental, cultural, and community asset

**WHEREAS**, Gloucester County has actively participated in and promoted Delaware Valley Regionalized Planning; for the past 40 years; and

**WHEREAS**, the success of such planning relies on all areas of the region sharing in the positive and negative impacts of infrastructure development; and

**WHEREAS**, a shared regional asset such as Philadelphia International Airport requires shared regional impacts rather than an impact focused on Gloucester County's residents.

**WHEREAS**, the Runway 17-35 Extension Project is incompatible with the County's smart growth Strategies Plan vision and produces an extreme undo burden of airport traffic noise and visual interruption singularly to the residents of Gloucester County; and

**WHEREAS**, the impact of such disruptive activities will produce an irrevocable reversal of the successful planned growth and open space protection practiced and delivered in Gloucester County; and

**WHEREAS**, other viable regional alternatives are available, such as greater use of the regions other airports.

**NOW THEREFORE BE IT RESOLVED**, that the Gloucester County Board of Chosen Freeholders strenuously opposes the Runway 17-35 Extension Project; and

**BE IT FURTHER RESOLVED**, that the Gloucester County Board of Chosen Freeholders supports an alternative that would promote greater use of other airports in the region.

**ADOPTED** at a meeting of the Board of Chosen Freeholders of the County of Gloucester held on Tuesday, November 23, 2004, at Woodbury, New Jersey.

COUNTY OF GLOUCESTER

ATTEST:

  
\_\_\_\_\_  
ROBERT N. DILELLA, CLERK

  
\_\_\_\_\_  
STEPHEN M. SWEENEY, DIRECTOR

## Letter 26

## Gloucester County, New Jersey Resolution - Stephen Sweeney

Comment Number	Comment	Response
26.1	...the Runway 17-35 Extension proposal conflicts with the County's smart growth and the "Gloucester County, Northeast Region Strategy's Plan's" goal to enhance the Delaware Riverfront Area's role as an environmental, cultural, and community asset...	The Philadelphia International Airport plays an important role in the Delaware Valley's economic vitality and is a community asset. As the EIS demonstrates, the proposed extension of Runway 17-35 will reduce delay, improve travel for area residents, and reduce air pollution. The Proposed Project is consistent with local planning. The land use compatibility study for this EIS determined that there were no incompatible land uses within the areas affected by the runway extension.
26.2	...the Runway 17-35 Extension Project is incompatible with the County's smart growth Strategies Plan vision and produces an extreme undo burden of airport traffic noise and visual interruption singularly to the residents of Gloucester County...	The Philadelphia International Airport plays an important role in the Delaware Valley's economic vitality and is a community asset. As the EIS demonstrates, the proposed extension of Runway 17-35 will reduce delay, improve travel for areas residents, and reduce air pollution. As shown in Figures 4.2-10 and 4.2-12, the proposed Runway 17-35 Extension will not significantly increase noise in Gloucester County, nor would it create new flight tracks in areas that planes currently do not fly over.
26.3	...the Gloucester County Board of Chosen Freeholders strenuously opposes the Runway 17-35 Extension Project..	The FAA has noted and considered your comment.
26.4	...the Gloucester County Board of Chosen Freeholders supports an alternative that would promote greater use of other airports in the region.	As described in Chapter 3, a number of alternatives, including greater use of other airports, were considered and analyzed for the Project. These alternatives were eliminated because they would not achieve the project's purpose and need of delay reduction at PHL in the short term.



**RESOLUTION NO. #2004-135**

**RESOLUTION OF THE TOWNSHIP OF HADDON, COUNTY  
OF CAMDEN AND STATE OF NEW JERSEY RELATIVE TO  
CONSIDERATIONS BEING GIVEN TO THE TOWNSHIP OF  
HADDON REGARDING CERTAIN RUNWAY  
CONSTRUCTION AT THE PHILADELPHIA  
INTERNATIONAL AIRPORT**

**WHEREAS**, the Mayor and Township Commissioners of the Township of Haddon Township wish to have our concerns considered by the Federal Aviation Administration's Capacity Enhancement Program Scoping Process, under Executive Order 13274, "Environmental Stewardship and Transportation Infrastructure Project Review," and

**WHEREAS**, that review supports the proposed expansion of the Philadelphia Airport, and

**WHEREAS**, there is local concern among residents of Haddon Township that regulations already on the books are not being strictly enforced as to altitude of flights over our community, such that greater noise is already being allowed in violation of present regulations, and

**WHEREAS**, the Mayor and Township Commissioners wish the right to review and comment on all future reports as to average and maximum noise profiles, as well as current and projected flight volumes over Haddon Township, and

**WHEREAS**, the Mayor and Township Commissioners urge no appreciable impact on Haddon Township from the proposed changes being contemplated for the expansion of the Philadelphia Airport, and

**WHEREAS**, the Mayor and Township Commissioners support the efforts of Congressman Robert E. Andrews (D-NJ) on our behalf in this matter concerning the expansion of the airport, including his suggestion that greater use be made of the airport in Atlantic City in order to reduce the volume of flights at the Philadelphia Airport, and

**WHEREAS**, the Mayor and Township Commissioners also support the input and efforts of New Jersey Governor Richard Codey, who is working on our behalf to minimize the impact on the communities in South Jersey from the expansion of the Philadelphia Airport, and

**WHEREAS**, the Mayor and Township Commissioners support the consideration of the construction of a north-south runway that might reduce the number of flights over South Jersey, and

**WHEREAS**, the Mayor and Township Commissioners now to submit these comments to you, for inclusion and consideration, before the formal close of the public comment period on December 1, 2004, and

WHEREAS, the Mayor and Township Commissioners wish for Haddon Township to be given all due consideration for these and any other impacts as may obtain from the expansion of the airport;

NOW THEREFORE, BE IT RESOLVED, by the Mayor and Township Commissioners of the Township of Haddon, County of Camden, State of New Jersey, that we ask the FAA and its agents to give all due consideration to planned and potential unintended consequential impacts to Haddon Township and surrounding communities as the expansion of the Philadelphia Airport is further contemplated, and, in particular, we ask earnest deliberations in ways to minimize any adverse or increased impacts from noise, from more frequent flights overhead, and any increase in noise caused by altitudes and any other such flight path considerations,

BE IT FURTHER RESOLVED, that this Resolution shall be distributed to the appropriate personnel representing the FAA, as well as to Congressman Andrews, as well as to the Camden County Freeholders, as well as to Governor Richard Codey, and to our elected State representatives, and in distribution to the appropriate media contacts for publication and notification to the residents of our community,

THE TOWNSHIP OF HADDON

BY:   
WILLIAM J. PARK, JR., MAYOR

BY:   
KATHLEEN V. HOGAN, COMMISSIONER

BY:   
JAMES T. BRODERICK, COMMISSIONER

I, do hereby certify the foregoing to be a true and correct copy of a Resolution adopted by the Board of Commissioners of the Township of Haddon at a regular meeting held on November 30, 2004.

  
DENISE P. ADAMS, TOWNSHIP CLERK

## Letter 27

## Haddon Twp, New Jersey Resolution - Mayor William Park

Comment Number	Comment	Response
27.1	There is local concern among residents of Haddon Township that regulations already on the books are not being strictly enforced as to altitude of flights over our community, such that greater noise is already being allowed in violation of present regulations.	Procedures can be applied at pilot's discretion. There are regulations that prohibit flights less than 1,500 feet above an obstruction except on takeoff and landing. In accordance with the Council on Environmental Quality's Regulations for Implementing NEPA, the EIS must address impacts associated with the Runway 17-35 Extension Project. The Runway 17-35 Extension will have no significant effect on aircraft altitudes.
27.2	The Mayor and Township Commissioners wish the right to review and comment on all future reports as to average and maximum noise profiles, as well as current and projected flight volumes over Haddon Township.	The Mayor and Township Commissioners have had the opportunity to review this EIS and participate in the public review and comment process, and will have the same opportunity for the Capacity Enhancement Program (CEP).
27.3	The Mayor and Township Commissioners support the efforts of the Congressman Robert E. Andrews (D-NJ) on our behalf in this matter concerning the expansion of the airport, including his suggestion that greater use be made of the airport in Atlantic City in order to reduce the volume of flights at the Philadelphia Airport.	As described in Section 3.3.1 (Alternative A2), FAA evaluated more extensive use of existing regional airports, including Atlantic City Airport. Neither FAA nor the Project Sponsor can dictate an increase in service or require airline service to an airport. Therefore, these alternatives cannot be guaranteed or relied upon to reduce delay at PHL and were therefore eliminated because they would not achieve the project's purpose and need.
27.4	The Mayor and Township Commissioners support the consideration of the construction of a north-south runway that might reduce the number of flights over South Jersey.	Runway 17-35 is a north-south runway. This project does not involve the construction of any new runways. However, the long-term Capacity Enhancement Program (CEP) may include the construction of additional runways.
27.5	The Mayor and Township Commissioners wish for Haddon Township to be given all due consideration for these and any other impacts as may obtain from the expansion of the airport. The Mayor and Township Commissioners of the Township of Haddon, County of Camden, State of New Jersey, ask the FAA and its agents to give all due consideration to planned and potential unintended consequential impacts to Haddon Township and surrounding communities as the expansion of the Philadelphia Airport is further contemplated.	Haddon Township is located within the Study Area for the Proposed Project and therefore any potential impacts to Haddon Township have been considered during preparation of the EIS. EIS Section 4.18 on cumulative impacts considers other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes them.
27.6	We ask earnest deliberations in ways to minimize any adverse or increased impacts from noise, from more frequent flights overhead, and any increase in noise caused by altitudes and any other such flight path considerations.	According to the FAA criteria discussed in Section 4.2, Noise, of this EIS, neither Alternative 1 nor Alternative 2 will cause significant noise impact anywhere in the Local or Regional Study Areas during either of the two study years, 2007 or 2015. Thus, no mitigation measures are required for the proposed Project.



TOWNSHIP OF  
**HAVERFORD**  
DELAWARE COUNTY

2325 DARBY ROAD HAVERTOWN, PA 19083-2251

MANAGER 610-446-9403  
HUMAN RESOURCES 610-446-9408  
FAX 610-446-3930

JOSEPH F. KELLY, *President*  
FRED C. MORAN, *Vice President*  
MICHAEL F. ENGLISH, *Manager/Secretary*  
RONALD E. POGUE, CPA, *Auditor*  
A. LEO SERENI, ESQ., *Solicitor*  
PENNONI ASSOCIATES, INC., *Engineer*

WARD COMMISSIONERS

1st Ward STEPHEN D'EMILIO  
2nd Ward JOSEPH F. KELLY  
3rd Ward ROBERT E. TRUMBULL  
4th Ward FRED C. MORAN  
5th Ward ANDY LEWIS  
6th Ward GEORGE TWARDY, ESQ.  
7th Ward JAMES E. MCGARRITY  
8th Ward KENNETH B. RICHARDSON  
9th Ward CAROL A. McDONALD

November 24, 2004

Marion Blakey  
FAA Administrator  
800 Independence Avenue, SW  
Washington, D.C. 20591

Dear Marion;

On behalf of the Township of Haverford, I am writing to request that the FAA extend the deadline for the Public Comment on the Environmental Impact Statement (EIS) for the extension of Runway 17-35 at the Philadelphia International Airport.

As I am sure you are aware, Delaware County Council has hired a consultant to review this (EIS) and prepare comments. Many of Haverford Township's 49,608 residents would be greatly affected by the increase of air traffic resulting from the extension of Runway 17-35.

Thank you for your consideration of this request.

Sincerely,

Michael F. English  
Township Manager/Secretary

MFE/kk

cc: The Honorable W. Curtis Weldon  
Board of Commissioners



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Office of the Associate  
Administrator for Airports

Response to Letter #28

800 Independence Ave., SW  
Washington, DC 20591

DEC 20 2004

Mr. Michael F. English  
Township Manager/Secretary  
Township of Haverford  
2325 Darby Road  
Havertown, PA 19083

Dear Mr. English:

Administrator Blakey has asked me to respond to your November 24 letter about the Philadelphia International (PHL) Airport Runway 17-35 Extension Project. You stated that Haverford Township's consultant did not have enough time to analyze the project documents properly. Therefore, you asked for an extension to the Draft Environmental Impact Statement (DEIS) public comment period.

The Federal Aviation Administration (FAA) is sensitive to the concerns of residents surrounding PHL. Because of this, we have conducted extensive public outreach to keep the public informed and to hear their concerns. While it is not possible for us to meet individually with all townships and local communities in the project area, we have attempted to notify communities of upcoming events and to conduct public meetings in centralized locations. Our first step in notifying the public was to publish a Notice of Intent to prepare an environmental impact statement in the Federal Register on August 1, 2003. Since then, we established a project Web site ([www.phlrunway17-35eis.com](http://www.phlrunway17-35eis.com)) and published, several newsletters. We also conducted a public scoping meeting on August 12, 2003 and held three sets of public outreach meetings in April, May, and September 2004 in Pennsylvania, Delaware, and New Jersey. We engaged the expertise of State and Federal agencies during DEIS development.

We also briefed congressional members on November 5, 2004 and held public hearings on November 15, 16, 17, and 18, 2004 at locations recommended by congressional members. At every meeting, we let the attendees know about upcoming events, the DEIS schedule, ways to get information, and how to get a copy of the DEIS. We also provided this information on the project Web site.

We released copies of the DEIS on October 14, 2004, one month before the public hearings. We mailed Executive Summaries, compact disks of the full DEIS, and technical studies to over 1,000 households. We also sent copies to local, State, and Federal officials. We gave out hard copies of the entire six-volume set to 40 public libraries. We made available Executive Summaries and compact disks at the hearings to anyone who asked for one. They were available via the project Web site, e-mail, telephone, fax, or letter.

We have conducted procedures and analyses to the rigorous standards prescribed by the Council on Environmental Quality (CEQ). CEQ standards include a minimum 45-day public comment period. This project had a 47-day comment period. The CEQ regulations (section 1506.10 (d)) allow the lead Federal agency or the Environmental Protection Agency to extend the public comment period if "compelling reasons of national policy" are shown. Considering the extensive public involvement outlined above, the FAA believes the 47-day public comment period was satisfactory.

The FAA is aware that Delaware County Council has hired a consultant to review the DEIS and prepare comments. The FAA has and will continue to provide any information asked for by Delaware County Council or their consultants to aid in their review. Although the comment period is closed, the FAA will make every reasonable effort to consider comments filed after that deadline and before we publish the Final Environmental Impact Statement (FEIS). We expect to publish the FEIS in late February 2005.

If I can be of further help, please let me know.

Sincerely,

Original Signed by:  
Woodie Woodward

Woodie Woodward  
Associate Administrator  
for Airports

**RESOLUTION NO. 1492-2004**

**WHEREAS, the Board of Commissioners of the Township of Haverford, County of Delaware, Commonwealth of PA, has great concern regarding the safety, welfare, and quality of life for all its' residents; and**

**WHEREAS, the proposed expansion of Runway 17-35 at Philadelphia International Airport will create a number of potential problems for Haverford Township residents; and**

**WHEREAS, Delaware County Council is planning to engage a consultant to monitor the concerns raised by a number of municipalities in the County.**

**NOW, THEREFORE, BE IT RESOLVED by the Board of Commissioners of the Township of Haverford, County of Delaware, Commonwealth of Pennsylvania, that the said Board of Commissioners has grave concerns regarding the expansion of Runway 17-35. This will have a strong impact on the health, safety, welfare, and quality of life on Haverford Township residents, and we strongly urge Delaware County Council, State and Federal Representatives to articulate the Boards' concerns with respect to the Runway 17-35 expansion to the Federal Aviation Administration.**

**RESOLVED this 19<sup>th</sup> day of April, A.D., 2004.**

**TOWNSHIP OF HAVERFORD**

**BY: JOSEPH F. KELLY  
President  
Board of Commissioners**

**Attest: Michael F. English  
Township Manager/Secretary**

**Letter 29****Haverford Twp, Pennsylvania - Joseph Kelly**

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
29.1	This will have a strong impact on the health, safety, welfare, and quality of life on Haverford Township residents, and we strongly urge Delaware County Council, State and Federal Representatives to articulate the Boards' concerns with respect to the Runway 17-35 expansion to the Federal Aviation Administration.	The study has shown that there are no significant impacts from the Proposed Project. Quality of life depends on a number of factors. Because there will be no significant impacts, it is unlikely that the Proposed Project would adversely affect quality of life, however, the FAA has noted your comment.





# Borough Of Lansdowne

12 East Baltimore Avenue  
Lansdowne, PA 19050  
(610) 623-7300  
Fax: (610) 623-5533  
[www.lansdowneborough.com](http://www.lansdowneborough.com)

*Jayne C. Young*  
Mayor  
*David R. Forrest*  
Borough Manager

November 30, 2004

Ms. Susan McDonald  
U.S. Department of Transportation  
Federal Aviation Administration  
Harrisburg Airport Districts Office  
3905 Hartzdale Drive, Ste. 508  
Camp Hill, PA 17011

Dear Ms. McDonald:

The Borough of Lansdowne wishes to comment on the Draft Environmental Impact Statement (DEIS) for the proposed Runway 17-35 Extension Project at the Philadelphia International Airport.

We do not feel that enough time was provided to adequately review the DEIS. This is a large, technical document requiring extensive analysis. We understand that Delaware County has hired a consultant to evaluate the DEIS. We think this is a good idea, but more time should be provided to allow the consultant to complete his work.

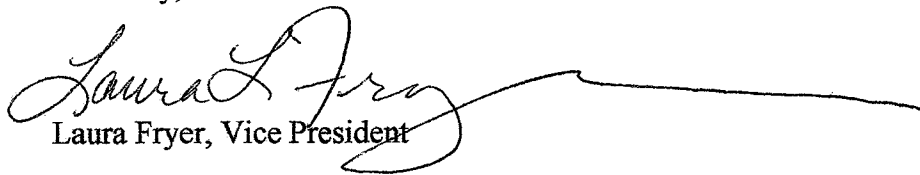
Apart from procedural issues, Lansdowne is concerned about the potential negative impact this project might have on the quality of life of a significant portion of Delaware County. For example, DEIS data indicated that for most communities included in the study area, including Lansdowne, there would be no significant noise impact. We question the FAA's methodology in coming to this conclusion. We understand that the day-night average sound level (DNL) was used as a measure of the noise impact as a result of the project. We are concerned that this average is not an adequate measure. We believe a better way to evaluate the noise impact would be to measure the impact of each additional aircraft flying over the region. After all, this is how people actually experience aircraft noise.

Ms. Susan McDonald  
November 30, 2004  
Page 2

We are also concerned that the project will increase the chance that a catastrophic accident may occur over this densely populated area of the County. It was not clear to us that safety issues were adequately addressed in the DEIS. Again, more time to review the document would be helpful in this regard.

We hope you take our comments into consideration.

Sincerely,

A handwritten signature in cursive script that reads "Laura Fryer". The signature is written in black ink and extends across the width of the page with a long horizontal flourish.

Laura Fryer, Vice President

Comment Number	Comment	Response
30.1	We do not feel that enough time was provided to adequately review the DEIS. This is a large, technical document requiring extensive analysis. We understand that Delaware County has hired a consultant to evaluate the DEIS. We think this is a good idea, but more time should be provided to allow the consultant to complete his work.	The Federal Aviation Administration complied with the Code of Federal Regulations (CFR) which states the required comment period for a DEIS is 45 days (40 CFR 1506.10(c)). At the Public Information Meetings held in September 2004, the release date of the DEIS and the DEIS Public Hearing dates were made public. This is a streamlined project and the FAA believes the comment period should only be extended for compelling reasons of national importance but the FAA did make every reasonable effort to consider those comments received within a reasonable period after the comment period closed.
30.2	Apart from procedural issues, Lansdowne is concerned about the potential negative impact this project might have on the quality of life of a significant portion of Delaware County. For example, DEIS data indicated that for most communities included in the study area, including Lansdowne, there would be no significant noise impact. We question the FAA's methodology in coming to this conclusion. We understand that the day-night average sound level (DNL) was used as a measure of the noise impact as a result of the project. We are concerned that this average is not an adequate measure. We believe a better way to evaluate the noise impact would be to measure the impact of each additional aircraft flying over the region. After all, this is how people actually experience aircraft noise.	<p>FAA Order 1050.1E requires that the DNL noise metric be used to identify the significant impacts. As described in Section 4.2, Noise, of this EIS, additional noise metrics were computed at a large number of noise-sensitive locations in the Study Area including the Night DNL, the Maximum A-weighted Sound Level (Lmax), the Time Above Sound Levels of 65, 75, and 85 dB for a 24-hour day (TA-24), and the Sound Exposure Level (SEL).</p> <p>The last significant governmental review of the use of DNL for determining aircraft noise / land use compatibility in the U.S. was conducted by the Federal Interagency Committee on Noise (FICON) and published in 1992. At that time, the Committee recommended the continued "...use of the DNL metric as the principal means for describing long-term noise exposure for civil and military aircraft operations." [Federal Interagency Committee on Noise, "Federal Agency Review of Selected Airport Noise Analysis Issues," August 1992] Though there are more flights now and greater population densities than when the DNL metric was originally proposed, the development of the original relationship between aircraft sound exposure and effects on people was based solely on sound levels and percent of people affected. Hence, increasing numbers of flights or increasing populations were incorporated to the extent that the increased operations raise the sound levels in terms of DNL in residential areas.</p> <p>This same FICON study also recommended that other metrics, in addition to DNL, be used to help characterize specific noise effects. These additional or "supplemental" metrics were to be used at the discretion of the agency as an aid "...to determine noise impacts at specific noise-sensitive locations...." [FICON, 1992] Finally, the FICON report also recommended that if "...noise-sensitive areas will be at or above DNL 65 dB and will have an increase of DNL 1.5 dB or more, further analysis should be conducted of noise sensitive areas between DNL 60-65 dB having an increase of DNL 3 dB or more due to the proposed airport noise exposure." [FICON, 1992] All these recommendations were directed at improving public understanding of the effects of changes in aircraft noise. The current study has made use of these recommendations and provided supplemental metrics and analyses.</p> <p>Any promulgation of standards would be subject to public review.</p>
30.3	We are also concerned that the project will increase the chance that a catastrophic accident may occur over this densely populated area of this County. It was not clear to us that safety issues were adequately addressed in the DEIS.	Safety is the FAA's highest priority, and the agency will ensure that the design of the Runway 17-35 Extension Project properly protects the public safety. The Preferred Alternative will meet all FAA safety standards and design criteria. The extended runway will reduce congestion in the current primary east-west operating direction, and will reduce the reliance on Runways 9L/27R and 9R/27L during heavy demand. This will enhance safety.



Philadelphia International Airport  
Runway 17-35 Extension Project  
Environmental Impact Statement

Public Hearings  
November 15, 16, 17, and 18, 2004

Public Comment Form

The Federal Aviation Administration (FAA) encourages all interested parties to provide comments concerning the scope and content of the DEIS. Comments should be as specific as possible and address the analysis of potential environmental impacts and the adequacy of the proposed action or merits of alternatives and the mitigation being considered. Reviewers should organize their participation so that it is meaningful and makes the agency aware of the viewer's interests and concerns using quotations and other specific references to the text of the DEIS and related documents. Matters that could have been raised with specificity during the comment period on the DEIS may not be considered if they are raised later in the decision process. This commenting procedure is intended to ensure that substantive comments and concerns are made available to the FAA in a timely manner so that the FAA has an opportunity to address them.

Please clearly print your contact information and your comment on the DEIS in the space below. Space is also available on the back page. Please either drop this form off tonight at the sign-in table or mail this form to the contact and address listed at the bottom of the back page. You can also submit your comments via email ([smcdonald.faa.17-35@vhb.com](mailto:smcdonald.faa.17-35@vhb.com)) or the Project web site ([www.phlrunway17-35eis.com](http://www.phlrunway17-35eis.com)), where the DEIS is available.

Comments must be received by **December 1, 2004** in order to be considered.

Thank you for participating.

Name: SUPT. JOSEPH J DALY

Address: TOWNSHIP OF LOWER MERION 75 E. LANGSTON AVE

City: ARDMORE

State: PA Zip Code: 19003

E-mail Address: J.DALY@LOWER.MERION.PA.PE

PLEASE PRINT CLEARLY

Comment: TOWNSHIP IS CONCERNED ABOUT NOT  
BEING INCLUDED IN ENVIRONMENTAL IMPACT STATEMENT  
SINCE FLIGHTS UTILIZING RUNWAY 17-35 CURRENTLY  
EFFECT QUALITY OF LIFE ISSUES IN THE COMMUNITY.  
ATTACHED PLEASE FIND A RESOLUTION PASSED BY  
THE BOARD OF COMMISSIONERS AND A LETTER FROM  
BOARD PRESIDENT JOSEPH M. MANICO ESQ. BOTH DOCUMENT  
OUTLINE COMMUNITY CONCERNS.

## Runway 17-35 Philadelphia International Airport

Whereas, the Board of Commissioners of the Township of Lower Merion, County of Montgomery, Commonwealth of Pennsylvania have great concern regarding the health, safety, welfare and quality of life of its residents; and

WHEREAS, the Township has learned of a proposed expansion of Runway 17-35 at the Philadelphia International Airport which could potentially impact our residents and their quality of life possibly having a detrimental effect on our community; and

WHEREAS, the Township of Lower Merion joins with its fellow municipalities in Delaware County in expressing concern regarding this runway expansion; and

WHEREAS, the Township has had great difficulty in obtaining information from officials at the Philadelphia International Airport and the Federal Aviation Administration regarding plans for a possible runway expansion and its potential impact.

NOW, THEREFORE, BE IT RESOLVED, that we the members of the Board of Commissioners of the Township of Lower Merion desire that our concerns over the proposed expansion of Runway 17-35 project be communicated to our Federal Representatives, Senators Arlen Specter and Rick Santorum and Congressman Jim Gerlach and our State Officials, Senator Connie Williams and Representatives Daylin Leach, Melissa Murphy Weber and Kathy Manderino requesting that they call upon the Federal Aviation Administration and related entities to open lines of communication with the Township in order to better inform and advise our residents regarding this potential project.

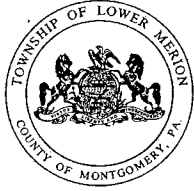
## Letter 31

## Lower Merion Twp, Pennsylvania - Joseph Daly

Comment Number	Comment	Response
31.1	The Township of Lower Merion is concerned about not being included in the Environmental Impact Statement [EIS] since flights utilizing Runway 17-35 currently effect quality of life issues in the community.	<p>Under the National Environmental Policy Act, the Federal Aviation Administration must analyze the environmental effects of the proposed project. To capture those effects, a Local and Regional Study Area was established for each environmental effect based on their appropriate regulatory requirements.</p> <p>Your community was considered and included in the project's Noise Study Area and the Land Use Regional Study Area, as shown in Figures 3-12 through 3-15 of the Noise Technical Report DEIS Appendix A.1.</p>
31.2	The Board of Commissioners of the Township of Lower Merion, County of Montgomery, Commonwealth of Pennsylvania have great concern regarding the health, safety, welfare and quality of life of its residents.	Quality of life depends on a number of factors. Because there will be no significant impacts, it is unlikely that the Proposed Project would adversely affect quality of life, however, the FAA has noted your comment.
31.3	The Township of Lower Merion has had great difficulty in obtaining information from officials at the Philadelphia International Airport and the Federal Aviation Administration regarding plans for a possible runway expansion and its potential impact.	This EIS provides this information. Additionally, the City of Philadelphia met with Lower Merion Township officials after the November 2004 Public Hearings and had an open exchange of information.
31.4	We call upon the Federal Aviation Administration and related entities to open lines of communication with the Township in order to better inform and advise our residents regarding this potential project.	The Federal Aviation Administration (FAA) used several methods to reach out and notify the public about the project and public meetings. These methods included placing notices in area newspapers, sending information letters to township officials, sending meeting flyers to area churches and libraries, and sending newsletters or post cards about upcoming meetings to everyone on the project mailing list.

**TOWNSHIP  
OF  
LOWER MERION**

MONTGOMERY COUNTY



BOARD OF COMMISSIONERS

75 E. Lancaster Ave.  
Ardmore, Pa. 19003 2376  
Telephone: (610) 649-4000  
TDD: (610) 645-6277  
FAX: (610) 645-6145

JOSEPH M. MANKO, ESQ.  
*President*

MATTHEW J. COMISKY, ESQ.  
*Vice President*

CHARLES J. BLOOM, ESQ.  
ROCCO J. BURDO  
KENNETH E. DAVIS  
JANE DELLHEIM  
JAMES S. ETTELSON, ESQ.  
CHERYL B. GELBER  
LEWIS F. GOULD, JR., ESQ.  
MARYAM W. PHILLIPS  
BRUCE D. REED  
ELIZABETH S. ROGAN  
FELICE G. WIENER  
MARY WRIGHT

DOUGLAS S. CLELAND  
*Manager*

EILEEN R. TRAINER, CMC  
*Secretary*

GILBERT P. HIGH, JR., ESQ.  
*Solicitor*

EDWARD P. PLUCIENNIK, PE  
*Engineer*

November 15, 2004

Marion Blakey, Administrator  
Federal Aviation Administration  
800 Independence Avenue SW  
Washington, DC 20591

Dear Administrator Blakey:

For some time now, members of our Township's Board of Commissioners and I have been receiving inquiries from many of our concerned constituents regarding the proposed expansion of Runway 17-35 at the Philadelphia International Airport.

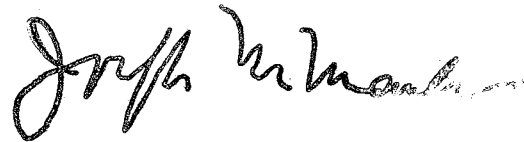
In short, they fear that the proposed expansion will have an unacceptable impact on their quality-of-life. These concerns have risen as a result of anticipating seeing, and more importantly hearing, more commercial aircraft flying at lower altitudes, directly attributable to the expanded use of the existing Runway 17-35. The current increase in activity, coupled with the proposed expansion of this runway to accommodate more and larger jet aircraft, has given rise to concerns over air pollution, structural damage from prolonged exposure to vibrations, loss of property value and the fears of a crash. This latter fear, with the tragic helicopter / airplane crash in Merion as a backdrop, has given rise to other questions, such as the level of preparedness, and the qualifications and skills of emergency personnel to effectively respond to such an event. The potential use of aircraft for terrorist acts adds to this heightened fear.

In attempting to determine potential impact from FAA Representatives, members of our Township staff were informed that the impact of this proposed project would only be felt in Delaware and Chester Counties in Pennsylvania and New Castle County in Delaware. We were further advised that although an Environmental Impact Study (EIS) was being completed, it would assess impact in only those areas.

Local FAA officials have declined our invitation to attend a town meeting to enlighten citizens of our community as to the scope of the project and to answer their questions. Further research and input from informed residents seems to confirm that in 2005 there will be nearly 45,000 additional aircraft utilizing runway 17-35, much of which will be at or below an altitude of 2,000 feet over the Township. These conflicting reports are disconcerting and only serve to add distrust to the growing list of concerns.

On behalf of the Board of Commissioners and the residents of the Township of Lower Merion, I therefore respectfully request that (1) you arrange to have appropriate FAA personnel attend a meeting in our Township, (2) include our Township in the pending EIS and (3) postpone the project for a suitable period of time to allow the expanded EIS to be completed and that an opportunity for input from directly affected communities be provided.

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph M. Manko". The signature is fluid and cursive, written in a professional style.

Joseph M. Manko, Esquire  
President, Board of Commissioners

cc: Susan McDonald  
T. Jeffrey Shull, Philadelphia Chief of Staff  
Charles J. Isdell, Philadelphia Aviation Director  
Calvin Davenger, Philadelphia Deputy Aviation Director  
Commissioner Matthew J. Comisky  
Commissioner Charles J. Bloom  
Commissioner Rocco J. Burdo  
Commissioner Kenneth E. Davis  
Commissioner Jane Dellheim  
Commissioner James S. Ettelson  
Commissioner Cheryl B. Gelber  
Commissioner Lewis F. Gould, Jr.  
Commissioner Maryam W. Phillips  
Commissioner Bruce D. Reed  
Commissioner Elizabeth S. Rogan  
Commissioner Felice G. Wiener  
Commissioner Mary Wright  
Senator Arlen Specter  
Senator Rick Santorum  
Congressman Jim Gerlach  
Congressman Curt Weldon





U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Office of the Associate  
Administrator for Airports

Response to Letter #32

800 Independence Ave., SW.  
Washington, DC 20591

DEC 20 2004

The Honorable Joseph M. Manko  
President, Board of Commissioners  
Township of Lower Merion  
75 E. Lancaster Avenue  
Ardmore, PA 19003

Dear Mr. Manko:

Administrator Blakey has asked me to respond to your November 15 letter about the Philadelphia International (PHL) Airport Runway 17-35 Extension Project. The Federal Aviation Administration (FAA) issued a Draft Environmental Impact Statement (DEIS) for the proposed project on October 14.

You expressed concern about many issues related to aircraft flight. You asked that FAA personnel attend a meeting in the township of Lower Merion to discuss the PHL DEIS. You also asked the FAA to include an analysis of impacts on the Township in the EIS. You want us to postpone the project to allow for completing this "expanded" EIS with an opportunity for comments.

The FAA is sensitive to the concerns of the communities surrounding PHL. We have made every reasonable effort to identify potential impacts to the surrounding communities and to the natural environment. The EIS does show in its noise analysis what impacts may occur in the township of Lower Merion. We conducted extensive public outreach before we released the DEIS. The first step we took was to publish a Notice of Intent to prepare an EIS in the Federal Register on August 1, 2003. It was not possible for us to meet individually with all townships and local communities in the project area. Instead, through publishing notices in local newspapers, we notified communities of upcoming events. We held public meetings in centralized locations.

We conducted all environmental studies following the rigorous standards prescribed by the Council of Environmental Quality and the National Environmental Policy Act. We also engaged the expertise of the State and Federal agencies. We coordinated our environmental studies with these agencies and presented them to the public on several occasions. We developed a project Web site and published several newsletters. We conducted a public scoping meeting on August 12, 2003 and held three sets of public outreach meetings in April, May, and September 2004 in Pennsylvania, Delaware, and New Jersey. At every meeting, we let attendees know about upcoming events, the DEIS schedule, ways to get and provide information, and how to get a copy of the DEIS.

In September 2004, we held a public meeting in Delaware County to present the findings of our noise analysis. At that meeting, we presented the changes in noise levels that could result over many communities surrounding PHL for the three alternatives we are considering. Our presentation showed where the flight tracks and noise impacts on communities, including the township of Lower Merion, were located.

At the time we released the DEIS for comment, we mailed Executive Summaries and compact disks of the full DEIS and technical studies to over 1,000 households that asked for them. We sent copies to local, State and Federal officials, and hard copies of the entire six-volume set to 40 public libraries. We also made Executive Summaries and compact disks available at the hearings to anyone who asked for one through our Web site, e-mail, telephone, fax, or letter. The public comment period closed on December 1.

For these reasons, we do not believe that a meeting specific to the township of Lower Merion or extension of the public comment period for the DEIS is warranted. The FAA will, however, make every reasonable effort to consider comments filed after the deadline and before we publish the Final EIS.

If I can be of further help, please let me know.

Sincerely,

Original Signed by:  
Woodie Woodward

Woodie Woodward  
Associate Administrator  
for Airports

BOROUGH OF MEDIA  
CHARTERED MARCH 10TH, 1850  
301 N. JACKSON STREET

ROBERT A. MCMAHON  
MAYOR  
ROBERT GIOGGIA, PH. D.  
TREASURER  
JEFFREY A. SMITH  
BOROUGH MANAGER  
ROBERT DIMOND  
TAX COLLECTOR  
LILLI MIDDLEBROOKS, ESQ.  
SOLICITOR

2ND FLOOR  
MEDIA, PA 19063  
610 566-5210  
FAX # 610 566-0335

COUNCIL  
JOAN M. HAGAN  
PRESIDENT  
PAUL M. ROBINSON  
VICE-PRESIDENT  
C. BARRY SHERWIN  
GAIL M. WHITAKER, ESQ.  
DEBORAH KRULL, ESQ.  
PETER ALYANAKIAN  
BILL TYSON

December 6, 2004

Susan McDonald  
Environmental Protection Specialist, Federal Aviation Administration  
Harrisburg Airports District Office  
3905 Hartzdale Drive  
Camp Hill, PA 17011

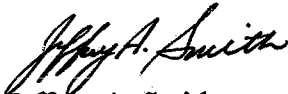
**Re: Runway 17-35 Extension Environmental Impact Statement**

Dear Ms. McDonald:

Media Borough Council adopted the attached resolution on November 29, 2004 stating their sentiments in opposition to the runway extension. Please enter the resolution into the public record for consideration on this matter.

If you have any questions, please feel free to contact me, at 610-566-5210, Ext. 242. Thank you for your assistance.

Sincerely,



Jeffrey A. Smith  
Borough Manager

JAS/cg

Attachment

cc: Robert McMahon, Mayor, Media Borough  
Media Borough Council

**BOROUGH OF MEDIA**

**RESOLUTION # 2004-14**

**Opposition To The Extension of Runway 17-35 At The Philadelphia International Airport**

**WHEREAS**, the Federal Aviation Administration (FAA) is proposing the extension of runway 17-35 at the Philadelphia International Airport from 5,459 feet to 7,000 feet; and

**WHEREAS**, the extension will allow regional jets to take off from and land on runway 17-35; and

**WHEREAS**, regional jets carry heavier loads of fuel than the aircrafts that currently take off from and land on runway 17-35; and

**WHEREAS**, traffic on runway 17-35 is anticipated to increase if the FAA permits the extension; and


**WHEREAS**, if the FAA permits the extension, the regional jets' flight pattern will possibly carry them over sections of Media Borough; and

**WHEREAS**, this Council is concerned that regional jet and other traffic that would result from the extension will increase stress and noise levels within the Borough, cause vibrations in structures in the vicinity of the take off and landing flight plans, cause an increase in the possibility of hazardous material falling from aircrafts, and cause an increase in other safety risks that will negatively impact the health, safety, and welfare of the Borough, its residents, business people, and visitors; and

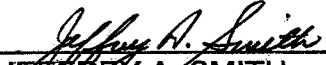
**WHEREAS**, it is estimated that the delay time, after the expense and increased noise and stress, will be reduced from 15.3 minutes to 15.1 minutes;

**NOW THEREFORE BE IT RESOLVED** the Borough of Media opposes the proposed extension of runway 17-35.

**APPROVED AND RESOLVED THIS 29<sup>th</sup> DAY OF NOVEMBER 2004**

BY:   
JOAN M. HAGAN, COUNCIL PRESIDENT

ATTEST:

  
JEFFREY A. SMITH  
BOROUGH SECRETARY

## Letter 33

Media Borough - Jeffrey Smith

Comment Number	Comment	Response
33.1	Media Borough Council adopted the attached resolution on November 29, 2004 stating their sentiments in opposition to the runway extension. Please enter the resolution into the public record for consideration on this matter.	The FAA has noted and considered your comment.
33.2	Whereas, this Council is concerned that regional jet and other traffic that would result from the extension will increase stress and noise levels within the Borough, cause vibrations in structures in the vicinity of the take off and landing flight plans, cause an increase in the possibility of hazardous material falling from aircrafts, and cause an increase in other safety risks that will negatively impact the health, safety, and welfare of the Borough, its residents, business people, and visitors...	The FAA has noted and considered your comment. As the EIS demonstrates, the proposed project will decrease air pollution, will not result in significant noise impacts at any noise-sensitive location, will not increase the possibility of hazardous materials falling from aircraft, and will not increase safety risks within the Study Area.
33.3	Whereas, it is estimated that the delay time, after the expense and increased noise and stress, will be reduced from 15.3 minutes to 15.1 minutes.	Alternative 1, the Preferred Alternative, will reduce delays in 2007 by 1.4 minutes.

**From:** Bob Dougherty[SMTP:CLERK@MCSYSTEMS.NET]  
**Sent:** Monday, November 22, 2004 4:33:19 PM  
**To:** PHL 17-35 EIS  
**Subject:** PHL Runway Expansion Project  
**Auto forwarded by a Rule**

This is in response to the request for public comment regarding the runway expansion project at Philadelphia Airport. As a resident and official in the Borough of National Park in Gloucester County, NJ my major concern is an increase in air traffic noise. We presently have more than our fair share of air traffic noise and the thought of an increase in it does cause me great concern. Will the FAA or Philadelphia Airport be responsible for mitigation measures should air traffic noise increase beyond acceptable levels in our community. It is my understanding that there is a process in which homes and buildings have their soundproofing qualities increased and the cost is borne by the government. There is also the concern regarding our residents that would be exposed to increased noise while out of doors. What protection measures will be available?

Robert Dougherty  
Clerk/Administrator

## Letter 34

## National Park Borough, New Jersey - Robert Dougherty

Comment Number	Comment	Response
34.1	Will the FAA or Philadelphia Airport be responsible for mitigation measures should air traffic noise increase beyond acceptable levels in our community? It is my understanding that there is a process in which homes and buildings have their soundproofing qualities increased and the cost is borne by the government.	According to the FAA criteria discussed in Section 4.2, Noise, of this EIS, neither Alternative 1 nor Alternative 2 will cause significant noise impact anywhere in the Local or Regional Study Areas during either of the two study years, 2007 or 2015. Thus, no mitigation measures are required for the proposed Project.
34.2	There is also the concern regarding our residents [National Park Borough] that would be exposed to increased noise while out of doors. What protection measures will be available?	Because no significant noise impacts result from the proposed Build Alternatives, no noise mitigation measures will be implemented in connection with this project. Regarding National Park Borough in particular, noise levels in that community are not expected to change in any substantive way as a result of either Build Alternative. In fact, Figures 4.2-10 through 4.2-13 indicate that very small improvements in noise are expected in that area as a result of the Build Alternatives, caused by small reductions in the number of aircraft landing on Runway 27L.

**RESOLUTION OPPOSING THE PHILADELPHIA INTERNATIONAL  
RUNWAY 17-35 EXTENSION PROJECT**

WHEREAS, Gloucester County is the fastest growing county for residential growth in the Delaware ; and

WHEREAS, Gloucester County has achieved the 10<sup>th</sup> greatest growth in jobs of all counties in the United States of America; and

WHEREAS, recent focus group studies verified that a major element of this sustained, controlled growth success is due to the quality of life issues including the bucolic character of the county; and

WHEREAS, due to its renewed quality of life, the Delaware Riverfront Area has experienced significant residential, recreational and mixed use development activity; and

WHEREAS, the Borough of National Park, located along the Delaware River, has experienced recent residential development, in part due to its location along the Delaware River; and

WHEREAS, the Runway 17-35 Extension Project will impact the Borough with increased noise and visual interruption; and

WHEREAS, the Borough recognizes that the Philadelphia Airport is an asset to the region, therefore the impact of airport's growth should be shared by the entire region, not just the municipalities along the New Jersey side of the Delaware River; and

WHEREAS, other airports in the region could share in the growth of necessary air traffic;



NOW, THEREFORE, BE IT RESOLVED, that the Mayor and Council opposes the Runway 17-35 Extension Project supporting the alternative of a greater use of other airports in the region.

BOROUGH OF NATIONAL PARK

---

PATRICIA M. KOLOSKI, MAYOR

ATTEST:

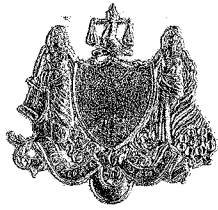
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ROBERT DOUGHERTY, CLERK

## Letter 35

## National Park Borough, New Jersey - Patricia Koloski

Comment Number	Comment	Response
35.1	The Runway 17-35 Extension Project will impact the Borough with increased noise and visual interruption.	The noise analyses of the DEIS show that the comment, as it pertains to the effects of either of the two Build Alternatives on National Park Borough, is not correct. Figures 4.2-10 through 4.2-13 actually show very minor decreases in noise exposure in National Park Borough compared to the No-Action Alternative, due primarily to the slight reduction in landing traffic on parallel Runways 27L and 27R.
35.2	The Philadelphia Airport is an asset to the region, therefore the impact of airport's growth should be shared by the entire region, not just the municipalities along the New Jersey side of the Delaware River.	Section 4.2 and the associated graphics, particularly those showing the flight tracks, demonstrate that aircraft fly over municipalities along the New Jersey side of the Delaware River, as well as municipalities in Delaware and Pennsylvania.
35.3	Other airports in the region could share in the growth of necessary air traffic.	As described in Chapter 3, a number of alternatives, including greater use of other airports, were considered and analyzed for the Project. These alternatives were eliminated because they would not achieve the project's purpose and need of delay reduction at PHL in the short term.
35.4	The Mayor and Council opposes the Runway 17-35 Extension Project supporting the alternative of a greater use of other airports in the region.	The FAA has noted and considered your comment.



# CITY OF PHILADELPHIA

Philadelphia International Airport  
Terminal E  
Philadelphia, Pennsylvania 19153

(215) 937-6760  
FAX (215) 937-6759

CHARLES J. ISDELL  
Director of Aviation

November 30, 2004

Ms. Susan McDonald  
Environmental Protection Specialist  
Federal Aviation Administration  
Harrisburg Airports District Office  
3905 Hartzdale Drive, Suite 508  
Camp Hill, PA 17011

Re: Philadelphia International Airport  
Comments on the Runway 17-35 Extension  
Draft Environmental Impact Statement

Dear Ms. McDonald:

The City of Philadelphia's Department of Commerce, Division of Aviation, as owner and operator of Philadelphia International Airport, takes this opportunity to present its perspective in support of the Runway 17-35 Extension Project.

## Airport History

The City of Philadelphia officially entered the field of air transportation in 1925 when it provided 125 acres of land adjacent to Island Road (now part of the northeast corner of Philadelphia International Airport) for training aviators of the Pennsylvania National Guard. Philadelphia's strategic location along the Delaware River had attracted military naval operations since colonial times. Not surprisingly, this property became attractive to the Navy and War departments for developing flying fields in the area.

The early Philadelphia Airport mud fields served as a midway point between New York City and Washington D.C., on the mail route flown by the United States Post Office. The airfield was within easy reach of city center and was located in an area well positioned for rail, marine, and air transportation facilities.

## Evolution of Runway 17-35

The airfield, then called The Municipal Aviation Landing Field, was formally dedicated on October 22, 1927 by Charles A. Lindbergh. To permit expansion, the City in 1930 acquired the Hog Island site, which contained the giant emergency shipbuilding yards of World War I. Following delays caused by the Great Depression, actual building and landing field construction began in 1937 for the commercial airport. The Airport was formally opened as Philadelphia Municipal Airport on June 20, 1940. One of the three original runways was Runway 1-5, which is now Runway 17-35. (See photo exhibit attached.)

### Philadelphia International Airport Today

PHL's economic stability is largely due to its position as the only major commercial airport serving most of the approximately 8 million people who live within a 90-minute drive. Among the top 15 U.S. connecting hub airports, Philadelphia has the highest percentage (63%) of originating passengers - passengers who begin and end their trips here. During the fiscal year beginning July 1, 2003 and ending June 30, 2004 an all-time passenger traffic mark was recorded with 26,190,976 total passengers and 3,873,337 international passengers passing through PHL. A 2004 calendar year record approaching 27 million passengers is projected. A majority of this local demand is generated from Southeastern Pennsylvania, Southern New Jersey and a portion of Northern Delaware. PHL will soon be the only Pennsylvania airport designated a "large hub" by the FAA, meaning that it handles more than 1% of the entire nation's passengers.

### Project Need

Since 1990, the FAA has ranked PHL among the top 20 airports in terms of total delays. In 2003, PHL was the 13<sup>th</sup> busiest and sixth most-delayed airport in the nation. The FAA, in fact, has identified PHL as one of the eight "pacing" airports contributing to delays throughout the National Airspace System. On an average day, PHL experiences a total of 160 hours of aircraft flight delays. A single hour of flight delay results in \$1,260 of additional airline operating costs such as labor and fuel. This ultimately adds up to higher airfares for the traveling public. Currently, airfield and airspace system delays cost the airlines that operate at PHL approximately \$100 million per year. From a passenger standpoint, delays can be frustrating and inconvenient, often causing the postponement of scheduled appointments and/or missed connecting flights. Business travelers especially will avoid airports that are noted for delays.

One of the major causes of delay here is inadequate all-weather airfield capacity due to the existing airfield configuration. Regional jets and larger commercial aircraft must share the use of the primary runways, 9L-27R and 9R-27L, leaving Runway 17-35 and Runway 8-26 underutilized because they are too short to accommodate most of the commercial jet air traffic under most conditions. This increases delays by requiring more aircraft operations on the two primary runways.

By 2010, we project that the aircraft fleet mix at PHL will show a dramatic increase in the number of operations by regional jets and a substantial decrease in the number of operations by turboprop aircraft. This will mean that an even greater number of aircraft will need to use the primary runways. Immediate action is therefore needed to reduce the current and projected airfield delays and to allow PHL to operate more efficiently.

### Airport Master Plan

The FAA considers an airport with an average delay in excess of five minutes per operation to be congested. Knowing that PHL already exceeded that threshold, and realizing the Airport's regional importance, the City began preparing a Master Plan Update in 2000 to study the Airport's facility needs relative to projected aircraft and passenger demand. The Master Plan and a concurrent Noise Impact study have been carried out with the assistance of numerous advisory committees. The Master Plan Advisory Committees consists of a total of 58 regional and industry representatives. The Noise Study Advisory Committee included two

representatives from Tinicum Township, and one each from the Eastwick section of Philadelphia and Wilmington, DE, as well as Delaware Valley Regional Planning Commission members.

Detailed planning studies determined that the numbers and durations of delayed operations at PHL will continue to increase from their current average level of nearly 10 minutes per operation to nearly 19 minutes per operation in 2010 if no action was taken. Despite these increasing delays, demand for air service at Philadelphia continues to grow and the airlines continue to add flights to meet that demand. For example, on May 9, 2004 Southwest Airlines initiated service at PHL with 14 daily non-stop flights to 6 cities. Since then, the airline has continually added service and now provides 41 daily departures to more than one dozen cities across the nation. Current Airport operations are up 6.5% through September 2004 and are projected to top 470,000 this year.

The ultimate airfield development concepts in the Master Plan would provide adequate capacity to accommodate forecasted demand over the next twenty years. However, it will take years to develop and choose from among the various possible long-term solutions of the comprehensive Master Plan, and many more years to implement them. Meanwhile, to address the existing growing delay problem, the extension of Runway 17-35 was identified as an early-action project that would provide delay reduction in the short-term.

#### FAA Environmental Impact Statement

Based on the FAA's judgment that the proposed runway extension had the potential for significant environmental impacts, the FAA determined that the project would require an Environmental Impact Statement (EIS) in compliance with the National Environmental Policy Act of 1969 (NEPA). The Draft EIS evaluated a reasonable range of alternatives developed to meet the project's identified purpose and need and presents a detailed analysis of the environmental impacts that could result from the implementation of those alternatives, as compared with the alternative of taking no action.

#### Alternatives Analysis

A reasonable range of alternatives was evaluated in the DEIS. PHL agrees that extending Runway 17-35 appears to be the only feasible means of achieving delay reduction in the short-term. Both build alternatives to extend Runway 17-35 would enable greater utilization by more aircraft types, and shift more current planes, and those in the anticipated fleet mix, from the congested primary runways. PHL is opposed to the No-Action Alternative because it fails to achieve our objective for this project.

As described earlier, faster than previously anticipated changes in aircraft fleet mix and runway utilization have made delays at the Airport worse. Over a 16-month period from May 2003 to September 2004, the number of regional jets arriving on Runway 17-35 increased from 199 to 1,538. Similarly, during the same period, the number of narrow-body jets arriving on Runway 17-35 increased from 2 to 88.

Extending Runway 17-35 will enable landings by existing and future narrow-body fleets at their maximum allowable landing weight. The utilization of this extended runway for these aircraft types will improve arrival flows and reduce delays.

Under the No-Action Alternative, in 2007 the predicted average delay per operation would be 15.3 minutes, and by 2015 that delay would increase to 32.4 minutes per operation. Delays would continue under the build alternatives, but by significantly less than if no action were taken. Under Alternative 1, the anticipated delay per operation in 2007 is 13.9 minutes, increasing to 25.9 minutes in 2015. Under Alternative 2, the anticipated delay per operation in 2007 is 15.1 minutes, increasing to 28.3 minutes in 2015.

Extending the runway would enable narrow-body and regional jet aircraft to support destinations between 800 and 1,000 miles, which accounts for 75% of PHL operations. This increased utilization would reduce departure aircraft sequencing resulting in fewer delays. While this certainly would be our expectation, it is important to note that the Airport does not control aircraft movements or the airspace at PHL. Therefore, changes in FAA ATCT procedures may be necessary to ensure optimum operational efficiencies for Runways 17-35 and 9L-27R/9R-27L.

### Environmental Stewardship Goals

The Airport has created an executive-level position to advance Environmental Stewardship for the protection and enhancement of the natural and human environment in the planning, development, operation, and maintenance of PHL's facilities and services. As the development envisioned by the Master Plan is accomplished, the Airport will consider, among other things, sources of ground noise and noise-sensitive uses in surrounding neighborhoods. Such measures were employed in connection with the operation of the Airport's state-of-the-art Deicing Facility where numerous evergreen trees and shrubs of 21 types have been planted along Tinicum Island Road creating a natural noise buffer between the facility and Tinicum Township.

Because the surrounding communities consider aircraft noise of primary concern, PHL is committed to all measures of the 2003 FAA Part 150 Noise Compatibility Program Study. The plan includes a residential sound insulation program, through which 445 homes in Tinicum Township will receive sound insulation treatments. An engineering study has begun to assess the feasibility of noise attenuation measures for structures within Historic Fort Mifflin. The program also provides for updating the noise exposure map following any substantial changes in the airfield configuration. At such time, the Airport will evaluate the extent to which it may be appropriate to expand the noise attenuation program to the Eastwick neighborhood.

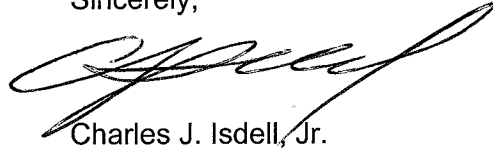
Other near-term environmental stewardship goals in connection with this project include determining the feasibility of implementing ISO-14001 (an Environmental Management System / Certification Program), evaluating and developing environmental stewardship opportunities related to reducing construction equipment emissions, and pursuing the benefits of renewable energy sources.

### Conclusion

In conclusion, the City of Philadelphia believes that either build alternative for the proposed project is reasonable and would provide a more efficient airfield that would reduce projected Airport delays. The City concurs with the FAA's conclusions in the Draft EIS that the project would not result in significant adverse direct, indirect or cumulative environmental impacts. We believe the FAA has considered all reasonable alternatives, and we are amenable to the mitigation measures being proposed.

We appreciate the opportunity to review the Draft EIS and trust the FAA will take these comments into consideration when preparing the Final EIS and the Record of Decision. If you have any questions or should you require additional information, please do not hesitate to contact me directly.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Isdell, Jr.", written in a cursive style.

Charles J. Isdell, Jr.

Attachment: Photo Exhibit



PHILADELPHIA MUNICIPAL AIRPORT  
1940's AERIAL PHOTO



## Letter 36

Philadelphia, City of, Pennsylvania - Charles Isdell, Jr.

Comment Number	Comment	Response
36.1	The City of Philadelphia's Department of Commerce, Division of Aviation, as owner and operator of Philadelphia International Airport, takes this opportunity to present its perspective in support of the Runway 17-35 Extension Project.	The FAA has noted and considered your comment.
36.2	<p>Faster th[a]n previously anticipated changes in aircraft fleet mix and runway utilization have made delays at the Airport worse. Over a 16-month period from May 2003 to September 2004, the number of regional jets arriving on Runway 17-35 increased from 199 to 1,538. Similarly, during the same period, the number of narrow-body jets arriving on Runway 17-35 increased from 2 to 88.</p> <p>Extending Runway 17-35 will enable landings by existing and future narrow-body fleets at their maximum allowable landing weight. The utilization of this extended runway for these aircraft types will improve arrival flows and reduce delays.</p>	Use of Runway 17-35 has increased over the past year. The increase in use of the runway has been mostly for arrivals, under certain limited circumstances, but the runway is not generally adequate for departures by Regional Jets (RJs) or narrowbody jets. This increase in use has not caused a significant effect on delays.
36.3	Changes in FAA ATCT procedures may be necessary to ensure optimum operational efficiencies for Runways 17-35 and 9L-27R/9R-27L.	The FAA anticipates that the Air Traffic Control Tower procedures are not expected to change as a result of the project, however, aircraft may be at slightly different altitudes (lower or higher) and turns may be made at slightly different locations.
36.4	<p>The Airport has created an executive-level position to advance Environmental Stewardship for the protection and enhancement of the natural and human environment in the planning, development, operation, and maintenance of PHL's facilities and services. As the development envisioned by the Master Plan is accomplished, the Airport will consider, among other things, sources of ground noise and noise-sensitive uses in surrounding neighborhoods. Such measures were employed in connection with the operation of the Airport's state-of-the-art Deicing Facility where numerous evergreen trees and shrubs of 21 types have been planted along Tinicum Island Road creating a natural noise buffer between the facility and Tinicum Township.</p> <p>Because the surrounding communities consider aircraft noise of primary concern, PHL is committed to all measures of the 2003 FAA Part 150 Noise Compatibility Program Study. The plan includes a residential sound insulation program, through which 445 homes in Tinicum Township will receive sound insulation treatments. An engineering study has begun to assess the feasibility of noise attenuation measures for structures within Historic Fort Mifflin. The program also provides for updating the noise exposure map following any substantial changes in the airfield configuration. At such time, the Airport will evaluate the extent to which it may be appropriate to expand the noise attenuation program to the Eastwick neighborhood.</p>	The FAA has noted and considered your comment.



CITY OF PHILADELPHIA  
CITY COUNCIL

JUAN F. RAMOS  
Room 592, City Hall  
Philadelphia, Pennsylvania 19107  
(215) 686-3420 or 3421  
Fax (215) 686-1930

COUNCILMAN-AT-LARGE

COMMITTEES  
Chairman  
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Vice Chairman  
Streets & Services  
Housing & Homeless

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Committee of the Whole  
Finance  
Appropriations  
Public Property & Public Works  
Licenses & Inspections  
Commerce & Economic Development  
Public Health & Human Services  
Public Safety  
Legislative Oversight

October 29, 2004

Ms. Susan McDonald  
Environmental Protection Specialist  
Federal Aviation Administration  
Harrisburg Airports District Office  
3905 Hartzdale Drive, Suite 508  
Camp Hill, PA 17011

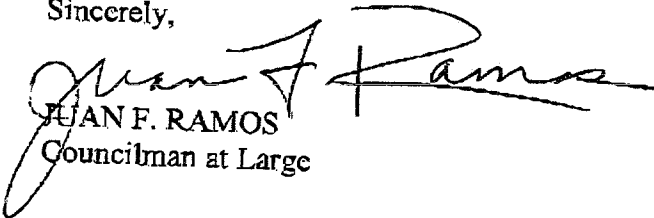
Re: DEIS for PHL Runway 17-35 Extension Project

Dear Ms. McDonald,

I am writing in support of a "Build" alternative for the proposed extension of Runway 17-35. As you are aware the Philadelphia International Airport is an integral part of the region's economy. As such we must ensure that the airfield operates at its maximum level.

I believe the proposed extension will contribute greatly to increasing the efficiency of the airport and I am therefore in favor of the "Build" option.

Sincerely,

  
JUAN F. RAMOS  
Councilman at Large

**Letter 37****Philadelphia, City of, Pennsylvania, City Council - Juan Ramos**

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
37.1	<p>I am writing in support of a "Build" alternative for the proposed extension of Runway 17-35. As you are aware the Philadelphia International Airport is an integral part of the region's economy. As such we must ensure that the airfield operates at its maximum level.</p> <p>I believe the proposed extension will contribute greatly to increasing the efficiency of the airport and therefore I am in favor of the "Build" option.</p>	The FAA has noted and considered your comment.



**Swarthmore**  
**BOROUGH**

**ADMINISTRATIVE OFFICE**

121 Park Avenue  
Swarthmore, PA 19081  
Telephone 610•543•4599  
Fax 610•543•1833  
Email [swarthmore2@comcast.net](mailto:swarthmore2@comcast.net)  
[www.swarthmorepa.org](http://www.swarthmorepa.org)

November 29, 2004

Marion Blakey, Administrator  
Federal Aviation Administration  
800 Independence Avenue, S.W.  
Washington, DC 20591

**Re: Proposed expansion of Philadelphia International Airport  
Environmental Impact Statement for 17-35 Runway Project**

Dear Ms. Blakey:

Enclosed is the Swarthmore Borough Task Force on Airport Expansion Comments on 17-35 Environmental Impact Statement.

Out of concern for the potential impact on the Borough of Swarthmore of the airport expansion plans, and our desire to be better informed about all aspects and potential effects of the plan, the Swarthmore Borough Council established the Task Force on September 7, 2004.

The enclosed document was prepared by the Task Force with input from the Borough's Environmental Advisory Council. To highlight some of the points:

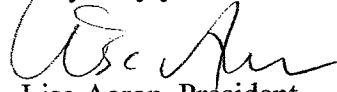
- The FAA employed flawed methodology that does not adequately measure the real effects of aircraft noise, particular in that it ignored the effects of single events and did not take into account the effects of nighttime cargo flights;
- The 17-35 project will result in a significant deterioration of the quality of life for those who live, study, and work in the Borough;
- From start to the present, the FAA has not engaged in meaningful public outreach nor has it facilitated meaningful public participation; and
- Sufficient justification for the 17-35 Project has not been demonstrated, as alternatives to the project have not been given genuine and sufficient consideration.



As more fully discussed in the Comments, the Task Force requests that the time for comments on the 17-35 EIS be extended; that relevant documents be made public; that the methodology for impact assessment be amended to include, at a minimum, measurement of single noise events and assessment of effects of nighttime air cargo flights; and that alternatives to expansion be fairly and fully considered and, if appropriate, implemented before expansion plans are finalized.

We appreciate the opportunity to present these Comments. If you have any questions or want to discuss any aspect of this response, please feel free to contact us.

Very truly yours,



Lisa Aaron, President  
Swarthmore Borough Council



Eric C. Gerner, Mayor  
Borough of Swarthmore

cc: John J. McFadden, Chairman, Delaware County Council  
Linda Cartisano, Delaware County Council  
John E. Pickett, Director, Delaware County Planning Department  
Sen. Arlen Specter  
Sen. Rick Santorum  
Sen. Edwin B. Erickson  
Rep. Thomas P. Gannon  
Rep. Curt Weldon

## SWARTHMORE BOROUGH TASK FORCE ON AIRPORT EXPANSION

### COMMENTS ON 17-35 EIS

#### **I. THE METHODOLOGY USED FOR IMPACT ASSESSMENT IS SEVERELY FLAWED AND SHOULD BE REVISED**

***A. The 65 dB Day-Night Average Sound Level (DNL) is a misleading and inappropriate metric.***

The FAA concludes that the 17-35 Extension Project (hereafter "the Project") would not have any significant noise impact on the communities adjacent to the airport. We absolutely disagree.

The conclusion is based solely on the 65 dB DNL metric, which is an inappropriate and misleading metric. It is an annual average of 365 daily average noise levels; a daily average is the average of the data collected each second. The double averaging hides the true impact on individuals of single noise events, such as nighttime air cargo flights.

Although the DNL applies a 10 dB "penalty" to noise events occurring between the hours of 10 p.m. and 7:00 a.m. to account of human sensitivity to noise during these hours, that penalty is grossly inadequate.

***B. By ignoring single noise events, the DNL methodology does not reflect real experience.***

The FAA has adopted the DNL methodology recommended by the Federal Interagency Committee on Noise (FICON)<sup>1</sup>. The FICON claims that noise affects individuals differently and that no metric is superior to DNL.

Despite the DNL methodology, loud single events of aircraft noise disturb sleep and intrude on conversations, television viewing, reading, and speaking on the telephone, thus robbing people of a decent quality of life. Noise-induced sleep loss can be caused by noise spikes of 8-10 dB above ambient noise levels<sup>2</sup>. It is common for aircraft to cause sleep interference when single event aircraft noise exceeds 55 dB. Further, even sleep interference without awakenings degrades the quality of sleep by shifting sleepers out of deeper levels of sleep. The impact of single-event aviation noise on wildlife has been observed as disruptive of feeding and mating patterns.

---

<sup>1</sup> Federal Interagency Committee on Noise, Federal Agency Review of Selected Airport Noise Analysis Issues, August 1992.

<sup>2</sup> Griefahn, B., 1990, Research on Noise and Sleep: Present State, Noise as a Public Health Problem, Vol. 5, Swedish Council for Building Research, Stockholm.

***C. The 65 DNL is not compatible with residential uses.***

The FAA considers noise levels below 65 dB DNL compatible for most land uses, including residential uses. We strongly disagree.

The FAA Order 1050.1E, Environmental Impacts: Policies and Procedures, states that the responsibility for determining the acceptable and permissible land uses and the relationship between specific properties and specific noise contours rests with the local authorities. Pursuant to this policy, the FAA is hereby notified that Swarthmore Borough deems 65 dB DNL incompatible with residential uses in the Borough.

***D. The 65 dB DNL was adopted by the FAA without public participation.***

The FAA adopted DNL as the metric and set 65 dB as the threshold based on FICON's recommendations. Because the 65 dB DNL metric ultimately determines whether a federally funded airport project has significant adverse impact and whether the project complies with National Environmental Policy Act (NEPA) regulations, the FAA cannot adopt FICON's recommendations without a thorough public review. To our knowledge, the FAA has not conducted such a review.

Neither the Borough of Swarthmore nor any other municipality in Delaware County, which is adversely impacted by the ever-increasing noise created by PHL, has been given an opportunity to comment on the metric.

***E. The 65 dB DNL metric must be re-evaluated.***

FICON's recommendations on the 65 dB DNL were based from the Shultz Curve that was published more than 25 years ago. The FAA appears to recognize that the metrics warrant periodic review, as it states in the preamble of its Order 1050.1E, Environmental Impacts: Policies and Procedures, that the FAA and other Federal agencies continue to promote and monitor research in the field of aviation noise effects on the human and natural environment. We firmly believe that the metric must be re-evaluated in the light new scientific evidence.

***F. The DEIS must address the impact of nighttime air cargo traffic.***

One of the most glaring deficiencies of the DEIS is the failure to address nighttime air cargo traffic and its effect on sleep. In view of the significant increase in nighttime cargo flights that will occur if the Project is completed, an analysis of the Project's impact on sleep is critical to enable nearby residents to understand how their lives would be affected. Considering that PHL is a UPS hub and serves five other dedicated cargo carriers, this is a serious and unjustifiable omission.

Courts have held that an EIS must evaluate the noise impact of air cargo operations. In the case of Davison v. Department of Defense<sup>3</sup>, the court sided with the plaintiffs, who challenged the sufficiency of an EIS prepared in connection with the addition of civilian air cargo operations at Rickenbacker Air National Guard Base. The court ruled that the "greatest single environmental impact" occasioned by the proposed nighttime air cargo flights was on the sleep of the people who lived near the airfield. The EIS prepared for that project set 65 dB DNL as the threshold for significant noise exposure and identified which houses would be significantly affected. The court held that DNL, even when coupled with a time-above analysis, did not adequately inform the public about how an increase in nighttime flights would affect sleep in a nearby residential area.

The Davison court also cited several technical deficiencies in the EIS. First, the study did not state the number of night flights that traditionally had taken off or landed at Rickenbacker. Second, it did not estimate the number of times a nearby resident could be awakened by overflights during "normal" or "worst case" nights. Third, the study did not discuss whether residents' sleep disturbance would diminish over time. Finally, the EIS did not address the issue of whether long-term exposure to noise-induced sleep disturbance would result in any significant physiological effects. The court pointed out that because these issues would be vital considerations to a decisionmaker analyzing the proposal, the EIS did not meet NEPA's mandate to explore unavoidable environmental consequences "... to the fullest extent possible...." The DEIS for the 17-35 Project suffers from identical deficiencies.

Likewise, the California Court of Appeal, in the Berkeley Jet case<sup>4</sup>, ruled that the City of Oakland airport authority failed to address adequately the potential disturbance to area residents resulting from increased nighttime air cargo operations.

To minimize the risk of protracted litigation as well as to measure the real effects of all aircraft noise effects at PHL, the FAA/PHL must address the affects of air cargo traffic in the EIS.

***G. FAA must use a single-event noise metric for impact analysis and promulgate numeric standards for that metric, subject to full public review.***

As discussed, exclusive reliance on the DNL metric does not provide a true or complete picture of the noise environment. Single events interrupt school lectures, wake people up in the middle of night, and interfere with speech intelligibility, among other consequences.

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<sup>3</sup> Davison v. Department of Defense, 560 F. Supp. 1019, 1037 (S.D. Ohio 1982).

<sup>4</sup> Berkeley Keep Jets Over the Bay Committee v. Board of Port Comm'rs of the City of Oakland, 91 Cal. App. 4th 1344, 111 Cal. Rptr. 2d 598 (2001).



Rather than the DNL, the "Sound Exposure Level" (SEL), which measures the intensity of sound during a single noise event, must be used.

Although Paragraph 14.5f the FAA Order 1050.1E provides the agency discretionary authority to use the "Sound Exposure Level" (SEL) or Time-above (TA) metrics in an impact analysis, the Order has not established numeric standards or guidelines for these metrics. The FAA needs to publish numeric standards so that they can be used to determine more definitively if the FAA has complied with the NEPA requirements for a proposed airport project. Qualitative narrative statements or guidelines are not definitive and provide the FAA too much leeway to dismiss significant impacts.

Many factors need to be considered in establishing the numeric standards, including seven key issues identified by EPA more than 20 years ago, which remain relevant:

- Duration of intruding noises and frequency of occurrence
- Time of year (windows open or closed; air cold or hot)<sup>5</sup>
- Time of day of exposure
- Outdoor noise level in community when intruding noises are not present
- History of prior exposure to noise source
- Attitude toward the noise source
- Presence of pure tones or impulses

Any numeric standards or guidelines for single-event noise adopted by the FAA will affect the results of the impact analysis under the NEPA. The standards can be adopted only with full public review. Just following FICON's recommendations based on selective use of data is not acceptable.

We strongly recommend that the FAA postpone the 17-35 Project and the CEP EIS until numeric standards are promulgated after full public review.

***H. The cumulative impact analysis falls short of meeting NEPA requirements.***

The Council of Environmental Quality (CEQ) Regulations (40 CFR 1508.7) define cumulative impacts as "the impact on the environment which results from the incremental impact of an action when added to other past, present, and *reasonably foreseeable* [emphasis added] future actions regardless of what agency or person undertakes such other actions."

To comply with this requirement, the DEIS for the 17-35 Project must address the cumulative impacts of the CEP, as well as the Airspace Redesign and the Master Plan Update. All these programs or projects are "reasonably foreseeable."

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<sup>5</sup> Temperature is important because, on hot days, air density is lower and aircraft must achieve higher air speeds to create the same lift. High speeds create more noise.

The FAA/PHL claims that the potential future effects of CEP are “speculative” and will be considered in detail in the Environmental Impact Statement currently being prepared for that project. The fact remains that the estimated air traffic volumes for the 17-35 Project are also speculative, yet that has not stopped the FAA from performing the EIS analysis for the Project. Leaving the CEP and Airspace Redesign out of a cumulative analysis does not comply with the CEQ/NEPA requirements.

If the impacts of the future programs or projects cannot be fully determined at present, the FAA should develop worst-case scenarios to perform the cumulative impact analysis. Alternatively, the FAA/PHL can postpone the DEIS for the 17-35 Project until the impact of the CEP and the other regional and national programs can be better determined.

## **II. A REALISTIC ANALYSIS OF PROJECTED EFFECTS OF THE 17-35 EXPANSION SHOWS A SIGNIFICANT INCREASE IN LOW-FLYING AIRCRAFT OVER SWARTHMORE BOROUGH, WHICH WOULD RESULT IN A SIGNIFICANT REDUCTION OF QUALITY OF LIFE**

Although the DEIS shows only nominal changes in DNL outside the immediate vicinity of the airport, much of the worst aircraft noise in Swarthmore Borough occurs from flights that take off of Runway 35, then turn to vectors of 300-310 degrees, passing low over the Borough.

According to the DEIS, Swarthmore would experience changes as follows (all values in dB):

2003	44.2
2007 No Build	46.0
2007 Alt 1	46.3
2007 Alt 2	46.9
2015 No Build	47.2
2015 Alt 1	47.3
2015 Alt 2	47.7

Based on information from the DEIS and from posterboard presented at the public meeting in Ridley Township on November 15, 2004, the following are projections of flights that will take off from Runway 35 and then turn left to vectors of 300 - 310 degrees:

	# Total Flights	% Departures on Runway 35	# Departures on Runway 35	35 Departures Current (%)
2003	445,967	3.7%	16,500	—
2007 No Build	528,400	5.2%	27,477	166.5%
2007 Alt 1	528,400	11.2%	59,180	358.7%
2007 Alt 2	528,400	12.2%	64,464	390.7%
2015 No Build	616,000	4.1%	25,256	153.1%
2015 Alt 1	616,000	9.6%	59,136	358.4%
2015 Alt 2	616,000	11.6%	71,456	333.1%

If it can be assumed that the fraction of Runway 35 flights that turn left after takeoff remains constant, then the values in the right column also represent the increases in low flights overhead that may be expected by Swarthmore Borough. Clearly, there is a significant difference between this and the DNL projections.

It can be seen that: (a) growth in the total number of flights alone will increase the number of low-flying aircraft over Swarthmore by about 50 percent; and (b) the doubling-tripling of the percentage of takeoffs on Runway 35 would further boost those numbers to approximately 3.5-fold over current levels.

Analyzing these projected increases with appropriate noise metrics, as discussed above, would demonstrate a significant increase in aircraft noise over Swarthmore, with attendant annoyance and loss of quality of life.

### **III. THE 17-35 PROJECT CANNOT BE JUSTIFIED UNDER CURRENT CIRCUMSTANCES**

#### ***A. FAA has not adequately assessed the root causes of air traffic delay.***

The FAA's advocacy of the PHL 17-35 and CEP projects is inappropriate without a thorough analysis of delays in the DEIS. The delays have many causes — antiquated air traffic control system, airline operational problems, bad weather, just to name a few. The DEIS must provide an analysis of the impact of each cause on the delays at PHL, and of how elimination of each cause would affect the traffic at PHL.

Without such analyses, the need for the 17-35 Project cannot be established.

***B. Assessment of the need for the Project is premature.***

The FAA indicates that it is conducting an EIS on Air Traffic Procedural Changes – New York/New Jersey /Philadelphia Metropolitan Airspace Redesign Project. The Airspace Redesign EIS will assess the potential environmental impacts resulting from proposed changes in air traffic routings in these metropolitan areas. That EIS will examine ways to develop viable alternatives to current operations to increase efficiency and reliability of the air traffic system through the adjustment of traffic flows in the areas to accommodate new technologies and reduce delays.

Projections of the delays at PHL must consider the results of other delay-reducing programs, such as the Airspace Redesign Project and the Master Plan Update. Otherwise, the FAA's current forecast for delays at PHL is speculative at best.

***C. The FAA must fix its air traffic control system before embarking on an expansion project.***

The FAA must first fix its air traffic control system before it can accurately assess the need for the very costly and environmentally damaging 17-35 and CEP projects.

According to The Wall Street Journal<sup>6</sup>, the air traffic control system of the U.S. is the most technologically backward in the Western world, contributing to costly delays, inefficient routing, and perpetual gridlock. Recent statistics compiled by the Department of Transportation have confirmed that the biggest cause of air-travel delays is the FAA's air-traffic control system. The aviation system was blamed for 43% of all flight delays from September 2003 to February 2004, the period for which the data are available.

The system still operates in a "Lily Tomlin" world, as if human operators were still required to connect and disconnect every phone call physically. Pilots cannot taxi, take off, turn left, turn right, ascend, descend or land without exchanging words and getting permission from someone on the ground. Not only does this procedure fill the airwaves with low-efficiency chatter, but useful information is transferred at speeds that would be inadequate for a dial-up modem.

A recent Wall Street Journal article indicates that the FAA's mental state is reflected in an emergency meeting called last March to explore the theme, titled optimistically but not very accurately, "Growth Without Gridlock."<sup>7</sup>

The solution has been obvious for years: the Pentagon's global positioning system (GPS). Though GPS is technically viable, the FAA is the stumbling block to its wide use in U.S. aviation. In contrast, Europe will be launching the Galileo satellite system, to become operational in 2008. The Pentagon's GPS and Galileo will be compatible, allowing users to draw on both fleets of satellites for an ultra-reliable and precise location fix.

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<sup>6</sup> The Wall Street Journal, "The Coming Revolution In Air Traffic Control," August 18, 2004; Page A11.

<sup>7</sup> The Wall Street Journal, "The Truth About Flight Delays," April 21, 2004; Page D1.

An improved air traffic control system can significantly reduce traffic congestion and delays. The need for the 17-35, and the CEP as well, cannot be accurately assessed until the FAA fixes the system. The projected delays in the DEIS are therefore highly speculative.

***D. Effects of the airlines' operations on delays and how they might be ameliorated must be taken into account.***

The FAA needs to provide the leadership to address the delays caused by airlines before advocating the building of more runways and airports. DOT statistics have shown that airline operations problems — anything from maintenance to baggage handling — were responsible for 20% of delays, and a catchall category of "late-arriving aircraft," when problems cascade throughout the day, accounted for 25% of flight delays.

Further, the projections of the delays at PHL are based on false assumptions that airlines' operations will stay the same. Facts clearly indicate otherwise. For example, American Airlines<sup>8</sup> has already spread out its schedule rather than bunching flights closely together at hubs. It has recognized that grouping flights required manning many gates and aircraft simultaneously. Now, American saves millions by flying the same number of flights with fewer staffers and planes. Moreover, large airlines are abandoning hub-centric operations. In November, American shrank its St. Louis hub and shifted flights to more profitable routes out of Dallas and Chicago. This would increase the spacing between flights.

**IV. THE FAA HAS FAILED TO SOLICIT MEANINGFUL PUBLIC INPUT.**

***A. No scoping meeting was held in Delaware County.***

Delaware County will be significantly affected by the 17-35 Extension Project and the Capacity Enhancement Program (CEP), yet the FAA/PHL did not hold any scoping meeting in the County.

Swarthmore Borough was not contacted by the FAA or PHL before the meetings, even though it is directly underneath the flight paths shortly after takeoffs and before landings. Publishing notices in the Federal Register is only a minimum requirement, and it does not guarantee effective outreach. Small municipalities like Swarthmore do not have the resources to read the Federal Register every day. To ensure actual, not just technical, notice, the FAA and PHL should have notified Swarthmore and all the neighboring municipalities directly.

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<sup>8</sup> The Wall Street Journal, "American Airlines Shrinks a Hub, Reduces Plane Polishing Looking Beyond Business Class," June 7, 2004; Page A1.

Scoping is extremely important because it is through this process that the public can identify major issues to be addressed in the Environmental Impact Statement (EIS). Leaving the affected communities out of the scoping process does not comply with the National Environmental Policy Act (NEPA), and is a serious omission.

***B. The dates chosen for the scoping meetings effectively minimized public participation.***

The FAA chose to hold the scoping meetings in August 2003, when many people were on vacation. It also held the first informational meeting in Delaware County on April 15, 2004, the tax due date. The choice of dates suggests a strategy of minimizing public participation.

***C. FAA actions have thwarted meaningful public comment .***

The FAA and PHL have not made available the documents referenced in the DEIS or the CEP. Without them, the public cannot determine the validity of the operational assumptions or the projections in the DEIS. All the supporting documents must be made available to the public, with sufficient time for meaningful review. The DEIS comment period must be extended accordingly.

The FAA published the Philadelphia International Airport, Master Plan Update, Final Technical Report 2004.17, Runway 17-35 Extension, Capacity/Delay Simulation Analysis, DMJM Aviation, on 27 August 2004. This report has repeatedly been referenced in the draft EIS (DEIS) for the Project, yet neither the FAA nor PHL has made this report available to the public.

Further, the FAA/PHL has yet to hold a public meeting on the Master Plan Update (MPU), even though it has already identified two "Build Alternatives" to be evaluated by the CEP EIS. The FAA and PHL have failed to disclose any information on how and why the two "Build Alternatives" were chosen for the CEP. This information was requested months ago under the Freedom of Information Act by a member of the Swarthmore Environmental Advisory Council but has not been received to date.

Lack of disclosure not only denies the public the opportunity to comment meaningfully, but it brings into question the accuracy and credibility of the information provided by the FAA in the DEIS for the Project and elsewhere.

**V. THE TIME FRAMES FOR THE 17-35 AND CEP PROJECTS ESTABLISHED BY THE FAA AND PHL ARE ARBITRARY AND WILL RESULT IN SKEWED ASSESSMENTS OF NEED AND INCOMPLETE ANALYSES OF ENVIRONMENTAL IMPACT.**

***A. The 2007 design year for the 17-35 Project is arbitrary.***

The FAA/PHL does not show that selecting 2007 as the design year for completing the 17-35 Project is reasonable or necessary. The results of other national and regional delay-reducing alternatives should be analyzed before the Project is implemented.

***B. The time frame for the CEP is also arbitrary.***

The DEIS indicates that the CEP will not be completed until year 2020. This estimate provides the FAA a convenient excuse for not incorporating the CEP in the cumulative environmental impact analysis.

The CEP has been selected by the Secretary of Transportation on October 31, 2002, as a "High-Priority" project subject to Presidential Executive Order 13274, Environmental Stewardship and Transportation Infrastructure Project Review.

The FAA/PHL has already been working on the CEP EIS and plans to publish a draft in 2005. It is conceivable that the Final EIS and Record of Decision for CEP could be issued by the end of 2006. Design, permitting, and construction bids would take another two or three years. The construction could start as early as 2009, and the new CEP runways could become operational in 2014 or 2015, not 2020.

***C. The 17-35 Project must be postponed until the effects of other delay-reduction programs can be quantified.***

The DEIS for the 17-35 Project indicates that the Airspace Redesign EIS will assess the potential environmental impacts resulting from proposed changes to air traffic routings in the New York - New Jersey - Philadelphia area. The EIS will examine ways to develop viable air traffic control alternatives to current procedures to take advantage of new and emerging air traffic control technologies, improved performance characteristics of modern aircraft, and improvements in navigational capabilities.

The DEIS further states that impacts of the alternatives considered Airspace Redesign are speculative now and will be addressed in that project's EIS. Airspace redesign alternatives may result in more or fewer flights over a given area and/or at different altitudes, resulting in potential increases or decreases to air quality emissions or noise levels within the Study Area of the 17-35 EIS, but would not alter the physical or natural features of the study area.

Nevertheless, the fact is the 17-35 runway extension, the Airspace Redesign, and the CEP are intertwined, and the impact of each must not be assessed in isolation. That the FAA cannot assess the impact of CEP and the Airspace Redesign program underscores the need to defer the 17-35 Project. An irreversible decision based on a prematurely prepared EIS for the Project would be unjustifiable and must be postponed.

***D. By selecting the 2020 design year for CEP, the FAA circumvents the intent of NEPA.***

As discussed previously, 2020 is an arbitrary design year for the CEP, and implementation of the CEP could occur as soon as 2014.

Arbitrarily selecting the 2020 design year provides the FAA a convenient excuse for not assessing the cumulative impact of the 17-35 and CEP projects.

***E. The cumulative impacts of ground traffic must be considered in the DEIS.***

The traffic volumes of the Interstate 95 and 476 will continue to grow. The future increases in noise and air pollution because of the ground traffic must be added to the increases in air traffic in the cumulative impact assessment. The DEIS does not contain this information and therefore does not comply with the NEPA requirements.

## **VI. THE FAA'S ANALYSIS OF ALTERNATIVES IS SERIOUSLY INADEQUATE**

***A. The FAA dismissed alternatives without adequate justifications.***

As mentioned earlier, the DEIS should have identified all the root causes for air traffic delays, and how the elimination of these causes would affect the traffic at PHL.

For example, the FAA was quick to drop GPS and other technologies based on the arbitrary 2007 deadline for the 17-35 extensions. As indicated in the DOT's data, poor air traffic control has caused more than 40% of the delays. Upgrading to a GPS system may be a more cost-effective solution than 17-35 extension. The FAA needs to perform a more thorough analysis and provide better justifications before rejecting the alternatives.

***B. Combinations of alternatives were not considered.***

The FAA has never demonstrated that combinations of some of the dismissed alternatives are not viable. While a single alternative alone might not solve the problems, a combination of alternatives may. For example, a combination of convenient inter-airport train services may shift some of the traffic from PHL to EWR (Newark), significantly reducing delays at PHL.



***C. Routing of connecting traffic was not evaluated.***

The DEIS indicates that passengers who connect make up 37 percent of the traffic through PHL. The DEIS did not evaluate an alternative that would shift some of the traffic to other hubs to alleviate delays at PHL.

The FAA contends that an airline's decision to establish connecting operations at an airport is based on such factors as economics and location, and that the FAA and other government agencies are prohibited from controlling or making these decisions. Even so, the FAA has indirect influence on airlines as it has demonstrated at ORD (Chicago O'Hare). Advocating PHL's proposal for expansion without attempting to effect any operational changes that might alleviate delays is inappropriate.

***D. The FAA should acknowledge and take advantage of its ability to influence airlines' operations indirectly.***

Despite its contention that governmental authorities have relatively little control over the airlines' routing and scheduling, the FAA does have indirect leverage, as it has demonstrated at ORD, where American Airlines and United Airlines have "voluntarily" changed their schedules to reduce delay during rush hours significantly.

***E. The FAA should identify which "Build Alternative" it prefers.***

The FAA has not indicated which of the "Build Alternatives" it prefers. The public needs to know the FAA's position in order to offer meaningful comments. A straightforward statement of its preference would assure the public that the FAA is not engaged in a "divide and conquer" strategy with regard to public sentiment — that is, diluting opposition by pitting communities against one another, then picking the alternative that has the least opposition, regardless of its relative merits.

**VII. TO PROCEED WITH EXPANSION PLANS WITH INSUFFICIENT JUSTIFICATION AND RATIONALIZED BY INAPPROPRIATE METHODOLOGY WILL RESULT IN ENVIRONMENTAL INJUSTICE.**

***A. The 17-35 Project will significantly increase noise in Eastwick and other minority communities.***

The FAA asserts that the Project will not have an adverse impact on the minority and/or low-income communities near PHL, including Eastwick, Yeadon Borough, Colwyn Borough, and Darby Township, because the DNL will generally not exceed 65 dB, and even it does, the increase will be less than 1.5 dB. The insupportability of this assertion is discussed above.

Eastwick is located near at the north end of the 17-35 runway, and the other municipalities are directly underneath the flight tracks of aircraft that use the runway. The narrow-body aircraft currently using 9R-27L and 9L-27R runways will be diverted to the extended 17-35 runway. These communities, most particularly Eastwick, will take the brunt of the resulting noise increase.

As discussed above, the FAA has the discretionary authority under Order 1050.1E to evaluate noise impacts using metrics that are more appropriate than DNL, but the FAA has failed to do so. Moreover, the FAA has not dealt with the impact of nighttime air cargo traffic. The FAA should have taken this opportunity to move beyond mere minimum standards and employ a more realistic approach to identifying significant impacts. Simply retreating to the 65 dB DNL and contending that there is no impact on these communities amounts under the circumstances to environmental injustice.

***B. The 17-35 Project will divert air pollution to minority and/or low-income communities.***

The DEIS contends that there will be no increased adverse air quality impact because the number of flights under the two Build Alternatives and the No Build Alternative are essentially the same. Even so, the extended 17-35 will significantly increase ground-level concentrations of hazardous air pollutants particularly in Eastwick and also the other communities.

As the DEIS indicates, after the 17-35 runway extension, more jets will be diverted from the main runways to this runway. In addition, as more and more passengers use regional airlines, the number of aircraft taking off and landing on the 17-35 runway will increase significantly. Eastwick in particular and also the other communities will receive proportionally larger amounts of emissions.

The DEIS has not addressed these localized increases in air emissions. This is a serious omission. The DEIS should have estimated the increased amounts of hazardous air pollutants that the minority and/or low-income residents would be exposed to.

The residents of Eastwick and the other communities are obviously quite concerned with the adverse impact of the Project, as demonstrated by the large turnout at the public meetings. Once again, the impact of the failure to go beyond the minimum requirement for impact analysis of air quality amounts under the circumstances to environmental injustice.

## **VIII. THE DEIS FAILS TO ADDRESS SAFETY ISSUES**

Paragraph 85(1) of the FAA Order 5050.4A, Airport Environmental Handbook requires that the EIS address environmental consequences in terms of public health and safety.

The FAA contends that because of jurisdictional limitations it cannot control either the ever-increasing demand for PHL services or operations within the airspace that surrounds it. Nevertheless, PHL proposes a plan to encompass all future demands notwithstanding unknown and potentially significant limitations on the use of regional airspace. To meet this information gap, the DEIS should have included the results of an airspace safety analysis. While the details are not known, it is understood that the FAA has begun a national airspace analysis to enable comprehensive planning of future operations in the U.S. The EIS cannot be complete without knowledge of the level of safe saturation of airspace.

## Letter 38

## Swarthmore Borough, Pennsylvania - Lisa Aaron, Elric Gerner

Comment Number	Comment	Response
38.1	<p>The FAA concludes that the 17-35 Extension Project (hereafter "the Project") would not have any significant noise impact on the communities adjacent to the airport. We absolutely disagree. The conclusion is based solely on the 65 dB DNL metric, which is an inappropriate and misleading metric. It is an annual average of 365 daily average noise levels; a daily average is the average of the data collected each second. The double averaging hides the true impact on individuals of single noise events, such as nighttime air cargo flights. Although DNL applies 10 dB "penalty" to the noise events occurring between the hours of 10 p.m. and 7:00 a.m. to account [for] human sensitivity to noise during these hours, that penalty is grossly inadequate.</p>	<p>The use of the DNL noise metric is prescribed by FAA Order 1050.1E. As described in Section 4.2, Noise, of this EIS, additional noise metrics were computed at a large number of noise-sensitive locations in the Study Area including the Night DNL, the Maximum A-weighted Sound Level (Lmax), the Time Above Sound Levels of 65, 65, and 85 dB for a 24-hour day (TA-24), and the Sound Exposure Level (SEL).</p> <p>The last significant governmental review of the use of DNL for determining aircraft noise / land use compatibility in the U.S. was conducted by the Federal Interagency Committee on Noise (FICON) and published in 1992. At that time, the Committee recommended the continued "...use of the DNL metric as the principal means for describing long-term noise exposure for civil and military aircraft operations." [Federal Interagency Committee on Noise, "Federal Agency Review of Selected Airport Noise Analysis Issues," August 1992] Though there are more flights now and greater population densities than when the DNL metric was originally proposed, the development of the original relationship between aircraft sound exposure and effects on people was based solely on sound levels and percent of people affected. Hence, increasing numbers of flights or increasing populations were incorporated to the extent that the increased operations raise the sound levels in terms of DNL in residential areas.</p> <p>This same FICON study also recommended that other metrics, in addition to DNL, be used to help characterize specific noise effects. These additional or "supplemental" metrics were to be used at the discretion of the agency as an aid "...to determine noise impacts at specific noise-sensitive locations...." [FICON, 1992] Finally, the FICON report also recommended that if "...noise-sensitive areas will be at or above DNL 65 dB and will have an increase of DNL 1.5 dB or more, further analysis should be conducted of noise sensitive areas between DNL 60-65 dB having an increase of DNL 3 dB or more due to the proposed airport noise exposure." [FICON, 1992] All these recommendations were directed at improving public understanding of the effects of changes in aircraft noise. The current study has made use of these recommendations and provided supplemental metrics and analyses.</p>
38.2	<p>By ignoring single noise events, the DNL methodology does not reflect real experience. The FAA has adopted the DNL methodology recommended by the Federal Interagency Committee on Noise (FICON). The FICON claims that noise affects individuals differently and no metric is superior to DNL.</p>	<p>In addition to DNL values, the EIS presents other metrics including the partial DNL due to nighttime operations, the maximum SEL, the maximum sound level, and Time-Above-Threshold values for several threshold sound levels. The information is presented at numerous specific points within the EIS study area. For example, Appendix E of the DEIS presents computed maximum sound levels (Lmax values) from individual events at each of 35 noise monitoring sites for the 2003 Existing scenario as well as for the future No-Action and Build Alternatives, and at each site compares the maximums to comparable DNL values under the same scenario. Thus, for example, on page E-3, Site LT-1 in Darby Borough is expected to experience a maximum level of 91.0 dBA in 2007 under the No-Action Alternative, while the comparable DNL value is expected to be 53.1 dB, clearly illustrating the difference in magnitude between the level of the loudest noise event and the overall average daily exposure.</p> <p>In addition, Appendices G.1 through G.7 list hundreds of cultural resource locations where similar comparisons are made between DNL values, maximum levels, and other supplemental noise metrics. All are included with the intention of better explaining the differences between the various project alternatives.</p>

## Letter 38

## Swarthmore Borough, Pennsylvania - Lisa Aaron, Elric Gerner

Comment Number	Comment	Response
38.3	The 65 DNL is not compatible with residential uses. The FAA considers noise levels below 65 dB DNL compatible for most land uses including residential uses. We strongly disagree. The FAA Order 1050.1E, Environmental Impacts: Policies and Procedures, states that the responsibility for determining the acceptable and permissible land uses and the relationship between specific properties and specific noise contours rests with the local authorities. Pursuant to this policy, the FAA is hereby notified that Swarthmore Borough deems 65 dB DNL incompatible with residential uses in the Borough.	The commentor is incorrect that FAA considers noise levels above DNL 65 dB to be incompatible with residential land use. FAA Order 1050.1E, Section 14.3, clearly states "A significant noise impact would occur if analysis shows that the proposed action will cause noise sensitive areas to experience an increase in noise of DNL 1.5 dB or more at or above DNL 65 dB noise exposure when compared to the no action alternative for the same time frame." As documented in the EIS, noise levels in Swarthmore would be less than 48 dB DNL under all future conditions. The proposed project would not result in noise levels incompatible with residential uses in Swarthmore or any other community.
38.4	The 65 dB DNL was adopted by the FAA without public participation. The FAA adopted DNL as the metric and set 65 dB as the threshold based on FICON's recommendations. Because the 65 dB DNL metric ultimately determines whether a federally funded airport project has significant adverse impact and whether the project complies with the National Environmental Policy Act (NEPA) regulations, the FAA cannot adopt FICON's recommendations without a thorough public review. To our knowledge, the FAA has not conducted such a review. Neither the Borough of Swarthmore nor any other municipality in Delaware County, which is adversely impacted by the ever-increasing noise created by PHL, has been given an opportunity to comment on the metric.	The DNL (formerly Ldn) metric contained in the 1984 Part 150 Rule making, the FAA Order 1050.1D and the recently revised FAA Order 1050.1E, as well as the revision to Order 5050.4B which is currently undergoing public comment were all formally advertised in the Federal Register for public comment.
38.5	The 65 dB DNL metric must be re-evaluated. FICON's recommendations on the 65 dB DNL were based from the Shultz Curve that was published more than 25 years ago. The FAA appears to recognize that the metrics warrant periodic review, as it states in the preamble of its Order 1050.1E, Environmental Impacts: Policies and Procedures that the FAA and other Federal agencies continue to promote and monitor research in the field of aviation noise effects on the human and natural environment. We firmly believe that the [65 dB DNL] metric must be re-evaluated in the light of new scientific evidence.	<p>In 1992, the Federal government considered whether it was appropriate to continue using DNL to describe noise impacts. At that time, the Committee recommended the continued "...use of the DNL metric as the principal means for describing long-term noise exposure for civil and military aircraft operations." [Federal Interagency Committee on Noise, "Federal Agency Review of Selected Airport Noise Analysis Issues," August 1992] Though there are more flights now and greater population densities than when the DNL metric was originally proposed, the development of the original relationship between aircraft sound exposure and effects on people was based solely on sound levels and percent of people affected. Hence, increasing numbers of flights or increasing populations were incorporated to the extent that the increased operations raise the sound levels in terms of DNL in residential areas.</p> <p>This same FICON study also recommended that other metrics, in addition to DNL, be used to help characterize specific noise effects. These additional or "supplemental" metrics were to be used at the discretion of the agency as an aid "...to determine noise impacts at specific noise-sensitive locations...." [FICON, 1992] Finally, the FICON report also recommended that if "...noise-sensitive areas will be at or above DNL 65 dB and will have an increase of DNL 1.5 dB or more, further analysis should be conducted of noise sensitive areas between DNL 60-65 dB having an increase of DNL 3 dB or more due to the proposed airport noise exposure." [FICON, 1992] All these recommendations were directed at improving public understanding of the effects of changes in aircraft noise. The current study has made use of these recommendations and provided supplemental metrics and analyses.</p>

Comment Number	Comment	Response
38.6	<p>The DEIS must address impact of nighttime air cargo traffic. One of the most glaring deficiencies of the DEIS is the failure to address nighttime air cargo traffic and its effect on sleep. In view of the significantly increase in nighttime cargo flights that will occur if the Project is completed, an analysis of the Project's impact on sleep is critical to enable nearby residents to understand how their lives would be affected. Considering that PHL is a UPS hub and serves five other dedicated cargo carriers, this is a serious and unjustifiable omission.</p> <p>Courts have held that an EIS must evaluate the noise impact of air cargo operations. In the case of <i>Davison v. Department of Defense</i>, the court sided with the plaintiffs, who challenged the sufficiency of an EIS prepared in connection with the addition of civilian air cargo operations at Rickenbacker Air National Guard Base. The court ruled that the "greatest single environmental impact" occasioned by the proposed nighttime air cargo flights were on the sleep of the people who lived near the airfield. The EIS prepared for that project set 65 dB DNL as the threshold for significant noise exposure and identified which houses would be significantly affected. The court held that DNL, even when coupled with a time-above analysis, did not adequately inform the public about how an increase in nighttime flights would affect sleep in a nearby residential area.</p> <p>The <i>Davison</i> court also cited several technical deficiencies in the EIS. First, the study did not state the number of night flights that traditionally had taken off or landed at Rickenbacker. Second, it did not estimate the number of times a nearby resident could be awakened by overflights during "normal" or "worst case" nights. Third, the study did not discuss whether residents' sleep disturbance would diminish over time. Finally, the EIS did not address the issue of whether long-term exposure to noise-induced sleep disturbance would result in any significant physiological effects. The court pointed out that because these issues would be vital considerations to a decision maker analyzing the proposal, the EIS did not meet NEPA's mandate to explore unavoidable environmental consequences "...to the fullest extent possible.." The DEIS for the 17-35 Project suffers from the identical deficiencies...To minimize the risk of protracted litigation, as well as to measure the real effects of all aircraft noise effects at PHL, the FAA/PHL must address the affects of air cargo traffic in the EIS.</p>	<p>There is an existing voluntary noise abatement procedure in place for Runway 17-35. Every attempt is made to limit departures on Runway 35 (to the north) and arrivals on Runway 17 (from the north) between the hours of 11 PM and 6 AM. However, from time to time, the noise abatement procedure may not be used based on operational safety criteria conditions (weather/wind, visibility, volume of traffic, delays, pilot discretion, construction, etc.). This existing noise abatement procedure is voluntary and will remain so in the future. The Part 150 Study further describes the nature of the night time runway use plan. Any permanent access restriction would need to be considered as part of a FAR Part 161 Study, which can only be initiated by the airport sponsor.</p> <p>Philadelphia International Airport is fundamentally an air carrier airport serving combined passenger, cargo, and general aviation needs, all of which produce nighttime operations. However, this EIS is not being conducted for the purpose of evaluating a major change in the nighttime or cargo activity; rather it examines the effects of proposed extensions to a short crosswind runway that will help to reduce delays during heavy demand periods throughout the day. In that context, nighttime operations are still considered sensitive and this EIS addresses them in a variety of different ways:</p> <p>Nighttime operations are summarized by different categories of aircraft in Table 4.2-2 for existing activity levels and again in Table 4.2-6 for projected future alternatives. Appendices B.2, B.3, and B.4 further subdivide the daytime and nighttime operations by aircraft category into landings and takeoffs by stage length (i.e. distance to destination -- an indicator of climb performance). Runway utilizations are also subdivided into daytime and nighttime percentages separately for takeoffs and landings to show how the airport operates differently at night when demand decreases; these are reported in Table 4.2-3 for existing operations and in Tables 4.2-8 through 4.2-13 for the future scenarios, and are subdivided into still greater detail in Appendix C of the DEIS.</p> <p>These operational inputs are then used by the INM to compute not just standard DNL values but a series of supplemental noise metrics that are helpful in interpreting nighttime activity. For example, Table 4.2-20 is a summary of the nighttime portion of total DNL that is attributable to nighttime operations by themselves (referred to as the Nighttime DNL, or NDNL). Values are computed at the measurement locations analyzed in the EIS for each study alternative and each study year, and also at additional noise-sensitive cultural resource locations reported in Appendices G.1 through G.7. Maximum sound levels and maximum SEL values are also computed and reported for each of these sites and are also of use in evaluating sleep disturbance.</p> <p>To help interpret these results, Appendix A of the DEIS presents background information on sleep interference, including the dose-response relationship between indoor SEL and number of awakenings, which has been published by the Federal Interagency Committee on Aviation Noise (FICAN) as a conservative indicator of sleep disturbance. Page 4-31 of the DEIS summarizes the FICAN position and shows how the relationship is useful for interpreting where awakenings are likely to occur. In short, the DEIS presents considerable information on nighttime noise and how it is expected to change with each of the No-Action and Build Alternatives.</p>

Comment Number	Comment	Response
38.7	FAA must use a single-event noise metric for impact analysis and promulgate numeric standards for that metric, subject to full public review.	<p>FAA Order 1050.1E requires that the DNL noise metric be used to identify the significant impacts. As described in Section 4.2, Noise, of this EIS, additional noise metrics were computed at a large number of noise-sensitive locations in the Study Area including the Night DNL, the Maximum A-weighted Sound Level (Lmax), the Time Above Sound Levels of 65, 75, and 85 dB for a 24-hour day (TA-24), and the Sound Exposure Level (SEL).</p> <p>The last significant governmental review of the use of DNL for determining aircraft noise / land use compatibility in the U.S. was conducted by the Federal Interagency Committee on Noise (FICON) and published in 1992. At that time, the Committee recommended the continued "...use of the DNL metric as the principal means for describing long-term noise exposure for civil and military aircraft operations." [Federal Interagency Committee on Noise, "Federal Agency Review of Selected Airport Noise Analysis Issues," August 1992] Though there are more flights now and greater population densities than when the DNL metric was originally proposed, the development of the original relationship between aircraft sound exposure and effects on people was based solely on sound levels and percent of people affected. Hence, increasing numbers of flights or increasing populations were incorporated to the extent that the increased operations raise the sound levels in terms of DNL in residential areas.</p> <p>This same FICON study also recommended that other metrics, in addition to DNL, be used to help characterize specific noise effects. These additional or "supplemental" metrics were to be used at the discretion of the agency as an aid "...to determine noise impacts at specific noise-sensitive locations...." [FICON, 1992] Finally, the FICON report also recommended that if "...noise-sensitive areas will be at or above DNL 65 dB and will have an increase of DNL 1.5 dB or more, further analysis should be conducted of noise sensitive areas between DNL 60-65 dB having an increase of DNL 3 dB or more due to the proposed airport noise exposure." [FICON, 1992] All these recommendations were directed at improving public understanding of the effects of changes in aircraft noise. The current study has made use of these recommendations and provided supplemental metrics and analyses.</p> <p>Any promulgation of standards would be subject to public review.</p>
38.8	The DEIS for the 17-35 Project must address the cumulative impacts of the CEP, as well as the Airspace Redesign and the Master Plan Update. All of these programs or projects are "reasonably foreseeable". The FAA/PHL claims that the potential future effects of CEP are "speculative" and will be considered in detail in the Environmental Impact Statement currently being prepared for that project. The fact remains that the estimated air traffic volumes for the 17-35 Project are also speculative, yet that has not stopped the FAA from performing the EIS analysis for the Project. Leaving the CEP and Airspace Redesign out of a cumulative analysis does not comply with the CEQ/NEPA requirements. If the impacts of the future programs or projects cannot be fully determined at present, the FAA should develop worst-case scenarios to perform the cumulative impact analysis. Alternatively, the FAA/PHL can postpone the DEIS for the 17-35 Project until the impact of the CEP and other regional and national programs can be better determined.	Section 4.18 of the EIS presents the cumulative impact analysis, which was completed in conformance with CEQ guidelines. It takes into account the effects of the CEP, to the extent that these can be estimated at this time. CEQ guidelines do not require that "worst case" impacts be quantitatively evaluated. The data used in this analysis was based on the best available data as required by CEQ regulations. While the proposed NY/NJ/PHL Metropolitan Area Airspace Redesign Project may improve the operational efficiency of the regional airspace, information is not yet available on the potential impacts and therefore will not be incorporated within the PHL Runway 17-35 Extension EIS. The NY/NJ/PHL Metropolitan Area Airspace Redesign Project is a separate project and a Draft Environmental Impact Statement will be published for public review and comment.

## Letter 38

## Swarthmore Borough, Pennsylvania - Lisa Aaron, Elric Gerner

Comment Number	Comment	Response
38.9	FAA has not adequately assessed the root causes of air traffic delay.	The TAAM modeling shows that the existing runway configuration would account for 1.4 minutes of average annual delay, based on a comparison of the No-Action Alternative and Alternative 1 in 2007. The TAAM model takes into account all variables affecting airport operations. The analysis held all causes of delay constant while adjusting one variable - runway length - and therefore tested the effect of runway configuration on delay. The project shows that factors under the airport's control cause delay, and that delay would be reduced by the proposed runway extension.
38.10	Assessment of the need for the Project is premature...Projections of the delays at PHL must consider the results of other delay-reducing programs, such as the Airspace Redesign Project and the Master Plan Update.	There clearly is an immediate need for measures which reduce delay at the Philadelphia International Airport. The EIS for the New York/New Jersey/Philadelphia Metropolitan Area Airspace Redesign Project has not been completed, and the effects of the airspace redesign alternatives on delay at PHL have not been determined. It is, however, unlikely that airspace redesign would reduce delays due to runway congestion or airfield operations, and therefore would not provide a solution to the delay problem experienced at PHL. This Project is one of the recommendations from the Master Plan Update.
38.11	The FAA must fix its air traffic control system before embarking on an expansion project.	<p>There clearly is an immediate need for measures which reduce delay at the Philadelphia International Airport. The EIS for the New York/New Jersey/Philadelphia Metropolitan Area Airspace Redesign Project has not been completed, and the effects of the airspace redesign alternatives on delay at PHL have not been determined. It is, however, unlikely that airspace redesign would reduce delays due to runway congestion or airfield operations, and therefore would not provide a solution to the delay problem experienced at PHL. This Project is one of the recommendations from the Master Plan Update. The delay analysis conducted for this project demonstrated that changing the runway length (holding everything else in the model constant) would reduce delays.</p> <p>The delay calculations are simulated by a complex computer-based simulation model, Total Airspace and Airport Modeler (TAAM), as discussed in Chapter 2 and furthermore in the Master Plan Update, Final Technical Report 2004.17. The TAAM model takes into account all variables affecting airport operations. The analysis held all external causes of delay constant while adjusting only one variable, runway length, and therefore tested the effect of runway configuration on delay. The results show that factors under the airport's control cause delay, and that delay would be reduced by the proposed runway extension.</p>
38.12	Effects of the airlines' operations on delays and how they might be ameliorated must be taken into account.	Airport delays are caused by a range of factors, including weather, operations at other airports, and scheduling as well as the configuration and capacity of the Philadelphia International Airport's runways and taxiways. The analysis contained in the EIS demonstrates that the proposed runway extension will meet the project's purpose by reducing delay. The delay analysis is documented in the Airport's Master Plan Technical Report 2004.17. In a market economy, airlines provide the amount of service demanded by the public.
38.13	The projections of the delays at PHL are based on the false assumptions that airlines' operations will stay the same. Facts clearly indicate otherwise. For example, American Airlines has already spread out its schedule rather than bunching flights closely together at hubs.	The FAA has reviewed and approved the forecasts on which the analyses are based. This forecast is based on the analysis of historical trends, input from airlines, and assumptions regarding the key factors affecting airline traffic. Because PHL is an important origin/destination airport, there is forecast to be a continuing high level of demand for flights, regardless of whether or not any airline conducts hubbing operations at PHL.
38.14	No scoping meeting was held in Delaware County...Swarthmore Borough was not contacted by the FAA or PHL before the meetings, even though it is directly underneath the flight paths shortly after takeoffs and before landings.	Swarthmore Borough was directly notified of the scoping meetings for the Proposed Project and was included on the distribution list of the Scoping Information Document that was distributed to area municipalities. Swarthmore Borough was one of many Delaware County municipalities that received written notifications of all the public meetings and public hearings (see Appendix C of the DEIS).



## Letter 38

## Swarthmore Borough, Pennsylvania - Lisa Aaron, Elric Gerner

Comment Number	Comment	Response
38.15	The dates chosen for the scoping meetings effectively minimized public participation. The FAA chose to hold the scoping meetings in August 2003, when many people were on vacation. It also held the first informational meeting in Delaware County on April 15, 2004, the tax due date. The FAA apparently intended to minimize the public participation.	As described in Chapter 1 of this EIS, the FAA held three scoping meetings, nine public information meetings, and four public hearings, and continuously provided the opportunity for public participation through the project website. Various factors, such as holidays, school vacations, meeting location availability, and project schedule, were all considered when establishing the public meeting dates to ensure the best possible public participation.
38.16	The FAA and PHL have not made available the document referenced in the DEIS. Without them, the public cannot determine the validity of the operational assumptions or the projections in the DEIS. All the supporting documents must be made available to the public, with sufficient time for meaningful review. The DEIS comment period must be extended accordingly.	The commenter has not requested copies of the supporting Master Plan documents. All supporting information referenced in the Draft Environmental Impact Statement is available for public review. The Federal Aviation Administration has made available, upon request, the documents referenced in the DEIS. The Federal Aviation Administration complied with the Code of Federal Regulations (CFR) which states the required comment period for a DEIS is 45 days (40 CFR 1506.10(c)).
38.17	The FAA published the Philadelphia International Airport, Master Plan Update, Final Technical Report 2004.17, Runway 17-35 Extension, Capacity/Delay Simulation Analysis, DMJM Aviation, on 27 August 2004. This report has repetitively been referenced in the draft EIS (DEIS) for the Project. Yet, neither the FAA nor PHL has made this report available to the public.	No member of the public requested that FAA provide a copy of this document. The Master Plan Update (MPU), is being prepared by the City of Philadelphia's Department of Commerce, Division of Aviation, and not the Federal Aviation Administration (FAA). The MPU is a study of the airport's facility needs relative to future operational and passenger demand and especially to evaluate the cause(s) of delay at the airport. The MPU has proposed projects (Runway 17-35 Extension Project and Capacity Enhancement Program (CEP)) to alleviate the delay problem. However, if any members of the public had requested the MPU documents related to the Runway 17-35 Extension Project, the FAA would have provided them, as they are referenced in the EIS. FAA is not aware of this request.
38.18	The FAA/PHL has yet to hold a public meeting on the Master Plan Update (MPU), even though it has already identified two "Build Alternatives" to be evaluated by the CEP EIS. The FAA and PHL have failed to disclose any information on how and why the two "Build Alternatives" were chosen for the CEP. This information was requested months ago under the Freedom of Information Act by a member of the Swarthmore Environmental Advisory Council but has not been received to date.	The Master Plan Update (MPU), is being prepared by the City of Philadelphia's Department of Commerce, Division of Aviation, and not the Federal Aviation Administration (FAA). The MPU is a study of the airport's facility needs relative to future operational and passenger demand and especially to evaluate the cause(s) of delay at the airport. The MPU has proposed projects (Runway 17-35 Extension Project and Capacity Enhancement Program (CEP)) to alleviate the delay problem. However, if any members of the public had requested the MPU documents related to the Runway 17-35 Extension Project, the FAA would have provided them, as they are referenced in the EIS. Although the scoping for CEP was completed in August 2003, the FAA is still developing alternatives for the Project.
38.19	The 2007 design year for the 17-35 Project is arbitrary. The FAA/PHL does not show 2007 for completing the 17-35 Project is reasonable or necessary.	2007 was selected as the design/evaluation year because it is the earliest time that a delay-reduction measure could be designed and implemented. As demonstrated in Chapter 2 of the EIS, there is an immediate need for delay reduction at PHL.
38.20	The time frame for the CEP is also arbitrary. The DEIS indicates that the CEP will not be completely until year 2020. This estimate provides the FAA a convenient excuse for not to incorporate the CEP in the cumulative environmental impact analysis...It is conceivable that the Final EIS and Record of Decision for CEP could be issued by the end of 2006. Design, permitting and construction bids would take another two or three years. The construction could start as early as 2009, and the new CEP runways could become operational in 2014 or 2015, not 2020.	The EIS evaluates a reasonable time frame for construction of the CEP. The earliest that a ROD could be issued could be in 2007, and design-permitting-construction bidding would require a minimum of 4 years. Construction could start, at the earliest, in 2011, and is anticipated to take up to ten years to complete.

Comment Number	Comment	Response
38.21	<p>The 17-35 Project must be postponed until the effects of other delay-reduction programs can be quantified...The DEIS further states that the impacts of the alternatives considered Airspace Redesign are speculative now and will be addressed in that project's EIS. Airspace redesign alternatives may result in more or fewer flights over a given area and/or at different altitudes, resulting in potential increases or decreases to air quality emissions or noise levels within the Study Area of the 17-35 EIS, but would not alter the physical or natural features of the study area. Nevertheless, the fact is the 17-35 runway extension, Airspace Redesign and the CEP are intertwined and the impact of each must not be assessed in isolation. That the FAA cannot assess the impact of CEP and the Airspace Redesign program underscores the need to defer the 17-35 Project. The decision based on the prematurely prepared EIS for the Project is irreversible and must be postponed.</p>	<p>There clearly is an immediate need for measures which reduce delay at the Philadelphia International Airport. The EIS for the New York/New Jersey/Philadelphia Metropolitan Area Airspace Redesign Project has not been completed, and the effects of the airspace redesign alternatives on delay at PHL have not been determined. It is, however, unlikely that airspace redesign would reduce delays due to runway congestion or airfield operations, and therefore would not provide a solution to the delay problem experienced at PHL. This Project is one of the recommendations from the Master Plan Update. The delay analysis conducted for this project demonstrated that changing the runway length (holding everything else in the model constant) would reduce delays. The delay calculations are simulated by a complex computer-based simulation model, Total Airspace and Airport Modeler (TAAM), as discussed in Chapter 2 and furthermore in the Master Plan Update, Final Technical Report 2004.17. The TAAM model takes into account all variables affecting airport operations. The analysis held all external causes of delay constant while adjusting only one variable, runway length, and therefore tested the effect of runway configuration on delay. The results show that factors under the airport's control cause delay, and that delay would be reduced by the proposed runway extension.</p>
38.22	<p>The traffic volumes of the Interstate 95 and 476 will continue to grow. The future increases in noise and air pollution because of the ground traffic must be added to the increases in air traffic in the cumulative impact assessment.</p>	<p>As Section 4.2 of this EIS demonstrates, the Runway 17-35 Extension Project will not significantly increase noise levels in areas north or south of the existing runway. Only aircraft noise is taken into account when assessing impacts in changes in aircraft operations. While there are areas with high levels of ambient highway noise, the contribution of aircraft is not significant.</p>
38.23	<p>The FAA dismissed alternatives without adequate justifications. As mentioned earlier, the DEIS should have identified all the root causes for air traffic delays, and how the elimination of these causes would affect the traffic at PHL.</p>	<p>Chapter 3 of the EIS contains a detailed and complete analysis of alternatives with respect to whether they are reasonable, feasible, and could meet the project purpose and need. Reduction of delay at PHL is needed immediately, and 2007 was established as the target year because this was determined to be the soonest that any alternative could be identified and become operational. As the EIS documents, there are no reasonable technology alternatives that could be implemented at PHL and that would reduce delays in a short time frame.</p> <p>Airport delays are caused by a range of factors, including weather, operations at other airports, and scheduling as well as the configuration and capacity of the Philadelphia International Airport's runways and taxiways. Regardless of the cause of delay, the analysis demonstrates that the proposed runway extension will meet the projects' purpose by reducing delay. The delay analysis is documented in the Airport's Master Plan Technical Report 2004.17.</p> <p>The TAAM modeling shows that the existing runway configuration would account for 1.4 minutes of average annual delay, based on a comparison of the No-Action Alternative and Alternative 1 in 2007. The TAAM model takes into account all variables affecting airport operations. The analysis held all causes of delay constant while adjusting one variable - runway length - and therefore tested the effect of runway configuration on delay. The project shows that factors under the airport's control cause delay, and that delay would be reduced by the proposed runway extension.</p>
38.24	<p>Combinations of alternatives were not considered. The FAA has never demonstrated that combinations of some of the dismissed alternatives are not viable. While a single alternative alone might not solve the problems, a combination of alternatives may. For example, a combination of convenient inter-airport train services may shift some of the traffic from PHL to EWR (Newark), significantly reducing delays at PHL.</p>	<p>A combination of alternatives may solve problems when each individual alternative has an impact on the problem. In the case of delay reduction at PHL in the short term, a number of alternatives, as described in Chapter 3, were evaluated and rejected because of their inability to meet the project's purpose. Chapter 3 (Alternative B2) evaluated the potential for rail (both for origin-destination markets as well as connecting air passengers). Alternative A1 evaluated more extensive use of existing large hub airports, including Newark (EWR).</p>

## Letter 38

## Swarthmore Borough, Pennsylvania - Lisa Aaron, Elric Gerner

Comment Number	Comment	Response
38.25	Routing of connecting traffic was not evaluated. The DEIS indicates that passengers who connect make up 37 percent of the traffic through PHL. The DEIS did not evaluate an alternative that would shift some of the traffic to other hubs to alleviate delays at PHL.	As described in Chapter 3, a number of alternatives, including greater use of other airports, were considered and analyzed for the Project. These alternatives were eliminated because they would not achieve the project's purpose and need of delay reduction at PHL in the short term. Moreover, the FAA has no authority to direct airlines to conduct hub operations at other airports.
38.26	FAA has direct influence on airlines as it has demonstrated at ORD (Chicago O'Hare). Advocating PHL's proposal for expansion without attempting to affect any operational changes that might alleviate delays is inappropriate.	Section 3.3.3 of the EIS considers Demand Management alternatives, including Administrative Approaches and Voluntary De-Peaking and Flight Reductions, that have the potential to meet the project's purpose and need. This section provides a detailed analysis of the situation at O'Hare Airport. The FAA eliminated administrative approaches such as slots (operational controls) for several reasons: (1) as a matter of policy, administrative actions such as operational controls or caps are not desirable to serve as long-term solutions to delay at an airport where capacity expansion is physically possible; (2) it would be inconsistent with Congress' intent of promoting competition among airlines and prevent air carriers from satisfying their customer's demands, and 3) A severe and extraordinary level of delay and effect on the NAS does not exist at PHL (as it does at ORD). The FAA also eliminated voluntary de-peaking and flight reduction approaches. While these have proven effective at O'Hare in the very short term, the possibility of their effectiveness at PHL to meet the proposed project's purpose and need is unknown, due to the differences between the airports and in the severity of delay and congestion between ORD and PHL. While PHL is delayed, it is not severely congested to a point where FAA would invite scheduled air carriers to a scheduling reduction meeting. The type and severity of delay and the role that PHL plays in the national and international aviation systems, and the composition of airlines at PHL are significantly different from those at ORD.
38.27	The FAA should identify which "Build Alternative" it prefers.	CEQ regulations require the FAA to identify its preferred alternative as soon as it has been identified, but no later than the FEIS. At the time, the DEIS was published, the FAA had not identified a preferred alternative. As indicated in this EIS, the FAA has identified Alternative 1 as its Preferred Alternative.
38.28	The 17-35 Project will significantly increase noise in Eastwick and other minority communities. The FAA asserts that the Project will not have adverse impact on the minority and/or low-income communities near PHL, including Eastwick, Yeadon Borough, Colwyn Borough and Darby Township, because the DNL will generally not exceed 65 dB, and even it does, the increase will be less than 1.5 dB. ...the FAA has the discretionary authority under Order 1050.1E to evaluate noise impacts using the metrics that are more appropriate than DNL but the FAA has failed to do so. Moreover, the FAA has not dealt with the impact of the nighttime air cargo traffic. The FAA should have taken this opportunity to move beyond mere minimum standards and employ a more realistic approach to identifying significant impacts. Simply retreating to the 65 dB DNL and contending that there is no impact on these communities amounts to environmental injustice.	Section 4.6 states that the predominantly minority neighborhood in Eastwick would experience an increase of less than 1.5 dB in the 65 dB DNL contour in 2007 but that under FAA standards, this change is not considered to be a significant adverse impact. Section 4.6 concluded that there would be no disproportionate adverse impacts to any low-income or minority populations. FAA Order 1050.1E states that DNL is the best measure of significant impact on the quality of the human environment and is the only noise metric with a substantial body of scientific data on the reaction of people to noise. This EIS (see Appendix A.1 of the DEIS) also reports the nighttime day-night noise level (NDNL) which addresses night-time noise directly.

Comment Number	Comment	Response
38.29	<p>The 17-35 Project will divert air pollution to minority and/or low-income communities. The DEIS contends that there will be no increased adverse air quality impact because the number of flights under the two Build Alternatives and the No Build Alternative are essentially the same. Even so, the extended 17-35 will significantly increase the ground-level concentrations of hazardous air pollutants particularly in Eastwick and also the other communities.</p>	<p>Project-related air pollution impacts in the Eastwick area were addressed by including a receptor on the Airport property line just north of the end of Runway 17 (R11) in the dispersion modeling network. Other locations in the areas farther from the Airport will experience lower concentrations due to depletion of pollutants in the air because they are farther from the Airport sources. Appendix H of the Air Quality Technical Report (Detailed Dispersion Modeling Results) presents the results of the modeling analysis for this receptor and shows that the concentrations of carbon monoxide and particulate matter estimated for the future alternatives either decrease in the future or remain unchanged due to the Proposed Project. This is also true for nitrogen dioxide concentrations in 2015; however, in 2007 nitrogen dioxide concentrations at receptor R11 do increase slightly, but by less than 1 percent. In all cases, estimated pollutant concentrations remain well below the National and Pennsylvania Ambient Air Quality Standards. (See Tables H-3 through H-8 for these results.)</p> <p>Since Airport-related pollutant concentrations due to the Proposed Project do not exceed any air quality standards, there is no adverse air quality impact, and, therefore, there are no disproportionate adverse air quality impacts to any areas surrounding the Airport. Thus, there are no environmental justice issues regarding air quality. In addition, emissions of project-related criteria pollutants and Hazardous Air Pollutants (HAPS) will be reduced with either Alternative of the Proposed Project. See Table 4.5-7 and Table 4.5-12 of this EIS.</p>
38.30	<p>As the DEIS indicates, after the 17-35 runway extension, more jets will be diverted from the main runways to this runway. In addition, as more and more passengers use regional airlines, the number of aircrafts taking off and landing on the 17-35 runway will increase significantly. Eastwick in particular and also the other communities will receive proportionally larger amounts of emissions. The DEIS has not addressed the localized increases in air emissions. This is a serious omission. The DEIS should have estimated the increased amounts of hazardous air pollutants that the minority and/or low-[in]come residents would be exposed to. The residents in Eastwick and the other communities are obviously quite concerned with the adverse impact of the Project, as demonstrated by the large turnout at the public meetings. Once again, the impact of the failure to go beyond the minimum requirement for impact analysis of air quality amounts under the circumstances to environmental injustice.</p>	<p>As the EIS shows (Tables 4.2-8 to 4.2-13), the number of flights using Runway 17-35 will increase with Alternative 1. However, this increase is relatively small. In 2007, 1.8 percent of total operations would use Runway 17-35 and 17.8 percent would use Runway 35 in the No-Action Alternative. This would increase to 2.2 percent and 29.5 percent for Alternative 1. Emissions of project-related Hazardous Air Pollutants (HAPS) will be reduced with either Alternative of the Proposed Project. See Table 4.5-12 of this EIS. Since Airport-related pollutant emissions will decrease with the project, there is no adverse air quality impact, and, therefore, there are no environmental justice issues regarding air quality. The FAA notes Swarthmore's concern for the residents of Eastwick, a neighborhood of the City of Philadelphia.</p>
38.31	<p>the DEIS should have included the results of an airspace safety analysis. While the details are not known, it is understood that the FAA has begun a national airspace analysis to enable comprehensive planning of future operations in the U.S. The EIS cannot be completed without knowledge of the level of safe saturation of airspace.</p>	<p>Safety is the FAA's statutory mission as well as its highest priority. Both Alternative 1 and Alternative 2 will meet all FAA safety standards for airports.</p>

## Correspondence from Tinicum Township Manager Norbert Poloncarz

Tinicum Township is opposed to proposal to expand Philadelphia International Airport in order to reduce aircraft delays. The majority of Airport property is located in Tinicum Township, Delaware County. We believe that relocating and extending the Airport's runways will cause major impacts that the Federal Aviation Administration needs to address during the Environmental Impact Statement process:

1. Noise, especially when aircraft noise is introduced to areas that currently are not affected by that noise
2. The possibility of airplane crashes into developed areas
3. Tinicum Township and as many as 26 other residential communities within Delaware County. Thousands of Residents and residential properties in Delaware County alone, without mentioning those in surrounding Philadelphia, Camden and Gloucester Counties, will be impacted.

### Other impacts:

Quality of life and quiet enjoyment of resident's property.

Livability within the Community.

Impact upon the Local Schools and educational process.

Fear of low flying planes over our homes.

Decrease in property values that these concepts are likely to cause.

## Letter 39

## Tinicum Twp, Pennsylvania - Norbert Poloncarz

Comment Number	Comment	Response
39.1	We believe that relocating and extending the Airport's runways will cause major impacts that the Federal Aviation Administration needs to address during the Environmental Impact Statement process: Noise, especially when aircraft noise is introduced to areas that currently are not affected by that noise	The current study is concerned with the proposed extension of Runway 17-35, the purpose of which is to reduce current and projected airfield delays at PHL as soon as feasible. The potential noise impact associated with the Runway 17-35 Extension Project is detailed in this EIS. A second project, known as the Capacity Enhancement Program (CEP), is a major airfield redevelopment project that would provide greater relief from delay over a much longer period. The FAA is preparing a separate EIS for each project because each project has independent utility: the Runway 17-35 Extension Project will address the need for delay reduction at PHL in the short term while the CEP will provide both more comprehensive and longer term delay reduction as well as additional capacity at the airport. Both EISs were initiated in 2003.
39.2	We believe that relocating and extending the Airport's runways will cause major impacts that the Federal Aviation Administration needs to address during the Environmental Impact Statement process...the possibility of airplane crashes into developed areas	Safety is the FAA's highest priority, and the agency will ensure that the design of the Runway 17-35 Extension Project properly protects the public safety. The Preferred Alternative will meet all FAA safety standards and design criteria. The extended runway will reduce congestion in the current primary east-west operating direction, and will reduce the reliance on Runways 9L/27R and 9R/27L during heavy demand. This will enhance safety.
39.3	We believe that relocating and extending the Airport's runways will cause major impacts that the Federal Aviation Administration needs to address during the Environmental Impact Statement process: Tinicum Township and as many as 26 other residential communities within Delaware County. Thousands of Residents and residential properties in Delaware County alone, without mentioning those in surrounding Philadelphia, Camden and Gloucester Counties, will be impacted.	There are no significant impacts anticipated from the Proposed Project. These communities were all included in the Regional Study Area.
39.4	Other impacts: Quality of life and quiet enjoyment of resident's property. Livability within the community. Impact upon the local schools and educational process. Fear of low flying planes over our homes. Decrease in property values that these concepts are likely to cause.	Quality of life and property values depend on a number of factors. Because there will be no significant impacts, it is unlikely that the Proposed Project would adversely affect quality of life or have a significant impact on noise or environmental impacts. It is highly unlikely that any property values will decrease. Additionally, no significant impacts to schools are expected from the Proposed Project; however, the FAA has noted and considered your comment.

## **UPPER DARBY TOWNSHIP**

### **Resolution No. 54-04**

#### **A RESOLUTION OF UPPER DARBY TOWNSHIP, DELAWARE COUNTY, PENNSYLVANIA OPPOSING THE EXTENSION OF RUNWAY 17-35 AT THE PHILADELPHIA INTERNATIONAL AIRPORT.**

WHEREAS, on November 18, 2004, and on three (3) other dates, the Federal Aviation Administration ("FAA") will hold public hearings to discuss the proposed extension of runway 17-35 at the Philadelphia International Airport from 5,459 feet to 7,000 feet; and

WHEREAS, the extension will allow regional jets to take off from and land on runway 17-35; and

WHEREAS, regional jets carry heavier loads of fuel than the aircrafts that currently take off from and land on runway 17-35; and

WHEREAS, traffic on runway 17-35 is anticipated to increase if the FAA permits the extension; and

WHEREAS, if the FAA permits the extension, the regional jets' flight pattern will carry them over the Bywood and Highland Park sections of Upper Darby Township and will be in close proximity to seven (7) schools within the Township; and

WHEREAS, this Council is concerned that regional jet and other traffic that would result from the extension of runway 17-35 will increase stress and noise levels within the Township, cause vibrations in structures in the vicinity of the take off and landing flight plans, cause an increase in the possibility of hazardous material falling from aircrafts into

the Township and cause an increase in other safety risks that will negatively impact the health, safety and welfare of the Township, its residents, business people and visitors.

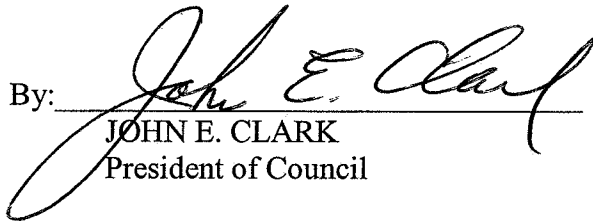
NOW, THEREFORE, BE IT RESOLVED that:

1. The Township opposes the proposed extension of runway 17-35.
2. The Mayor and Administration are hereby empowered to take all steps necessary to insure that the Township's opposition to the extension of runway 17-35 is expressed to the FAA at the public hearing on November 18, 2004.


Resolved this 17<sup>th</sup> day of November 2004.

**UPPER DARBY TOWNSHIP**

By:

  
JOHN E. CLARK  
President of Council

Attest:

  
THOMAS N. MICOZZIE  
Secretary of Council

Resolution No. 54-04 is hereby approved this 17th day of November, 2004.

  
F. RAYMOND SHAY  
Mayor

Attest:

  
THOMAS J. JUDGE, JR.  
Chief Administrative Officer



## Letter 40

Upper Darby Twp, Pennsylvania - John Clark

Comment Number	Comment	Response
40.1	This Council is concerned that regional jet and other traffic that would result from the extension of runway 17-35 will increase stress and noise levels within the Township, cause vibrations in structures in the vicinity of the take off and landing flight plans, cause an increase in the possibility of hazardous material falling from aircrafts into the Township, and cause an increase in other safety risks that will negatively impact the health, safety and welfare of the Township, its residents, business people and visitors. The Township opposes the proposed extension of runway 17-35.	<p>The Proposed Project will not cause Regional Jets to fly to PHL. The Purpose and Need of the Project is to accommodate those that already do. As documented in this EIS, the proposed Project will not result in significant noise increases, will not cause damaging vibrations, and will not increase safety risks. The proposed project will decrease air pollutant emissions.</p> <p>Safety is the FAA's highest priority, and the agency will ensure that the design of the Runway 17-35 Extension Project properly protects the public safety. The Preferred Alternative will meet all FAA safety standards and design criteria. The extended runway will reduce congestion in the current primary east-west operating direction, and will reduce the reliance on Runways 9L/27R and 9R/27L during heavy demand. This will enhance safety.</p>
40.2	The Township opposes the proposed extension of Runway 17-35.	The FAA has noted and considered your comment.



# UPPER DARBY TOWNSHIP

OFFICE OF THE MAYOR

HON. F. RAYMOND SHAY  
610-352-4103  
FAX 610-734-7709

MUNICIPAL BUILDING  
100 GARRETT ROAD  
UPPER DARBY, PA 19082-3135

August 28, 2003

Mr. James B. Byers  
Environmental Specialist  
Federal Aviation Administration  
Airports District Office  
3905 Hartzdale Drive, Suite 508  
Camp Hill, Pa 17011

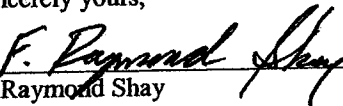
Dear Mr. Byers:

This refers to request for comments related to the Philadelphia International Airport's proposed Capacity Enhancement Program and Runway 17-35 Improvement Project.

We are concerned with several issues associated with the two proposals. The economic impact both plans will have on Delaware County and surrounding communities appears to be considerable. The potential loss of jobs to our residents and since lost tax revenue to the local municipalities will be devastating, additional study and review is required. In addition, the increased noise levels and potential negative impact on the emergency response community (first responders) needs to be assessed.

Please note these comments in the Scoping Process Report for both proposals. We also would like to reserve the right to provide additional comments as more information on these proposals is developed.

Sincerely yours,

  
F. Raymond Shay  
Mayor

FRS:bn

Cc: John E. Clark, Council President  
Marianne Grace, Executive Director - Delaware County Council

~~Thomas J. Judge, Jr., Chief Administrative Officer~~ /

## Letter 41

## Upper Darby Twp, Pennsylvania - Mayor F. Raymond Shay

Comment Number	Comment	Response
41.1	The economic impact both plans will have on Delaware County and surrounding communities appears to be considerable. The potential loss of jobs to our residents and since lost tax revenue to the local municipalities will be devastating, additional study and review is required.	There would be no adverse economic impacts to Delaware County. The Proposed Project would provide construction-period jobs which would have a minor regional benefit. No businesses in Delaware County will be displaced and there will be no loss in jobs due to the Proposed Project.
41.2	In addition, the increased noise levels and potential negative impact on the emergency response community (first responders) needs to be assessed.	<p>Figures 4.2-14 through 4.2-17 in this EIS depict the changed noise exposure for those areas experiencing aircraft noise levels between 45 and 60 dB DNL as a result of the Project. The shading of the squares in those figures indicates the magnitude of the changed noise exposure between 45 and 60 dB DNL. Based on the noise analysis, the changed noise exposure for those areas would be less than 5 dB for all future forecast cases. As stated in section 4.2 of this EIS, "increases of 5 dB or greater in areas that would be exposed to DNL values between 45 dB and 60 dB are considered to reflect slight-to-moderate change because noise unrelated to the project can have a significant influence on total exposure at these lower levels. The increases in noise at these levels are enough to be noticeable and potentially disturbing to some people, but the cumulative noise level is not high enough to constitute a significant impact." The effect of the Project on aircraft noise exposure levels in Upper Darby Township is reflected in Figures 4.2-14 through 4.2-17.</p> <p>No negative impact on the emergency response community is anticipated. The proposed Runway 17-35 Extension project will not result in increased safety risks requiring emergency response.</p>



Philadelphia International Airport  
Runway 17-35 Extension Project  
Environmental Impact Statement  
Public Hearings  
November 15, 16, 17, and 18, 2004

**Public Comment Form**

The Federal Aviation Administration (FAA) encourages all interested parties to provide comments concerning the scope and content of the DEIS. Comments should be as specific as possible and address the analysis of potential environmental impacts and the adequacy of the proposed action or merits of alternatives and the mitigation being considered. Reviewers should organize their participation so that it is meaningful and makes the agency aware of the viewer's interests and concerns using quotations and other specific references to the text of the DEIS and related documents. Matters that could have been raised with specificity during the comment period on the DEIS may not be considered if they are raised later in the decision process. This commenting procedure is intended to ensure that substantive comments and concerns are made available to the FAA in a timely manner so that the FAA has an opportunity to address them.

Please clearly print your contact information and your comment on the DEIS in the space below. Space is also available on the back page. Please either drop this form off tonight at the sign-in table or mail this form to the contact and address listed at the bottom of the back page. You can also submit your comments via email ([smcdonald.faa.17-35@vhb.com](mailto:smcdonald.faa.17-35@vhb.com)) or the Project web site ([www.phlrunway17-35eis.com](http://www.phlrunway17-35eis.com)), where the DEIS is available.

Comments must be received by **December 1, 2004** in order to be considered.

Thank you for participating.

Name: Deputy Mayor Len Daws  
Address: 1647 PENNFIELD DR  
City: THOROFARE  
State: NJ Zip Code: 08086  
E-mail Address: len-daws@hotmail.com

**PLEASE PRINT CLEARLY**

Comment: (See back of page)  
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*Over*



Comment (cont.) Deputy Mayor Len Dewis

West Deptford Township requests the following:

- 1) Revise model inputs for the Integrated Noise Model to reflect 2004 Radar data for arriving flights, specifically those flights originating outside the RW 17-35 backbone. Of particular concerns are those flights making 90 to 100° banking adjustments within a 2 1/2 to 3 mile radius of the airport <sup>(RW 17-35)</sup>, resulting in increased thrusting noise.
- 2) Document the Standard Operating Procedures between the tower and merchant ships regarding the <sup>a crit</sup> notification of area Merchant traffic resulting in the suspension of ~~the~~ arriving flights to RW 17-35
- 3) Document ~~the~~ cost/risks associated with prevention of RW 26 &

Please drop off this form at the sign in table before you leave the hearing or mail this form to the <sup>271</sup> following address: <sub>expansion</sub>

Susan McDonald, FAA Environmental Protection Specialist  
c/o VHB  
101 Walnut Street  
PO Box 9151  
Watertown, MA 02471-9151

Additional Page Included  Yes  No

## Letter 42

West Deptford Twp, New Jersey - Deputy Mayor Len Daws

Comment Number	Comment	Response
42.1	Revise model inputs for the Integrated Noise Model to reflect 2004 Radar data for arriving flights, specifically those flights originating outside the RW 17-35 backbone. Of particular concerns are those flights making 90 to 100 degree bearing adjustments within a 2.5 to 3 mile radius of the airport (RW 17-35), resulting in increased thrusting noise.	The noise analysis is accurate and the FAA believes it accurately predicts the difference in noise levels between the future No-Action condition and the Preferred Alternative. The model was based on the best available data which included information from 2003 and three months of 2004.
42.2	Document the standard operating procedures between the town and merchant ships regarding the alert of area merchant traffic resulting in the suspension of arriving flights to RW 17-35.	By federal law, waterborne vessels have the right-of-way in occurrences where they encounter other modes of transportation. Therefore, aircraft have to yield the right-of-way to watercraft and this is the current (existing) condition. Thus, it is the airport, rather than the port traffic, that is impeded. The DEIS estimated that landings on Runway 35 would be suspended on average 4 times per day for 15 minutes as a result of ships in the channel, and this is included in the delay analysis presented in this EIS.
42.3	Document cost/risk associated with prevention of RW 26 and 27L expansion.	Extending Runway 26 was considered and analyzed for the Project. This alternative was eliminated because it would not achieve the project's purpose and need in that it could not be accomplished in the short term.

Testimony of  
The Honorable Janice Hauser  
West Deptford Township Committeewomen  
Before the Federal Aviation Administration  
Public Hearing, Philadelphia International Airport  
Runway 17-35 Expansion Project

Good evening Ladies and Gentleman.

I thank you for this opportunity to speak on behalf of West Deptford Township residents regarding our concerns related to the Philadelphia International Airport's Runway 17-35 Expansion Project.

The Philadelphia International Airport is currently seeking approval from the Federal Aviation Administration and other regulatory agencies to expand Runway 17-35. At the present, this runway primarily serves commuter aircraft. However, the expansion would enable this runway to accommodate regional commuter jets as well. A study conducted by Philadelphia International Airport specified that the airport presently handles 73,242 regional jets annually. This same study also projected there would be 178,000 regional jets by the year 2010, a 144% increase.

We recognize Philadelphia International Airport is an important economic asset to the entire Delaware Valley and an important link in the national network. We also recognize that the airport needs to improve its facilities in order to keep pace with growing air traffic. However, we have serious concerns regarding the environmental impact, effectiveness, and the safety of the proposed runway expansion alternatives.

Our first concern is the potential for this project to significantly increase the aircraft noise impact on residences and businesses in West Deptford. A noise monitoring study conducted in January of 2003 measured the impact of aircraft operations, which were then 44% to 52% under the current annual average operational levels. Since that time, usage of Runway 17-35 has increased to the extent that we believe the existing noise study is no longer an accurate indicator of the potential impact on ambient noise levels in West Deptford Township.

While the Draft Environmental Impact Statement did not project any “significant” increases in average noise levels based on



FAA assessment procedures for cumulative noise exposure, it did show an increase in average noise levels in West Deptford Township. This will have a serious impact on the quality of life in our Township, particularly neighborhoods in the approach path of Runway 17-35.

The Draft Environmental Impact Statement's noise study assumes a continuation of the current voluntary noise abatement procedures, which restrict nighttime use of Runway 17-35. On behalf of West Deptford Township residents, I request that the Federal Aviation Administration make these nighttime restrictions both mandatory and permanent, regardless of whether or not approvals for the extension of Runway 17-35 are granted.

In accordance with section S.7.3 of the Draft Environmental Impact Statement, large tankers and container ships using the Delaware River Shipping Channel require that aircraft arrivals on Runway 17-35 be suspended an average of four times a day. However, credible sources familiar with Philadelphia International Airport operations have told township officials that these

suspensions presently occur an average of ten times a day. The number of arrival suspensions are expected to increase as usage of Runway 17-35 increases and the separation distance between aircraft decreases to a planned 3.5 nautical miles from the currently approved six nautical miles.

I question whether the extension of Runway 17-35 is the most effective response, given that an increase in arrival suspensions is more than likely to occur as a result of the increased usage of Runway 17-35. In addition, tanker and container ship traffic on the Delaware River is also increasing, which is another factor that will lead to an increase in arrival suspensions.

Is it really prudent to invest millions of dollars in the extension of Runway 17-35 when the benefit of this project, namely the decrease in flight delays, is likely to be significantly less effective due to an increase in aircraft arrival suspensions associated with tanker and container ships? I also question whether a safer alternative could be developed which would not increase the interaction of aircrafts and large ships. I am afraid the

expansion of Runway 17-35 could put the public at a greater risk in the event of a disastrous collision between a passenger aircraft and a large tanker or containership. There must be a safer way to reduce flight delays at Philadelphia International Airport.

In closing, if the primary goal of this proposed project is to reduce flight delays, I question whether this is a sound expenditure of public funds. It is my understanding that Runway 17-35 is a “visual flight rules” runway. These rules limit the usage of this runway to weather conditions that provide good visibility. I also believe that the millions of public dollars being spent on the expansion of Runway 17-35 would be better spent expanding other existing runways. For instance Runway 18-26, is currently controlled by a “precision radar monitor” which makes landings relatively unaffected by visibility conditions. Therefore an expansion of Runway 18-26 may be a safer and more efficient use of public funds. Another alternative approach apparently not considered is the construction of a new, state-of-the-art runway adjacent to the Delaware River and parallel to the existing east-

west main runways. The new runway would both lessen the chance of devastating collisions with large ships, and minimize noise impacts on West Deptford and other communities in New Jersey and Pennsylvania.

On behalf of West Deptford Township, I thank you again for this opportunity and hope you will seriously consider our concerns and the negative impact the runway expansion project will have on the environment and the safety of West Deptford residents.

Comment Number	Comment	Response
43.1	Our first concern is the potential for this project to significantly increase the aircraft noise impact on residences and businesses in West Deptford.	Build Alternative 1 is projected to cause an increase in noise exposure in New Jersey directly across the Delaware River and under the flight paths to Runway 17-35. This is shown in Figures 4.2-6 and 4.2-7 in this EIS. However, no residents in this area are projected to experience significant noise impact according to criteria established by the FAA in Order 1050.1E. In fact no residents in New Jersey off the south end of Runway 17-35 falls within the 60 DNL noise contour, though some people in the River Winds development and others living along Crown Point Road are exposed to DNL levels close to 60 dB.
43.2	A noise monitoring study conducted in January of 2003 measured the impact of aircraft operations, which were then 44% to 52% under the current annual average operational levels. Since that time, usage of Runway 17-35 has increased to the extent that we believe the existing noise study is no longer an accurate indicator of the potential impact on ambient noise levels in West Deptford Township.	<p>The temporary noise measurement program for this study was conducted in January 2004. The commentor is correct with respect to the fact that the average number of daytime and nighttime operations during the temporary noise measurement program were less than the number of daytime and nighttime operations for the average annual day for 2003 Existing Conditions.</p> <p>As noted in Section 4.2.2, Affected Environment, of this EIS, radar flight track data obtained from the Airport's NOMS system were used to develop input for the FAA's INM. The radar flight track data which were obtained were considered representative of the following operating conditions at PHL:</p> <ul style="list-style-type: none"> <li>-- West flow conditions;</li> <li>-- East flow conditions;</li> <li>-- A new procedure called the "Dual Modena" by air traffic controllers, implemented on October 31, 2003 and primarily affecting aircraft with southerly destinations.</li> </ul> <p>It is believed that the new procedures were accurately reflected in the modeling of the Existing Conditions for 2003, as well as for each of the future forecast cases.</p>
43.3	While the Draft Environmental Impact Statement did not project any "significant" increases in average noise levels based on FAA assessment procedures for cumulative noise exposure, it did show an increase in average noise levels in West Deptford Township. This will have a serious impact on the quality of life in our Township, particularly neighborhoods in the approach path of Runway 17-35.	<p>The results of the noise analysis indicate that no New Jersey residents located off the south end of Runway 17-35 fall within the 60 DNL noise contour, though some residents in the River Winds development and others living along Crown Point Road are exposed to DNL levels close to 60 dB.</p> <p>Following the guidelines in FAA Order 1050.1E, increases of five dB or greater in areas that would be exposed to DNL values between 45 dB and 60 dB are considered to reflect slight-to-moderate change because noise unrelated to the project can have a significant influence on total exposure at these lower levels. The increases in noise at these exposure levels are enough to be noticeable and potentially disturbing to some people, but the cumulative noise level is not high enough to constitute a significant impact. No New Jersey residents who would be exposed to aircraft DNLs between 45 and 60 dB DNL would experience an increase in exposure of five dB or more.</p> <p>The FAA has worked with Federal Interagency Committee on Noise (FICON) on the noise compatibility standards and the noise level is compatible.</p>
43.4	The Draft Environmental Impact Statement's noise study assumes a continuation of the current voluntary noise abatement procedures, which restrict nighttime use of Runway 17-35. On behalf of West Deptford Township residents, I request that the Federal Aviation Administration make these nighttime restrictions both mandatory and permanent, regardless of whether or not approvals for the extension of Runway 17-35 are granted.	Mandatory nighttime use restrictions are not within the purview or authority of the FAA to initiate; they can be initiated only by the Airport operator, in this case the City of Philadelphia, and only if their justification is established through a FAR Part 161 Study. The Part 161 Study has to be approved by the FAA before any mandatory noise restrictions can be implemented.

## Letter 43

West Deptford Twp, New Jersey - Janice Hauser

Comment Number	Comment	Response
43.5	<p>In accordance with Section S.7.3 of the Draft Environmental Impact Statement, large tankers and container ships using the Delaware River Shipping Channel require that aircraft arrivals on Runway 17-35 be suspended an average of four times a day. However, credible sources familiar with Philadelphia International Airport operations have told township officials that these suspensions presently occur an average of ten times a day. The number of arrival suspensions are expected to increase as usage of Runway 17-35 increases and the separation distance between aircraft decreases to a planned 3.5 nautical miles from the currently approved six nautical miles.</p> <p>I question whether the extension of Runway 17-3 5 is the most effective response, given that an increase in arrival suspensions is more than likely to occur as a result of the increased usage of Runway 17-3 5. In addition, tanker and container ship traffic on the Delaware River is also increasing, which is another factor that will lead to an increase in arrival suspensions. Is it really prudent to invest millions of dollars in the extension of Runway 17-35 when the benefit of this project, namely the decrease in flight delays, is likely to be significantly less effective due to an increase in aircraft arrival suspensions associated with tanker and container ships?</p>	<p>The transit time that was used in the delay reduction simulation assumes an average of up to 15 minutes. This data is based on observations as documented in the Philadelphia International Airport: Master Plan Update, Final Technical Report 2004.02, Runway 17-35 Extension Project Justification and Definition.</p> <p>The Air Traffic Control Tower data show that on average fewer than three large ships pass the airport daily, less than the four ships per day that were modeled. The FAA does not anticipate a significant increase in the use of large ships that would affect the delay reduction benefits of Alternative 1.</p>
43.6	<p>I also question whether a safer alternative could be developed which would not increase the interaction of aircrafts and large ships.</p>	<p>The issue of large ships obstructing Runway 35 Approaches would occur whether or not the Runway is extended. Alternative 2 would alleviate the requirement that Runway 35 approaches are diverted for tall ships. However, a procedure is currently in place and would continue under Alternative 1 that addresses safety issues.</p>
43.7	<p>I am afraid the expansion of Runway 17-35 could put the public at a greater risk in the event of a disastrous collision between a passenger aircraft and a large tanker or containership. There must be a safer way to reduce flight delays at Philadelphia International Airport.</p>	<p>The Preferred Alternative (Alternative 1) incorporates safety procedures to eliminate the potential for aircraft approaching Runway 35 to collide with the taller ships that use the Delaware River channel. These safety procedures are required under the existing and future No-Action conditions as well. The Runway 17-35 Extension project does not increase the potential for a ship collision.</p>
43.8	<p>The millions of public dollars being spent on the expansion of Runway 17-35 would be better spent expanding other existing runways. For instance Runway 18-26, is currently controlled by a "precision radar monitor" which makes landings relatively unaffected by visibility conditions. Therefore an expansion of Runway 18-26 may be a safer and more efficient use of public funds.</p>	<p>As described in Chapter 3, a number of alternatives, including extension of Runway 8-26, were considered and analyzed for the Project. These alternatives were eliminated because they would not achieve the project's purpose and need. As described in Chapter 2, Runway 17 is a Precision Instrument Runway that can be used in poor weather conditions. Extension of Runway 8-26 will be studied in the Capacity Enhancement Program (CEP) EIS.</p>
43.9	<p>Another alternative approach apparently not considered is the construction of a new, state-of-the-art runway adjacent to the Delaware River and parallel to the existing east west main runways. The new runway would both lessen the chance of devastating collisions with large ships, and minimize noise impacts on West Deptford and other communities in New Jersey and Pennsylvania.</p>	<p>Improvements to delay at PHL are needed immediately. The Runway 17-35 Extension Project has been identified as a project that could be implemented within the next two years. As described in Chapter 3, a number of alternatives were considered and analyzed for the Project. These alternatives were eliminated because they would not achieve the project's purpose and need, which is to reduce delay at PHL in the short term. Construction or relocation of a runway adjacent to the Delaware River is not a short-term undertaking and is being investigated for the Capacity Enhancement Program (CEP), which is a long-term redevelopment project.</p>

----- Message from Bill Bittner <topcop@comcast.net> on Wed, 01 Dec 2004  
16:41:34 -0500 -----

To: smcdonald.fss.17-35@vhb.com

Subject Proposed Runway 17-35 Extension Project Philadelphia  
: International Airport

Borough of Westville  
William C. Packer, III  
Mayor  
856-456-0030  
Fax 856-742-8190

December 1, 2004  
Federal Aviation Administration

Dear Sirs,

As Mayor of the Borough of Westville, please accept this letter as our official opposition to the Runway 17-35 Extension Project at the Philadelphia International Airport.

Westville is located in the northernmost end of Gloucester County on the Delaware River at the juncture of the Big Timber Creek. Our area has enjoyed increased recreation opportunities thanks to the cleanup of the areas waterways. We already experience our fair share of noise and airport traffic over our municipality. It is my understanding that with this expansion project, the noise and air traffic will increase over our area.

If anything, we would encourage a decrease in this activity over our area by use of other airports in the area. We have recently acquired the last piece of property fronting the Big Timber Creek for dedicated parkland. In addition there is a significant wildlife, waterfowl and other bird population in the area, and we believe that increased air traffic would be detrimental to any parkland development and the general wildlife in the area of Westville.

Increased air traffic and noise would also detrimentally affect the quality of life of the citizens of Westville. We would encourage looking to other regional airports to handle any increased traffic or to relieve the traffic that currently exists at Philadelphia International.

Thank you for your time and consideration in this matter.

Yours Truly,

William C. Packer  
Mayor  
Borough of Westville

## Letter 44

## Westville Borough, New Jersey - Mayor William Packer III

Comment Number	Comment	Response
44.1	We already experience our fair share of noise and airport traffic over our municipality. It is my understanding that with this expansion project, the noise and air traffic will increase over our area.	Build Alternative 1 is projected to cause an increase in noise exposure in New Jersey directly across the Delaware River and under the flight paths to Runway 17-35. This is shown in Figures 4.2-6 and 4.2-7 in this EIS. However, no residents in this area are projected to experience significant noise impact according to criteria established by the FAA in Order 1050.1E. No residents in New Jersey off the south end of Runway 17-35 are within the 60 DNL noise contour. The noise impact analysis compares the future No-Action Alternative to the future build alternatives.
44.2	We have recently acquired the last piece of property fronting the Big Timber Creek for dedicated parkland. In addition, there is a significant wildlife, waterfowl and other bird population in the area, and we believe that increased air traffic would be detrimental to any parkland development and the general wildlife in the area of Westville.	Westville is on the approach/departure path for Runway 9/27, and would not be affected by air traffic using Runway 17-35. As demonstrated in Section 4.2 of this EIS, no increase in noise is expected.
44.3	Increased air traffic and noise would also detrimentally affect the quality of life of the citizens of Westville.	Quality of life depends on a number of factors. Because there will be no significant impacts, it is unlikely that the Proposed Project would adversely affect quality of life, however, the FAA has noted your comment.
44.4	We would encourage looking to other regional airports to handle any increased traffic or to relieve the traffic that currently exists at Philadelphia International.	As described in Chapter 3, a number of alternatives, including greater use of other airports, were considered and analyzed for the Project. These alternatives were eliminated because they would not achieve the project's purpose and need of delay reduction at PHL in the short term.





## Office of Emergency Management Borough of Yeadon

---

**William W. Neil**  
Emergency Management  
Coordinator

November 29, 2004

Ms. Marion Blakey  
Administrator  
Federal Aviation Administration  
800 Independence Avenue, SW  
Washington, D.C. 20591

Dear Administrator Blakey:

We are writing to protest the inadequate comment period for Philadelphia International Airport's Runway 17-35 Draft Environment Impact Statement and the FAA's refusal to release the Integrated Noise Model files for public review.

The draft EIS is a voluminous document, requiring an extensive amount of time and expertise to review. The document was released to the public only last month. The deadline for the comment is December 1, 2004. On November 6th, Congressman Curt Weldon of Pennsylvania's 7th Congressional District requested that you extend the deadline to January 15, 2005. Considering the significant impact this project will have on Delaware County and many municipalities within the County, a lengthier comment period is necessary.

On November 19th, the County of Delaware requested from FAA staff a copy of the Integrated Noise Model files, so that the County could review traffic and noise projections for reasonableness. FAA staff refused to make the model files available, thus making review of these projections impossible. Public funding of this project demands that all information relating to it be available for public review!

Your immediate attention to this matter would be appreciated.

Very truly yours,

**William W. Neil**  
Emergency Management Coordinator

## Letter 45

## Yeadon Borough, Office of Emergency Management - William Neil

Comment Number	Comment	Response
45.1	We are writing to protest the inadequate comment period for Philadelphia International Airport's 17-35 Draft Environmental Impact Statement and the FAA's refusal to release the Integrated Noise Model files for public review.	The Federal Aviation Administration complied with the Code of Federal Regulations (CFR) which states the required comment period for a Draft Environmental Impact Statement is 45 days (40 CFR 1506.10(c)). At the Public Information Meetings held in September 2004, the release date of the DEIS and the DEIS Public Hearing dates were made public. This is a streamlined project and the FAA believes the comment period should only be extended for compelling reasons of national importance but the FAA did make every reasonable effort to consider those comments received within a reasonable period after the comment period. Additionally, the FAA did indeed respond and complete the request for the Integrated Noise Model (INM) files and made these files available for review to the County. The INM input data are provided in Appendix A.1 (Volume 3) of the DEIS.
45.2	On November 19th, the County of Delaware requested from FAA staff a copy of the Integrated Noise Model files, so that the County could review traffic and noise projections for reasonableness. FAA staff refused to make the model files available, thus making review of these projections impossible. Public funding of this project demands that all information relating to it be available for public review.	The Federal Aviation Administration did indeed respond to the request within three days of receiving it and made the Integrated Noise Model files available for review by the County.

# **BOROUGH of YEADON**

Church Lane and Baily Road  
P.O. Box 5187  
Yeadon, PA 19050  
Offices: 610-284-1606 • Fax: 610-284-2138

November 22, 2004

Ms. Marion Blakey  
Adminstrator  
Federal Aviation Administration  
800 Independence Avenue, SW  
Washington, D.C. 20591

Dear Administrator Blakey:

We are writing to protest the inadequate comment period allowed for Philadelphia International Airport's Runway 17-35 Draft Environmental Impact Statement(EIS) and the FAA's refusal to release the Integrated Noise Model files for public review.

The draft EIS is a document that requires that those who wish to review it have both time and expertise. Since the document was only released to the public in October and the deadline for comments was December 1,2004, we have not had adequate time for review.

On November 6<sup>th</sup>, Congressman Curt Weldon of Pennsylvania's 7<sup>th</sup> Congressional District requested that you extend the deadline to January 15, 2005. Because of the significant impact this project will have on Delaware County and many municipalities within the County, most especially, Yeadon, a lengthier comment period is necessary.

On November 19<sup>th</sup>, the County of Delaware requested from FAA staff a copy of the Integrated Noise Model files, so that the County could review traffic and noise projections for reasonableness. FAA staff refused to make the model files available, thus making review of these projections impossible. Public funding of this project demands that all information relating to it be available for public review!

Your immediate attention to this matter as well as a response to this request would be appreciated.

Very truly yours,

Jacquelynn Puriefoy-Brinkley  
President, Yeadon Borough Council

Council Members John Byrne, Linda Talbert, Vivian Ford, Rosalind Johnson, Ivory Taliaferro and Gloria Newsome

Cc: Delaware County Council  
Delaware County Planning Department  
Federal and State Elected Officials

## Letter 46

## Yeadon Borough, Pennsylvania, Council - Jacquelynn Puriefoy-Brinkley

Comment Number	Comment	Response
46.1	We are writing to protest the inadequate comment period allowed for Philadelphia International Airport's Runway 17-35 Draft Environmental Impact Statement (EIS) and the FAA's refusal to release the Integrated Noise Model files for public review. The draft EIS is a document that requires that those who wish to review it have both time and expertise. Since the document was only released to the public in October and the deadline for comments was December 1, 2004, we have not had adequate time for review. On November 6th, Congressman Curt Weldon of Pennsylvania's 7th Congressional District requested that you extend the deadline to January 15, 2005.	The Federal Aviation Administration complied with the Code of Federal Regulations (CFR) which states the required comment period for a Draft Environmental Impact Statement is 45 days (40 CFR 1506.10(c)). At the Public Information Meetings held in September 2004, the release date of the DEIS and the DEIS Public Hearing dates were made public. This is a streamlined project and the FAA believes the comment period should only be extended for compelling reasons of national importance but the FAA did make every reasonable effort to consider those comments received within a reasonable period after the comment period. Additionally, the FAA did indeed respond and complete the request for the Integrated Noise Model (INM) files and made these files available for review to the County. The INM input data are provided in Appendix A.1 (Volume 3) of the DEIS.
46.2	On November 19th, the County of Delaware requested from FAA staff a copy of the Integrated Noise Model files, so that the County could review traffic and noise projections for reasonableness. FAA staff refused to make the model files available, thus making review of these projections impossible. Public funding of this project demands that all information relating to it be available for public review!	The Federal Aviation Administration did indeed respond to the request within three days of receiving it and made the Integrated Noise Model files available for review to the County.

**From:** John f. byrne[SMTP:CJPBYRNE@COMCAST.NET]  
**Sent:** Monday, November 29, 2004 9:41:56 PM  
**To:** PHL 17-35 EIS  
**Subject:** Airport Runway Ltr  
**Auto forwarded by a Rule**

## **BOROUGH of YEADON**

Church Lane and Baily Road  
P.O. Box 5187  
Yeadon, PA 19050  
Offices: 610-284-1606 • Fax: 610-284-2138

November 22, 2004

Ms. Marion Blakey  
Adminstrator  
Federal Aviation Administration  
800 Independence Avenue, SW  
Washington, D.C. 20591

Dear Administrator Blakey:

I am writing to protest the inadequate comment period for Philadelphia International Airport's Runway 17-35 Draft Environmental Impact Statement and the FAA's refusal to release the Integrated Noise Model files for public review.

The draft EIS is a voluminous document, requiring an extensive amount of time and expertise to review. The document was released to the public only last month. The deadline for comments is December 1, 2004. On November 6<sup>th</sup>, Congressman Curt Weldon of Pennsylvania's 7<sup>th</sup> Congressional District requested that you extend the deadline to January 15, 2005. Considering the significant impact this project will have on Delaware County and many municipalities within the County, a lengthier comment period is necessary.

On November 19<sup>th</sup>, the County of Delaware requested from FAA staff a copy of the Integrated Noise Model files, so that the County could review traffic and noise projections for reasonableness. FAA staff refused to make the model files available, thus making review of these projections impossible. Public funding of this project demands that all information relating to it be available for public review!

Your immediate attention to this matter would be appreciated.

Very truly yours  
John F. Byrne,  
Yeadon Borough Elected Official

Cc: Delaware County Council  
Delaware County Planning Department  
Federal and State Elected Officials

## Letter 47

## Yeadon Borough, Pennsylvania - John Byrne

Comment Number	Comment	Response
47.1	I am writing to protest the inadequate comment period for Philadelphia International Airport's Runway 17-35 Draft Environmental Impact Statement and the FAA's refusal to release the Integrated Noise Model files for public review.	The Federal Aviation Administration complied with the Code of Federal Regulations (CFR) which states the required comment period for a Draft Environmental Impact Statement is 45 days (40 CFR 1506.10(c)). At the Public Information Meetings held in September 2004, the release date of the DEIS and the DEIS Public Hearing dates were made public. This is a streamlined project and the FAA believes the comment period should only be extended for compelling reasons of national importance but the FAA did make every reasonable effort to consider those comments received within a reasonable period after the comment period. Additionally, the FAA did indeed respond and complete the request for the Integrated Noise Model (INM) files and made these files available for review to the County. The INM input data are provided in Appendix A.1 (Volume 3) of the DEIS.
47.2	On November 19th, the County of Delaware requested from FAA staff a copy of the Integrated Noise Model files, so that the County could review traffic and noise projections for reasonableness. FAA staff refused to make the model files available, thus making review of these projections impossible. Public funding of this project demands that all information relating to it be available for public review.	The Federal Aviation Administration did indeed respond to the request within three days of receiving it and made the Integrated Noise Model files available for review by the County.



# Organizations, Institutions, and Businesses Comments and Responses



November 18, 2004

Ms. Susan McDonald  
Environmental Protection Specialist  
Federal Aviation Administration  
Harrisburg Airports District Office  
3905 Hartzdale Drive, Suite 508  
Camp Hill, PA 17011

Subject: Philadelphia International Airport – Runway 17-35 Extension Project Draft  
Environmental Impact Statement (DEIS)

Dear Ms. McDonald:

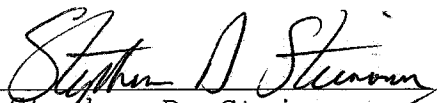
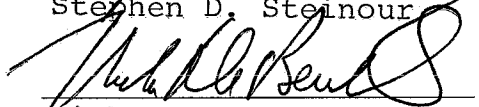
Philadelphia International Airport (PHL) is a major transportation facility serving the Greater Philadelphia Region. Benefits associated with improvements to the Airport are far-reaching in terms of economic impact, tourism promotion, and business development at both the local and regional level.


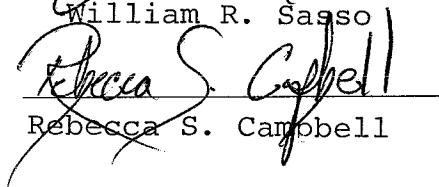
We understand that the proposed extension of Runway 17-35 is intended to reduce current and projected short-term airfield delays at PHL as soon as possible. Two “Build” alternatives were identified in the DEIS to provide this short-term relief. We are in support of either “Build” alternative, particularly since the DEIS indicates that their implementation and operation will not result in any significant direct, indirect or cumulative environmental impact.

The Airport’s recent accomplishments, such as construction of the new International Terminal A-West, combined with the planned short-term airfield improvements, enhance our ability to promote the Philadelphia area as a business location, convention, meeting and tourist destination to national and international audiences. A more efficient airfield will reduce airline operating costs by reducing Airport delays. All of the above will contribute to the ongoing effort to attract and retain businesses and residents for the continued economic health of the Greater Philadelphia region.

Please enter this letter in the public record as evidence of our support for a “Build” alternative.  
Thank you.

Sincerely,

  
Stephen D. Steinour  
  
Nicholas DeBenedictis

  
William R. Sasso  
  
Rebecca S. Campbell

*Francis J. Van Kirk*  
Francis J. Van Kirk

*Dennis Powell*  
Dennis Powell

*Molly D. Shepard*  
Molly D. Shepard

*Frank Baldino, Jr.*  
Frank Baldino, Jr.

*Judith M. von Seldeneck*  
Judith M. von Seldeneck

*Howard L. Meyers*  
Howard L. Meyers

*James J. Lynch*  
James J. Lynch

*J. Kenneth Harris*  
J. Kenneth Harris

*J. William Mills*  
J. William Mills

*Kathleen S. Allison*  
Kathleen S. Allison

*David L. Cohen*  
David L. Cohen

*Kenneth Gamble*  
Kenneth Gamble

*Mark S. Schweiker*  
Mark S. Schweiker

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The following organizations and persons submitted this letter:

<b>Organization</b>	<b>Last Name</b>	<b>First Name</b>	<b>Title</b>
Adam's Mark Hotel & Resorts	Day	Ron	General Manager
Blank Rome	Diaz	Nelson	
Greater Philadelphia Chamber of Commerce	Allison Baldino, Jr. Campbell Cohen DeBenedictis Gamble Harris Lynch Meyers Mills Powell Sasso Schweiker Shepard Steinour Van Kirk von Seldeneck	Kathleen  Frank Rebecca David Nicholas Kenneth J. Kenneth James Howard J. William Dennis William Mark Molly Stephen Francis Judith	
Gulph Creek Hotels	Blynn McBrearty	L. Clarke Douglas	Principal Principal
Hyatt Regency Philadelphia at Penn's Landing	Kroll	John	General Manager
Independence Visitor Center Corporation	Moore	William	President and CEO
Philadelphia Convention & Visitors Bureau	Muldoon	Tom	President
Riscoe & Associates	Riscoe	Romona	President
Saul Ewing	Aichele	Stephen	Managing Partner
Synterra Partners	Wilson	William	Principal
Talley Management Group, Inc.	Talley	Robert	CEO
The Arden Group, Inc.	Spencer	Craig	President and CEO
The Staubach Company	Lynch	Thomas	Senior Vice President

**Letter 48****Form Letters (Various Commentors)**

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
48.1	We are in support of either "Build" alternative, particularly since the DEIS indicates that their implementation and operation will not result in any significant direct, indirect, or cumulative environmental impact.	The FAA has noted and considered your comment.
48.2	A more efficient airfield will reduce airline operating costs by reducing Airport delays. All of the above will contribute to the ongoing effort to attract and retain businesses and residents for the continued economic health of the Philadelphia region.	The FAA has noted and considered your comment.



Corporate Headquarters  
808 South Olive Street  
Los Angeles, CA 90014-3097  
Telephone: (213) 624-6065  
Facsimile: (213) 312-2104

November 30, 2004

Gary Gower  
Vice President

Federal Aviation Administration  
3905 Hartzdale Avenue, Suite 508  
Camp Hill, Pennsylvania 17011  
Attn: Susan McDonald  
(email - [smdonald.faa.17-35@vhb.com](mailto:smdonald.faa.17-35@vhb.com))

re: Runway 17-35 Extension Project

Dear Ms. McDonald:

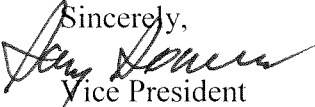
My company (Ampco System Parking ) is the sole tenant of the major real estate property comprised of more than 300,000 square feet owned by Jerome and Flora Heilweil ("Heilweil Property") which is located at 4700 Island Avenue. We have only very recently been made aware of the proposed runway extension, and have attended one public meeting (November 18<sup>th</sup>), and have now reviewed the Executive Summary of the Environmental Impact Statement. We have communicated our concerns related to the impact of this project on the continued viability of our off-airport parking facility to our landlord of the Heilweil Property, and have been advised that they will integrate those comments and forward them to your attention. I expect you will get our detailed comments shortly.

Please keep in mind as you review those comments, that we have not been able in such a short period of time (less than two weeks since the first public meeting we were aware of), interrupted by the Thanksgiving holiday to completely review all information in the Environmental Impact Statement to begin to determine the impact of the proposed project on our company. At the very least it appears to be a very adverse financial impact on our parking operation and on the financial viability of our lease on the Heilweil Property. Let me quickly summarize our concerns.

Our operations consist of a 1,500 space covered and uncovered off-airport parking operation whose success and continued operation is highly dependent upon the convenience of our service which we provide to our customers. Our operation is also a major competitor to the on-site airport parking operation conducted by the airport. It is clear that our operation will be detrimentally impacted by the planned closure of route 291, and construction activity that will likely cause delays along Island Avenue. Delays introduced by changes in the routing of vehicles, closure of roads, and our customers unfortunately will likely be looking at more convenient parking alternatives.

The Heilweil Property, although located in the primary impact area, appears to be completely ignored in the Environmental Impact Statement, as the Executive Summary – Table S-4 notes that the planned project will have: No Impact on Surface Transportation, No Impact from Construction, No Significant Impact on Land Use, No Significant Impact

on Social and Economic issues. While we do not have a complete understanding of the magnitude of the undertaking, but expect to learn more over time, we believe the conclusions reached are incorrect and that there are serious operational and financial impacts upon our continued operation at this site, that should receive the attention of all concerned.

Sincerely,  
  
Vice President

## Letter 49

## Ampco System Parking - Gary Gower

Comment Number	Comment	Response
49.1	It is clear that our operation will be detrimentally impacted by the planned closure of Route 291, and construction activity that will likely cause delays along Island Avenue. Delays introduced by changes in the routing of vehicles, closure of roads, and our customers unfortunately will likely be looking at more convenient parking alternatives.	With the closure of a portion of SR 291, traffic from the AMPCO System Parking would use I-95 to reach the Airport. In fact, I-95 would reduce trip times because there are fewer traffic signals on I-95 than existing SR 291. Construction activity is expected to be confined to the project site and not affect Island Avenue.
49.2	The Heilweil Property, although located in the primary impact area, appears to be completely ignored in the Environmental Impact Statement, as the Executive Summary, Table S-4 notes that the planned project will have: No Impact on Surface Transportation, No Impact from Construction, No Significant Impact on Land Use, No Significant Impact on Social and Environmental Issues.	As the EIS documents, the Proposed Project will have no impacts to this property as a result of re-routing SR 291. The Project will not change land use in the vicinity of Runway 17-35, will have no off-airport construction impacts and will have no social or adverse economic impacts (See Sections 4.3, 4.4, 4.14 and 4.17 of this EIS).
49.3	We believe the conclusions reached are incorrect and that there are serious operational and financial impacts upon our continued operation at the site, that should receive the attention of all concerned.	The Proposed Project would have no significant impact to this property.

1514 Woodsdale Road  
Wilmington DE 19809  
October 4, 2004

Susan McDonald  
FAA Environmental  
c/o VHB  
101 Walnut Street  
Watertown MA 02471-9151

Dear Ms. McDonald:

This is in response to Newsletter No. 3 regarding Runway 17-35 Extension Project at the Philadelphia Airport. Although it was stated at the Sept. 9th CCOBH meeting that hearings would be held and testimony taken, the Newsletter only lists meetings in Pennsylvania and New Jersey. Assuming that a hearing will be held ultimately in Delaware, I wish to submit testimony for the record at this time.

At the Sept. 9th meeting Mr. Miller displayed flight patterns which fanned out South of the airport over northern Delaware. He also presented computer projections of noise levels in detailed locations, based on a few measurements of some individual airplanes, and predicted very little noise impact from Philadelphia Airport traffic.

For several years, citizens in New Castle County have complained of traffic noise along interstates I-95, I-295 and I-495 and sought some form of noise mitigation. About 1999 state senator Dallas Winslow assembled a committee of citizens seeking noise abatement. In response Delaware Department of Transportation engaged consultants to conduct a study of noise levels in communities along the interstate corridors. Noise levels were monitored at many suspect locations during 3-hour morning and evening peak periods and at off-peak hours in March-April 2001. Noise levels along I-495 are shown in Table 6 of the consultant's report. Using the Federal Highway/DelDOT standard of 66dBA as noise impact and candidacy for noise mitigation, it was found that some 664 residences in Brandywine Hundred along I-495 were noise impacted, as shown in Table 8 of the report. Table 8 identifies 824 noise impacted residences along the interstates in New Castle County. Attached maps 2 and 3 identify the monitored locations in Brandywine Hundred. Note the 66 dBA noise line paralleling I-495 and the Delaware River. The conclusion of excessive noise impact is based on actual instrument measurements, not individual subjective complaints or theoretical computer exercises.

The noise in the I-495 area along the Delaware River is generated by a steady stream of bus, truck and vehicle traffic on I-495 and Governor Printz Boulevard, passenger and freight trains on the parallel Amtrak rails, river traffic and low-flying helicopters and small aircraft. Since the time of the above study, the vehicle speed limit on I-495 has been increased from 55 mph to



65 mph, raising the highway noise level. A feasible means of noise abatement has not been found and there has been no relief for this situation. The anticipated increase in Philadelphia Airport traffic over this area only compounds an existing severe noise problem.

In short, we are severely noise impacted on the ground in this area and resent any deliberate increase from above. For the FAA to dismiss a potential noise problem with a generalization that noise levels in northern Delaware will not be greatly impacted, on the basis of a hypothetical computer study and without knowledge of conditions on the ground, is not a satisfactory analysis of the environmental impact of the FAA project. The FAA has a responsibility of avoiding environmental problems, not just reporting estimates of impacts.

Again, please enter the above in the record of public input and consider means of avoiding noise impact and the impact of increased air pollution with the projected traffic increase.

The above testimony has been reviewed by and has the concurrence of the Executive Committee of the Council of Civic Organizations of Brandywine Hundred.

Respectfully,

*Charles O. King*  
Charles O. King  
Past president, CCOBH

Distribution:

Senator J. R. Biden, Jr.  
Senator T. R. Carper  
Representative M. N. Castle  
Governor R. A. Minner  
Secretary N. Hayward, III, DelDOT  
Secretary J. A. Highes, DENREC  
Senator C. A. Cloutier  
Senator C. L. Copeland  
Senator H. B. McDowell, III  
Representative W. A. Smith  
Representative R. J. Valihura, Jr.  
W. McGlinchey, Chair, Airport Action Group  
J. B. Byers, FAA  
C. J. Isdell, Philadelphia Airport  
E. D. Bockover, CCOBH  
C. E. Landry, CCOBH  
R. V. Wirt, Bellevue Manor Maint. Corp.

**Table 6  
Bond Bill Noise Assessment  
Monitored Levels (10 min. Leq.'s) (I-495)**

1	2	3	4	5	6
Site	Community	AM peak level	Off peak level	PM peak level	Worst Case Level
R37	Claymont Centre	69.5	64.9	67.7	67.7
R38	Claymont Centre	67.9	64.5	67.9	67.9
R39	Claymont Centre	68.4	65.1	68.4	68.4
R40	Claymont Centre	59.2	61.5	64.5	64.5
R33	Addicks Estates	65.0	63.1	63.7	65.0
R34	Addicks Estates	71.3	68.4	68.9	71.3
R35	Addicks Estates	63.7	60.3	59.8	63.7
R36	Addicks Estates	69.1	64.8	65.7	69.1
R25	Stockdale	64.4	63.2	69.2	69.2
R26	Stockdale	68.6	66.7	72.6	72.6
R27	Stockdale	72.0	69.6	70.3	70.3
R28	Stockdale	66.5	63.7	68.1	68.1
R21	Harbor House I, Riverview, Harbor House II	68.9	67.6	73.1	73.1
R22	Harbor House I, Riverview, Harbor House II	62.7	62.9	70.7	70.7
R23	Harbor House I, Riverview, Harbor House II	61.6	62.5	67.6	67.6
R24	Harbor House I, Riverview, Harbor House II	66.7	66.1	72.7	72.7
Harb1	Harbor House I, Riverview, Harbor House II	55.0	54.7	55.2	55.2
Harb2	Harbor House I, Riverview, Harbor House II	57.5	57.7	57.6	57.6
R17	Rolling Park, Green Hills	74.8	73.6	76.3	76.3
R18	Rolling Park, Green Hills	63.2	61.3	66.2	66.2
R19	Rolling Park, Green Hills	71.6	69.9	74.0	74.0
R20	Rolling Park, Green Hills	64.1	63.1	68.7	68.7
Hoak1	Holly Oak	65.5	62.8	62.7	62.7
Hoak2	Holly Oak	59.1	57.7	58.0	58.0
Hoak3	Holly Oak	76.9	74.6	75.2	75.2
Hoak4	Holly Oak	n/a	n/a	64.6	64.6
R9	Seton Villa/River Ridge	75.2	73.2	74.7	75.2
R10	Seton Villa/River Ridge	62.6	60.8	61.6	62.6
R11	Seton Villa/River Ridge	72.8	70.7	71.2	72.8
R12	Seton Villa/River Ridge	66.0	65.6	64.5	66.0
R13	Governor House	73.2	71.4	70.6	73.2
R14	Governor House	66.2	63.2	64.4	66.2
R15	Governor House	72.5	70.4	71.2	72.5
R16	Governor House	69.7	67.6	68.0	69.7
Gord1	Gordon Heights	66.5	65.2	63.1	65.2
Gord2	Gordon Heights	63.4	61.3	59.2	61.3
Gord3	Gordon Heights	n/a	66.5	65.8	66.5
Gord4	Gordon Heights	63.0	62.0	61.0	62.0
R5	Eden Park Gardens	66.9	68.6	69.0	69.0
R6	Eden Park Gardens	67.2	65.8	68.3	68.3
R7	Eden Park Gardens	70.1	69.2	65.4	65.4
R8	Eden Park Gardens	65.5	65.7	64.7	64.7
R1	Hamilton Park	67.3	64.1	67.4	67.4
R2	Hamilton Park	66.7	63.6	67.8	67.8
R3	Hamilton Park	62.5	59.4	60.8	60.8
R4	Hamilton Park	60.3	57.7	58.2	58.2
R29	West Minquadale	76.8	73.8	74.7	76.8
R30	West Minquadale	74.7	70.8	74.5	74.7
R31	West Minquadale	72.3	68.9	72.7	72.3
R32	West Minquadale	69.8	67.3	67.7	69.8
Wming1	West Minquadale	68.2	65.8	69.8	68.2
Wming2	West Minquadale	63.0	61.7	66.0	63.0

"Worst Case" represents the highest peak time period's readings for the community as a whole

**Table 8**  
**Bond Bill Noise Assessment**  
**Existing (2001) Noise - Impacted Communities**

I-95

Community Monitored	Number of Impacted Residences
Cavalier	84
Tall Pines/Beaulieu II	4
Aug. Ridge/Aug. Hills/Rock Manor	2

90

I-495

Community Monitored	Number of Impacted Residences
Governor House	252
Harbor House I/Riverview/Harbor House II	236
Rolling Park/Green Hills	61
Stockdale	55
West Minquadale	x 30
Seton Villa/River Ridge	27
Holly Oak	15
Addicks Estate	10
Hamilton Park	x 7
Eden Park Gardens	x 6
Claymont Centre	5
Gordon Heights	3

707

*664 Brandywine*

I-295

Community Monitored	Number of Impacted Residences
Landers Park/Swanwyck Gardens	13
Swanwyck Estates	10
Minquadale	3
Holloway Terrace	1

27

824

Letter 50

## Council of Civic Organizations of Brandywine Hundred - Charles King

Comment Number	Comment	Response
50.1	The conclusion of excessive noise impact is based on actual instrument measurements, not individual subjective complaints or theoretical computer exercises.	The potential noise impacts of the alternatives under consideration for the Runway 17-35 Extension were assessed in accordance with FAA Order 1050.1E. This order sets forth the policy and procedures for implementing the NEPA process for airport projects. As documented in Section 4.2 of this EIS, the proposed project will not significantly increase noise in northern Delaware.
50.2	The anticipated increase in Philadelphia Airport traffic over this area only compounds an existing severe noise problem.	As Section 4.2 of this EIS demonstrates, the Runway 17-35 Extension Project will not significantly increase noise levels in areas north or south of the existing runway. Only aircraft noise is taken into account when assessing impacts in changes in aircraft operations. While there are areas in Brandywine with high levels of ambient highway noise, the contribution of aircraft is not significant.
50.3	We are severely noise impacted on the ground in this area and resent any deliberate increase from above. For the FAA to dismiss as potential noise problem with a generalization that noise levels in northern Delaware will not be greatly impacted, on the basis of a hypothetical computer study and without knowledge of conditions on the ground, is not a satisfactory analysis of the environmental impact of the FAA project. The FAA has a responsibility of avoiding environmental problems not just reporting estimates of impacts.	Increased traffic is projected to occur at PHL over the next three to 11 years and will cause noise exposure levels in all areas near the airport to increase commensurately, regardless of whether the proposed project is implemented or not. This is illustrated in Figure 4.2-5 of this EIS. However, the purpose of this document is to evaluate two proposed Build Alternatives involving extensions to the short Runway 17-35, and results of the noise analyses for those extensions show no detrimental effect on noise levels in northern Delaware. If anything, levels in that area will decrease very slightly due to reduced operations on the parallel Runway 9R-27L and 9L-27R, as indicated in Figures 4.2-14 through 4.2-17. While there are areas in Brandywine with high levels of ambient highway noise, the contribution of the aircraft is not significant.
50.4	Consider means of avoiding noise impact and the impact of increased air pollution with the projected traffic increase.	The potential noise impacts of the alternatives under consideration for the Runway 17-35 Extension were assessed in accordance with FAA Order 1050.1E. This order sets forth the policy and procedures for implementing the NEPA process for airport projects. As documented in Section 4.2 of this EIS, the proposed project will not significantly increase noise in northern Delaware. Similarly, as documented in Section 4.5 of the EIS, the proposed project will decrease air pollution in northern Delaware and elsewhere in the study area.



# CCOBH

**Council of Civic Organizations of Brandywine Hundred**  
2316 Graywood Rd., Wilm. DE 19810      www.ccobh.com      302-475-7969

November 17, 2004

Ms. Susan McDonald  
c/o VHB  
101 Walnut Street  
PO Box 9151  
Watertown, MA 20471-9151

Dear Ms. McDonald,

SUBJECT: PHL RUNWAY 17-35 DEIS

We are writing you on behalf of our 140 civic association members, representing 83,000 residents of Brandywine Hundred, New Castle County, DE. We oppose your study because it has seriously underestimated the impact of the PHL Runway 17-35 Project on our quality of life here in northern Delaware. You base your conclusion that any noise below the 65-decibel limit used by the federal government has no impact on tens of thousands of citizens living under the approach path to runway 9R at PHL, and that lengthening runway 17-35 will have no impact on Delaware. Both conclusions are incorrect.

According to FAA, the reason for using 65 db as the acceptable limit for aircraft noise is that noise beyond that level causes people to become "highly annoyed" (T.J. Schultz, "Synthesis of Social Surveys on Noise Annoyance," *Journal of the Acoustical Society of America* 64(2) (1978), pp. 377-405). The Aviation Safety and Noise Abatement Act of 1979 required that the Department of Transportation, including the FAA, to adopt a single method to measure the impact of noise on populations. The "Day-Night Sound Level Method" was selected because it was believed that it produced the best measure of average noise impact on a population over time. Using this method, the FAA assumes that noise levels below 65 db have no adverse impact on affected populations at all. Such an assumption defies logic, and the study cited above makes no such assumption. The ability of people to endure noise without harm can depend upon several things not taken into consideration by the FAA. For example, schools can be adversely affected by any repetitive noise that makes communication more difficult. The noise need not be so loud that conversation is drowned out. Any sort of regular disruption can have an adverse impact. Age and health can easily affect people's ability to tolerate noise at levels well below 65 db. The FAA's failure to consider increasingly annoying noise levels below 65 db brings into question the basic methodology used to assert that Delaware would not be affected by noise from changing aircraft patterns.

By modifying runway 17-35 to accept regional jets, the pattern of traffic over Brandywine Hundred will change. Smaller jets and turboprops not only produce less noise, but also require longer spacing behind large jets, thereby, decreasing the noise impact on the ground. When these aircraft are diverted to runway 17-35 there may be an initial reduction in the total number of aircraft flying overhead, but that advantage will be offset by denser heavy jet traffic during peak operating hours. If, as anticipated, traffic at PHL increases in the future, the result will be more heavy jets overhead, spaced closer together, for longer periods of time. Noise levels in Brandywine Hundred will increase, and the adverse impact to our communities will be intensified.

Hundreds of homes in Brandywine Hundred are in noise-impacted areas caused by traffic on I-495. Your study did not address the impact of aircraft noise on these areas and on nearby areas just outside these 65 decibel zones. It considered neither the current impact of combined ground and aircraft noise, nor the potential impact that increased aircraft traffic might have when combined with existing ground noise. This is a major oversight that leaves our most noise-affected neighbors at risk of even more serious harm. This study remains incomplete and inaccurate until the combined impact of current and projected aircraft and ground noise on these areas, and, indeed, on all of Brandywine Hundred is measured and included in your findings.

CCOBH is keenly aware that PHL is a critical element in the economic health of the Philadelphia and Wilmington region. We remind you, however, that another critical element of economic health is the ability of businesses to attract highly skilled employees to desirable communities unaffected by serious noise and pollution. We urge you to reexamine your findings and to examine and include the very real harm this project will cause to northern Delaware.

Sincerely,

Charles Landry, Chairman  
CCOBH Aviation Committee

cc: CCOBH Executive Committee  
Governor Ruth Ann Minner  
Senator Joseph R. Biden, Jr.  
Senator Thomas R. Carper  
Representative Michael N. Castle

## Council of Civic Organizations of Brandywine Hundred - Charles Landry

Comment Number	Comment	Response
51.1	We are writing you on behalf of our 140 civic association members, representing 83,000 residents of Brandywine Hundred, New Castle County, DE. We oppose your study because it has seriously underestimated the impact of the PHL Runway 17-35 Project on our quality of life here in northern Delaware.	Quality of life depends on a number of factors. Because there will be no significant impacts, it is unlikely that the Proposed Project would adversely affect quality of life, however, the FAA has noted your comment.
51.2	You base your conclusion that any noise below the 65-decibel limit used by the federal government has no impact on tens of thousands of citizens living under the approach path to runway 9R at PHL, and that lengthening runway 17-35 will have no impact on Delaware.	Section 4.2, Noise, of this EIS summarizes the threshold of "significant impact," as defined in FAA Order 1050.1E. Per FAA Order 1050.1E, if a location of incompatible land use is exposed to a project-related increase in noise level of DNL 1.5 dB or more, and that location lies within the DNL 65 dB noise contour for the Proposed Action, then the location is considered significantly impacted by noise. Significant impact is not expected to occur in Delaware with either of the Project Alternatives. However, FAA recognizes that adverse community reaction to aircraft noise may occur outside the DNL 65 dB contour as noted in Section 4.2, Noise, of this EIS. Consequently, the noise analysis considered the changed exposure for noise-sensitive areas outside the DNL 65 dB contours, including areas of Delaware. One of the objectives of the noise analysis was to identify noise-sensitive areas that would experience a changed noise exposure of 3 dB between 60 and 65 dB DNL, as a result of the Proposed Action. Another objective was to identify noise-sensitive areas that would experience a changed noise exposure of 5 dB outside 60 dB DNL, for locations exposed to Project DNLs as low as 45 dB. As documented in the Section 4.2, Noise, of this EIS changed noise exposures of these magnitudes would not occur in Delaware or anywhere else as a result of either build alternative under consideration for the proposed extension of Runway 17-35.
51.3	The "Day-Night Sound Level Method" was selected because it was believed that it produced the best measure of average noise impact on a population over time. Using this method, the FAA assumes that noise levels below 65 dB have no adverse impact on affected populations at all. Such an assumption defies logic, and the study cited above makes no such assumption. The ability of people to endure noise without harm can depend upon several things not taken into consideration by the FAA. For example, schools can be adversely affected by any repetitive noise that makes communication more difficult. The noise need not be so loud that conversation is drowned out. Any sort of regular disruption can have an adverse impact. Age and health can easily affect people's ability to tolerate noise at levels well below 65 dB. The FAA's failure to consider increasingly annoying noise levels below 65 dB brings into question the basic methodology used to assert that Delaware would not be affected by noise from changing aircraft patterns.	The use of the Day-Night Sound Level (DNL) to evaluate potential noise impact is prescribed by FAA Order 1050.1E.  FAA recognizes that adverse community reaction to aircraft noise may occur outside the DNL 65 dB contour as noted in Section 4.2 of this EIS. Consequently, the noise analysis considered the changed exposure for noise-sensitive areas outside the DNL 65 dB contours, including areas of Delaware. One of the objectives of the noise analysis was to identify noise-sensitive areas that would experience a changed noise exposure of three dB between 60 and 65 dB DNL, as a result of the Proposed Action. Another objective was to identify noise-sensitive areas that would experience a changed noise exposure of five dB outside 60 dB DNL, for locations exposed to Project DNLs as low as 45 dB. As documented in the Section 4.2 changed noise exposures of these magnitudes would not occur in Delaware or anywhere else as a result of either alternative. No significant impacts to schools are expected from the Proposed Project.
51.4	If, as anticipated, traffic at PHL increases in the future, the result will be more heavy jets overhead, spaced closer together, for longer periods of time. Noise levels in Brandywine Hundred will increase, and the adverse impact to our communities will be intensified.	Aircraft traffic will increase in the future whether or not the runway extension is constructed. Therefore, Section 4.2 of this EIS acknowledges that between the 2003 Existing Conditions and the 2007 No Action Alternative, aircraft noise exposure to the west of the Airport will increase as a result of the anticipated increase in arrivals to Runway 9R. However, as shown in Figures 4.2-14 through 4.2-17 of this EIS, for each future forecast year, aircraft noise exposure is expected to decrease in Delaware as a result of the Project. The Project would not increase the number or frequency of large jets using the primary runways.

## Letter 51

## Council of Civic Organizations of Brandywine Hundred - Charles Landry

Comment Number	Comment	Response
51.5	<p>Hundreds of homes in Brandywine Hundred are in noise-impacted areas caused by traffic on I-495. Your study did not address the impact of aircraft noise on these areas and on nearby areas just outside these 65 decibel zones. It considered neither the current impact of combined ground and aircraft noise, nor the potential impact that increased aircraft traffic might have when combined with existing ground noise. This is a major oversight that leaves our most noise-affected neighbors at risk of even more serious harm. This study remains incomplete and inaccurate until the combined impact of current and projected aircraft and ground noise on these areas, and, indeed, on all of Brandywine Hundred is measured and included in your findings.</p>	<p>As Section 4.2 of this EIS demonstrates, the Runway 17-35 Extension Project will not significantly increase noise levels in areas north or south of the existing runway. The potential noise impacts of the alternatives under consideration for the Runway 17-35 Extension were assessed in accordance with FAA Order 1050.1E. This order sets forth the policy and procedures for implementing the NEPA process for airport projects. Consideration of the potential noise impact of non-aviation sources would be limited to those sources that are included as part of an airport project such as surface transportation improvements in the vicinity of the airport, e.g. the construction of a new access road or the relocation of an existing road. Only aircraft noise is taken into account when assessing impacts of changes in aircraft operations. While there are areas in Brandywine with high levels of ambient noise, the contribution of aircraft is not significant.</p>



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December 10, 2004

**VIA REGULAR AND OVERNIGHT MAIL**

Ms. Susan McDonald  
FAA Environmental Protection Specialist, c/o VHB  
101 Walnut Street  
PO Box 9151  
Watertown, MA 02471-9151

Re: **Philadelphia International Airport  
Runway 17-35 Extension Project EIS  
Block 351, Lots 7.04, 7.09, 7.10, 7.11**

Dear Ms. McDonald,

I am writing you regarding the proposed 17-35 Runway Extension Project at The Philadelphia International Airport. My interest in the project is related to my position as Delaware Valley Division President for D.R. Horton, a homebuilder with a new neighborhood currently under construction between Grove Road and Kings Highway in West Deptford Township, New Jersey. We have had concern registered by our purchasers and prospective purchasers about the proposed extension. In addition, The Gloucester County Times recently showed a photograph of the entrance to our property under a heading that read, "Runway extension could hurt property values, residents say."

Though I am not disputing the necessity of expanding the capabilities of Philadelphia International Airport, I do have an interest in understanding what the proposed project will mean to those purchasing a home in our community. Recently, comments have been made to me that the air traffic appears to be lower and more directly above our new home neighborhood. I would first like to understand whether that is actually the case and whether this condition will continue. Secondly, I would like to have an understanding of what impact the proposed future expansion will have on the airspace above the neighborhood. The news article stated that "a closer runway would mean an even lower flight pattern over the area as planes take off or approach the landing." Can you clarify whether this is true and what it means in terms of altitude, noise and the like?

It is also important that you understand that our new West Deptford neighborhood will include income restricted affordable homes. Our neighborhood is a result of an Affordable Housing settlement with the Township of West Deptford and is a significant component in the Township's ability to satisfy its fair share of Affordable Housing. We are concerned that any actual or perceived detriment caused by the runway extension project to West Deptford could impact our ability to successfully market and sell homes in this inclusionary development. In addition, as a corporate citizen of West Deptford Township, we are concerned on behalf of all residents in the Township that may be affected by the visual and audio intrusion from the runway extension.

I appreciate you taking the time to provide some information on this very important subject for our customers. If you would like to respond by telephone or email you may contact me at 856.235.5150 or at [agarfall@drhorton.com](mailto:agarfall@drhorton.com). Also, please add us to your Public Notice List on the expansion project. Thanks again for your time.

Sincerely,

A large, stylized handwritten signature in black ink, appearing to read 'Al Garfall', written over the word 'Sincerely,'.

Al Garfall

President

D.R. Horton – Delaware Valley Division

Letter 52

D.R. Horton - Al Garfall

Comment Number	Comment	Response
52.1	<p>Though I am not disputing the necessity of expanding the capabilities of Philadelphia International Airport, I do have an interest in understanding what the proposed project will mean to those purchasing a home in our community. Recently, comments have been made to me that the air traffic appears to be lower and more directly above our new home neighborhood. I would first like to understand whether that is actually the case whether this condition will continue.</p>	<p>The Runway 17-35 EIS addresses the potential impacts of the proposed project, rather than existing conditions. The proposed runway extension would result in slight changes in aircraft altitude as a result of shifts in the runway thresholds. Property values depend on many factors. One factor is the environment. This Project will not have significant impact on noise or environmental impacts. Is it unlikely that there would be an impact on property values.</p>
52.2	<p>Secondly, I would like to have an understanding of what impact the proposed future expansion will have on the airspace above the neighborhood. The news article stated that "a closer runway would mean an even lower flight pattern over the area as planes take off or approach the landing." Can you clarify whether this is true and what it means in terms of altitude, noise and the like?</p>	<p>The table provided in Responses to Comments Attachment #2 summarizes typical altitudes of an aircraft on approach to Runway 17 from the north and to Runway 35 from the south at representative distances of 8, 4, and 2 miles from the present runway ends; it also compares the altitudes to those of an aircraft approaching the extended runway for each of the proposed Build Alternatives.</p> <p>Altitudes of aircraft on departure from Runway 17 or Runway 35 under either of the proposed Build Alternatives will be slightly higher than the No-Action Alternative because the aircraft will begin their takeoff roll on the extended pavement, slightly farther from the communities they overfly. The amount of increase depends on the climb capability of each individual aircraft and the length of the extension.</p> <p>For a given distance to the runway, differences in the individual sound levels of a landing aircraft at the different altitudes identified in the table are only on the order of a few tenths of a decibel. Changes of that magnitude, up or down, are not likely to be discerned on an event-by-event basis.</p>
52.3	<p>It is also important that you understand that our new West Deptford neighborhood will include income restricted affordable homes. Our neighborhood is a result of an Affordable Housing settlement with the Township of West Deptford and is a significant component in the Township's ability to satisfy its fair share of Affordable Housing. We are concerned that any actual or perceived detriment caused by the runway extension project to West Deptford could impact our ability to successfully market and sell homes in this inclusionary development.</p>	<p>The noise analysis (Section 4.2) and land use compatibility analysis (Section 4.3) demonstrate that there would not be significant adverse impacts in the Regional Study Area, within which West Deptford is located. Schools, hospitals, and residences in this area would not be significantly impacted. There will be no disruption to surrounding communities.</p>
52.4	<p>In addition, as a corporate citizen of West Deptford Township, we are concerned on behalf of all residents in the Township that may be affected by the visual and audio intrusion from the runway extension.</p>	<p>Figures 4.2-14 through 4.2-17 of this EIS summarize the changed noise exposure for areas that would experience aircraft noise levels between 45 and 60 dB DNL, with each alternative and for each future forecast year. As shown in those figures, more areas to the north of the Airport would experience an increase in noise exposure with Alternative 2 than with Alternative 1; however, in those areas that would experience an increase in aircraft noise exposure, the magnitude of the increase would be less than 5 dB in all cases. As noted in Section 4.2 of this EIS, a 5 dB change in noise exposure between 45 and 60 dB DNL is considered a "slight-to-moderate" change by FAA. While a 5 dB increase in noise at these exposure levels is enough to be noticeable and potentially disturbing to some people, the cumulative noise level is not high enough to constitute a significant impact.</p>

# FOX ♦ ROTHSCHILD<sup>LLP</sup>

ATTORNEYS AT LAW

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December 1, 2004

## **VIA E-MAIL (W/CONFIRMATION VIA TELECOPY AND FEDERAL EXPRESS)**

Federal Aviation Administration  
Harrisburg Airports District Office  
3905 Hartzdale Avenue, Suite 508  
Camp Hill, PA 17011  
ATTN: Susan McDonald

Re: Draft Environmental Impact Statement for Runway 17-35 Extension Project

Dear Ms. McDonald:

Our law firm is counsel to Jerome and Flora Heilweil (the "Heilweils"). The Heilweils are long-time residents of the Philadelphia area who now reside in Florida and California. They are the owners of the property located at 4700 Island Avenue, Philadelphia, PA, across the street from the Philadelphia International Airport (the "Heilweil property"). The Heilweil property is a site of 36± acres that is partially improved with a building of 300,000± square feet and a parking lot with 1,500± parking spaces being operated by a tenant, Ampco, as an airport parking facility.

On behalf of the Heilweils, we submit the following comments regarding the draft Environmental Impact Statement for the Runway 17-35 Extension Project:

### Lack of Notice to the Heilweils

In light of the size of the Heilweil property and its proximity to the Airport and the proposed project, we believe that the Heilweils should have received individual notice by mail of the proposed project and the EIS process. The Heilweils did not receive any notice of the proposed project until two weeks ago and, as a result, they were not afforded the opportunity to

participate in the process until now. (Since they live in Florida and California, they are not in a position to see notices that are published in the local newspapers.)

#### Failure to Properly Consider Impacts on the Heilweil Property

There is no evidence in the draft EIS that the potential impacts on the Heilweil property were evaluated. In fact, the evidence indicates that the potential impacts were not evaluated at all. For example:

- The 300,000± square foot building on the Heilweil property is not even shown on most of the exhibits to the draft EIS while other less significant improvements on other properties are consistently shown.
- The draft EIS does not accurately reflect the pipelines and underground storage tanks that exist – or formerly existed – on the Heilweil property.
- There is no mention of the Heilweil property or the airport parking operations thereon in any of the narrative sections, including but not limited to those sections related to economic impact, surface transportation and noise.

The close proximity of the Heilweil property to the Airport, and especially to Runway 17-35, makes noise impacts inevitable. In addition, in light of the property's proximity to Route 291, and the use of the property for airport parking operations, surface transportation impacts are significant. In particular, the tenant, Ampco, has advised the Heilweils of the following:

1. Ampco did not receive any information on the project, including the Executive Summary, until the mid-November 2004 public meetings. As a result, Ampco did not become aware of the pending closure and abandonment of Route 291 and other likely adverse impacts from construction immediately adjacent to Island Avenue until that time.
2. Ampco shuttles currently use Route 291 as a primary means of returning customers to its off-airport parking facility, and may be severely impacted in terms of increasing time for its shuttle route.
3. Customers may no longer choose to park with Ampco as customer "drop-offs" are more difficult without access to its facility via Route 291.
4. Island Avenue is the primary surface route to Ampco's parking facility, and will likely be adversely impacted by adjacent construction for the extension of Runway 17-35, leading to likely construction-related delays and to possible loss of customers.

5. Ampco may be unable to lease 60,000 square feet of improved office space which will cause Ampco to lose \$8 million in rent over its lease term.

6. Absent leasing opportunities particularly during the time of construction, Ampco will be unable to invest \$1.5 million to \$2 million to improve the property.

7. Failure to mitigate the impacts may result in Ampco's termination of its long term lease with serious financial consequences. Ampco's current investment is \$2 million, which may be at risk upon the closure of Route 291. Ampco currently pays \$1.2 million in rent and has a 13 year lease term.

8. Opportunities to mitigate all impacts should be carefully studied, but the lack of information about the project until this time made it impossible for Ampco to comment about changes that it or the project team can make to mitigate impacts.

9. With the Airport directly competing with off-airport parking, it is surprising that the draft EIS does not even consider the hardship and impact on the Airport's largest and only indoor competitor of a closure of its primary access route, Route 291, and the subsequent extensive rerouting process or consider viable alternatives that would alleviate the need for any rerouting.

The proposed project would have an overall negative economic impact on the Heilweil property, its tenants and their employees, an impact that should be addressed in the EIS.

#### Dubious Need for Project

In light of the precarious financial position of US Airways, the Airport's primary carrier, the Heilweils question the wisdom of undertaking the proposed project and incurring significant financial costs and suffering other significant adverse impacts on the surrounding community.

#### Failure to Appreciate Public Benefits of Route 291

The draft EIS does not properly recognize the contribution of Route 291 to the highway system in the vicinity of the Airport. Currently, Route 291 provides the most natural and direct route from the Airport to I-76 and Center City via the Platt Bridge. The proposed re-routing of Route 291 over Bartram Avenue would make access to Center City via the Platt Bridge awkward and more difficult, with a resulting negative economic impact extending all the way to Center City.

In addition, since it parallels I-95, Route 291 currently offers the most viable alternative to I-95 in the vicinity of the Airport. As a result, at present, it reduces traffic levels on I-95 in the vicinity of the Airport. It also offers an efficient alternative to I-95 in the event of emergencies.

Bartram Avenue does not even compare to Route 291 as a viable alternative to I-95. Moreover, to the extent Bartram Avenue serves as an alternative to I-95, there are currently two alternatives – Route 291 and Bartram Avenue – and the proposed project would eliminate the most viable of the two.

#### Failure to Consider Alternative Designs

The draft EIS fails to consider any options to both extend the runway and preserve Route 291. Some obvious alternatives that were not considered are as follows:

- Under proposed Alternative 1, if an EMAS system were installed at the North end of the runway as is proposed in Alternative 2, only a 500' Runway Safety Area would be required, allowing Route 291 to remain open. There would actually be more buffer between the RSA and the roadway under this scenario than under proposed Alternative 2. Since the installation of an EMAS system was considered in order to preserve I-95, it should have been considered in order to preserve Route 291 as well and, thus, avoid the costs of closing Route 291 and of making improvements to Bartram Avenue.
- No tunneling options were considered. If Route 291 were lowered below grade under either proposed Alternative 1 or proposed Alternative 2, it would not have to be closed.

Kindly include the foregoing comments in the record of public comment and take them into consideration in finalizing the Environmental Impact Statement. Thank you.

Very truly yours,

Herbert Bass

Marc E. Needles

HB/MEN:sbb

cc: Jerome P. Heilweil  
Howard I. Rubin, Esquire

Comment Number	Comment	Response
53.1	In light of the size of the Heilweil property and its proximity to the Airport and the proposed project, we believe that the Heilweils should have received individual notice by mail of the proposed project and the EIS process. The Heilweils did not receive any notice of the proposed project until two weeks ago and, as a result, they were not afforded the opportunity to participate in the process until now. (Since they live in Florida and California, they are not in a position to see notices that are published in the local newspapers.)	Given the wide publicity and numerous newspaper articles concerning the Proposed Project, the owners and their tenants are unlikely to have not known about the Proposed Project. The Federal Aviation Administration (FAA) used several methods to reach out and notify the public about the project and public meetings. These methods included placing notices in area newspapers, sending information letters to township officials, sending meeting flyers to area churches and libraries, and sending newsletters or post cards about upcoming meetings to everyone on the project mailing list. Public Outreach did not specifically identify any property owners in the vicinity of the Airport.
53.2	The 300,000+/- square foot building on the Heilweil property is not even shown on most of the exhibits to the draft EIS while other less significant improvements on other properties are consistently shown.	This has been corrected and the Heilweil property and its associated buildings are shown on the EIS exhibits. The property is within the local study area in which impacts were evaluated.
53.3	The draft EIS does not accurately reflect the pipelines and underground storage tanks that exist - or formerly existed - on the Heilweil property.	A review of Federal and state environmental databases was performed to identify registered underground storage tanks (USTs), releases of oil and/or hazardous materials, and other potential environmental concerns in the vicinity of the Project that have been reported to the Pennsylvania Department of Environmental Protection (PA DEP) and/or U.S. Environmental Protection Agency (EPA). Based on the results of this review, all properties considered of concern to the Project were investigated further at the PA DEP. Any pipelines or USTs on the Heilweil property are not an environmental concern for this Project because no work is proposed on or near this property. See DEIS Section A-11 of this EIS for additional information.
53.4	There is no mention of the Heilweil property or the airport parking operations thereon in any of the narrative sections, including but not limited to those sections related to economic impact, surface transportation and noise.	Neither the Heilweil property nor any other properties in the Island Avenue-Enterprise Avenue area are adversely affected by any aspect of the Proposed Project.
53.5	Ampco did not receive any information on the project, including the Executive Summary, until the mid-November 2004 public meetings. As a result, Ampco did not become aware of the pending closure and abandonment of Route 291 and other likely adverse impacts from construction immediately adjacent to Island Avenue until that time.	The Federal Aviation Administration (FAA) used several methods to reach out and notify the public about the project and public meetings. These methods included placing notices in area newspapers, sending information letters to local officials, sending meeting flyers to area churches and libraries, and sending newsletters or post cards about upcoming meetings to everyone on the project mailing list. The project mailing list includes Federal, state and local officials, anyone who signed up for the mailing list at the public information meetings or through the website and anyone who sent a communication to the project and provided contact information. Section 1.3 provides a detailed description of the public participation program.
53.6	Ampco shuttles currently use Route 291 as a primary means of returning customers to its off-airport parking facility, and may be severely impacted in terms of increasing time for its shuttle route.	With the closure of a portion of SR 291, traffic from the AMPCO System Parking would use I-95 to reach the Airport. In fact, I-95 would reduce trip times because there are fewer traffic signals on I-95 than existing SR 291. Construction activity is expected to be confined to the project site and not affect Island Avenue.
53.7	Customers may no longer choose to park with Ampco as customer "drop-offs" are more difficult without access to its facility via Route 291.	With the closure of a portion of SR 291, traffic from the AMPCO System Parking would use I-95 to reach the Airport. In fact, I-95 would reduce trip times because there are fewer traffic signals on I-95 than existing SR 291. Construction activity is expected to be confined to the project site and not affect Island Avenue.
53.8	Island Avenue is the primary surface route to Ampco's parking facility, and will likely be adversely impacted by adjacent construction for the extension of Runway 17-35, leading to likely construction-related delays and to possible loss of customers.	There are no construction impacts expected along Island Avenue as a result of this project. With the closure of a portion of SR 291, traffic from the AMPCO System Parking would use I-95 to reach the Airport. In fact, I-95 would reduce trip times because there are fewer traffic signals on I-95 than existing SR 291. Construction activity is expected to be confined to the project site and not affect Island Avenue.



Letter 53

Fox Rothschild LLP - Herbert Bass

Comment Number	Comment	Response
53.9	Ampco may be unable to lease 60,000 square feet of improved office space which will cause Ampco to lose \$8 million in rent over its lease term.	Section 4.2 demonstrates that the Preferred Alternative will not result in significant noise impacts and nor would it notably change the existing noise environment, therefore there would be no impact to Ampco in terms of their ability to rent office space. In addition, the Preferred Alternative would not change access to this property. Travel times between the airport and Ampco would be comparable.
53.10	Absent leasing opportunities particularly during the time of construction, Ampco will be unable to invest \$1.5 million to \$2 million to improve the property.	As the EIS demonstrates, there will be no off-airport construction impacts. On-airport construction will occur over a short period and would not affect use of any off-airport property.
53.11	Failure to mitigate the impacts may result in Ampco's termination of its long term lease with serious financial consequences. Ampco's current investment is \$2 million, which may be at risk upon the closure of Route 291. Ampco currently pays \$1.2 million in rent and has a 13 year lease term.	Section 4.2 demonstrates that the Preferred Alternative will not result in significant noise impacts and nor would it notably change the existing noise environment, therefore there would be no impact to Ampco in terms of their ability to rent office space. In addition, the Preferred Alternative would not change access to this property. Travel times between the airport and Ampco would be comparable.
53.12	Opportunities to mitigate all impacts should be carefully studied, but the lack of information about the project until this time made it impossible for Ampco to comment about changes that it or the project team can make to mitigate impacts.	The proposed closure of a portion of SR 291, and re-routing traffic onto Bartram Avenue, is not anticipated to adversely affect access to businesses on Island Avenue or Penrose Avenue. The proposed re-routing will not change access from I-95 southbound or northbound, nor will access from Philadelphia via Sr 291 (Penrose Avenue) or Island Avenue be affected. Customers traveling from the airport terminal complex (including hotel shuttles as well as customers of eastside businesses) will access the Island Avenue area via I-95 Ramp F. Travel times will not be significantly affected.
53.13	With the Airport directly competing with off-airport parking, it is surprising that the draft EIS does not even consider the hardship and impact on the Airport's largest and only indoor competitor of a closure of its primary access route, Route 291, and the subsequent extensive rerouting process or consider viable alternatives that would alleviate the need for any rerouting.	The proposed closure of a portion of SR 291, and re-routing traffic onto Bartram Avenue, is not anticipated to adversely affect access to businesses on Island Avenue or Penrose Avenue. The proposed re-routing will not change access from I-95 southbound or northbound, nor will access from Philadelphia via Sr 291 (Penrose Avenue) or Island Avenue be affected. Customers traveling from the airport terminal complex (including hotel shuttles as well as customers of eastside businesses) will access the Island Avenue area via I-95 Ramp F. Travel times will not be significantly affected.
53.14	The proposed project would have an overall negative economic impact on the Heilweil property, its tenants and their employees, an impact that should be addressed in the EIS.	As explained in the responses to other comments in this letter, the proposed project is not anticipated to result in an adverse economic impact to this property, its tenants, or employees.
53.15	In light of the precarious financial position of US Airways, the Airport's primary carrier, the Heilweils question the wisdom of undertaking the proposed project and incurring significant financial costs and suffering other significant adverse impacts on the surrounding community.	As noted in Chapter 2, FAA does not expect that the financial position of any airline will affect the need for the project. PHL is a heavy origin-destination market with a considerable demand for air carrier services. If US Airways were to cancel services, other airlines would be expected to increase services to meet this demand. US Airways has recently increased service at PHL.
53.16	The draft EIS does not properly recognize the contribution of Route 291 to the highway system in the vicinity of the Airport. Currently, Route 291 provides the most natural and direct route from the Airport to I-76 and Center City via the Platt Bridge. The proposed re-routing of Route 291 over Bartram Avenue would make access to Center City via the Platt Bridge awkward and more difficult, with a resulting negative economic impact extending all the way to Center City.	Re-routing of SR 291 traffic is not expected to have significant travel time changes for the longer distance trip to Center City Philadelphia. The most direct route to I-76 and Center City from the airport is to access I-95N (Ramp F, and proceed to I-76. I-95N also provides a direct ramp connection to the Platt Bridge which connects to Center City. Mitigation measures proposed for Bartram Avenue and its intersections will sufficiently accommodate traffic volumes.

Letter 53

Fox Rothschild LLP - Herbert Bass

Comment Number	Comment	Response
53.17	Since it parallels I-95, Route 291 currently offers the most viable alternative to I-95 in the vicinity of the Airport. As a result, at present, it reduces traffic levels on I-95 in the vicinity of the Airport. It also offers an efficient alternative to I-95 in the event of emergencies. Bartram Avenue does not even compare to Route 291 as a viable alternative to I-95. Moreover, to the extent Bartram Avenue serves as an alternative to I-95, there are currently two alternatives - Route 291 and Bartram Avenue - and the proposed project would eliminate the most viable of the two.	SR 291 in the vicinity of the Airport carries just a fraction of traffic in comparison to I-95. While it is currently an alternative to I-95, Bartram Avenue will offer a similar alternative once the mitigation measures are in place.
53.18	Under proposed Alternative 1, if an EMAS system were installed at the North end of the runway as is proposed in Alternative 2, only a 500' Runway Safety Area would be required, allowing Route 291 to remain open. There would actually be more buffer between the RSA and the roadway under this scenario than under proposed Alternative 2. Since the installation of an EMAS system was considered in order to preserve I-95, it should have been considered in order to preserve Route 291 as well and, thus, avoid the costs of closing Route 291 and of making improvements to Bartram Avenue.	<p>FAA Order 5200.9, Financial Feasibility and Equivalency of Runway Safety Area Improvements and Engineered Material Arresting Systems" (3/15/04) applies to RSA improvement projects, not to the construction of new runways or extension of existing runways. Nevertheless, FAA has considered lifecycle costs. For Alternative 2, use of EMAS is the lowest lifecycle cost (LLC) compared to the costs (particularly land acquisition and construction) of relocating an elevated interstate highway. There is no other lower cost alternative that could accommodate the I-95 traffic.</p> <p>In contrast for Alternative 1, abandoning a portion of Industrial Highway/SR 291 and designating a portion of Island Avenue and Bartram Avenue as SR 291, including surface transportation mitigation measures, is the LLC alternative compared to the lifecycle cost of EMAS. The City of Philadelphia Streets Department and the Pennsylvania Department of Transportation have concurred with the abandonment of a portion of Industrial Highway/SR 291, designation of a portion of Island Avenue and Bartram Avenue as SR 291 and the proposed surface transportation mitigation measures.</p>
53.19	No tunneling options were considered. If Route 291 were lowered below grade under either proposed Alternative 1 or proposed Alternative 2, it would not have to be closed.	The cost of tunneling significantly increases the cost of the project. The tunneling process actually increases the environmental impacts during construction and provides no environmental, aviation or surface transportation benefits for the additional cost. With the proposed mitigation, Alternative 1 results in surface transportation improvements over the No-Action Alternative at four intersections in the vicinity of Bartram Avenue, as described in Section 4.1.14 of this EIS. The Project is needed in the short term and tunneling would not be possible in this case.

# Haverford

C O L L E G E

Office of the President

EDUCATING TO LEAD

EDUCATING TO SERVE

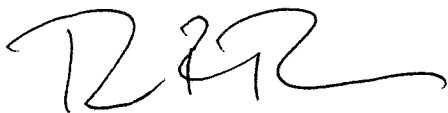
November 11, 2004

Susan McDonald  
Federal Aviation Administration  
Harrisburg Airports District Office  
3905 Hartzdale Avenue  
Suite 508  
Camp Hill, PA 17011

Dear Susan McDonald:

I have just learned that the Philadelphia Airport expansion plans include a new runway whose approach angle brings low flying jet aircraft directly over the campus of Haverford College. To my knowledge the FAA has not made any attempt to inform us or ask for our comments on this subject, so I would respectfully request that action not be taken until we have a chance to educate ourselves on the facts and options to this potentially disruptive incursion on our educational purpose.

Sincerely,



Thomas R. Tritton  
President

TRT/ff

**Letter 54****Haverford College - Thomas R. Tritton**

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
54.1	To my knowledge the FAA has not made any attempt to inform us or ask for our comments on this subject, so I would respectfully request that action not be taken until we have a chance to educate ourselves on the facts and options to this potentially disruptive incursion on our educational purpose.	The Federal Aviation Administration (FAA) used several methods to reach out and notify the public about the project and public meetings. These methods included placing notices in area newspapers, sending information letters to township officials, sending meeting flyers to area churches and libraries, and sending newsletters or post cards about upcoming meetings to everyone on the project mailing list.

# Haverford Township Civic Council

Statement to Commissioners, Monday November 8, 2004

I am Phil Di Nenzo, president of the Haverford Civic Council, the umbrella organization for all the fine community groups in our township. I am speaking to you tonight on an issue of importance to all township residents.

Haverford Township now lies on the direct flight path of commercial aircraft taking off and landing on the North/South runway designated 17-35, which is being used more and more frequently for the aircraft favored for regional flights. With the planned increases in flights of the new regional airlines, such as Southwest and Frontier, we can expect these flights to increase in a major way. The impact on residents of the township cannot be denied. We are already seeing the increased air traffic over our community. What brings me here tonight on behalf of the Civic Council is the plan of the FAA to *expand* 17-35 so that it can comfortably accommodate even larger aircraft.

There are serious plans to expand the total runway capacity at Philadelphia airport and some of the planning will take several years but the plan to lengthen 17-35 and therefore to increase our traffic is on the front burner with the deadline for community input set for the middle of November!

*What does that mean to Haverford residents?* It means seriously increased noise and air pollution. It means the structural damage of vibration to our homes. The FAA Environmental Study did not include Haverford Township in its scope. We, at seven and a half miles from the airport are not deemed to be affected in a significant way although residents report being unable to converse in their backyards at certain times of the day.

*What can we do?* The entire Philadelphia metropolitan area is already in serious noncompliance on *air pollution* standards. Research is showing the harmful effects of noise, not only serious short bursts of noise but the neurological effects of frequent noise at what is considered a non-harmful level. The Haverford Township Civic Council joins the League of Women Voters and a coalition of other community activists in calling upon Congressman Weldon, and Senators Specter and Santorum to act to preserve the quality of life in our community. We have written letters to all federal officials as well as FAA administrators and encourage all residents to do likewise. What happens will affect the lives and property values of all the residents.

Thank you

## Letter 55

## Haverford Township Civic Council - Phil DiNunno

Comment Number	Comment	Response
55.1	What brings me here tonight on behalf of the Civic Council is the plan of the FAA to expand 17-35 so that it can comfortably accommodate even larger aircraft.	The proposed project is needed to reduce the existing and future delay problem at Philadelphia International Airport. The runway extension will allow some of the aircraft currently using Runway 9-27 to use Runway 17-35 for both arrivals and departures, reducing delays due to congestion on the primary runways. Some of these aircraft (regional jets and narrowbody jets) are already landing on Runway 35, but cannot take off from this short runway without severe weight penalties or stage length penalties.
55.2	What does that mean to Haverford residents? It means seriously increased noise and air pollution. It means the structural damage of vibration to our homes. The FAA Environmental Study did not include Haverford Township in its scope. We, at seven and a half miles from the airport are not deemed to be affected in a significant way although residents report being unable to converse in their backyards at certain times of the day.	All communities within this area, including Haverford, were considered in the analysis presented in the EIS. The regional study area for this project is a circle around the airport with a radius (distance from the airport) of 27 miles. Aircraft noise exposure levels in Haverford Township are expected to fall well outside the 60 dB DNL contour for each of the Build alternatives in each future forecast year. The Project would not result in vibration levels in Haverford (or any other community) that could cause structural damage to buildings.
55.3	The entire Philadelphia metropolitan area is already in serious noncompliance on air pollution standards.	The region is classified as a moderate non-attainment area for ozone, but is in compliance with the Pennsylvania and National Ambient Air Quality Standards for carbon monoxide, nitrogen dioxide, sulfur dioxide, and PM10. This EIS demonstrates that the Proposed Project will reduce air pollutant emissions in the region below levels expected under the No-Action Alternative and that ambient pollutant concentrations will remain well below the National and Pennsylvania Ambient Air Quality Standards.
55.4	Research is showing the harmful effects of noise, not only serious short bursts of noise but neurological effects of frequent noise at what is considered a non-harmful level.	<p>The question of whether jet noise can lead to hearing loss has been investigated. While hearing impairment could be a risk under some circumstances for employees working on the aprons around aircraft, it is very unlikely that any hearing loss could occur in neighborhoods around an airport. For example, more than 9,000 overflights during eight hours, each producing a Sound Exposure Level of 90 dB, would be required to produce an eight hour equivalent level of 85 dBA. If this level of operations were to occur for five days a week, continuously for 40 years, and if people were exposed to this noise outdoors without any attenuation from buildings, the exposure would be likely to produce less than 10 dB loss of hearing in the most sensitive 10 percent of the population.</p> <p>Based on the projected annual operations on Runway 17-35 and projected runway utilization (see Section 4.2) in 2007, an estimated 170 aircraft per eight hour day would pass over Haverford. This is a maximum, as flight tracks would disperse after takeoff. This is significantly less than 9,000 per eight hour day, and would not result in any detrimental health effects.</p>

70 Huntington Dr.  
Jackson, NJ 08527  
Voice (732) 928-6421  
Fax (732) 928-6952  
Email: [bhandel@optonline.net](mailto:bhandel@optonline.net)

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October 25, 2004

Susan McDonald, Environmental Protection Specialist  
Federal Aviation Administration  
c/o Vanasse Hangen Brustlin, Inc.  
101 Walnut Street  
PO Box 9151  
Watertown, MA 02471-9151

Dear Ms. McDonald,

We have reviewed the Draft Environmental Impact Statement (DEIS) prepared for the proposed extension of Runway 17-35 at the Philadelphia International Airport (PHL) and offer the following comments for consideration by the Federal Aviation Administration (FAA) in preparing the final EIS.

We note that the DEIS has considered the use of Engineered Materials Arresting System (EMAS) in meeting the project need. We acknowledge that EMAS is an effective method to provide protection for aircraft that may overrun the runway during a long landing or an aborted takeoff. However, as explained below, we believe that the DEIS has not fully explored the effectiveness of EMAS in meeting the project need and reducing environmental impacts associated with the runway extension project.

**Alternative 1 – Extension of RW 17-35 without EMAS or Displaced Thresholds**

As now proposed, this alternative requires that a portion of SR 291 be abandoned and demolished and the traffic diverted to Bartram Avenue. The impact on SR 291 is caused by the 1000' RSA associated with the 640' extension of the runway and not the runway pavement itself. There is enough space between the extended runway pavement and SR 291 to install an EMAS on a 600' long RSA, which, according to FAA Order 5200.9, would be equivalent to the proposed standard 1000' RSA in providing protection for RW 35 overruns and RW 17 undershoots. The FAA Order states that equivalency is obtained when the EMAS is 1. capable of stopping an overrunning aircraft exiting the runway at 70 knots and 2. placed on an RSA of at least 600' long serving a runway with vertical guidance for undershoot protection. An EMAS that is equivalent to a standard 1000' RSA is feasible for the north end of the runway as long as a portion of Economy Parking Lot and a segment of the airfield service road are relocated as already proposed in Alternative 1. An EMAS option meets the project need and minimizes environmental impacts. Specifically, it would eliminate the need for the City of Philadelphia to purchase the SR 291 right of

way from the Commonwealth of Pennsylvania as well as negates the adverse environmental impacts and associated costs of diverting SR 291 traffic to Bartram Avenue. The final EIS should include an EMAS option to Alternative 1 for the northerly end of the runway.

We appreciate the opportunity to comment on the DEIS for the RW 17-35 runway extension project at Philadelphia International Airport.

Sincerely,

A handwritten signature in black ink, appearing to read 'William Handel', written in a cursive style.

William Handel  
Vice President



Comment Number	Comment	Response
56.1	<p>As now proposed, this alternative requires that a portion of SR 291 be abandoned and demolished and the traffic diverted to Bartram Avenue. The impact on SR 291 is caused by the 1000' RSA associated with the 640' extension of the runway and not the runway pavement itself. There is enough space between the extended runway pavement and SR 291 to install an EMAS on a 600' long RSA, which, according to FAA Order 5200.9, would be equivalent to the proposed standard 1000' RSA in providing protection for RW 35 overruns and FW 17 undershoots. The FAA Order states that equivalency is obtained when the EMAS is: (1) capable of stopping an overrunning aircraft exiting the runway at 70 knots; and (2) placed on an RSA of at least 600' long serving a runway with vertical guidance for undershoot protection. An EMAS that is equivalent to a standard 1000' RSA is feasible for the north end of the runway as long as a portion of Economy Parking Lot and a segment of the airfield service road are relocated as already proposed in Alternative 1. An EMAS option meets the project need and minimizes environmental impacts. Specifically, it would eliminate the need for the City of Philadelphia to purchase the SW 291 right of way from the Commonwealth of Pennsylvania as well as negates the adverse environmental impacts and associated costs of diverting SR 291 traffic to Bartram Avenue. The final EIS should include an EMAS option to Alternative 1 for the northerly end of the runway.</p>	<p>FAA Order 5200.9, Financial Feasibility and Equivalency of Runway Safety Area Improvements and Engineered Material Arresting Systems" (3/15/04) applies to RSA improvement projects, not to the construction of new runways or extension of existing runways. Nevertheless, FAA has considered lifecycle costs. For Alternative 2, use of EMAS is the lowest lifecycle cost (LLC) compared to the costs (particularly land acquisition and construction) of relocating an elevated interstate highway. There is no other lower cost alternative that could accommodate the I-95 traffic.</p> <p>In contrast for Alternative 1, abandoning a portion of Industrial Highway/SR 291 and designating a portion of Island Avenue and Bartram Avenue as SR 291, including surface transportation mitigation measures, is the LLC alternative compared to the lifecycle cost of EMAS. The City of Philadelphia Streets Department and the Pennsylvania Department of Transportation have concurred with the abandonment of a portion of Industrial Highway/SR 291, designation of a portion of Island Avenue and Bartram Avenue as SR 291 and the proposed surface transportation mitigation measures.</p>

# KORMAN

COMMERCIAL  
PROPERTIES

November 24, 2004

Ms. Susan McDonald  
Harrisburg Airports District Office  
3905 Hartzdale Drive  
Suite 508  
Camp Hill, PA 17011

**Sent via Fax and US Mail**

**RE: Runway 17-35 Runway Extension  
Philadelphia International Airport**

Dear Ms. McDonald:

On behalf of Eastwick Joint Ventures, owners of *both Penrose Park Shopping Center and Penrose Plaza Shopping Center*, I would like to register our opposition to the planned extension of runway 17-35 by the Philadelphia International Airport.

Currently, both Shopping centers are directly under the flight path of runway 17-35. We have significant concerns about the increased noise levels our tenants and their customers will be subject to as a result of the extended runway being used for jet, rather than the current, turboprop aircraft.

These aircraft create significantly higher noise levels and require a longer trajectory to reach their cruising attitude bringing them over the shopping centers at a lower altitude than is currently our experience with the turboprop aircraft. The lower latitude will only exasperate the increase noise levels created by the jet aircraft.

We feel strongly that this project should be abandoned and alternative developed which would have little or no impact on the businesses and residents under the flight path of runway 17-35.

If the FAA and the City of Philadelphia proceed with this project, we think it appropriate that both authorities arrange for the implementation of an appropriate noise reduction program, at their expense, for both shopping centers.

Thank you for your attention to this matter.

Sincerely,

KORMAN COMMERCIAL PROPERTIES, INC.

  
Arnold S. Lurie  
Director of Shopping Centers

Korman Commercial Properties, Inc.

Suite 305 • Two Neshaminy Interplex • Trevose, Pennsylvania 19053 • Tel. 215.244.5100 • Fax 215.245.6243

## Letter 57

Korman Commercial Properties, Inc. - Arnold Lurie

Comment Number	Comment	Response
57.1	We have significant concerns about the increased noise levels our tenants and their customers will be subject to as a result of the extended runway being used for jet, rather than the current, turboprop aircraft.	With reference to Figures 4.2-6 through 4.2-9 of this EIS, the noise levels (to which Korman's tenants and their customers would be exposed as a result of either of the two Build Alternatives) are extremely similar to the levels resulting from the No-Action Alternative. In either case, the exposure levels are not expected to be incompatible with commercial use of the property.
57.2	We strongly feel that this project should be abandoned and alternative developed which would have little or no impact on the businesses and residents under the flight path of runway 17-35.	All reasonable alternatives were considered and analyzed very carefully for the Project. During the scoping process, FAA received a number of proposed alternatives from members of the public and from agencies. As described in Chapter 3, these alternatives were considered and analyzed for the Project. These alternatives were eliminated because they would not achieve the project's purpose and need in the short term.
57.3	We think it appropriate that both authorities arrange for the implementation of an appropriate noise reduction program, at their expense, for both shopping centers.	<p>According to the FAA criteria discussed in Section 4.2, Noise, of this EIS, neither Alternative 1 nor Alternative 2 will cause significant noise impact anywhere in the Local or Regional Study Areas during either of the two study years, 2007 or 2015. Thus, no mitigation measures are required for the proposed Project.</p> <p>It should be noted that under FAR Part 150 guidelines, commercial land uses such as shopping centers are considered compatible with aircraft noise exposures of up to 70 dB DNL, while residential land uses are compatible with aircraft noise exposures of less than 65 dB DNL.</p>

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# Main Line Health

November 15, 2004

Bryn Mawr Hospital

Lankenau Hospital

Paoli Hospital

Bryn Mawr Rehab Hospital

Great Valley Health

Jefferson Health System  
Ambulance

The Home Care Network

Lankenau Institute for  
Medical Research

Main Line Health Centers  
Exton  
Lawrence Park  
Shannondell  
Upper Providence

Main Line Health  
Adult Day Services

Main Line  
Clinical Laboratories

Wayne Center

Ms. Susan McDonald  
Federal Aviation Administration  
Harrisburg Airports District Office  
3905 Hartzdale Avenue, Suite 508  
Camp Hill, PA 17011

Dear Ms. McDonald:

On behalf of the patients, doctors, and employees of Bryn Mawr Hospital and Lankenau Hospital, I am writing to express our concern about the proposed expansion of Philadelphia International Airport's Runway 17-35. Bryn Mawr Hospital is located in Bryn Mawr, Pennsylvania, and Lankenau Hospital is located in Wynnewood, Pennsylvania—communities that will be directly affected by the proposed expansion.

We understand that the proposed expansion would significantly increase the volume of flights over our hospitals and, in addition, those flights would be at a significantly lower altitude than current air traffic. If this is so, the inevitable increase in noise, air pollution, and plane-induced vibrations has the potential to harm our patients and our hospitals, to say nothing of the quality of life in our surrounding neighborhoods. Our community has already experienced first hand the risks associated with low-flying aircraft. In 1991 a tragic plane crash over Merion Elementary School claimed the life of Senator John Heinz and six others, including two school children.

We are also troubled that we have never been contacted directly by either the FAA or the Philadelphia Airport about this proposed expansion, even though we are major institutions along the expanded flight path. As a result, we are learning about this project with little time to fully understand its possible implications for our hospitals. It is unclear whether the required environmental impact study has appropriately included communities along the Main Line in which our hospitals are located. Additionally, we wonder about the efficacy of the project, since, based upon information available on the PHL web site, full expansion of the runway would potentially reduce flight times—ten years from now—by only six minutes. We are incredulous that spending between \$36 million and \$56 million for such a minimal improvement in airport operations is a responsible use of funds.

Ms. Susan McDonald

November 15, 2004

Page 2

We urge the FAA and the Airport to suspend any further action on the runway expansion until these issues can be sufficiently addressed and steps can be taken to ensure the health, safety, and quality of life of our Main Line communities.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard Wells', with a large, circular flourish at the end.

Richard Wells

c. Michael Buongiorno, Acting CEO, Main Line Health  
Frank Slattery, Jr., Esq., Chairman, Main Line Health  
The Honorable Connie Williams  
The Honorable Daylin Leach  
The Honorable Jim Gerlach  
The Honorable Arlen Specter  
The Honorable Rick Santorum

## Letter 58

## Main Line Health - Richard Wells

Comment Number	Comment	Response
58.1	We understand that the proposed expansion would significantly increase the volume of flights over our hospitals and, in addition, those flights would be at a significantly lower altitude than current air traffic. If this is so, the inevitable increase in noise, air pollution, and plane-induced vibrations has the potential to harm our patients and our hospitals, to say nothing of the quality of life in our surrounding neighborhoods.	<p>The Project would not result in vibration levels in any community that could cause structural damage to buildings.</p> <p>The table provided in Responses to Comments Attachment #2 summarizes typical altitudes of an aircraft on approach to Runway 17 from the north and to Runway 35 from the south at representative distances of 8, 4, and 2 miles from the present runway ends; it also compares the altitudes to those of an aircraft approaching the extended runway for each of the proposed Build Alternatives.</p> <p>Altitudes of aircraft on departure from Runway 17 or Runway 35 under either of the proposed Build Alternatives will be slightly higher than the No-Action Alternative because the aircraft will begin their takeoff roll on the extended pavement, slightly farther from the communities they overfly. The amount of increase depends on the climb capability of each individual aircraft and the length of the extension.</p> <p>For a given distance to the runway, differences in the individual sound levels of a landing aircraft at the different altitudes identified in the table are only on the order of a few tenths of a decibel. Changes of that magnitude, up or down, are not likely to be discerned on an event-by-event basis.</p>
58.2	We are also troubled that we have never been contacted directly by either the FAA or the Philadelphia Airport about this proposed expansion, even though we are major institutions along the expanded flight path.	The Federal Aviation Administration (FAA) used several methods to reach out and notify the public about the project and public meetings. These methods included placing notices in area newspapers, sending information letters to township officials, sending meeting flyers to area churches and libraries, and sending newsletters or post cards about upcoming meetings to everyone on the project mailing list.
58.3	It is unclear whether the required environmental impact study has appropriately included communities along the Main Line in which our hospitals are located.	All communities within this area were considered in the analysis presented in this EIS. The noise study area for the proposed project encompasses the area within 27 miles of the airport. This distance, in conformance with FAA guidance, is equivalent to the distance from the airport at which a departing aircraft reaches an elevation of 10,000 feet, or an arriving aircraft reaches an elevation of 7,000 feet.
58.4	We wonder about the efficacy of the project, since, based upon information available on the PHL web site, full expansion of the runway would potentially reduce flight times-ten years from now-by only six minutes.	The numbers are annual averages, reflecting many on-time flights and some delays that are significantly longer than the stated averages. Alternative 1, the preferred alternative, would result in 1.4 minutes reduction in average annual delay per aircraft in 2007 and 6.5 minutes in 2015. This is a total savings of 12,329 hours annually in 2007 and 66,733 hours in 2015.



*Defending the Mid-Atlantic*

At Widener University School of Law  
4601 Concord Pike, P.O. Box 7474, Wilmington, DE 19803-0474  
302-477-2167/Fax: 302-477-2032/www.maelc.org

**VIA ELECTRONIC MAIL**

December 1, 2004

Ms. Susan McDonald  
Federal Aviation Administration  
c/o VHB  
101 Walnut Street  
PO Box 9151  
Watertown, MA 02471-9151

**RE: Comments to PHL Runway 17-35 Project**

Dear Ms. McDonald:

These comments are submitted on behalf of the Mid-Atlantic Environmental Law Center (MAELC), based in Wilmington, DE, in response to the Draft Environmental Impact Statement (DEIS) prepared by the Federal Aviation Administration (FAA) for a runway extension at the Philadelphia International Airport (PHL). The project is sponsored by the City of Philadelphia which owns the airport.

MAELC reserves the right to submit supplemental comments in the very near future in accordance with the Administrator's November 30, 2004 correspondence to several parties indicating that comments submitted within a reasonable period after the deadline would still receive consideration. This arrangement was related to MAELC by phone on December 1, 2004 by FAA District Office chief Wayne Hiebeck.

MAELC is nevertheless concerned that not all relevant reports and studies have been made available to the public, and therefore believes that these comments cannot be comprehensive regarding certain issues such as noise.

**Introduction:**

The National Environmental Policy Act (42 U.S.C. 4321 et seq) and its regulations (40 C.F.R. 1508.18) require that whenever a major project involving federal funding is undertaken with the potential to have a significant adverse impact on the environment, an Environmental Impact Statement, and a Draft EIS, be developed to ensure that alternatives to that impact are explored.

**The Preferred Alternative:**

In the DEIS, PHL's Runway 17-35, which is situated in a general north-south orientation, is proposed in the preferred Alternative 2 to be extended by 1540 feet bringing the total runway length to 7,000 feet. In its current length, Runway 17-35 "cannot regularly accommodate many of the regional jet or narrowbody aircraft flights at PHL. These runways primarily serve turboprop and general aviation aircraft which are becoming a smaller part of the fleet." (DEIS, Purpose and Need, 2-9) As a result, FAA states that the Airport's two primary runways are overtaxed by regional jets, small and large narrowbody jets and widebody jets creating significant delays.

The FAA projects an increase from roughly 446,000 takeoffs and landings daily in 2003 at PHL to some 615,000 by the year 2015. The DEIS provides data showing a



major shift in just the three-year period from 1999-2002 from turboprop flights, which are decreasing, and regional jet and small narrowbody jet flights, which are rapidly increasing at PHL. (DEIS, Purpose and Need, 2-8). FAA-approved projections out to 2010 continue to show a dramatic shift in the fleet in the same direction.

**Noise Impacts:**

Assuming that these projections are accurate, and concluding that PHL thus intends to use an extended Runway 17-35 to meet the prodigious growth in regional and narrowbody jet flight demand, a significant incongruity arises in the DEIS. In the sections of the DEIS which address impacts and environmental consequences, noise impact is analyzed. As discussed below in greater detail, there are hundreds of homes, businesses, schools, historical structures, and recreational areas in the Eastwick neighborhood and its surroundings in southwest Philadelphia, which are within the noise study area for an extension project for Runway 17-35. The claim is made in this section of the DEIS that the expected noise intensity increases in these areas will not reach the threshold of “significant impact.” In fact, most of them the DEIS indicates will experience increases of 1-2 decibels or less. Given the vast increase in usage of Runway 17-35 under preferred Alternative 2 for jet approaches and takeoffs as documented by the FAA, it simply strains credulity to assert such minimal noise impacts. Under the No-Action Alternative, since turboprop flights are projected to decrease and regional and narrowbody jets are unable to utilize Runway 17-35, it is anticipated that noise levels in the affected communities would be below 2003 baseline. That effect tends to accentuate the sound intensity distinction between turboprop craft and the jets that are largely replacing them. MAELC urges the FAA to adjust for these factors and perform the noise

analysis again in cooperation with outside experts sympathetic to the impacted communities.

The impact of noise on the communities surrounding the Philadelphia Airport has been a focal point of public concern regarding the Runway 17/35 extension plans. It is illustrative to provide further description of the units of measurement used to quantify sounds. Given the logarithmic scale used to measure the intensity of sound, as discussed below, the proper understanding of the increases in noise levels with the Runway 17/35 extension plans is of critical importance to the selection of the most appropriate Alternative including the option to not upgrade Runway 17/35.

The range of sound (intensity level) that the human ear can accommodate ranges from quietest level of  $10^{-12}$  watts/meter<sup>2</sup> to the loudest level of 1 watt/meter<sup>2</sup>, representing a range of 1,000,000,000,000 units. In order to make the measurement of sound intensity usable for average person a logarithmic scale (decibel [dB] scale) was developed to report sound intensity. A sound intensity of  $10^{-12}$  watts/meter<sup>2</sup> corresponds to 0 dB, and a sound intensity of 1 watt/meter<sup>2</sup> corresponds to 120 dB. The dB scale ranges from the quietest sound that the human ear can accommodate of 0 dB to the loudest sound that the human ear can accommodate of 120 dB. In practical terms an increase of 10 dB over near silence results in an increase in the sound intensity by a factor of 10, an increase of 20dB over near silence results in an increase in the sound intensity by a factor of 100, and so on up to an increase of 120 dB, the threshold of human hearing, that results in an increase in the sound intensity by a factor of 1,000,000,000,000. For example, the sound of a jet engine at 100 feet is 1,000,000,000,000 times more powerful than the smallest audible sound the human ear can hear.

To help put the level of sounds into perspective some common sounds with their respective decibel levels are listed below:

Source	Intensity	Intensity Level	Number of Times Greater than the Threshold of Hearing
Threshold of Hearing	$1 \cdot 10^{-12}$ Watt/meter <sup>2</sup>	0 dB	$10^0$
Rustling Leaves	$1 \cdot 10^{-11}$ Watt/meter <sup>2</sup>	10 dB	$10^1$
Whisper	$1 \cdot 10^{-10}$ Watt/meter <sup>2</sup>	20 dB	$10^2$
Normal Conversation	$1 \cdot 10^{-6}$ Watt/meter <sup>2</sup>	60 dB	$10^6$
Busy Street Traffic	$1 \cdot 10^{-5}$ Watt/meter <sup>2</sup>	70 dB	$10^7$
Vacuum Cleaner	$1 \cdot 10^{-4}$ Watt/meter <sup>2</sup>	80 dB	$10^8$
Large Orchestra	$6.3 \cdot 10^{-3}$ Watt/meter <sup>2</sup>	98 dB	$10^{9.8}$
Walkman at Maximum Level	$1 \cdot 10^{-2}$ Watt/meter <sup>2</sup>	100 dB	$10^{10}$
Front Rows of Rock Concert	$1 \cdot 10^{-1}$ Watt/meter <sup>2</sup>	110 dB	$10^{11}$
Jet Engine at 100 Feet	$1 \cdot 10^0$ Watt/meter <sup>2</sup>	120 dB	$10^{12}$

\*Source: *The Physics Classroom*, <http://www.glenbrook.k12.il.us/gbssci/phys/Class/sound/u1112b.html>

The Federal Aviation Administration (FAA) in Orders 1050.1E, *Environmental Impacts: Policies and Procedures*, and 5050.4A, *Airport Environmental Handbook*, characterizes noise increases that are equal to or greater than 1.5 dB within the 65 dB day-night average sound level (DNL) contour interval as a “significant impact”. In addition, the Federal Interagency Committee on Noise (FICON) recommended that “less than significant impacts” be reported as well. The “less than significant impacts” are increases that are equal to or greater than 3 dB within the 60 to 65 dB DNL contour interval, and increases that are equal to or greater than of 5 dB within the 45 to 60 dB DNL contour interval. The DEIS states that 5 dB or more increases in the 45 to 60 dB

DNL contour interval amount to “slight-to-moderate” changes in the DNL and that the potential for mitigation should not be evaluated. The DEIS states 3 dB or more increase in the 60 to 65 dB DNL contour interval amount to “slight-to-moderate” changes in the DNL and that the potential for mitigation should be considered.

The DEIS allowable increases for the greater than or equal to 65 dB, 60 to 65 dB, and 45 to 60 dB DNL contour intervals are 1.5 dB, 3 dB, and 5 dB, respectively. The allowable increase of 1.5 dB for the greater than or equal to 65 dB contour interval is contained in FAA Orders 1050.1E and 5050.4A, and are recommended by FICON . The allowable increase of 3 dB for the greater than or equal to 60 dB contour interval, and the allowable increase of 5 dB for the 45 to 60 dB contour interval are recommended by FICON. The 1.5 dB, 3 dB, and 5 dB translate into a 1.5, 3 and 5 times increase in the allowable intensity of noise due to aircraft operations around Philadelphia Airport. The 1.5 dB allowable increase within the greater than or equal to 65dB DNL contour interval is a 1.5 times increase in the intensity of the noise due to aircraft operations. For the 60 to 65 dB DNL contour interval the allowable 3 dB increase converts to a 3 times increase in the intensity of noise due to aircraft operations. Finally, for the 45 to 60 dB DNL contour interval the allowable 5 dB increase means a 5 times increase in the intensity of noise due to aircraft operations.

The DEIS states that no noise-sensitive areas within the greater than or equal to 65dB DNL contour interval would be exposed to a 1.5 dB or greater increase due to either Alternative 1 or 2. However, there are non-noise sensitive areas that will be exposed to an increase of 1.5 dB or more within the greater than or equal to 65 dB DNL contour interval.

As described above a 1.5 dB increase in the DNL is actually a 1.5 times increase in the intensity of the noise for the non-noise sensitive areas within the greater than or equal to 65 dB DNL contour interval.

For the 60 to 65 dB DNL contour interval the DEIS states that 665 housing units in Eastwick would be exposed to a greater than 3 dB increase in noise due to Alternative 2. The DEIS states that the increase of 3 dB or more within the 60 to 65 dB DNL contour interval does not amount to a significant noise impact.

As described above a 3 dB increase in the DNL is actually a three times increase in the intensity of noise for the 665 housing units within the 60 to 65 dB DNL contour interval. The DEIS states that a 3 dB increase within the 60 to 65 dB DNL contour interval does not amount to a “significant increase” in noise and that no mitigation measures are needed. This is a questionable conclusion given the sound intensity increase 3 dB represents while taking into account that DNL is an *average*, rather than a maximum level. At a minimum, the DEIS should address potential mitigation measures that could reduce the increase the noise increase for the 665 housing units within the 60 to 65 dB DNL contour interval.

In addition, the DEIS states that two schools, the Bartram High School Annex and the George Wharton Pepper Middle School are expected to experience a DNL noise level increases to above 65 dB under Alternative 2. The Bartram High School Annex is expected to have a DNL of 65.7 dB and the George Wolf Pepper Middle School is expected to have a DNL of 65.3 dB. The DEIS then states that “these levels are not sufficiently high to justify mitigation, unless the Noise Reduction Level of the building façade is of extremely poor quality (less than 25 dB).” Following the above quote the DEIS states that “no mitigation measures are required for the proposed project.” The

DEIS makes this statement without having any technical noise reduction data on the building façade for the two schools. At a minimum the DEIS should address the potential for mitigation based on a noise reduction analysis performed on the facades of the two schools. If the noise reduction analysis results in noise reductions of less than 25 dB then a mitigation plan should be developed for the school(s). Given the logarithmic dB scale used to measure sound intensity, if the noise reduction capacity of the two school buildings facades were less than the 25 dB rating quoted by the DEIS the impact of the interior of the schools could be dramatic. Furthermore, students at both schools would be expected to spend considerable time outdoors on school grounds during periods of physical education, as well as the beginning and end of the school day. During those times, Noise Reduction Level would be zero, and students would be exposed to greater than 65 decibels DNL *average* due to the Project.

In sum, the Airport has come to an unsupportable conclusion that significant noise impacts will not take place for people within the Study Area. First, the increase of 1.5 or more dB with in the greater than or equal to 65 dB DNL contour interval for an areas that is described in the DEIS as non-noise sensitive area is an unacceptable increase in the noise level due to the fact that a 1.5 dB increase is equal to a 1.5 times increase in the intensity of aircraft in an area that is already subject to a DNL of 65 dB. Second, the increase of 3 or more dB within the 60 to 65 dB DNL contour interval is in fact a significant impact on the 665 housing units as evidenced by the fact it represents an increase of three times for the noise intensity, and at a minimum the potential for mitigation for the increase in noise should be addressed in the DEIS. Third, the Bartram High School Annex and the George Wharton Pepper Middle School are expected to experience a DNL noise level increases to above 65 dB under Alternative 2. Due to the

expected increase in the DNL to above 65 dB the potential for mitigation should be addressed in the DEIS.

The entire noise analysis is performed on flawed assumptions. The DNL dB increases have been projected on the assumption that the increase in aircraft operations at the Philadelphia Airport will be the same for the No Action alternative as well as for Alternatives 1 and 2. This assumption cannot be made due to the fact that reduced airport delays may lead to additional aircraft operations at Philadelphia due to the projected shortened delay times. At a minimum the DEIS should address the potential for increases above the projected annual increases for aircraft operations reported in the DEIS. Or in the alternative the DEIS should require that any additional aircraft operations above the projections contained in the DEIS should be evaluated under a separate EIS to assess the potential for environmental harm due to increases in noise.

**Air Quality:**

The EIS must demonstrate that the proposed action will not result in significant adverse air quality impacts, must show conformity with the Pennsylvania State Implementation Plan, meet General Conformity, and contain several analyses. The required air quality analysis is highly complex and its main components include emissions inventory analyses and ambient concentration analyses.

It is noted that some of the ambient monitoring for some criteria were performed at curbside on the airport grounds and for others the data was collected as far away as 500 S. Broad St., Center City Philadelphia, roughly six miles away. It is questionable

whether it is appropriate to utilize data from this distance. MAELC urges the Administrator to utilize data from areas more proximal to the project area.

The DEIS discusses rationale for why assumptions were made to limit some projections of air quality impact to the airport grounds themselves. It is asserted in the DEIS that the emissions from aircraft all occur very close to the surface and therefore do not spread to the surrounding areas as would be expected from stack gases from stationary sources. It is also stated that at ground and extremely low altitude level emission, there is less wind or air disruption to carry the emissions any great distance. Such arguments are not well-founded. It is self-evident that the constant procession of aircraft through the air space at high speeds at 0-300 feet or so around the perimeter of the airport serve to create turbulent air conditions that further disperse air well above and beyond the natural wind forces at low altitude. The FAA argument also seems to presume that the aircraft stop emitting pollutants after they leave the airport's perimeter. In fact, planes that are in the process of gaining altitude are emitting pollutants at a particularly high rate, and landing craft do so as well. Jets passing over a neighborhood at low altitude at the frequency of one every several minutes, as is the case with this extension project, would most certainly result in a significant impact to localized ambient concentrations of jet exhaust constituents.

The 2003 Inventory shows NO<sub>x</sub> from airport at 2,166 (1,679 from planes) and that the 2007 Estimate for the No Action Alternative shows a NO<sub>x</sub> increase of 838 tons. (DEIS, 2-11) The increase is less than that for the Alternatives 1 and 2, it is claimed by FAA, because there is less idling on the runway during delays. It is remarkable that FAA



even claims a NO<sub>x</sub> decrease for Alternative 1 and 2 relative to No Action during 2005 and 2006, the construction years for the extension project. (DEIS, S-4)

PM-10 and PM2.5:

On the issue of particulate emissions, FAA provides itself with a convenient excuse to factor PM-10 and PM2.5 emissions from aircraft at zero, by claiming that there is no data available. Therefore, for the purpose of determining whether the Runway Extension Project risks causing an exceedance to a NAAQS, the permitted modeling for the determination includes only the effect of the Project on ground sources at the airport, ignoring the aircraft component of the emissions inventory, which for most other criteria pollutants represents the greatest share. FAA's own "Air Quality Procedures For Civilian Airports & Air Bases," Appendix D notes data availability for only "a few aircraft engines" for PM-10 and no FAA/EPA emission factors at all for PM2.5. It is difficult to believe that any good faith rationale exists for this lack of data given the existence of the PM2.5 standard for 7 years and the PM-10 standard for *decades.*, not to mention the presence in the aircraft fleet of models that have also been in existence for decades. It is patently arbitrary to expect the public to accept a zero quantification for particulate emissions that are certain to be significant in any real world inventory. It would be more appropriate for FAA to make conservative assumptions, perhaps based on old emission factors, of particulate emissions. Given the fact that there is at least one monitoring station in the vicinity that has recorded ambient levels of PM2.5 at 14.7 ug/m<sup>3</sup>--extremely close to the annual standard of 15 ug/m<sup>3</sup>--there is a real possibility that the

FAA's unreasonable assumption of zero particulate aircraft emissions is masking a NAAQS exceedance impact for this Action.

The DEIS excludes the mitigating impacts of the Capacity Enhancement Project. "The potential future effects of the CEP are speculative and will be considered in detail in the EIS currently being prepared for that project." (DEIS, 6-3) It does not seem appropriate that this process is being assessed on a separate track when its changes are relevant to the instant action. An artificial distinction is being drawn by FAA which then mitigates in favor of proceeding with the Runway Extension. The exclusion of the CEP is directly contrary to the decision to include in the accounting the impacts of the proposed Naval Yard redevelopment, the USPS Distribution Center construction and operation, and the Industrial/Commercial development in Tinicum Industrial Park.

### **No Additional Flights**

A critical flaw in the DEIS is the assumption of no new aircraft despite the increased capacity at the airport provided by the runway extension. It is not reasonable for the FAA to assume the same number of flights for the extension alternatives and the no action alternatives. Passenger demand is elastic: airlines know that passengers will follow price and convenience. If delays are shorter at PHL, demand there may increase. Moreover, airlines can offer lower price when they have more flights from same airport. The runway extension lessens delays significantly at first, providing some incentive for airlines to squeeze more flights in.

It is an apt analogy to compare this capacity issue to roadways. If the “level of service” of a road improves, more motorists tend to use it, and the LOS eventually degrades again. On a grand scale, I-476 (the Blue Route) was built in the late 1980s, as a relief valve for congestion on the Schuylkill Expressway. It did not take very many years for rush hour traffic on the Blue Route to become significantly congested as well. FAA has offered no reason why the old adage, “if you build it, they will come” does not apply to the expanded capacity of the airport under the project build alternatives.

FAA’s failure to reasonably project additional flight usage under the preferred Alternative artificially lowers the impacts of both the Air Quality and Noise segments of the DEIS estimates. MAELC therefore urges the Administrator to perform the appropriate analyses with adjusted inputs in order to give a more accurate portrayal of the Environmental Impact of this major federal action.

**Conclusion:**

For the reasons stated above, MAELC hereby requests the Administrator order a significant overhaul of the EIS, to ensure in particular that an air quality analysis and noise impact analysis that can inspire public confidence has been provided.

Respectfully submitted,

Michael D. Fiorentino, Esq.  
Executive Director  
Mid-Atlantic Environmental Law Center

Bob Albanese  
Legal Intern  
Mid-Atlantic Environmental Law Center

Comment Number	Comment	Response
59.1	In the DEIS, PHL's Runway 17-35, which is situated in a general north-south orientation, is proposed in the Preferred Alternative 2 to be extended by 1,540 feet bringing the total runway length to 7,000 feet.	At the time of the DEIS, the FAA had not yet identified a Preferred Alternative. In fact, the Preferred Alternative has been identified as "Alternative 1." The proposed total runway length is 6,500 feet.
59.2	The DEIS indicates [most areas] will experience increases of 1-2 decibels or less. Given the vast increase in usage of Runway 17-35 under Preferred Alternative 2 for jet approaches and takeoffs as documented by the FAA, it simply strains credulity to assert such minimal noise impacts. Under the No-Action Alternative, since turboprop flights are projected to decrease and regional and narrowbody jets are unable to utilize Runway 17-35, it is anticipated that noise levels in the affected communities would be below 2003 baseline. That effect tends to accentuate the sound intensity distinction between turboprop craft and the jets that are largely replacing them. MAELC urges the FAA to adjust for these factors and perform the noise analysis again in cooperation with outside experts sympathetic to the impacted communities.	<p>As this EIS documents, Alternative 1 (not Alternative 2) is the FAA's preferred alternative. Alternative 1 is anticipated to increase aircraft use of Runway 17-35 by 8.5 percent of total operations in 2007 (28.1 percent of total operations will use Runway 17-35, in contrast to 19.6 percent for the No-Action Alternative). The noise analysis compares the future No-Action Alternative to the future Build conditions not to 2003 conditions. This is not a "vast increase in usage". The expected change in noise exposure is not as great as the commentor suggests it should be for two reasons. Regional and narrow-body jets are not unable to use Runway 17-35 at its current length; they, as well as a significant number of corporate jets and even a small number of wide-bodied aircraft use it now, particularly for arrivals, as shown in Appendix C, Table C-1 of the DEIS, which shows details of the percentages of aircraft groups found to be using Runway 17-35 in 2003. By 2007, the No-Action Alternative forecasts corporate jets and RJs to increase substantially on that runway. Future Build Alternatives are forecast to have even greater increases in RJs as well as narrow-body jets on the extended runway, but are also forecast to have fewer corporate jets, resulting in a tradeoff of noise levels -- still increasing overall noise exposure (as shown in Figures 4.2-6 and 4.2-7) but primarily to the south under the approach path to Runway 35.</p> <p>In addition, the commentor appears to imply that regional jets are louder than the turboprops they are replacing, though this is not uniformly true. Some models of RJs are in fact quieter than comparable turboprops, and even those that are louder are not significantly different in level during their operation.</p> <p>These factors combined help account for why the change in exposure is relatively modest.</p>
59.3	It is illustrative to provide further description of the units of measurement used to quantify sounds. Given the logarithmic scale used to measure the intensity of sound, as discussed below, the proper understanding of the increases in noise levels with the Runway 17/35 extension plans is of critical importance to the selection of the most appropriate Alternative including the option to not upgrade Runway 17-35.	Appendix A, Introduction to Acoustics and Noise Terminology, of the Noise Technical Report (Appendix A.1 of the DEIS) provides further descriptions of the units and metrics used to quantify sound levels.
59.4	The DEIS allowable increases for the greater than or equal to 65dB, 60 to 65 dB, and 45 to 60 dB DNL contour intervals are 1.5 dB, 3 dB, and 5 dB, respectively.	The FAA does not set "allowable increases". The FAA sets thresholds for significant impacts. See Section 4.2 in this EIS for additional information.
59.5	The DEIS states that no noise-sensitive areas within the greater than or equal to 65dB DNL contour interval would be exposed to a 1.5 dB or greater increase due to either Alternative 1 or 2. However, there are non-noise sensitive areas that will be exposed to an increase of 1.5 dB or more within the greater than or equal to 65 dB DNL contour interval.	The commentor correctly notes that, for Alternative 1, the Integrated Noise Models predicts noise increases of 1.5 dB in an undeveloped area in New Jersey, which is not noise sensitive. Therefore, there are no significant adverse impacts (see Section 4.2.3).
59.6	A 3 dB increase in the DNL is actually a three times increase in the intensity of noise for the 665 housing units within the 60 to 65 dB DNL contour interval. The DEIS states that a 3 dB increase within the 60 to 65 dB DNL contour interval does not amount to a "significant increase" in noise.	A 3 dB increase in the DNL is actually a two times increase not a three time increase. Changes in single-event sound levels are perceived differently than changes in noise exposure metrics such as DNL. Appendix A of the Noise Technical Report (Appendix A.1 of the DEIS) provides some background information that helps explain how changes in sound levels are perceived. A 3 dB increase in noise exposure between 60 and 65 dB DNL is considered a slight-to-moderate change by FAA. It would only be considered a significant impact if there is a greater than 1.5 dB increase for locations within the 65-70 dB contour.

Letter 59

Mid-Atlantic Environmental Law Center - Michael D. Fiorentino

Comment Number	Comment	Response
59.7	At a minimum, the DEIS should address potential mitigation measures that could reduce the noise increase for the 665 housing units within the 60 to 65 dB DNL contour interval.	According to the FAA criteria discussed in Section 4.2, Noise, of this EIS, neither Alternative 1 nor Alternative 2 will cause significant noise impact anywhere in the Local or Regional Study Areas during either of the two study years, 2007 or 2015. Thus, no mitigation measures are required for the proposed Project.
59.8	At a minimum the DEIS should address the potential for mitigation based on a noise reduction analysis performed on the facades of the two schools. If the noise reduction analysis results in noise reductions of less than 25 dB then a mitigation plan should be developed for the school(s). Given the logarithmic dB scale used to measure sound intensity, if the noise reduction capacity of the two school buildings facades were less than the 25 dB rating quoted by the DEIS the impact of the interior of the schools could be dramatic.	<p>According to the FAA criteria discussed in Section 4.2, Noise, of this EIS, neither Alternative 1 nor Alternative 2 will cause significant noise impact (increase of 1.5 dB or greater) anywhere in the Local or Regional Study Areas during either of the two study years, 2007 or 2015. Thus, no mitigation measures are required for the proposed Project.</p> <p>Recently, the Airport began implementation of some of the measures of the 2003 FAR Part 150 Noise Compatibility Program Study. Two of the measures identified in this plan include a residential sound insulation program (RSIP), and an update to the noise exposure map should any substantial changes in the airfield configuration occur. When the noise exposure map is updated, the City has committed to evaluating the possibility of expanding the RSIP, which currently includes a number of homes in Tincicum Township, Pennsylvania. At that time, the City also may consider expanding the sound insulation program to include any schools that may be eligible based on the findings of an updated noise exposure map. This is addressed through the FAR Part 150 Noise Compatibility Program Study process, which qualifying schools can initiate to receive noise mitigation for their structures.</p> <p>The commentor appears to disagree with the standards rather than the analysis.</p>
59.9	Furthermore, students at both schools would be expected to spend considerable time outdoors on school grounds during periods of physical education, as well as the beginning and end of the school day. During those times, Noise Reduction Level would be zero, and students would be exposed to greater than 65 decibels DNL average due to the Project.	Neither Alternative 1 nor Alternative 2 will cause significant noise impact anywhere in the Local or Regional Study Areas during either of the two study years, 2007 or 2015. These kinds of outdoor activities are compatible with projected sound levels.
59.10	In sum, the Airport has come to an unsupportable conclusion that significant noise impacts will not take place for people within the Study Area. First, the increase of 1.5 or more dB with in the greater than or equal to 65 dB DNL contour interval for an areas that is described in the DEIS as non-noise sensitive area is an unacceptable increase in the noise level due to the fact that a 1.5 dB increase is equal to a 1.5 times increase in the intensity of aircraft in an area that is already subject to a DNL of 65 dB.	FAA Order 1050.1E stipulates the 1.5 dB threshold of "significant impact" to noise sensitive areas, within the 65 dB DNL noise contour for the "with action" condition. The commentor appears to have concerns with the standards rather than the analysis. A 1.5 dB DNL increase is actually about 41 percent louder, not (as stated by the commentor) 150 percent louder. A 1 dB increase is imperceptible by the human ear.
59.11	Second, the increase of 3 or more dB within the 60 to 65 dB DNL contour interval is in fact a significant impact on the 665 housing units as evidenced by the fact it represents an increase of three times for the noise intensity, and at a minimum the potential for mitigation for the increase in noise should be addressed in the DEIS.	An increase of 3 dB is a doubling of sound levels, not three times. As stated in the Section 4.2, Noise, of this EIS, the Federal Interagency Committee on Noise (FICON) recommended that in addition to significant impacts, less-than-significant noise level changes be identified for noise-sensitive locations exposed to Project-related increases. FICON recommended reporting any changes in DNL of 3 dB or more between 60 and 65 dB DNL, and increases of DNL 5 dB or more between 45 and 60 dB DNL. The FAA's subsequent Air Traffic Noise Screening (ATNS) procedure further emphasized the importance of these changes in DNL, so that they, also, are now included in FAA Order 1050.1E. While these recommendations only apply to cases where the significant threshold (1.5 dB or more DNL) is met or exceeded, they are included in this DEIS in response to comments raised during scoping. An increase of 3 dB would only occur under Alternative 2, not under Alternative 1 (the Preferred Alternative). The commentor appears to disagree with the standards rather than the analysis.

Comment Number	Comment	Response
59.12	Third, the Bartram High School Annex and the George Wharton Pepper Middle School are expected to experience a DNL noise level increases to above 65 dB under Alternative 2. Due to the expected increase in the DNL to above 65 dB the potential for mitigation should be addressed in the DEIS.	<p>According to the FAA criteria discussed in Section 4.2, Noise, of this EIS, neither Alternative 1 nor Alternative 2 will cause significant noise impact (increase of 1.5 dB or greater) anywhere in the Local or Regional Study Areas during either of the two study years, 2007 or 2015. Thus, no mitigation measures are required for the proposed Project.</p> <p>Recently, the Airport began implementation of some of the measures of the 2003 FAR Part 150 Noise Compatibility Program Study. Two of the measures identified in this plan include a residential sound insulation program (RSIP), and an update to the noise exposure map should any substantial changes in the airfield configuration occur. When the noise exposure map is updated, the City has committed to evaluating the possibility of expanding the RSIP, which currently includes a number of homes in Tinicum Township, Pennsylvania. At that time, the City also may consider expanding the sound insulation program to include any schools that may be eligible based on the findings of an updated noise exposure map. This is addressed through the FAR Part 150 Noise Compatibility Program Study process, which qualifying schools can initiate to receive noise mitigation for their structures.</p> <p>The commentator appears to disagree with the standards rather than the analysis.</p>
59.13	The entire noise analysis is performed on flawed assumptions. The DNL dB increases have been projected on the assumption that the increase in aircraft operations at the Philadelphia Airport will be the same for the No Action alternative as well as for Alternatives 1 and 2. This assumption cannot be made due to the fact that reduced airport delays may lead to additional aircraft operations at Philadelphia due to the projected shortened delay times. At a minimum, the DEIS should address the potential for increases above the projected annual increases for aircraft operations reported in the DEIS.	The FAA has reviewed and approved the forecast on which the noise analysis is based. This forecast is based on predicted demand, and is not constrained by the airports configuration. The project is aimed at reducing delays caused by an increasing number of regional jets on the parallel runways by shifting those operations to Runway 17-35. The forecast indicates that the fleet mix and predicted operations (given that delays will still occur) will not result in increased operations at the airport.
59.14	The DEIS should require that any additional aircraft operations above the projections contained in the DEIS should be evaluated under a separate EIS to assess the potential for environmental harm due to increases in noise.	The FAA has conducted its analyses using reasonable forecasts of the number of operations in future years. Generally, airlines are free to add or decrease the number of flights to or from a particular airport without FAA approval. In instances where FAA approval is required, for example, when a change to the air carrier's operating specifications is required, the FAA will conduct the appropriate level of environmental review pursuant to NEPA, CEQ regulations and FAA Order 1050.1E.
59.15	It is noted that some of the ambient monitoring for some criteria were performed at curbside on the airport grounds and for others the data was collected as far away as 500 S. Broad St., Center City Philadelphia, roughly six miles away. It is questionable whether it is appropriate to utilize data from this distance. MAELC urges the Administrator to utilize data from areas more proximal to the project area.	Measured carbon monoxide and nitrogen dioxide data were taken from the 500 South Broad Street site in Philadelphia and used to describe the current conditions around the Airport. This location is the nearest ambient air quality monitoring site to the Airport which measures these pollutants. PA DEP, US EPA, and Philadelphia County Air Management Services approved the use of the data from this site. No monitoring was performed at the terminal curbsides, rather, pollutant concentrations were estimated at the curbsides for comparison with the National and Pennsylvania Ambient Air Quality Standards.
59.16	It is asserted in the DEIS that the emissions from aircraft all occur very close to the surface and therefore do not spread to the surrounding areas as would be expected from stack gases from stationary sources. It is also stated that at ground and extremely low altitude level emission, there is less wind or air disruption to carry the emissions any great distance. Such arguments are not well-founded. It is self-evident that the constant procession of aircraft through the air space at high speeds at 0-300 feet or so around the perimeter of the airport serve to create turbulent air conditions that further disperse air well above and beyond the natural wind forces at low altitude.	Although aircraft do create mechanical air turbulence during takeoff and landing, their effects on atmospheric dispersion is very small compared to that of the wind. The net impact of emissions from aircraft during flight modes on receptors at the ground is negligible compared to the effects of ground-mode emissions.

Comment Number	Comment	Response
59.17	The FAA argument also seems to presume that the aircraft stop emitting pollutants after they leave the airport's perimeter. In fact, planes that are in the process of gaining altitude are emitting pollutants at a particularly high rate, and landing crafts do so as well. Jets passing over a neighborhood at low altitude at the frequency of one every several minutes, as is the case with this extension project, would most certainly result in a significant impact to localized ambient concentrations of jet exhaust constituents.	Aircraft which are taking off are using full thrust and thus are emitting the highest levels of pollutants. This action is called "climbout" in EDMS and the emissions and concentrations presented in the DEIS include these effects explicitly. Aircraft which are landing are using the lowest thrust level that will keep them in the air and thus have relatively low pollutant emission levels. This action is called "approach" in EDMS and the emissions and concentrations presented in the DEIS include these effects explicitly. The impact on ground level concentrations caused by aircraft in flight modes (climbout and approach) has been shown (by others) to be negligible. And, regardless of their thrust setting, the pollutants emitted by the engines are dispersed in the atmosphere very quickly and over such long travel distances that the resulting concentrations are nearly unmeasurable. This means that the highest concentrations from aircraft in flight modes would be lower farther from the airport. Since all of the estimated pollutant concentrations presented in the DEIS are below the NAAQS, the concentrations in neighborhoods farther away from the airport would be lower than those reported in the DEIS.
59.18	The 2003 Inventory shows NOx from airport at 2,166 (1,679 from planes) and that the 2007 Estimate for the No Action Alternative shows a NOx increase of 838 tons. (DEIS, 2-11) The increase is less than that for the Alternatives 1 and 2, it is claimed by FAA, because there is less idling on the runway during delays. It is remarkable that FAA even claims a NOx decrease for Alternative 1 and 2 relative to No Action during 2005 and 2006, the construction years for the extension project.	The EIS correctly states the future NOx emissions for the No-Action Alternative and the Preferred Alternative. As described in Section 4.17.2 (Pages 4-192 and 4-193) of the DEIS, NOx emissions due to construction activities for this project will occur in 2005 and 2006. These NOx emissions (13.35 tons per year (tpy) for Alternative 1 in 2005 and 11.95 tpy in 2006, and 15.39 tpy for Alternative 2 in 2005 and 13.28 tpy in 2006) are increases, not decreases as the commentor states, above the then existing Airport emissions. The EDMS model demonstrates that, in 2007, after construction, the NOx emissions will decrease over the No-Action Alternative because of reduced aircraft idling times.
59.19	It would be more appropriate for FAA to make conservative assumptions, perhaps based on old emission factors, of particulate emissions. Given the fact that there is at least one monitoring station in the vicinity that has recorded ambient levels of PM2.5 at 14.7 ug/m3-- extremely close to the annual standard of 15 ug/m3--there is a real possibility that the FAA's unreasonable assumption of zero particulate aircraft emissions is masking a NAAQS exceedance impact for this Action.	As stated in Section 4.5.2 (Page 4-58), "particulate data are available for only a few aircraft engines, and that, until further data becomes available, PM10 emission factors of engines for which no data are available should be assumed to be zero." The phrase "assumed to be zero" is part of the instructions for analysts using the EDMS program to evaluate air quality impacts. FAA does not claim that actual PM10 emissions from aircraft are zero, only that analysts should not attempt to compute PM10 emissions. This describes both the current State-of-the-Art and FAA's technical position (See FAA Order 1050.1E, Environmental Impacts: Policies and Procedures for further details). As the Proposed Project will result in a decrease in emissions of VOC, NOx, CO, and SO2 from aircraft, it is reasonable to expect that emissions of PM2.5 will decrease as well.
59.20	The DEIS excludes the mitigating impacts of the Capacity Enhancement Project. "The potential future effects of the CEP are speculative and will be considered in detail in the EIS currently being prepared for that project." (DEIS, 6-3) It does not seem appropriate that this process is being assessed on a separate track when its changes are relevant to the instant action. An artificial distinction is being drawn by FAA which then mitigates in favor of proceeding with the Runway Extension. The exclusion of the CEP is directly contrary to the decision to include in the accounting the impacts of the proposed Naval Yard redevelopment, the USPS Distribution Center construction and operation, and the Industrial/Commercial development in Tinicum Industrial Park.	The cumulative impact analysis (Section 4.18 of this EIS) took the Proposed CEP Project into account. The FAA is still developing alternatives for CEP and is unable to predict impacts at this time.  The CEP is a major airfield redevelopment project that would provide greater relief from delay over a much longer period. The FAA is preparing a separate EIS for each project because each project has independent utility: the Runway 17-35 Extension Project will address the need for delay reduction at PHL in the short term while the CEP will provide both more comprehensive and longer term delay reduction as well as additional capacity at the airport. Both EISs were initiated in 2003.

## Letter 59

Mid-Atlantic Environmental Law Center - Michael D. Fiorentino

Comment Number	Comment	Response
59.21	A critical flaw in the DEIS is the assumption of no new aircraft despite the increased capacity at the airport provided by the runway extension. It is not reasonable for the FAA to assume the same number of flights for the extension alternatives and the no action alternatives. Passenger demand is elastic: airlines know that passengers will follow price and convenience. If delays are shorter at PHL, demand there may increase. Moreover, airlines can offer lower price when they have more flights from same airport. The runway extension lessens delays significantly at first, providing some incentive for airlines to squeeze more flights in.	<p>The proposed runway extension is intended to reduce delay in the short-term, and will not increase airport capacity. The number of flights that an air carrier offers is driven by passenger demand. Studies at Logan Airport show that delay (or reduction in delay) does not significantly affect passenger's choice of airports. Air carriers are currently seeking ways to operate more efficiently by increasing the number of passengers per flight, rather than by offering more flights.</p> <p>In developing the forecast, the agency considered demand, and the number of flights used in this analysis is based on anticipated passenger demand.</p>
59.22	FAA has offered no reason why the old adage (if you build it, they will come) does not apply to the expanded capacity of the airport under the project build alternatives.	<p>The proposed runway extension is intended to reduce delay in the short-term, and will not increase airport capacity. The number of flights that an air carrier offers is driven by passenger demand. Studies at Logan Airport show that delay (or reduction in delay) does not significantly affect passenger's choice of airports. Air carriers are currently seeking ways to operate more efficiently by increasing the number of passengers per flight, rather than by offering more flights.</p> <p>Under the build alternatives, delays on the primary runways will be relieved as smaller aircraft are shifted to Runway 17-35. The forecast indicates that the fleet mix and predicted operations (given that delays will still occur) will not result in increased operations at the airport.</p>
59.23	FAA's failure to reasonably project additional flight usage under the Preferred Alternative artificially lowers the impacts of both the Air Quality and Noise segments of the DEIS estimates. MAELC therefore urges the Administrator to perform the appropriate analyses with adjusted inputs in order to give a more accurate portrayal of the Environmental Impact of this major federal action.	<p>The proposed runway extension is intended to reduce delay in the short-term, and will not increase airport capacity. The number of flights that an air carrier offers is driven by passenger demand. Studies at Logan Airport show that delay (or reduction in delay) does not significantly affect passenger's choice of airports. Air carriers are currently seeking ways to operate more efficiently by increasing the number of passengers per flight, rather than by offering more flights.</p> <p>The FAA-approved forecast assumes that operations in the future would increase regardless of whether or not this project is completed. Given that delays will still occur, the fleet mix and predicted operations will not result in increased operations at the airport.</p>



**Philadelphia Airport Air Traffic and Quality of Life Issues Action Group**  
Delaware

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Via email and facsimile

December 1, 2004

ATTN: Susan McDonald  
Harrisburg Airports District Office  
Federal Aviation Administration  
3905 Hartzdale Avenue, Suite 508  
Camp Hill, Pennsylvania 17011

Subject: Philadelphia International Airport Runway 17-35 Extension Project  
Draft Environmental Impact Statement

Dear Ms. McDonald,

On behalf of the Philadelphia Airport Air Traffic and Quality of Life Issues Action Group of Delaware (hereinafter 'Action Group'), I submit the following comments in response to the Philadelphia International Airport Runway 17-35 Extension Project Draft Environmental Impact Statement (DEIS).

The impact of air traffic on the quality of life for Delawareans, especially in the northern part of the state, is a major concern. The current flight patterns of aircraft arriving and departing from the Philadelphia International Airport over northern Delaware has produced undesirable conditions for residents. More specifically, the steady stream of air traffic and the late night arrivals and departures have contributed to the noise pollution currently experienced by residents in the communities of northern Delaware. Consequently, the Runway 17-35 Extension Project and the Capacity Enhancement Program have raised even more concerns among residents.

We were disappointed that the Federal Aviation Administration (FAA) denied our request for an extended comment period for the Runway 17-35 Extension Project DEIS. Projects such as the Runway 17-35 Extension Project significantly impact people long after implementation. We therefore hoped to have more time to review the alternatives presented in the DEIS and their potential impact on Delaware. By not granting the extension, the FAA raised concerns among residents about the FAA's commitment to minimizing and mitigating the potential impacts of expansion on Delawareans.

The Action Group has reviewed the DEIS and would like to offer the following comments and recommendations:

- We believe that the data used to calculate the noise impact on Delaware is not an accurate reflection of what residents experience. The “short-term” monitoring (1.91 days) and the “long-term” monitoring (12.87 days) performed in January 2004 were not adequate. We would like the FAA to provide us with specific data regarding PHL Airport Operations during these days, including the number and percentage of flights over northern Delaware during this period. We also believe that this information should be included in the Final Environmental Impact Statement.
- Permanent noise monitors should be installed as soon as possible in Brandywine Hundred and Arden to measure the current impact of PHL Airport Operations and in preparation of data collection for the Capacity Enhancement Project.
- The Philadelphia International Airport is a major hub for U.S. Airways. While the Philadelphia Airport and Chicago’s O’Hare Airport have different operations, we would like to suggest that the Philadelphia Airport be considered for voluntary de-peaking. If this action is not something that the Philadelphia Airport can implement, we would like to better understand the obstacles.
- We have continued concerns regarding the FAA’s assertion that extending Runway 17-35 will not create additional capacity for runway operations over Delaware and that once air traffic is shifted to Runway 17-35, it will not be replaced by other (and possibly larger) aircraft.

On behalf of the Action Group, I hope that you will thoughtfully consider the concerns and comments in this letter.

Sincerely,

William V. McGlinchey, Chair  
Philadelphia Airport Action Group  
Delaware

cc: Action Group committee members

Letter 60

## Philadelphia Airport Action Group - William McGlinchey

Comment Number	Comment	Response
60.1	The impact of air traffic on the quality of life for Delawareans, especially in the northern part of the state, is a major concern. The current flight patterns of aircraft arriving and departing from the Philadelphia International Airport over northern Delaware has produced undesirable conditions for residents.	Quality of life depends on a number of factors. Because there will be no significant impacts, it is unlikely that the Proposed Project would adversely affect quality of life, however, the FAA has noted your comment.
60.2	The steady stream of air traffic and the late night arrivals and departures have contributed to the noise pollution currently experienced by residents in the communities of northern Delaware. Consequently, the Runway 17-35 Extension Project and the Capacity Enhancement Program have raised even more concerns among residents.	The FAA has noted and considered your comment.
60.3	We believe that the data used to calculate the noise impact on Delaware is not an accurate reflection of what residents experience. The "short-term" monitoring (1.91 days) and the "long-term" monitoring (12.87 days) performed in January 2004 were not adequate. We would like the FAA to provide us with specific data regarding PHL Airport Operations during these days, including the number and percentage of flights over northern Delaware during this period. We also believe that this information should be included in the Final Environmental Impact Statement.	FAA relies on modeling to provide an appropriate and consistent basis for comparison of the effects of the projected No-Action Alternative and proposed conditions. The INM has been tested and verified to accurately project existing and future conditions. Actual monitoring data are provided for information and does not allow FAA to forecast any potential impacts. FAA does not believe that the information requested is necessary to include in the FEIS, as this data was not used to predict future noise levels. As the noise analysis shows, the Proposed Project would not result in significant noise increases in Delaware (or at any location in the study area).
60.4	Permanent noise monitors should be installed as soon as possible in Brandywine Hundred and Arden to measure the current impact of PHL Airport Operations and in preparation of data collection for the Capacity Enhancement Project.	<p>The CEP analysis, as all other airport projects analysis, relies on modeled data to describe noise conditions and compare noise impacts. Measured data is provided for information only.</p> <p>Temporary noise monitoring was conducted at two locations in the state of Delaware during a two-week period in January 2004. Those two sites are identified as LT-4 and ST-9 in this EIS. Because those two sites were considered to be not applicable to the Runway 17-35 Extension Project, certain noise measurement data (such as Aircraft DNL and measured single event noise metrics) were not reported for those sites. Sites LT-4 and ST-9 are considered applicable to the upcoming Capacity Enhancement Program (CEP) EIS. Additional noise measurement data for those sites will be reported in the CEP EIS.</p>
60.5	The Philadelphia International Airport is a major hub for U.S. Airways. While the Philadelphia Airport and Chicago's O'Hare Airport have different operations, we would like to suggest that the Philadelphia Airport be considered for voluntary de-peaking. If this action is not something that the Philadelphia Airport can implement, we would like to better understand the obstacles.	Section 3.3.3 of the EIS considers Demand Management alternatives, including Administrative Approaches and Voluntary De-Peaking and Flight Reductions, that have the potential to meet the project's purpose and need. This section provides a detailed analysis of the situation at O'Hare Airport. The FAA eliminated administrative approaches such as slots (operational controls) for several reasons: (1) as a matter of policy, administrative actions such as operational controls or caps are not desirable to serve as long-term solutions to delay at an airport where capacity expansion is physically possible; (2) it would be inconsistent with Congress' intent of promoting competition among airlines and prevent air carriers from satisfying their customer's demands, and 3) A severe and extraordinary level of delay and effect on the NAS does not exist at PHL (as it does at ORD). The FAA also eliminated voluntary de-peaking and flight reduction approaches. While these have proven effective at O'Hare in the very short term, the possibility of their effectiveness at PHL to meet the proposed project's purpose and need is unknown, due to the differences between the airports and in the severity of delay and congestion between ORD and PHL. While PHL is delayed, it is not severely congested to a point where FAA would invite scheduled air carriers to a scheduling reduction meeting. The type and severity of delay and the role that PHL plays in the national and international aviation systems, and the composition of airlines at PHL are significantly different from those at ORD.

## Letter 60

## Philadelphia Airport Action Group - William McGlinchey

Comment Number	Comment	Response
60.6	We have continued concerns regarding the FAA's assertion that extending Runway 17-35 will not create additional capacity for runway operations over Delaware and that once air traffic is shifted to Runway 17-35, it will not be replaced by other (and possibly larger) aircraft.	As documented in this EIS, there are forecast to be 528,400 annual operations at the Philadelphia International Airport in 2007, whether the Runway 17-35 Extension is constructed or it is not constructed. This is an increase of 82,433 annual operations from the annual 445,967 operations in 2003. The number of operations at an airport increases because of increases in demand for service, not because there is additional capacity. Tables 3-4, 3-5, 3-7 and 3-8 in the Noise Technical Appendix (Appendix A.1) illustrate that operations on the primary Runways 9L-27R and 9R-27L would be lower with construction of the Preferred Alternative (Alternative 1) than with the No-Action alternative.



# General Public Comments and Responses

----- Original Message -----

From: leslieadler

To: Smcdonald.faa.17-35.@vhb.com

Cc: Deandra.Brooks@faa.gov Bill.Tighe@mail.house.gov  
wayne.heibeck@faa.gov

Sent: Thursday, November 25, 2004 8:10 AM

Subject: Testimony on Runway 17-35

My name is Gary Adler. I wish to express my deepest concerns for myself and the community of Lower Merion! I am not a pilot nor do I have a background in Airport operations. But I do know business and I know when the facts that are being presented are at best difficult to comprehend. Having read the EIS, I must give you my honest opinion, and that it' doesn't address any important issues. It speaks of what effect it will have on streams, construction, etc. It says nothing of what the noise projections are based on a possible 26% increase in flights by 2007. It shows nothing of global positioning that reflects the altitudes these new runway proposals will generate over Lower Merion.

It does not talk of the 65 decibel limit for flights, and the way calculations take place to arrive at the proper level. What is doesn't tell, is where is the impact study on Lower Merion. We are being told that this new runway will have no effect on Lower Merion! LOOK AT THE MAP! Someone must really think we are stupid! By the way taking every minute in a 365 year and making a denominator out of it, appears to make for very small increases of decibels as I view it. In addition it was brought up at one of the meetings to have the airlines reduce their peak load, or allocate them. It was stated there is nothing to be done! Could you then explain then how the FAA ordered the Airlines in Chicago to do exactly that, which reduced delays and traffic? I believe if I am correct we could do that here. Forgive me, the pressure for a runway extension is so much more important than creating safe, quiet community's

There are many underlying tones as to the fact that this runway is being pushed through. Talking to the people and counties involved, the FAA has been slow to respond on request of noise studies, as well as making themselves available to meet with the public! What's missing! I will tell you. The public who are not pilots, the public who may not know aviation, need answers in simple lay terms. We need a paper that addresses all the answers to Testimony you have received, in language that we can understand. We may not like the answers, but whatever happens in this issue the FAA owes a complete and simplified explanation as to why I am going to be hearing more aircraft over my house and my community. I want to know why leaving it the way it is does not work!

The feeling that I am getting is that this is a done deal! Before this becomes a political slam dunk, as a taxpayer I am owed more. PLEASE PROVIDE IT!

Gary Adler

Letter 61

Gary Adler

Comment Number	Comment	Response
61.1	[The EIS] says nothing of what the noise projections are based on a possible 26% increase in flights by 2007.	Figure 4.2-5 shows the projected change in noise from 2003 to 2007, assuming No-Action. The changes reflect the increase in operations and altered runway use patterns that are projected to occur, even if nothing is done in the interim to improve Runway 17-35.
61.2	[The EIS] does not talk of the 65 decibel limit for flights, and the way calculations take place to arrive at the proper level. What it doesn't tell us is where the impact study on Lower Merion is. We are being told that this new runway will have no effect on Lower Merion!	As documented in this EIS, the noise analysis for this EIS was conducted in accordance with FAA Order 1050.1E, FAA Order 5050.4A, and the National Environmental Policy Act (NEPA) as specified in the Council on Environmental Quality's Regulations for Implementing the National Environmental Policy Act (40 CFR 1500-1508). The methodology and approach to the noise analysis are well-documented therein.  For 2003 Existing Conditions and with any of the future forecast cases, aircraft noise exposure levels in Lower Merion Township, Pennsylvania are well below 60 dB DNL, as shown on Figures 4.2-14 through 4.2-17 of this EIS.
61.3	It was brought up at one of the meetings to have the airlines reduce their peak load, or allocate them. It was stated there is nothing to be done! Could you then explain then how the FAA ordered the Airlines in Chicago to do exactly that, which reduced delays and traffic? I believe if I am correct we could do that here.	Section 3.3.3 of the EIS considers Demand Management alternatives, including Administrative Approaches and Voluntary De-Peaking and Flight Reductions, that have the potential to meet the project's purpose and need. This section provides a detailed analysis of the situation at O'Hare Airport. The FAA eliminated administrative approaches such as slots (operational controls) for several reasons: (1) as a matter of policy, administrative actions such as operational controls or caps are not desirable to serve as long-term solutions to delay at an airport where capacity expansion is physically possible; (2) it would be inconsistent with Congress' intent of promoting competition among airlines and prevent air carriers from satisfying their customer's demands, and 3) A severe and extraordinary level of delay and effect on the NAS does not exist at PHL (as it does at ORD). The FAA also eliminated voluntary de-peaking and flight reduction approaches. While these have proven effective at O'Hare in the very short term, the possibility of their effectiveness at PHL to meet the proposed project's purpose and need is unknown, due to the differences between the airports and in the severity of delay and congestion between ORD and PHL. While PHL is delayed, it is not severely congested to a point where FAA would invite scheduled air carriers to a scheduling reduction meeting. The type and severity of delay and the role that PHL plays in the national and international aviation systems, and the composition of airlines at PHL are significantly different from those at ORD.
61.4	Talking to the people and counties involved, the FAA has been slow to respond on request of noise studies, as well as making themselves available to meet with the public!	The Federal Aviation Administration (FAA) has responded to all requests for noise modeling information and it was made available for public review.
61.5	The public who are not pilots, the public who may not know aviation, need answers in simple lay terms.	The FAA has noted and considered your comment. This EIS is written in such a way that the general public would be able to understand and provide comment. There is a glossary of terms to help understand technical issues.
61.6	FAA owes a complete and simplified explanation as to why I am going to be hearing more aircraft over my house and my community.	As described in Chapter 2, Purpose and Need, a forecast based an analysis of historical trends, input from airlines, and assumptions regarding key factors affecting airline traffic at the airport shows that aviation activity is expected to increase throughout the immediate five-year planning horizon and beyond with or without the Runway 17-35 Extension.
61.7	I want to know why leaving it the way it is does not work!	The purpose of the project is to reduce delay at PHL. As documented in Chapter 1, PHL was the sixth most delayed airport in the US in 2003 with an average level of nearly 10 minutes per operation. By 2010, this is expected to increase to approximately 19 minutes per operation. PHL is a pacing airport that contributes to delays throughout the national airport system.

Camille610A@aol.c  
om

11/09/2004 10:07  
PM

Susan McDonald/AEA/FAA@FAA,  
Kelly.Colvin@mail.house.gov

To

Spygirl52@rcn.com

cc

Subject

Fwd: US Citizens object: FAA  
Projects/without our REPRESENTATION

Dear Ms. McDonald:

Please review my forward. I tried to e-mail your predecessor, Jim Byers, without success. Ms. Kelly Colvin, District Director of U.S. Representative Curt Weldon's office, gave me your name and e-mail address. I forward this self-explanatory complaint which will be read by me, at any of the upcoming Public Hearings I attend, regarding the Philadelphia International Airport, and, Runway 17-35. FYI, I have sent e-mails to various public officials, regarding my inability to contact the FAA and the DOT. Hence, Ms. Colvin's intervention.

Sincerely,

Camille Amato

Camille610A@aol.com

----- Message from Camille610A@aol.com on Mon, 8 Nov 2004 14:18:48 EST

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To: president@whitehouse.gov

cc: Spygirl52@rcn.com

Subject: US Citizens object: FAA Projects/without our REPRESENTATION

Subject #1: Ms. Kelly Colvin Meeting of 11/05/2004 with 7 Delaware County area activists regarding objections to Runway 17-35 Expansion Project, Philadelphia International Airport.

Subject #2: Handout from Ms. Kelly Colvin: Delaware County, Media, PA; "Minutes of Council Public Hearing, 8/18/2003", regarding Philadelphia International Airport, "Capacity Enhancement Program".

Dear Government Officials and all Activists:

This e-mail is written with information obtained:

At an Upper Darby Township Council Meeting

At a meeting with Activists

A conference with US Rep. Curt Weldon's District Director, Kelly Colvin, on 11/5/2004

Reading the Delaware County, Media, PA "Minutes of Council Public Hearing, 8/18/2003", regarding Philadelphia (PA) International Airport, "Capacity Enhancement Program".

I conclude the following:

There is little communication or courtesy given to Delaware Co., PA authorities, and, citizens regarding the above subject matter by Federal Government employees (FAA). This was emphasized by Mr. Weldon on 8/18/2003,



and, by our lead Local Activist on 11/5/2004.

The grave concerns stated by the Local Activist is the need for an extension of time by the FAA to communicate with Delaware Co. residents, preferably at Town Meetings.

The Local Activist states also, the need for a "full" hard copy of the Environmental Impact Statement.

The environmental impact was a chief concern of most activists at the meeting of 11/5/04.

After I read the Public Hearing Minutes of 8/18/03, I have personal statements to make, separate from the above meetings:

As I understand the Minutes, they were talking about billions in dollars: monies spent, and, apparently monies part of the bottom line for spending on 3 new projects

Cascading down, these monies will be obtained from all US Citizens of our 50 States, at the Federal taxation level.

The Minutes mentioned 2 "obsolete" projects of the Philadelphia International Airport: millions spent, and, projects "obsolete" right after opening.

What galls me the most: if the FAA has their way, these projects would EVICT healthy, tax revenue producing companies, to produce 1 or 2 "obsolete" runways for bankrupted airlines.

I warn Gov. Rendell, Mayor Street, Delaware Co. Council, and, all of Pennsylvania: if you "evict" any healthy company to produce the effects above, you will never get any CEO to invest in Pennsylvania again. You will be a dead State.

This e-mail was sent individually to Federal, State, and, Local Government Officials, and, one local activist, most effected in this concern, due to possible address errors in a group mailing situation. Should you need a list of contacts, please advise.

An excerpt from Jesus Christ's 11/5/2004 Message to All Nations: .....

"Today, My brothers and sisters, I am dispatching St. Michael and his warrior angels to protect the borders, the ports and every mode of transportation of this country from the evil that threatens them. What I cannot protect is the choice of free will that man makes within his own heart. Therefore, we must pray against Satan's tool of hatred, and we must make this Message of Holy and Divine Love known with courage and conviction."

I extend to all the Blessing of the United Hearts of Jesus Christ, and His Blessed Mother, Mary, of Maranatha Springs, Elyria, Ohio. [www.HolyLove.org](http://www.HolyLove.org)  
END ABORTION, WE WILL be so blessed.

Sincerely,

Camille Amato

Camille610A@aol.com

**Letter 62**  
**Camille Amato**

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
62.1	There is little communication or courtesy given to Delaware Co., PA authorities, and, citizens regarding the above subject matter by Federal Government employees (FAA). This was emphasized by Mr. Weldon on 8/18/2003, and, by our lead Local Activist on 11/5/2004. The grave concerns stated by the Local Activist is the need for an extension of time by the FAA to communicate with Delaware Co. residents, preferably at Town Meetings. The Local Activist states also, the need for a "full" hard copy of the Environmental Impact Statement. The environmental impact was a chief concern of most activists at the meeting of 11/5/04.	The FAA has noted and considered your comment.

From: Ammirato, Wendy[SMTP:WENDY.AMMIRATO@ASTRAZENECA.COM]  
Sent: Monday, November 22, 2004 3:29:13 PM  
To: PHL 17-35 EIS  
Subject: Comments About Runway Expansion  
Importance: High  
Auto forwarded by a Rule

Dear Susan:

I wanted to write to let you know that I am strongly against the proposed expansion of runway 17-35. I have attached a letter that lays out my concerns in great detail.

Overall, I find it strongly objectionable that the Philadelphia Airport actively sought to bring both Southwest Airlines and Frontier Airlines to Philadelphia while they were supposedly seeking alternatives to reduce their congestion. The result is that the Today Show and Good Morning America have both reported that they have drawn more traffic to the Philadelphia Airport away from surrounding airports such as NY and Baltimore. This information leaves one with the impression that the public is being lied to when we are told that they have explored "extensively using other airports in the area".

The impact on our neighborhoods is simply unacceptable. The planes that fly over our neighborhoods are far too close to the ground and present a significant danger to our children in terms of noise, air pollution, and the consequences of any type of accident. The article in the Gloucester County Times indicates that this expansion will reduce the current 10 minute delay by 2 1/2 to 3 minutes which means it will still far exceed the definition of congested (5 minutes). So what is next on the wish list to reduce congestion further?

I believe that the reduction of congestion by 2 1/2 to 3 minutes for an individual passenger will go virtually unnoticed by the passengers but the constant parade of low flying planes over my home and my children's schools, playgrounds and recreational fields will significantly impact their quality of life in a very negative manner. This seems to be an easy decision....protect our communities and the quality of life for our citizens especially our children rather than save airplane passengers a few moments of time.

Force the Philadelphia Airport to stop activities to attract more business, fix the taxiways and generate long term solutions that don't negatively impact the surrounding communities. Better yet expand Runway 18-26 so that the increased air traffic runs over the river where communities are less impacted and the chance of a catastrophic event in the case of a crash is minimized if not eliminated in terms of impact to those on the ground. We remember the impact when Senator Heinz plane went down over a school playground...shame on us if we let that happen again.

I appreciate any efforts you can take to alter the plans from expanding Runway 17-35 to expanding Runway 18-26. Also if you must use Runway 17-35 then only allow that for 2-3 years while they make the long term fixes and then shut it down. At the bare minimum make the planes stay up higher until they are at the airport.

Sincerely,  
Wendy Ammirato

October 1, 2004

Congressman Robert E. Andrews  
63 N. Broad Street  
Woodbury, NJ 08096

Dear Congressman Andrews:

I am writing to you regarding a matter of great importance to me as well as all your constituents in West Deptford and the surrounding communities. We recently learned that the Philadelphia Airport is working with the FAA and EIS Consulting to explore alternative methods of reducing congestion at the Philadelphia Airport. Public hearings have been held in order to share information.

Information shared at these meetings have included the following:

- The Philadelphia Airport experiences an average daily delay of 9 minutes therefore it is classified as congested (definition of congested being greater than 5 minutes).
- Questions raised by the audience attending the meeting revealed that 5 minutes of the current 9-minute delay is weather related. Therefore, no one can influence or change this portion of the delay. So in essence Philadelphia will always be labeled as congested due to the weather patterns of our region.
- The rationale for the need to reduce the delay was that the airlines lose money for every minute they are delayed. Other reasons cited later during the lively Q&A session included that it causes individuals to miss connections, and employers lose productive work time from their employees. I would just like to add that I work for an organization that has a lot of staff traveling and we have incorporated the potential delays into our working models so I don't feel this is a terribly valid point. Additionally, most companies have invested in the technology to allow employees to be productive while working remotely and this fact further dilutes their argument around lost working time.
- Several alternatives have been explored including the expansion of two smaller runways, premium pricing of landing fees for peak times (not yet implemented), and taking no action.
- Runway 8-26 has essentially been ruled out as it would be more expensive, would require acquiring land from the Army Corps of Engineers (which is alleged to be difficult to execute), and the Kvaerner's crane is also alleged to be in the way (even though no discussions have occurred to try and resolve this perceived impediment to expanding Runway 8-26).
- While it was communicated that all alternatives remain viable it was clear that the focus is on expanding runway 17-35.
- It was admitted that one of the biggest components in contributing to this delay is that fact that the taxiways at the airport are inefficient but that remedying this issue is not a short term fix.
- No commitments about the future use of runway 17-35 when long term plans are in place.
- Next steps in the process such as the Environmental Impact Assessment and Statement.

**Concerns:**

1. **Effective Communication and Notification:** Those present in the audience did attempt to explore with the Airport representatives (and their consultants) exactly how news of this meeting was shared. They shared that it was on NPR, in the local papers and notices were sent to our elected officials and libraries. When questioned more closely these officials were able to recite a list of papers in which the notice had appeared but were unable to articulate exactly what form the advertising took, when it appeared or how many times. In general, they

worked hard to give the appearance that they had made every attempt to get the word out but overall their statements did not seem to be true. They did not appear to have done a reasonable job of assessing the most effective communication plan given the demographics of the regions in question. It is our firm belief that in fact they do not want a great deal of public attention paid to this matter. It is now our mission to insure that as many individuals as possible are notified and a public call to action is issued and heeded.

- While none of our elected officials were able to attend this particular meeting the West Deptford Township Committee has passed a resolution against this proposed runway expansion.

## 2. **Good Faith Efforts on the Part of the Airlines?**

- Questions from the audience yielded the information that the airlines have done nothing to improve the situation. They have not voluntarily altered their flight schedules to reduce the congestion by making use of the “off-peak” times. There is a plan to change the pricing structure of landing fees to place a premium on the “peak times” but it is unclear if this will have the desired impact of encouraging the airlines to stagger their flights so as to reduce peak time usage and thus alleviate the delay issue. This is a critical point as we are being told that the airport needs to extend runway 17-35 to reduce congestion so the airlines will not in effect diminish their usage of the Philadelphia Airport. However, the fact that the airlines are not voluntarily altering their flight schedules to reduce the delay during peak times indicates that the delays are not a big enough cost factor for them yet or they would be modifying their behavior. The fact that the group conducting this meeting did not seem inclined to believe that increasing the cost of the landing fees during peak times was going to have the desired effect clearly indicates that the airlines are not inclined to modify their behavior at all to alleviate the congestion issue. This begs the question as to why the airport and the surrounding areas that will be impacted should even be considering doing anything to reduce the congestion. If the allegedly impacted companies and people don't feel strongly enough about it to do their part and alter their behaviors (alter flight schedules and effectively performance manage their personnel) why should anyone else be inclined to do so. It was also revealed that no exploration of improved performance management of their personnel to improve the turnaround of planes and thus gates has been attempted. In short, it appear that no one is asking the airlines to help themselves first before asking others to suffer on their behalf. In effect, we as homeowners are being asked to have the quality of our lives and more importantly the health and quality of our children's lives be significantly diminished to improve the financial performance of the airlines. We are being asked to do this while the airlines refuse to do anything to mitigate the issue. In my view we should not take action to correct the problem for them when they refuse to help themselves. There is no logical or rationale reason to shift this issue to the backs of the surrounding communities. In fact, the individuals running this meeting admitted that since the airlines have been deregulated they have lost the ability to police their behavior regarding their flight schedules, how low they fly over the homes, etc.... So it appears that our government has given the airlines the ability to police their own behavior, the airlines refuse to do so, no one is in the position to force them to remedy their behavior, and now we are going to reinforce their current bad behaviors by making modifications to the airport to allow them to continue unabated their bad behaviors and to do it while flying more planes and becoming more profitable. It seems quite likely that in fact congestion will not be effectively altered and they will return again in the future asking for yet more concessions. Can someone explain to me how that makes sense?

## 3. **Noise and Health Impacts:**

- **Dramatically reduced Quality of Life for our Community:**
- **Noise:**
  - Questions surrounding the mitigation of noise revealed that it would have to be terribly loud at certain times to exceed the 65 average quoted since it would be close to 0 during many hours of the night. This would mean we would have to endure many hours during the day of extremely excessive noise. Right now they are already landing the larger planes on this runway as we see it happening. So in reality they want to make these changes to the runway so they can allow them to take-off from it. Several pilots in the audience indicated that this would be significantly different in terms of the noise, how low the planes would be and the exposure of our area to the jet exhaust. The group conducting the meeting did indicate that if the average exceeded 65 then they would seek to mitigate the noise in our homes. However, they had no answers for how to mitigate the noise in our yards so our children could actually play outside on their play sets and recreational fields. The answer was that they couldn't so we would become prisoners in our own home? In a time when childhood obesity and the associated health issues are a huge concern we are going to force thousands of children to stay in their homes and become even more inactive. I find this position indefensible. We all know that lack of physical activity and obesity leads to increased incidences of diseases such as diabetes and hypertension in our children. This will condemn them to a poorer quality of life and a potentially lower life expectancy than their parents and grandparents. Is that in the best interest of the future of our country?
- **Health of our Children and Seniors:**
  - No good answers were provided to allay fears surrounding increased incidences of iatrogenically induced diseases in our children as a result of prolonged exposure to increased amounts of jet exhaust and forced inactivity. The flight paths that utilize Runway 17-35 go right over our middle school and our recreational fields where the children are running and inhaling even greater volumes of air. One can reasonably predict that the incidence of cancer and asthma will increase. Is this acceptable to anyone? Do you think it is reasonable to sacrifice the lives of our children on the alter of corporate greed?
  - Our senior citizens may also be at increased risk due to other health conditions they may have. We should not put the health of our most vulnerable citizens at risk to satisfy the demands of the airport and airlines.

**4. Missing Factors in the Environmental Impact Assessment that will be used to determine if this plan should go forward:**

- Discussions with several of the EIS consultants and the FAA representative revealed that several important factors would not be considered in the final equation of whether to move forward with this option.
  - The fact that Runway 17-35 causes significantly increased air traffic over heavily populated areas including schools, playgrounds and recreational fields will not be considered from a safety perspective. The FAA representative indicated that safety is assumed as a constant managed by other issues such as safety checks and maintenance. However, he was not able to respond effectively to the question of why

the higher impact associated with an air accident over a heavily populated area (including many areas heavily populated with children) versus an accident over the Delaware River (Runway 8-26 pathways run over the river) was not a factor to be considered. It seems quite logical that the higher impact of one path versus the other in the event of an unfortunate accident should be deemed very relevant. He kept reiterating that they assume safety is the same for either path as they deal with safety via their other processes, check and maintenance. I assume safety as well but I also know that we don't live in a perfect world free of accidents. For most individuals residing in this area the memory of the tragic crash that killed Senator Heinz is still all too fresh. We all remember the terrible price those children paid that day for simply being children and playing on the playground of their school. I don't think it is reasonable to ask us to play the odds that that type of accident won't happen again and possibly with an even larger airplane. Therefore, I kept asking how they factor in the higher risk associated with flying over homes, schools and recreation fields versus the Delaware River. He said that factor was not considered. This is a glaring hole in the assessment strategy. The risk of serious damage to humans is significantly increased in the unfortunate event of an accident. Apparently they are interested in the wetlands and protected species but not the most precious and protected species on the ground our children. Don't get me wrong I too strongly want the environment protected. However, to not include the protection of our children's health and happiness seems nothing short of ludicrous.

- The impact on the home values as a result of the reduced quality of life will not be considered in the cost analysis. This is a glaring oversight that cannot be deemed acceptable. In essence, you are not only decreasing the quality of our lives and our children you are asking us to pay the price for corporate greed. One attendee at the meeting summarized it nicely by stating that you are in essence transferring some of the value of our homes to the stockholders of the airlines without our consent. I ask you is that the "American Way"? That reduction in the equity in homes will translate to a reduced standard of living for your constituents and diminish their ability to improve the lives of the next generation by sending them to college with the hard earned equity in their homes. It is a proven fact that College graduation enhances the quality of life our children can expect to experience and sustains the community in which they live. How can this factor be ignored with a clear conscience? Additionally, the long-term impact could realistically be a downward spiral resulting in "blighted zones" within our communities. Is this the outcome we desire?
- The Environmental Impact Assessment will take into account the impact on the protected species in our area including the wetlands and the protected plant life such as the reeds that thrive in our community. However, they will not be taking into account the impact on our most precious resource our children. As stated previously, our children will be exposed to not only potential accidents but also the health impacts of increased exposure to the fuel exhaust from the airplanes flying low over their homes, schools and recreational fields. There is significant concern that cancer rates as well as other conditions such as asthma will rise. Additionally, the forced inactivity will translate into increased incidence of diabetes and hypertension as well as overall poor health. As these disease rates increase over the years one day someone will look back and say this is a problem we have to address. The problem is that for the impacted children you won't be able to turn back the hands of time and return their health and future to them. We must stand firm and protect them now not regret our decisions later. As we often hear "they are our future". These considerations must be given substantial weight in the final analysis, as the impact on their health cannot be ignored. This seems counterintuitive at best and downright criminal at worst.

**5. Lack of Planning and Accountability on the part of the Philadelphia Airport:**

- It was admitted that the airport has had many years to address this and for many reasons, including the terrible events of 9/11, they have not moved forward. However, they could have used the additional time provided by the downturn in air travel after 9/11 to plan accordingly and they did not. Their failure to plan should not force a crisis action upon the surrounding communities and force them to bear the brunt of this planning failure. The airport and the airlines need to bear responsibility for their own actions or lack of them and this means dealing with the delays until they can implement some of the long-term solutions or the more expensive solution associated with the other runway.
- In a recent travel segment on the Today Show their travel correspondent discussed the fact that the Philadelphia Airport has recently taken active steps to increase the flow of air traffic through their airport. He discussed the fact that they pursued bringing both SouthWest and Frontier airlines into what has been a stronghold hub for US Airways. He presented this as a preconceived plan on the part of Philadelphia Airport officials to drive competition, lower airfares and increase air traffic through Philadelphia. In fact, this gentleman indicated that he strongly expected the Philadelphia airport to pull air travel from the surrounding airports such as those in New York and Baltimore as a result of these actions. This makes it appear that they have actively sought to misrepresent the facts to us as they seek to explain why they need these modifications. They presented it as an unforeseen effect of their growth over the years rather than the end result of their activities to increase traffic through the airport. These types of actions do not build the level of trust one should expect from a good corporate neighbor. I know that when companies decide to locate their offices in communities they are often required to make certain promises around their behaviors (such as traffic patterns) in order to insure that they minimally impacted the surrounding communities. Their compliance with those promises is actively monitored and those organizations are very concerned with honoring their commitment and being truthful in their dealings with the surrounding communities. They recognize that "it is important to be good corporate neighbors." I ask you why it is not important that the Philadelphia Airport be held to the same standards and be expected to be truthful in their dealings with us while behaving as a "good corporate neighbor"?

**6. Other Alternatives:**

- Runway 8-26 has essentially been ruled out as it would be more expensive, would require acquiring land from the Army Corps of Engineers (which is alleged to be difficult to execute), and the Kvaerner's crane is also alleged to be in the way (even though no discussions have occurred to try and resolve this perceived impediment to expanding Runway 8-26). We think that this remains a viable and more attractive solution. We are asking you to use your influence and power to facilitate the process of acquiring the land from the Corp of Army Engineers. We are asking that the airlines that are willing to pay for the work be strongly encouraged to pay for the landfill required, and we are confident that the negotiations with the Kvaerner's crane should also be manageable.
- Support no short-term action and focus on the long-term solutions. In the short term allow the airlines to alter their schedules and performance manage their staff to peak performance to produce the necessary short-term improvements. I recently heard a report on the news that individuals were frustrated and angry about a weather delay at the airport. When you listened to the interviews it became clear that their anger was less about the delay and more about the way they were treated during it. They were misled about the delay and they were put on airplanes to sit for prolonged periods on the runway. These actions angered them not the delay. This illustrates the impact that the performance of the airlines can have on this matter. It is not just about the availability of additional runways.



- Assurance that the expanded use of Runway 17-35 be terminated when long-term solutions are in place. When questioned as to whether 17-35 would go away when the long-term solutions are in place there was no commitment made. It was stated that one long-term plan called for it to stay and one long-term plan called for it to go away. We all know that once something is put in place it is almost impossible to eliminate it later unless a preexisting agreement mandates it. If the expansion of Runway 17-35 must go forward then at a minimum it should be mandated that it must be eliminated in a certain timeframe when the long-term solution is in place. This should be an aggressive timeframe so as to insure that work is completed in a very timely manner. The incentive to move quickly is the loss of the runway by a predefined future date that is a hard endpoint.

**7. Airport Safety Zone:**

- A member of the audience who is in the real estate business raised the issue around whether these activities will change the Airport Safety Zone. The presenters did not really answer this question as they indicated that they were unfamiliar with the issue. They concluded by saying that the Airport Safety Zone is a NJ law so it doesn't apply in PA. I am confused by this response as their actions impact communities in NJ so they should be familiar with this topic and be able to articulate the implications for the these communities. This is a topic that requires further explanation to the impacted communities.
- A current issue is that the larger airplanes have recently begun to fly much lower over our homes. In fact, they have flown so low that my small children have been concerned that they were going to land near our home. As stated previously, in the meetings the airport officials have indicated that since deregulation they cannot control how low the airplanes fly as well as the pattern etc.... This is extremely concerning. It seems obvious that there should be regulations that control how low they are allowed to fly over a residential area where small children live and play. Additionally, there are airports where restrictions have been put in place to protect the surrounding communities. For instance, the John Wayne Airport in Orange County California can't operate past the early afternoon, as there are laws to protect the residents in the neighborhoods surrounding that airport. Can't we pass laws giving us similar protections? I would appreciate your guidance on these matters especially if you cannot help us stop this parade of planes over our neighborhood by altering the runway plans.

**In summary, we request that you work with us to stop the plans to extend runway 17-35 and convince them to work with the other runway or deal with the delays by asking the airlines to modify their behaviors (flight schedules and performance management of their personnel) while they implement the longer term solutions. Help us pass laws to protect us from low flying planes and limit the times we should have to endure this parade of planes. Please do not allow them to destroy the quality of life in our communities and our children's futures in the name of corporate greed.**

Sincerely,

Name:

Address:

Phone Number:

Letter 63

Wendy Ammirato

Comment Number	Comment	Response
63.1	The article in the Gloucester County Times indicates that this expansion will reduce the current 10 minute delay by 2 1/2 to 3 minutes which means it will still far exceed the definition of congested (5 minutes).	Alternative 1, the preferred alternative, would result in 1.4 minutes reduction in average annual delay per aircraft in 2007 and 6.5 minutes in 2015. This is a total savings of 12,329 hours annually in 2007 and 66,733 hours in 2015. The Airport will still experience delays which is why the FAA is studying the Capacity Enhancement Program (CEP).
63.2	I believe that the reduction of congestion by 2 1/2 to 3 minutes for an individual passenger will go virtually unnoticed by the passengers but the constant parade of low flying planes over my home and my children's schools, playgrounds and recreational fields will significantly impact their quality of life in a very negative manner. This seems to be an easy decision....protect our communities and the quality of life for our citizens especially our children rather than save airplane passengers a few moments of time.	Quality of life depends on a number of factors. Because there will be no significant impacts, it is unlikely that the Proposed Project would adversely affect quality of life, however, the FAA has noted your comment.
63.3	Better yet expand Runway 18-26 so that the increased air traffic runs over the river where communities are less impacted and the chance of a catastrophic event in the case of a crash is minimized if not eliminated in terms of impact to those on the ground.	As described in Section 3.4, an extension of Runway 8-26 was considered and analyzed for the Project. This alternative was eliminated because it would not achieve the project's purpose and need in that it could not be accomplished in the short term. Extending Runway 8-26 would require relocating a substantial part of the Corps of Engineers' dredge disposal facility, which is not feasible in a short time period. The Capacity Enhancement Project (CEP), which is a long-term redevelopment project, is considering extending Runway 8-26. The reasons mentioned are precisely why Runway 8-26 can't be implemented in the short term.
63.4	The Philadelphia Airport experiences an average daily delay of 9 minutes therefore it is classified as congested (definition of congested being greater than 5 minutes). Questions raised by the audience attending the meeting revealed that 5 minutes of the current 9-minute delay is weather related. Therefore, no one can influence or change this portion of the delay. So in essence Philadelphia will always be labeled as congested due to the weather patterns of our region.	Commentor is incorrect. While some delays are caused by weather, the analysis completed for this project documents that some delay is due to runway configuration and that the Proposed Project will improve (but not eliminate delay).
63.5	The rationale for the need to reduce the delay was that the airlines lose money for every minute they are delayed. Other reasons cited later during the lively Q&A session included that it causes individuals to miss connections, and employers lose productive work time from their employees. I would just like to add that I work for an organization that has a lot of staff traveling and we have incorporated the potential delays into our working models so I don't feel this is a terribly valid point. Additionally, most companies have invested in the technology to allow employees to be productive while working remotely and this fact further dilutes their argument around lost working time.	The FAA has noted and considered your comment.
63.6	They did not appear to have done a reasonable job of assessing the most effective communication plan given the demographics of the regions in question. It is our firm belief that in fact they do not want a great deal of public attention paid to this matter.	The Federal Aviation Administration (FAA) used several methods to reach out and notify the public about the project and public meetings. These methods included placing notices in area newspapers, such as the Jersey Courier-Post, sending information letters to township officials, including West Deptford, sending meeting flyers to area churches and libraries, and sending newsletters or post cards about upcoming meetings to everyone on the project mailing list. The project mailing list includes Federal, state and local officials, anyone who signed up for the mailing list at the public information meetings or through the website and anyone who sent a communication to the project and provided contact information. Section 1.3 provides a detailed description of the public participation program. To help advertise the September 2004 public meetings, the FAA's consultant team coordinated with West Deptford Township in placing a notice of the meeting in the Township's newsletter. Additionally, the City of Philadelphia distributed information brochures at the Airport.

Letter 63

Wendy Ammirato

Comment Number	Comment	Response
63.7	The airlines have done nothing to improve the situation. They have not voluntarily altered their flight schedules to reduce the congestion by making use of the "off-peak" times. There is a plan to change the pricing structure of landing fees to place a premium on the "peak times" but it is unclear if this will have the desired impact of encouraging the airlines to stagger their flights so as to reduce peak time usage and thus alleviate the delay issue.	Section 3.4.1 discusses the Peak Period Pricing Alternative (Alternative C3). The study conducted for this EIS demonstrated that peak period pricing, which attempts to encourage airlines to shift their operations from peak times to off-peak times, would reduce only General Aviation and turboprop service in both 2007 and 2015. These aircraft do not contribute to delays at PHL. Therefore, this alternative does not have the desired impact and does not achieve the project's purpose.
63.8	If the allegedly impacted companies and people don't feel strongly enough about it to do their part and alter their behaviors (alter flight schedules and effectively performance manage their personnel) why should anyone else be inclined to do so. It was also revealed that no exploration of improved performance management of their personnel to improve the turnaround of planes and thus gates has been attempted. In short, it appears that no one is asking the airlines to help themselves first before asking others to suffer on their behalf.	As discussed in Section 3.3.1, governmental authorities have little control over the airlines' routing, scheduling, and operations.
63.9	If the average exceeded 65 [dB] then they would seek to mitigate the noise in our homes. However, they had no answers for how to mitigate the noise in our yards so our children could actually play outside on their play sets and recreational fields. In a time when childhood obesity and the associated health issues are a huge concern we are going to force thousands of children to stay in their homes and become even more inactive.	Sound insulation of structures does not solve outdoor noise problems. Outdoor recreation uses, such as playgrounds, are considered to be compatible with 65 DNL contours.  According to the FAA criteria discussed in Section 4.2, Noise, of this EIS, neither Alternative 1 nor Alternative 2 will cause significant noise impact to any noise sensitive area anywhere in the Local or Regional Study Areas during either of the two study years, 2007 or 2015. Thus, no mitigation measures are required for the proposed Project.
63.10	No good answers were provided to allay fears surrounding increased incidences of iatrogenically induced diseases in our children as a result of prolonged exposure to increased amounts of jet exhaust and forced inactivity. The flight paths that utilize Runway 17-35 go right over our middle school and our recreational fields where the children are running and inhaling even greater volumes of air. One can reasonably predict that the incidence of cancer and asthma will increase.	This EIS demonstrates that compared to the No-Action Alternative, either alternative of the Proposed Project will reduce air pollution emissions in the region, and that ambient pollutant concentrations will remain well below the National and Pennsylvania Ambient Air Quality Standards. (See Table 4.5-7 of this EIS and DEIS Appendix H of the Air Quality Technical Report).
63.11	Our senior citizens may also be at increased risk due to other health conditions they may have. We should not put the health of our most vulnerable citizens at risk to satisfy the demands of the airport and airlines.	Emissions of project-related Hazardous Air Pollutants (HAPS) and the associated risks will be reduced with either Alternative of the Proposed Project. See Table 4.5-12 of this EIS.
63.12	The fact that Runway 17-35 causes significantly increased air traffic over heavily populated areas including schools, playgrounds and recreational fields will not be considered from a safety perspective.	Safety is the FAA's highest priority, and the agency will ensure that the design of the Runway 17-35 Extension Project properly protects the public safety. The Preferred Alternative will meet all FAA safety standards and design criteria. The extended runway will reduce congestion in the current primary east-west operating direction, and will reduce the reliance on Runways 9L/27R and 9R/27L during heavy demand. This will enhance safety.
63.13	I kept asking how they factor in the higher risk associated with flying over homes, schools and recreation fields versus the Delaware River. He said that factor was not considered. This is a glaring hole in the assessment strategy.	Safety is the FAA's highest priority, and the agency will ensure that the design of the Runway 17-35 Extension Project properly protects the public safety. The Preferred Alternative will meet all FAA safety standards and design criteria. The extended runway will reduce congestion in the current primary east-west operating direction, and will reduce the reliance on Runways 9L/27R and 9R/27L during heavy demand. This will enhance safety.
63.14	The impact on the home values as a result of the reduced quality of life will not be considered in the cost analysis. This is a glaring oversight that cannot be deemed acceptable.	Property values depend on many factors. One factor is the environment. This Project will not have significant impact on noise or environmental impacts. It is highly unlikely that any property values will decrease as a result of this Project.

Letter 63

Wendy Ammirato

Comment Number	Comment	Response
63.15	The long-term impact could realistically be a downward spiral resulting in "blighted zones" within our communities.	Property values depend on many factors. One factor is the environment. This Project will not have significant impact on noise or environmental impacts. It is highly unlikely that any property values will decrease as a result of this Project.
63.16	They will not be taking into account the impact on our most precious resource our children. As stated previously, our children will be exposed to not only potential accidents but also the health impacts of increased exposure to the fuel exhaust from the airplanes flying low over their homes, schools and recreational fields. There is significant concern that cancer rates as well as other conditions such as asthma will rise. Additionally, the forced inactivity will translate into increased incidence of diabetes and hypertension as well as overall poor health.	The DEIS demonstrated that compared to the No-Action Alternative, either alternative of the Proposed Project will reduce air pollution emissions in the region, and that ambient pollutant concentrations will remain well below the National and Pennsylvania Ambient Air Quality Standards. (See Table 4.5-7 of this EIS and DEIS Appendix H of the Air Quality Technical Report). Emissions of project-related Hazardous Air Pollutants (HAPS) and the associated risks will be reduced with either Alternative of the Proposed Project. See Table 4.5-12 of this EIS.
63.17	The airport and the airlines need to bear responsibility for their own actions or lack of them and this means dealing with the delays until they can implement some of the long-term solutions or the more expensive solution associated with the other runway.	The FAA has noted and considered your comment. The airlines are responding to the passenger demand. The Capacity Enhancement Program (CEP) is a long-term, major redevelopment project that would result in additional capacity and, as a result, more comprehensive and longer-term delay reduction. The Runway 17-35 Extension Project is aimed at reducing delay in the short term.
63.18	The Today Show [reported] that the Philadelphia Airport has recently taken active steps to increase the flow of air traffic through their airport [and suggested that the airport] pursued bringing both Southwest and Frontier airlines into what has been a stronghold hub for US Airways. He presented this as a preconceived plan on the part of Philadelphia Airport officials to drive competition, lower airfares and increase air traffic through Philadelphia. In fact, this gentleman indicated that he strongly expected the Philadelphia airport to pull air travel from the surrounding airports such as those in New York and Baltimore as a result of these actions. This makes it appear that they have actively sought to misrepresent the facts to us as they seek to explain why they need these modifications. They presented it as an unforeseen effect of their growth over the years rather than the end result of their activities to increase traffic through the airport.	<p>In accordance with the Wendell H. Ford Aviation Investment and Reform Act of the 21st Century (AIR 21), enacted April 2000, any large-hub or medium-hub airport at which one or two airlines control more than 50% of enplaned passengers must file an annual competition plan with the FAA in order to receive grants under the Airports Improvement Program (AIP) or be authorized to impose a new passenger facility charge (PFC). At PHL the two busiest airlines accounted for 67% of enplaned passengers (1999).</p> <p>The Congressional intent of a competitive plan is to encourage the investment of AIP and PFC funds in a way that will ensure that opportunities are available for any airline to provide service, on fair and reasonable commercial terms, at hub airports where services are dominated by one or two airlines. A result of this plan is that other airlines such as Southwest and Frontier are able to come to PHL. This does not necessarily mean more operations, but rather that there will be greater competition to meet the demands.</p>
63.19	Runway 8-26 has essentially been ruled out as it would be more expensive, would require acquiring land from the Army Corps of Engineers (which is alleged to be difficult to execute), and the Kvaerner's crane is also alleged to be in the way (even though no discussions have occurred to try and resolve this perceived impediment to expanding Runway 8-26). We think that this remains a viable and more attractive solution. We are asking you to use your influence and power to facilitate the process of acquiring the land from the Corp of Army Engineers. We are asking that the airlines that are willing to pay for the work be strongly encouraged to pay for the landfill required, and we are confident that the negotiations with the Kvaerner's crane should also be manageable.	As described in Section 3.4, an extension of Runway 8-26 was considered and analyzed for the Project. This alternative was eliminated because it would not achieve the project's purpose and need in that it could not be accomplished in the short term. The Capacity Enhancement Project (CEP), which is a long-term redevelopment project, is considering extending Runway 8-26. The reasons mentioned are precisely why Runway 8-26 can't be implemented in the short term. As discussed in Section 3.3.1, governmental authorities have little control over the airlines' routing, scheduling, and operations.
63.20	Support no short-term action and focus on the long-term solutions. In the short term, allow the airlines to alter their schedules and performance manage their staff to peak performance to produce the necessary short-term improvements.	The project is aimed at reducing delay as soon as possible. The Capacity Enhancement Program (CEP), as noted in Chapter 1, is a major redevelopment project that would result in additional capacity and, as a result, more comprehensive and longer-term delay reduction. Both projects are needed to address delays. Chapter 3 evaluated other alternatives, including demand management. However, these were eliminated because they would not achieve the project's purpose and need in the short term.

## Letter 63

Wendy Ammirato

Comment Number	Comment	Response
63.21	If the expansion of Runway 17-35 must go forward then at a minimum it should be mandated that it must be eliminated in a certain timeframe when the long-term solution is in place. This should be an aggressive timeframe so as to insure that work is completed in a very timely manner. The incentive to move quickly is the loss of the runway by a predefined future date that is a hard endpoint.	The Runway 17-35 Extension Project is aimed at reducing delay as soon as possible because Philadelphia is a pacing airport that contributes to delays throughout the national airport system. The Capacity Enhancement Program (CEP), as noted in Chapter 1, is a long-term, major redevelopment project that would result in additional capacity and, as a result, more comprehensive and longer-term delay reduction. The CEP may evaluate alternatives that may or may not eliminate the Runway 17-35 Extension Project.
63.22	A member of the audience who is in the real estate business raised the issue around whether these activities will change the Airport Safety Zone. The presenters did not really answer this question as they indicated that they were unfamiliar with the issue. They concluded by saying that the Airport Safety Zone is a NJ law so it doesn't apply in PA.	The New Jersey Administrative Code, Chapter 62, regulates air safety and zoning, including incompatible land uses, in the vicinity of airports. This statute authorizes the Commissioner of NJ DOT to identify airport safety zones (defined as any area of land or water upon which an airport hazard might be created), identify permitted and prohibited land uses and structure heights within these zones. The statute also requires municipalities to enact zoning ordinances for designated airport safety zones, to ensure that no structures are built in these zones that would create a dangerous condition for aircraft during takeoff or landing. There are no designated airport safety zones in New Jersey that are associated with the Philadelphia International Airport.
63.23	There should be regulations that control how low they are allowed to fly over a residential area where small children live and play.	The FAA does regulate minimum altitudes. These regulations can be found at 14 CFR Part 91.

**From:** D W Atkinson[SMTP:TIPPER@SNIP.NET]  
**Sent:** Monday, November 22, 2004 3:46:09 PM  
**To:** PHL 17-35 EIS  
**Subject:** runway expansion

Dear Susan, I live in Mantua Twp. I am concerned about this addition too. I agree with the riverside residents as to the noise. I hear it at my home, but I am more concerned with the environment with air pollution. My husband died in Jan. The doctors stated that his illness could have been caused by the environment, i.e. living near the airport. I hope this project is tabled. Let travellers find other means of transportation. And airlines other routes.

Doris Atkinson

**Letter 64****Doris Atkinson**

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
64.1	I am concerned about this addition too. I agree with the riverside residents as to the noise. I hear it at my home, but I am more concerned with the environment with air pollution. My husband died in Jan. The doctors stated that his illness could have been caused by the environment, i.e. living near the airport.	This EIS demonstrated that compared to the No-Action Alternative, either alternative of the Proposed Project will reduce the airport's contribution to the regional air pollution emissions, and that ambient pollutant concentrations will remain well below the National and Pennsylvania Ambient Air Quality Standards. (See Tables 4.5-7 and 4.5-12 of this EIS and DEIS Appendix H of the Air Quality Technical Report).

Dear Ms McDonald -

In a news letter from our representative  
in the PA legislature I read about the  
Proposed FAA statement about the  
runway extension for Philadelphia Airport -

The increased airplane traffic, noise  
pollution & elements which would  
impact disastrously on the ~~Philadelphia~~  
Haverford  
Township community -

Sincerely

Mary M. Benedict  
3300 Darby Rd. Haverford PA 19041



**Letter 65****Mary Benedict**

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
65.1	The increased airplane traffic, air and noise pollution are 3 elements which would impact disastrously on the Haverford Township community.	The FAA has noted and considered your comment. As the EIS demonstrates, the proposed project will decrease air pollution, and will not result in significant noise impacts at any noise-sensitive location within the Study Area.

**From:** Paul Breger[SMTP:PBREGER@COMCAST.NET]

**Sent:** Thursday, November 18, 2004 9:34:36 AM

**To:** PHL 17-35 EIS

**Subject:** Noise Polution

**Auto forwarded by a Rule**

I live in Yorklyn and I'm requesting that air traffic be directed away from this area. Recently, I've noticed a slight increase in low flying planes on approach to PHI airport.

Sincerely,

Paul Breger

P.O. Box 336

Yorklyn, DE 19736

**Letter 66****Paul Breger**

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
66.1	I live in Yorklyn and I'm requesting that air traffic be directed away from this area.	The extension of Runway 17-35 would not create new flight paths. As a result of the runway extension, aircraft using Runway 17-35 for approaches or departures would be shifted approximately 640 feet north (in areas north of the airport) and 400 feet south (in areas south of the airport). Because Runway 17-35 is perpendicular to the Delaware River, aircraft cannot follow the river on approach or departure under either existing or proposed conditions. Aircraft require an approach lined up with the centerline of the runway, in order to land safely.

## Public Statement

To: FAA/Phila. Airport officials  
 RE: Draft Environmental Impact Statement, (DEIS)  
 Place: 6630 Lindberg Blvd., Eastwick at the Meadows  
 Phila, PA.  
 Time: 7:00-9:00PM, (Public Comment Period)  
 By: Marcia Brunelli  
 1000 Agnew Drive  
 Drexel Hill, PA, 19026

As a resident of the Upper Darby Township, (Delaware County), and as an active member of the "Coalition of Communities Against Runway 17-35", I am opposed to the Runway 17-35 extension project, and I disagree with the Draft Environmental Impact Statement, (DEIS), that finds "no significant impact on our surrounding communities."

Under the "Capacity Enhancement Program," (CEP), (which includes Runway 17-35), large aircraft will be flying over our township at lower altitudes and with greater frequency. The extension's project's route stretches over our schools, our local hospital and highly populated residential areas in Upper Darby.

\*\*\*\*At the beginning of this week, you have heard testimonies from school officials of the Upper Darby School District. Tonight, I echo those concerns, Can you imagine (for a moment that you are a student in school.) Can you imagine trying to take a math test at the sound of overhead aircraft? Our schools are not air-conditioned and need to have the windows opened in the classrooms during the warmer weather. The noise will register at 5 or more decibels. This will be a severe impediment to learning.

\*\*\*\*At home where people go to find peace and comfort and where families settle down to spend "quality time" will be interrupted by airplanes flying over their homes. The quality of life, as we know it (in Upper Darby Township) will decline resulting from Runway 17-35 and other Capacity Enhancement Programs.

\*\*\*\*The general health risk from increased air traffic can not be underestimated. Under the extension project, Upper Darby Township and its surrounding communities will be subjected to air pollution from smog and ground level ozones. Exposure to air contaminants from jet fuels will increase the risk for cancer, and will increase asthma and other pulmonary diseases. Exposure to jet aircraft noise can elevate blood pressure levels, and it was documented in the "Indianapolis Star", that (jet noises) along with other loud noises have been proven to lead to hearing loss. #1.

\*\*\*\*Flying aircraft over a heavily populated area (such as Upper Darby) will present a significant safety risk for our township. The risk intensifies because of the increased number of aircraft and because Runway 17-35's route extends right over our public and parochial schools and our local hospital. One accident will be catastrophic. One accident is too many! One accident can injure and kill many people. Our township was not included in flight drills, and our township will need to have specialized training in order to respond to an aircraft mishap.

Regarding Runway 17-35, there needs to be a thorough economic impact study assessing the total fiscal impact on Delaware County, The runway will cost approximately \$2 billion, and will end up being a bandaid for a long range problem. There may be other alternatives that need to be discussed. According to my understanding, in one alternative (that may be a viable solution) proposes to move an already existing runway over 500 feet and have parallel take-offs over the river. This would eliminate flying over Delaware County, and jobs and <sup>#2</sup>business would not be effected. This would not effect any traffic either. This option is certainly one worth investigating.

In summary, The FAA has conducted an environmental study that is lacking. The FAA failed to include communities such as Havertown, Montgomery, and Upper darby Townships in their review. Contrary to the DEIS statement, there will be a significant impact on surrounding communities as a result from the Runway 17-35 project. There will be an adverse effect on our social environment disrupting our established community that includes our schools, our local hospital, and our residents dwelling in the densely populated metropolitan area of Upper Darby township.

Thank you ,

Marcia Brunelli

Bibliographies

#1. "Overexposure To Noise Damages Hearing," Indianapolis Star, (Health, pg#G01), April, 20, 2000, Author, Abe Aamidor

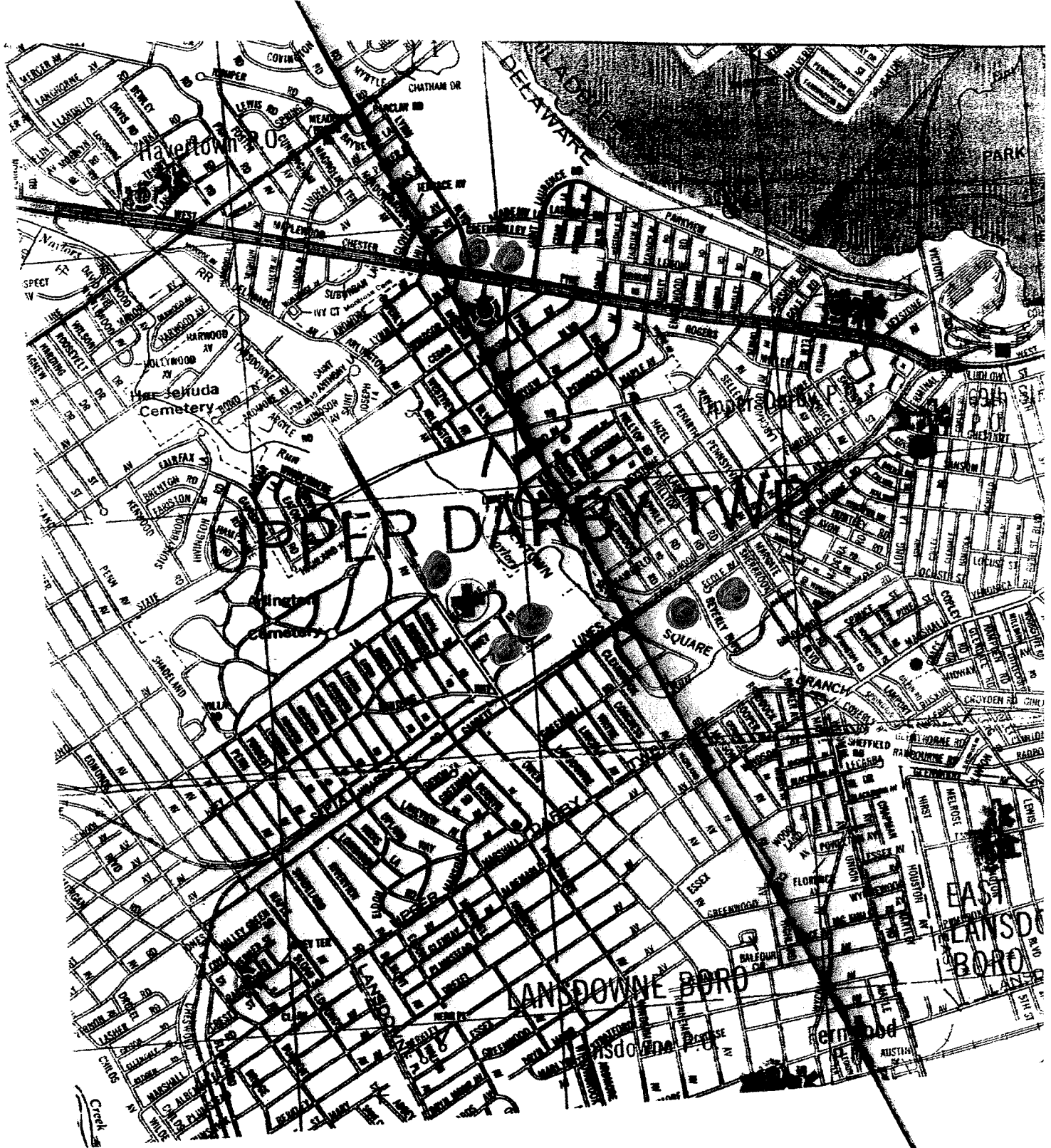
#2. "Philadelphia International Airport, (Capacity Enhancement Program), Public Hearing -minutes

This hearing was conducted at the Dekaware County Council Hearing Room, Government Center, Media, PA, 19063.

May 18, 2003-pg#25.. The entire document is 42 pages. You may contact Delaware County Council members for a copy and / or you may contact Congressman Weldon's office for a copy of this important document. # (610) #259-0700- (Ask for Kelly Colvin) Congressman Weldon's assistant

*Addendum*

*During the FAA public session at U D HS, on Sept 29th, there was a concern to preserve the "red bellied turtle". All life forms are important. Steps need to be taken to preserve the "Rarer Species" who will be effected by any Capacity Enhancement Program, (including "Runway 17-35")*



Public	Parochial	Hospital
Schools & Hospital effected by Runway 17-35		
Public	Parochial	Hospital
Upper Darby High School	Monsignor Bonner	Delaware County
Highland Park Elementary	Archbishop Pendergast	Memorial Hospital
Beverly Hills Middle	St. Lawrence Grade S.	
Bywood Elementary		

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# Airline Pollution: The Sky Has Its Limits

*TIME Magazine*  
By *Lance Morrow*

*Monday, May 07, 2001*

The Federal Aviation Agency has defined noise pollution as, among other things, noise loud enough to disturb a family's television watching.

Only a great culture could present its people with a dilemma like that.

But the problem, as defined, is pregnant with its own remedy. Airplanes too loud above your house? Well, then: **TURN UP THE VOLUME ON THE TELEVISION SET.**

There are less degenerate ways to solve the problem of airplane noise, an annoyance rapidly evolving into a menace. But do not look to the FAA or the aviation industry to help. Quality of life is not their department. Not for people in the air, and certainly not for those on the ground.

Magazines run cover stories about how awful air travel has become — crowded airports, crowded and overbooked planes, delayed flights, lousy service, awful food. Terrible. But the articles are talking about people in the air or in the airports, and not about the vastly greater numbers on the ground who are brutalized as the planes pass overhead. The solution to squalid air travel that experts propose is analogous to the fix (turn up the volume) when loud planes interrupt your television watching. All will be well if you build more runways, more airports, if you schedule more flights, and fling more profit-making, noise-making metal into the air.

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we, the traveling public, are responsible; we are the people who buy, who use Federal Express and all the other businesses that need planes and airports in order to do their work. Millions of jobs depend on aviation. The general public requires the convenience of air travel (though it is often inconvenient), and we are still, for the most part, passive and stoical about the price paid by everyone in noise and other forms of pollution. Most people regard noise — plane noise, truck noise, city noise, siren noise, car alarm noise, and so on — as a fact of life, at least until it becomes continuous and intolerable, which, for many people, it already has. Or until it dawns on people, not only those living around airports but the millions more who live under the proliferating webs of flight path, that they are paying an unacceptable price in stress, lost sleep, impaired hearing, inability to concentrate, in their children's ability to learn and in the generally degraded quality of life that results when the mind is tormented by these intrusions.

The expansionist logic of airlines and airports assumes that the air around and above us has an infinitely absorptive capacity and can tolerate any pollution. We used to think that about rivers. It isn't true, in either case. Industries that pollute rivers have been forced to change, to clean up. The people who worry about pollution from planes (noise pollution, trails of fuel waste raining down) are no longer Luddite crackpots.

Long ago, Charles Lindbergh embodied the chivalric attraction of flight — the lone eagle, soaring without boundaries in the purity of the upper air: "O, I have slipped the surly bonds of earth/ and climbed the sky on laughter-silvered wings." The aviation industry, with a sort of corrupt nostalgia, still uses rhetoric about "the freedom to fly." But Lindbergh ultimately became profoundly disgusted with the industry that he had pioneered. He ended life regarding air travel as mere squalor and aviation in general as one of the world's serious environmental problems.

There was a time, not so long ago, when Americans almost genially tolerated the idea of a man or woman having five or six drinks, or more, and driving home a little blurry, and maybe — oops! — banging into something along the way. But the issue came to critical mass in the public mind, thanks mainly to Mothers Against Drunk Driving, and now you can do time for such behavior.

Aviation noise, and noise pollution in general, are issues that will reach critical mass in the next few years. Not long ago, a "noise consultant" named Mark Johnson, working for Landrum & Brown, addressed a planning meeting for the expansion of the Albany, N.Y., airport. He wagged his eyebrows and declared: "We're not saying that people who complain about noise are out of their minds. Let's just say it's a sociological problem." As more and more people are driven out of their minds by noise, Johnson will find that it has become a political problem as well, and therefore an industry problem. Eventually, the FAA will be forced to abandon its disgracefully intimate collusion with the aviation industry.




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Letter 67

Marcia Brunelli

Comment Number	Comment	Response
67.1	Our schools are not air conditioned and need to have the windows opened in the classrooms during the warmer weather. The noise will register at 5 or more decibels. This will be a severe impediment to learning.	The Noise analysis presented in this EIS, Appendix A-1, shows that noise increases at Upper Darby Schools will be negligible. Under the No-Action Alternative, future noise levels would be between 45 and 50 dB DNL. Alternative 1 would increase noise levels at, for example, the Beverly Hills Middle School, Highland Park Elementary School and Bywood Elementary school by 0.5 to 1.0 dB DNL in 2007 and by 0.2 to 0.8 dB DNL in 2015. This increase is not perceptible.
67.2	At home where people go to find peace and comfort and where families settle down to spend quality time which will be interrupted by airplanes flying over their homes. The quality of life as we know it (in Upper Darby Township) will decline resulting from Runway 17-35 and other Capacity Enhancement Programs.	Quality of life depends on a number of factors. Because there will be no significant impacts, it is unlikely that the Proposed Project would adversely affect quality of life, however, the FAA has noted your comment.
67.3	Under the extension project, Upper Darby Township and its surrounding communities will be subjected to air pollution from smog and ground level ozone. Exposure to air contaminants from jet fuels will increase the risk for cancer, and will increase asthma and other pulmonary diseases.	Upper Darby Township is located in Delaware County, which is part of the Philadelphia Ozone Nonattainment Area. As such, this area is under strict state and Federal mandates to achieve compliance with the ozone ambient air quality standards. This EIS demonstrates that the Proposed Project will reduce air pollution emissions in the region, and that ambient pollutant concentrations will remain well below the National and Pennsylvania Ambient Air Quality Standards. (See Table 4.5-7 of this EIS, and DEIS Appendix, Air Quality Technical Report).
67.4	Exposure to jet aircraft noise can elevate blood pressure levels, and it was documented in the Indianapolis Star that (jet noises) along with other loud noises have been proven to lead to hearing loss.	<p>The question of whether jet noise can lead to hearing loss has been investigated. While hearing impairment could be a risk under some circumstances for employees working on the aprons around aircraft, it is very unlikely that any hearing loss could occur in neighborhoods around an airport. For example, more than 9,000 overflights during eight hours, each producing a Sound Exposure Level of 90 dB, would be required to produce an eight hour equivalent level of 85 dBA. If this level of operations were to occur for five days a week, continuously for 40 years, and if people were exposed to this noise outdoors without any attenuation from buildings, the exposure would be likely to produce less than 10 dB loss of hearing in the most sensitive 10 percent of the population.</p> <p>Based on the projected annual operations on Runway 17-35 and projected runway utilization (see Section 4.2) in 2007, an estimated 170 aircraft per eight hour day would pass over Haverford. This is a maximum, as flight tracks would disperse after takeoff. This is significantly less than 9,000 per eight hour day, and would not result in any detrimental health effects.</p>

Letter 67

Marcia Brunelli

Comment Number	Comment	Response
67.5	Flying aircraft over a heavily populated area (such as Upper Darby) will present a significant safety risk for our township. The risk intensifies because of the increased number of aircraft and because Runway 17-35's route extends right over our public and parochial schools and our local hospital.	<p>Safety is the FAA's highest priority. The Air Traffic Control Tower is responsible for spacing between planes, elevations, approach/departure paths that maintain safe airspace. The airlines are responsible for scheduling flights, which respond to passenger demands. Neither the FAA nor the Airport can require air carriers to change schedules.</p> <p>As documented in this EIS, there are forecast to be 528,400 annual operations at the Philadelphia International Airport in 2007, whether the Runway 17-35 Extension is constructed or it is not constructed. This is an increase of 82,433 annual operations from 2003 operations.</p> <p>In the Preferred Alternative in 2007, there would be an increase of approximately 123 daily operations on Runway 17-35, with approximately 93 of them departures to or arrivals from the north over Pennsylvania and approximately 30 departures to or arrivals from the south over New Jersey. In the Preferred Alternative in 2015, there would be an increase of 156 daily operations on Runway 17-35, with approximately 96 of them departures to or arrivals from the north over Pennsylvania and approximately 60 departures to or arrivals from the south over New Jersey. As shown in the flight track figures, (EIS Figures 4.2-2 and 4.2-3, not all of the operations fly over the same point on the ground.</p> <p>As a result of the runway extension to the north and south, departures from Runway 17 35 would be at a slightly higher altitude over the communities and arrivals would be at a slightly lower altitude than for the No-Action Alternative. This difference would be on the order of approximately 20 feet and would likely not be noticeable.</p>
67.6	Regarding Runway 17-35, there needs to be a thorough economic impact study assessing the total fiscal impact on Delaware County. The runway will cost approximately \$2 billion, and will end up being a band-aid for a long range problem.	The Proposed Project is estimated to cost approximately \$36 million not \$2 billion, as stated by the commentator. The Proposed Project is intended to reduce current and projected delays at PHL in the short-term and is not intended to be a long-term solution. The proposed CEP for PHL will provide a more comprehensive and longer-term delay reduction through a major airfield redevelopment program.
67.7	There may be other alternatives that need to be discussed. According to my understanding, one alternative (that may be a viable solution) proposes to move an already existing runway over 500 feet and have parallel take-offs over the river. This would eliminate flying over Delaware County, and jobs and businesses would not be affected. This would not affect any traffic either. This option is certainly worth investigating.	Improvements to delay at PHL are needed immediately. The Runway 17-35 Extension Project has been identified as a project that could be implemented within the next two years. As described in Chapter 3, a number of alternatives were considered and analyzed for the Project. These alternatives were eliminated because they would not achieve the project's purpose and need, which is to reduce delay at PHL in the short term. Construction or relocation of a runway adjacent to the Delaware River is not a short-term undertaking and is being investigated for the Capacity Enhancement Program (CEP), which is a long-term redevelopment project.
67.8	The FAA failed to include communities such as Havertown, Montgomery, and Upper Darby Townships in their review.	Havertown and Upper Darby Townships are included in the Study Area for the Proposed Project.
67.9	There will be a significant impact on surrounding communities as a result from the Runway 17-35 project. There will be an adverse effect on our social environment disrupting our established community that includes our schools, our local hospital and our residents dwelling in the densely populated metropolitan area of Upper Darby township.	The noise analysis (Section 4.2) and land use compatibility analysis (Section 4.3) demonstrate that there would not be significant adverse impacts in the Regional Study Area, within which Upper Darby Township is located. Schools, hospitals, and residences in this area would not be significantly impacted. There will be no disruption to surrounding communities.
67.10	During the FAA public session at UDHS [Upper Darby High School] on September 29, there was a concern to preserve the "red-bellied" turtle. All life forms are important.	The FAA and the Airport are committed to protecting the state threatened red-bellied turtle, which is legally protected, and to maintaining habitat for other wildlife species that are compatible with airport operations. The project has also been carefully examined with respects to potential impacts to human residents of the study area. As the EIS demonstrates, the Proposed Project will improve air quality, and will have no significant adverse noise impacts.

**From:** Tom Bunting[SMTP:T.BUNTING@VERIZON.NET]

**Sent:** Tuesday, November 23, 2004 12:50:31 AM

**To:** PHL 17-35 EIS

**Subject:** runway

My name is Thomas Bunting, I live in Delaware county.

I would NOT like to see Upper Darby turned into another Tincum township. We have enough airplanes flying over our houses as it is. I am totally against any future extentions to any runways. An Upper Darby resident who would like the quality of life to remain the same.

Sincerely, Thomas Bunting  
t.bunting@verizon

**Letter 68**

**Thomas Bunting**

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
68.1	We have enough airplanes flying over our houses as it is. I am totally against any future extensions to any runways. An Upper Darby resident who would like the quality of life to remain the same.	Quality of life depends on a number of factors. Because there will be no significant impacts, it is unlikely that the Proposed Project would adversely affect quality of life, however, the FAA has noted your comment.

From: Elliot Burch[SMTP:ELLIOTBURCH@MAC.COM]  
Sent: Tuesday, November 30, 2004 4:47:29 PM  
To: PHL 17-35 EIS  
Cc: Sara Burch  
Subject: Draft EIS for Philadelphia runway expansion  
Auto forwarded by a Rule

Dear Susan McDonald,

I live in Swarthmore, PA (southwest of the Philadelphia airport) and oppose the runway expansion project as outlined in the draft EIS statement.

It is my strong belief that this proposed expansion will drastically increase noise levels over Swarthmore and dramatically impact the quality of life in the township. The FAA has failed to correctly assess the impact of noise. They have only made some rough estimates of possible average noise level increases. They have not addressed the issue of Single Noise Events which would increase many fold with the expansion project.

We know too well the sound of low level jets that already occasionally come over Swarthmore when the weather is bad. The proposed expansion project would worsen this problem by far. The FAA has itself indicated that the 17-35 expansion may not be the best solution for dealing with airport delays. It is my sincere belief that the only way to adequately deal with all the issues is to favor additional parallel runways along the Delaware River. This course has the fewest negative impacts for the area in general.

Honestly, more time is needed for the public to review the recently released DEIS. The plan is flawed and needs to be reexamined.

Sincerely,

Elliot Burch  
314 Rutgers Ave.  
Swarthmore, PA  
610 328-7993

Letter 69

Elliot Burch

Comment Number	Comment	Response
69.1	It is my strong belief that this proposed expansion will drastically increase noise levels over Swarthmore and dramatically impact the quality of life in the township. The FAA has failed to correctly assess the impact of noise. They have only made some rough estimates of possible average noise level increases. They have not addressed the issue of Single Noise Events which would increase many fold with the expansion project.	<p>As documented in Chapter 2 of this EIS, the shift from turbo props to regional jets will occur even if no action is taken. Noise impacts as a result of the Proposed Action were assessed in accordance with FAA Order 1050.1E. Noise analysis compares the future No-Action Alternative to the future build scenarios.</p> <p>Figures 4.2-14 through 4.2-17 of this EIS show the changed noise exposure for areas of Pennsylvania that would experience noise exposure from 45 to 60 dB DNL as a result of Alternatives 1 and 2, including Swarthmore.</p> <p>However, it is important to note that while areas in Pennsylvania to the north of the Airport experience increase in aircraft noise exposures, no one in these areas would experience significant noise impact according to criteria established by the FAA in Order 1050.1E. In fact no one in Swarthmore would even fall within the 60 DNL noise contour. While Swarthmore falls in the area with noise levels of 45 to 60 dB, this area would not experience a change as a result of the project of 5 dB or greater. Such a change is considered a slight to moderate impact.</p> <p>Single event noise metrics were addressed in Section 4.2, Noise, of this EIS, and the Appendices of the Noise Technical Report contain tables of computed single event noise metrics for the measurements sites, cultural resources, 4(f) resources, and historic sites. The statement that single noise events "would increase many fold with the expansion project" is not quite right. The number of single noise events would increase over Delaware County insofar as the number of operations on Runway 17-35 would increase. However, the value of a single event noise metric, such as Lmax, evaluated at a given location in the community may not necessarily increase. The actual values of a single event noise metric, like Lmax, would be dependent upon the type of aircraft flying over the location of interest and the position of the aircraft during its points of closest approach to the location of interest.</p>
69.2	The only way to adequately deal with all the issues is to favor additional parallel runways along the Delaware River. This course has the fewest negative impacts for the area in general.	Improvements to delay at PHL are needed immediately. The Runway 17-35 Extension Project has been identified as a project that could be implemented within the next two years. As described in Chapter 3, a number of alternatives were considered and analyzed for the Project. These alternatives were eliminated because they would not achieve the project's purpose and need, which is to reduce delay at PHL in the short term. Construction or relocation of a runway adjacent to the Delaware River is not a short-term undertaking and is being investigated for the Capacity Enhancement Program (CEP), which is a long-term redevelopment project.
69.3	More time is needed for the public to review the recently released DEIS.	The Federal Aviation Administration complied with the Code of Federal Regulations (CFR) which states the required comment period for a DEIS is 45 days (40 CFR 1506.10(c)). At the Public Information Meetings held in September 2004, the release date of the DEIS and the DEIS Public Hearing dates were made public. This is a streamlined project and the FAA believes the comment period should only be extended for compelling reasons of national importance but the FAA did make every reasonable effort to consider those comments received within a reasonable period after the comment period closed.

-----  
**From:** Catmajo Devneywei[SMTP:CATMAJO@YAHOO.COM]  
**Sent:** Tuesday, November 30, 2004 5:28:19 PM  
**To:** PHL 17-35 EIS  
**Subject:** 17-35 CANNOT GO NORTH--pollution-traffic problems will result  
**Auto forwarded by a Rule**

BOTH ALTERNATIVES ARE BAD -- DON'T EXTEND RUNWAY 17-35 NORTH --  
3 BOTTLENECKS OF TRAFFIC on I-95 COULD BE THE RESULT (as traffic towards  
76-W is re-routed to a halt).

Both Alternative I and Alternative II extension plans of runway 17-35 call for the removal of that section of 291 that hooks I-95-S (via exit 13) to 76W (via Penrose Bridge and 26th street). The diversion of traffic from this removed road would have to occur at exit 10 for those trying to get to 76-W. A smoother entrance into Bartram Avenue would need to be built. This could be very detrimental to local traffic OR it could mean a new bottleneck of traffic on I95 just before exit 10 or at exits 17 and 22 since traffic trying to get to 76-W would no longer have easy access from I-95. Bartram Avenue now has lights in parts of this area and a fairly steady stream of traffic. The ideal set-up—if a section of 291 is removed—would be to have the I-95 traffic travel a high speed way above Bartram via a double-decker bridge traveling the length of it till it empties into Penrose Ave. This being costly, will it be attempted? Or will bottlenecks and accidents have to occur before it is mandated and designed to be possible?

I had the chance to speak at the meeting in Eastwick in November and at that time I voiced a vote for the Alternative I plan based on the erroneous info given about the differences between Alternative I and II. Alternative I would not be bad if it did not call for the removal of 291 or the extension north of runway 17. I figured since more planes must do circles in the air above the airport while waiting for landing clearance, the runway might alleviate the wait time in the air thus the threat of crashing might be reduced, but I now believe these extra planes are caused more by faulty planning. I also believe this northern extension of 17-35 is dangerous--TOO DANGEROUS TO ATTEMPT. Schedule fewer planes or schedule the planes more carefully but do not extend runways any closer toward people's homes. Use what used to be Old Man's airport in Jersey or create other airports in Harrington DE or send planes to Newark DE via a high-speed train line (Amtrak already has the Right of Way). Sound is not the only issue. Structure damage should be a chief concern. Delaware County already has too much water pollution where bacteria actually live in the pipes. This northern extension is too invasive to ground water problems and frail building structures. If they can't extend runway 8-26 toward the river, the extension plans should be dropped. Thousands of lives and businesses are at stake.

A double-decker Bartram Avenue, a lucrative buy-out of people's homes (renters included) in Eastwick for that area's conversion into a tourist center (to view takeoffs), AND elaborate filtration of disturbed ground water would first have to be mandated before this could be attempted.

Thanks for your time.

Catherine Marie Celley

(former state representative candidate for the 162nd district of Delaware County)



Letter 70

Catherine Marie Celley

Comment Number	Comment	Response
70.1	Both Alternative 1 and Alternative 2 extension plans of Runway 17-35 call for the removal of that section of 291 that hooks I-95-S (via exit 13) to 76W (via Penrose Bridge and 26th street). The diversion of traffic from this removed road would have to occur at exit 10 for those trying to get to 76-W. A smoother entrance into Bartram Avenue would need to be built. This could be very detrimental to local traffic OR it could mean a new bottleneck of traffic on I95 just before exit 10 or at exits 17 and 22 since traffic trying to get to 76-W would no longer have easy access from I-95. Bartram Avenue now has lights in parts of this area and a fairly steady stream of traffic. The ideal set-up (if a section of 291 is removed) would be to have the I-95 traffic travel a high speed way above Bartram via a double-decker bridge traveling the length of it till it empties into Penrose Ave. This being costly, will it be attempted? Or will bottlenecks and accidents have to occur before it is mandated and designed to be possible?	Mitigation measures proposed for the intersection of SR 291/Scott Way/Bartram Avenue and intersections along Bartram Avenue will be designed to expedite travel to/from I-95. These mitigations will include intersection geometry and signal timing and progression improvements to improve traffic flow. Double-decker bridges are not under consideration.
70.2	I had the chance to speak at the meeting in Eastwick in November and at that time I voiced a vote for the Alternative 1 plan based on the erroneous info given about the differences between Alternative 1 and 2. Alternative 1 would not be bad if it did not call for the removal of 291 or the extension north of runway 17.	There was no erroneous information presented. All information presented from the public scoping period onward has included the relocation of Route 291.
70.3	I also believe this northern extension of [Runway] 17-35 is dangerous--TOO DANGEROUS TO ATTEMPT. Schedule fewer planes or schedule the planes more carefully but do not extend runways any closer toward people's homes.	Safety is the FAA's statutory mission as well as its highest priority. Both Alternative 1 and Alternative 2 will meet all FAA safety standards for airports.
70.4	Use what used to be Old Man's airport in Jersey or create other airports in Harrington DE or send planes to Newark DE via a high-speed train line (Amtrak already has the Right-of-Way).	As described in Chapter 3, a number of alternatives, including greater use of other airports, were considered and analyzed for the Project. These alternatives were eliminated because they would not achieve the project's purpose and need of delay reduction at PHL in the short term.
70.5	Sound is not the only issue. Structure damage should be a chief concern.	Noise-induced vibration levels caused by aircraft overflights around Philadelphia International Airport are not considered sufficiently high to cause structural damage. In fact, in most airport noise environments, footfalls and doors closing produce vibration levels higher than those from aircraft overflights. (Source: HMMH, Inc.)
70.6	This northern extension is too invasive to ground water problems and frail building structures.	The proposed northern extension of Runway 17-35, as documented in this EIS, does not affect groundwater, does not interfere with any on-going or anticipated future groundwater remediation efforts, and is not located in close proximity to any buildings.
70.7	A double-decker Bartram Avenue, a lucrative buy-out of people's homes (renters included) in Eastwick for that area's conversion into a tourist center (to view takeoffs), and elaborate filtration of disturbed ground water would first have to be mandated before this could be attempted.	The evaluation of impacts to the Eastwick Community concluded that there would be no significant impacts that would require that kind of mitigation.

**From:** Glenn Ceponis[SMTP:GCEPONIS@MSN.COM]

**Sent:** Tuesday, November 23, 2004 8:17:38 PM

**To:** PHL 17-35 EIS

**Subject:** Phila. Airport Extention

Ms. McDonald,

I am writing in response to the proposed extension of runway 17-35 at the Philadelphia International Airport. I live in Woodbury, New Jersey and I am currently adversely affected by air traffic associated with the airport. We have planes overhead and a substantial amount of noise (depending on the runway being used and direction of take-off). Over the past year there has been an increase in jet traffic (compared to prop planes) over our house while on approach for landing. There are times when our windows rattle and visitors look startled as they wonder what is happening. Landing gear is already down by the time they are over our house.

Extension of this runway will adversely affect our quality of life. I am concerned that it will also affect our property values. In addition to my personal concerns, Woodbury is a historic area as well as home to various wildlife linked to the surrounding wetlands associated with Woodbury Creek. I believe that the extension of the runway will adversely impact both the surrounding environment as well as historic resources. Planes should be restricted as much as possible to an area parallel to the Delaware River.

The potential increase in convenience to air travelers does not warrant the substantial impacts to personal life of area residents, wildlife, the environment, or cultural resources that will result from the extension of runway 17-35.

Glenn Ceponis

**Letter 71**  
**Glenn Ceponis**

Comment Number	Comment	Response
71.1	Extension of this runway will adversely affect our quality of life.	Quality of life depends on a number of factors. Because there will be no significant impacts, it is unlikely that the Proposed Project would adversely affect quality of life, however, the FAA has noted your comment.
71.2	I am concerned that it will also affect our property values.	Property values depend on many factors. One factor is the environment. This Project will not have significant impact on noise or environmental impacts. Is it unlikely that there would be an impact on property values.
71.3	I believe that the extension of the runway will adversely impact both the surrounding environment as well as historic resources.	As stated in Section 4.9, the Proposed Project would not have an adverse effect on historic resources.
71.4	Planes should be restricted as much as possible to an area parallel to the Delaware River.	The Runway 17-35 Extension Project would increase aircraft usage of this north-south runway, but would not change existing flight tracks or approaches. It is not feasible to use an over-the-water approach to Runway 17-35, as it is perpendicular to the Delaware River.
71.5	The potential increase in convenience to air travelers does not warrant the substantial impacts to personal life of area residents, wildlife, the environment, or cultural resources that will result from the extension of runway 17-35.	The FAA has noted and considered your comment.

**From:** Maria Ceponis[SMTP:MCEPONIS@MSN.COM]  
**Sent:** Sunday, November 21, 2004 5:41:17 PM  
**To:** PHL 17-35 EIS  
**Subject:** airport runway

Dear Ms. McDonald:

We live in Woodbury, NJ, on the border of West Deptford Twp. Our lives are already negatively affected by planes passing overhead. Extending the runway at Philadelphia International Airport would negatively impact us even more. Our windows rattle, we are awakened at night and I dread having out-of-town guests visit. They never fail to look startled and comment when our conversations are drowned out by planes passing overhead.

Please consider all the people who will be affected by this action and reconsider the extension of this runway.

Thank You,

Maria Ceponis  
Woodbury, NJ

**Letter 72****Maria Ceponis**

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
72.1	Our lives are already negatively affected by planes passing overhead. Extending the runway at Philadelphia International Airport would negatively impact us even more.	The proposed Runway 17-35 extension would increase the number of planes over areas on approach to the Airport but would not have a significant adverse noise impact on residents.

**From:** Joseph & Tracey Coleman[SMTP:JTGCOLEMAN@EARTHLINK.NET]  
**Sent:** Wednesday, January 01, 1997 10:20:46 AM  
**To:** PHL 17-35 EIS  
**Subject:** Re:Runway 17-35 extension project

Ms Susan McDonald

FAA Environmental Protection Specialist  
C/o VHB  
101 Walnut Street  
Watertown, MA 02471-9151

Dear Ms Susan McDonald,

Greetings!

I have not been available to make the various meetings scheduled about the runway extension project at Philadelphia International Airport. It is important to value the City's need to for airport improvements necessary to accommodate the increasing air traffic.

However, I and my family's quality of life already suffers during the warm weather months with so much noise, traffic, and toxins sprayed over our home in Parkside, Delaware County. On many occasions, my wife Tracey, our children and I have to discontinue conversations so as to hear one another. Often during peak hours airport overhead traffic is every two minutes or less. We need to increase the volume on music and other entertainment venues in response to this situation.

Our neighborhood would best be served if the current traffic patterns could be routed over the Philadelphia shipyard, Delaware River and adjoining commercial areas instead of increasing traffic over residential Delaware County. It has been suggested to me that increased airbus traffic and travel is proposed with this extension project. We cannot bear to have more noise and traffic pollution over us.

The actual cost of millions of dollars for the extension does not seem to warrant spending if revenue and traffic is not increased to cover the expenditure. We know City spending can be somewhat frivolous but simple accounting would tell me that their is a need to increase sales to cover the spending.

We know your study is extensive on the issues and we just wanted to express our opinion to be incorporated into the final comments and concerns of the people who will serve to most impacted by the increase traffic over our homes. The disvalue this will cause upon resale. Potentially, the need to sell our home and relocate to a quieter location with environmental hazard concerns.

Genuinely,

Joseph J. Coleman  
145 E Roland Road  
Parkside, PA 19015  
(610) 876.1214  
[jtgcoleman@earthlink.net](mailto:jtgcoleman@earthlink.net)

--- Joseph & Tracey Coleman  
--- [jtgcoleman@earthlink.net](mailto:jtgcoleman@earthlink.net)

Letter 73

Joseph Coleman

Comment Number	Comment	Response
73.1	My family's quality of life already suffers during the warm weather months with toxins sprayed over our home in Parkside, Delaware County.	The DEIS demonstrated that compared to the No-Action Alternative, either alternative of the Proposed Project will reduce air pollution emissions in the region, and that ambient pollutant concentrations will remain well below the National and Pennsylvania Ambient Air Quality Standards. (See Table 4.5-7 of this EIS and DEIS Appendix H of the Air Quality Technical Report).
73.2	Our neighborhood, [Parkside, Delaware County] would best be served if the current traffic patterns could be routed over the Philadelphia shipyard, Delaware River and adjoining commercial areas instead of increasing traffic over residential Delaware County.	As demonstrated in Section 4.2, under Alternative 1 in 2007, the operations on Runway 17-35 are expected to account for approximately 28.1 percent of total airport operations, while the primary runways will account for approximately 65.1 percent of operations. Therefore, the majority of traffic will continue to use the parallel runways, flying over the Delaware River and the Philadelphia Shipyard.
73.3	We cannot bear to have more noise pollution over us.	The proposed Runway 17-35 Extension Project will not result in a significant increase in noise, as documented in Section 4.2 of the EIS.
73.4	The actual cost of millions of dollars for the extension does not seem to warrant spending if revenue is not increased to cover the expenditure.	The FAA has noted and considered your comment.
73.5	Disvalue this will cause upon resale [of our home in Parkside, Delaware County].	Property values depend on many factors. One factor is the environment. This Project will not have significant impact on noise or environmental impacts. It is highly unlikely that any property values will decrease as a result of this Project.



**From:** Bob Coons[SMTP:SCOONS1764@COMCAST.NET]

**Sent:** Tuesday, November 30, 2004 5:17:48 PM

**To:** PHL 17-35 EIS

**Subject:** Runway

Dear Susan,

I am a concerned resident of West Deptford Township. I have so many thoughts about this project it's hard for me to align where and how I want to begin.

I guess I should begin with current problems that will only get much much worse. On many occasions my family, including myself have been woken up from low flying aircraft. To be awoken to that sound will scare me so bad my heart pounds and it is very hard to fall back asleep. Thoughts of crashing planes race though my head. Not to mention it is difficult to fall asleep with the constant flights that occur now. I can not imagine what it would be like with MORE.

Constantly we raise the volume of television only to lower it after the plane has past...to have another approach and raise it again only to lower it as it passes. Phone conversations are put on hold until planes pass over and rarely can we have out windows open because of the disturbance and noise level.

I am asking you please take the project and throw it out the window. That is if your able to open yours!

Sincerely,  
Susan M. Coons

Letter 74

Susan Coons

Comment Number	Comment	Response
74.1	<p>On many occasions my family, including myself have been woken up from low flying aircraft. To be awoken to that sound will scare me so bad my heart pounds and it is very hard to fall back asleep. Thoughts of crashing planes race through my head. Not to mention it is difficult to fall asleep with the constant flights that occur now. I can not imagine what it would be like with MORE. Constantly we raise the volume of television only to lower it after the plane has past...to have another approach and raise it again only to lower it as it passes. Phone conversations are put on hold until planes pass over and rarely can we have our windows open because of the disturbance and noise level.</p>	<p>Operational inputs are used by the INM to compute not just standard DNL values but a series of supplemental noise metrics that are helpful in interpreting nighttime activity. For example, Table 4.2-20 is a summary of the nighttime portion of total DNL that is attributable to nighttime operations by themselves (referred to as the Nighttime DNL, or NDNL). Maximum sound levels and maximum SEL values are also computed and reported and are also of use in evaluating sleep disturbance.</p> <p>To help interpret these results, Appendix A of this EIS presents background information on sleep interference, including the dose-response relationship between indoor SEL and number of awakenings, which has been published by the Federal Interagency Committee on Aviation Noise (FICAN) as a conservative indicator of sleep disturbance. Page 4-31 of the DEIS summarizes the FICAN position and shows how the relationship is useful for interpreting where awakenings are likely to occur. In short, this EIS presents considerable information on nighttime noise and how it is expected to change with each of the No-Action and Build Alternatives.</p>

"Michael Curry" <mcurry@pkpc.net>  
To Susan McDonald/AEA/FAA@FAA  
11/29/2004 03:36PM

Subject Phila Airport Runway Extension Project

Dear Ms. McDonald:

Kindly note my objection to any extension of the Phila. International Airport runway as presently being considered. My family lives in the flight path of numerous planes using that airport and we get more than enough low flying traffic with no expansion. It would only get worse in my estimation.

Thank you.

Michael J. Curry  
13 Landover Road  
Bryn Mawr, PA 19010

MCurry@pkpc.net  
610-687-1100  
609-560-5083  
610-505-3331 direct  
[www.redrival.com/michaelcurryesq/index.htm](http://www.redrival.com/michaelcurryesq/index.htm)

**Letter 75****Michael Curry**

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
75.1	Note my objection to any extension of the Phila[delphia] International Airport runway as presently being considered. My family lives in the flight path of numerous planes using that airport and we get more than enough low flying traffic with no expansion.	The FAA has noted and considered your comment.

**From:** BDaily0726@aol.com[SMTP:BDAILY0726@AOL.COM]

**Sent:** Wednesday, December 01, 2004 8:53:42 AM

**To:** PHL 17-35 EIS

**Cc:** curtpa07@mail.house.gov; arlen\_specter@specter.senate.gov;  
webmail@santorum-iq.senate.gov; robert.a.brady@mail.house.gov;  
chwilliams@pasenate.com; vitali@libertynet.org;  
rob.andrews@mail.house.gov; delaware@mail.house.gov;  
ph.mkt@mccormicktaylor.com

**Subject:** Runway 17-35 Extension - Draft EIS

Dear Ms. McDonald:

My husband and I have followed this project since the August of 2003 and have attended most of the FAA Meetings. We have been very dismayed by the tenor of the whole process. All along the FAA and the consulting firm Vanasse Hangen Brustlin, Inc (VHB ) have treated the extension of Runway 17/35 as a "fait accompli" with regard to the findings of the Environmental Impact Study. In February 2004, VHB's Vice President, Jonathan L. Feinstein stated in the February, 2004 issue of "Transportation Builder" [TB2004-ThePhilaStory](#) that Environmental Stewardship got the PHL project back on track and actual construction was scheduled to begin in a couple of years. This statement was made prior to the Draft EIS being completed and clearly points out that the FAA, PHL and VHB have never seriously considered any other alternatives to the Extension of Runway 17/35. This shows a complete lack of regard for the people who participated in these meetings and illustrates that these meeting were a complete sham and the public's input was a mere formality in the environmental streamlining process.

Only the goals of the airport and FAA were addressed rather than the 300,000 people in the flightpath which includes West Deptford & Paulsboro, NJ, parts of Delaware, Southwest Philadelphia, eastern Delaware County and parts of Lower Merion. Also, the DEIS does not include all the affected communities in their study. The boundaries of the study area were set at a radius of 5 miles out which conveniently left out the residential communities that will have their quality of life changed. Lengthening Runway 17/35 will bring larger narrow body aircraft up and down this flight track on a regular basis. Examples, Boeing -737's, 757's, and Airbus -319's ,320's and 321's. The two new carriers at PHL, Southwest and Frontier airlines, only have narrow body aircraft in their fleets. Southwest has 737's and Frontier has both 737's and Airbus aircraft. Presently, they can only land these type aircraft on Runway 17/35 if they have a headwind. Bringing these larger commercial jets over this flightpath on a regular basis will change the character of our communities drastically. Increased noise, vibration and overflights will compromise property values and economic development in these areas. Operations by regional jets are forecast to increase 144 percent between 2002 and 2010 from approximately 73,000 to 178,000 yearly operations. By 2010, combined regional jet and small narrowbody aircraft operations will total approximately 306,000 or 67 % of PHL's total aircraft operations. The communities under the present flightpath of 17/35 will unfairly bear the burden of the airport expansion. This is not "Environmental Justice." This supposedly short term solution will become the stop gap resolution for years to come because of the complexity of the (2) proposed long term solutions (complete airport redesign) will take years to

implement.

Although there are many viable alternatives to the extension, it appears that expediency and Federal funding is driving the solution to the capacity problem. At the FAA meeting (5/13/04) in Eastwick, the FAA representatives repeatedly said they would only consider a solution that can be implemented by 2007. This seems very shortsighted to us. Runway 8/26 which was completed in 1999 for a cost of 221 million dollars to taxpayers was less than five years ago. This Runway is already obsolete because of poor planning with regard to regional jet expansion. If this runway had been extended to the proper length five years ago to accommodate regional jets, the 17/35 project would not even be on the table. What assurances do taxpayers have that this purely date driven solution will not be obsolete before 2010? We also believe Extending Runway 17/35 is a flawed solution because it is an intersecting runway with Runway 9L/27R and may pose unanticipated congestion problems of its own due to the slower climb rates of Regional jets as compared to traditional jets.

The Draft EIS is severely flawed in its assumptions, and the process should be halted until all alternatives can be considered together seriously. There were many alternatives that surfaced at the FAA meeting that were not given consideration. A one minute delay improvement does seem to justify a project that will negatively impact the quality of life of so many people. The whole community outreach and scheduled meetings were orchestrated to minimize public participation and were disingenuous at best.

Sincerely,  
Bea and Tim Daily  
52 Yale Road  
Havertown, Pa 19083



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Office of the Associate  
Administrator for Airports

JAN 3 1 2005

Response to Letter #76

Mr. and Mrs. Tim Daily  
52 Yale Road  
Havertown, PA 19083

Dear Mr. and Mrs. Daily:

Administrator Blakey has asked me to respond to your email about the Philadelphia International (PHL) Airport Runway 17-35 Extension Project. In your email, you expressed concerns that the Federal Aviation Administration (FAA) did not evaluate all alternatives and that it did not consider the impacts to communities.

The FAA is sensitive to the concerns of the communities surrounding PHL. We made every reasonable effort to identify potential impacts to the surrounding communities and to the natural environment. Our environmental study followed the rigorous standards prescribed by the Council on Environmental Quality and the National Environmental Policy Act. We consulted with experts at State and Federal agencies and presented the results of our analyses to the public on several occasions. We included the results of our study of each environmental resource in the Draft Environmental Impact Statement (DEIS) for the proposed Runway 17-35 Extension.

The analysis of feasible alternatives in the DEIS explains the screening process we used to determine which alternatives we would carry forward for detail study. Because of the severe aircraft operational delays now at the airport, we agreed to consider both short- and long-term solutions. The Runway 17-35 extension project was designed to address these delay problems at PHL in the short-term. The Capacity Enhancement Project (CEP) is the longer-term project study.

The comment period for the Runway 17-35 extension DEIS ended on December 1, 2004. Once we consider comments that we have received, we will assess the potential impacts and benefits associated with the project. We will then release a Final Environmental Impact Statement (FEIS) for agency and public review. In the FEIS, we will address all substantive comments received and identify our preferred alternative.

We expect to release the FEIS in late March or early April 2005. After a minimum of 30 days from the date we release the FEIS, we will be able to publish our Record of Decision. The Record of Decision will provide our rationale for the final, preferred alternative and any mitigation requirements. Throughout this process, FAA will

continue to consider all local, State, and national implications that could potentially occur as a result of the alternative we select.

If I can be of further help, please let me know.

Sincerely,

**Original Signed by:**  
**Woodie Woodward**

Woodie Woodward  
Associate Administrator  
for Airports



From: Ed Datz[SMTP:DATZ@POBOX.UPENN.EDU]  
Sent: Tuesday, November 30, 2004 2:19:02 PM  
To: PHL 17-35 EIS  
Subject: 17-35 Expansion  
Auto forwarded by a Rule

Susan

As a resident of West Deptford township and specifically of 1303 Camelot Court Thorofare NJ, I am opposed to the proposed runway expansion of 17-35. I have given careful consideration to the information presented and the public discussions. My objections are many however I will attempt to list them in order of sensitivity:

1. Volume of flights and size of aircraft. My family and I moved to this property in July of 2003. The volume of flights at that time were significantly less than the volumes that have been experienced in the last 6 months. It was the occasional flights during the day and evening with the exception of "rush hour". The volumes since our arrival I would venture to guess have increased several fold. In addition the aircraft have went from turbo-prop to jets. On a recent evening the frequency of aircraft approaching for landing was the worst I have seen. In a period of 15 minutes 10 aircraft flew overhead. In addition the quantity of jets in this period was 7. This volume continued for several hours further into the evening when I returned to the indoors. Upon first moving in only turbo-props approached from this direction. Although also noisy, the size of aircraft provides a level of concern. I have reviewed your diagram boards and it only appears this situation will deteriorate further. Outside noise is bad enough, but the frequency and noise levels inside watching TV on the 29th of this month were extreme. Quite enjoyment within our home is being negatively impacted.

2. Safety regarding increased volumes of aircraft, as well as take-offs and landings. At present the patterns of aircraft are landings. As the expansion would allow takeoffs of larger aircraft the risks associated with takeoffs and the variation of noise will change significantly. The impact of aircraft taking off in the southeastern direction will further both noise and potential safety hazards. I am concerned for my family's well being. I would also like to better understand the health impacts of the increased volumes.

3. Impact to housing values. I have made a significant investment in this community due to it's schools and recreational offerings. My family will be negatively impacted by the items mentioned above and further impacted if this proposal is approved. Many people will be turned off by the frequency of aircraft overhead and the noise they make. Conversations are impossible in the yard as the aircraft fly overhead. The safety of children will weigh on any homebuyer.

In summary I realize this process will continue and additional studies will be conducted. I would appreciate a further understanding of the health risks, the noise study be updated to include the present aircraft volumes and airline makeup, and the benefits in light of the restrictions of landing as shipping travels up the Delaware. As well as the impact to property values. In addition, at minimum I would demand the restriction of aircraft in the night hours. We understand the needs to address the airport volume

issues however there seems to be several alternatives that have not been fully vetted. Our community will be adversely impacted by this expansion and I will continue to object to this solution.

Please continue to keep us updated on the status of this expansion.

Regards

Ed Datz  
856-845-9181

Letter 77

Ed Datz

Comment Number	Comment	Response
77.1	I have reviewed your diagram boards and it only appears this situation will deteriorate further. Outside noise is bad enough, but the frequency and noise levels inside watching TV on the 29th of this month were extreme. Quite enjoyment within our home is being negatively impacted.	<p>A comparison of the DNL contours for 2003 Existing Conditions and the 2007 No-Action Alternative indicate that aircraft noise will increase in New Jersey to the south of the Airport along the final approach to Runway 35, whether or not the project is implemented.</p> <p>As shown in Figures 4.2-6 and 4.2-7 in this EIS, Alternative 1 is projected to cause an increase in noise exposure, when compared to the No-Action Alternative for the corresponding future year, in New Jersey directly across the Delaware River and under the flight paths to Runway 17-35. However, no one in this area is projected to experience significant noise impact according to criteria established by the FAA in Order 1050.1E. In fact no one in New Jersey off the south end of Runway 17-35 even falls within the 60 DNL noise contour, though some people in the River Winds development and others living along Crown Point Road are exposed to DNL levels close to 60 dB.</p> <p>Figures 4.2-8 and 4.2-9 of this EIS indicate very small reductions in noise exposure due to Alternative 2 because, though there are more aircraft projected to use the extended Runway, it will be used more for takeoffs to the north on 35 and slightly less for landings on 35 than either the Build Alternative 1 or the No-Action Alternative. In addition, aircraft arriving to land on Runway 35 will utilize the 1,444 foot displaced threshold on the extended runway so that they will actually be slightly higher in the air over this part of New Jersey than under the No-Action Alternative, and aircraft departing to the south on 17 will be using the extension at the north end of the runway so that they too will be higher over New Jersey than under the No-Action Alternative. These factors combine to produce the slight reductions in exposure relative to the No-Action Alternative that are seen in the referenced figures.</p>
77.2	Safety regarding increased volumes of aircraft, as well as take-offs and landings.	Safety is the FAA's highest priority, and the agency will ensure that the design of the Runway 17-35 Extension Project properly protects the public safety. The Preferred Alternative will meet all FAA safety standards and design criteria. The extended runway will reduce congestion in the current primary east-west operating direction, and will reduce the reliance on Runways 9L/27R and 9R/27L during heavy demand. This will enhance safety.
77.3	As the expansion would allow takeoffs of larger aircraft the risks associated with takeoffs and the variation of noise will change significantly. The impact of aircraft taking off in the southeastern direction will further both noise and potential safety hazards.	<p>The extension of Runway 17-35 would not create new flight paths. As a result of the runway extension, aircraft using Runway 17-35 for approaches or departures would be shifted approximately 640 feet north (in areas north of the airport) and 400 feet south (in areas south of the airport). The extension of Runway 17-35 does not increase the potential for crashes in areas under these existing flight tracks.</p> <p>Safety is the FAA's highest priority, and the agency will ensure that the design of the Runway 17-35 Extension Project properly protects the public safety. The Preferred Alternative will meet all FAA safety standards and design criteria. The extended runway will reduce congestion in the current primary east-west operating direction, and will reduce the reliance on Runways 9L/27R and 9R/27L during heavy demand. This will enhance safety.</p>
77.4	Impact to housing values [in West Deptford]. I have made a significant investment in this community due to it's schools and recreational offerings. My family will be negatively impacted by the items mentioned above and further impacted if this proposal is approved. Many people will be turned off by the frequency of aircraft overhead and the noise they make. Conversations are impossible in the yard as the aircraft fly overhead. The safety of children will weigh on any homebuyer.	Property values depend on many factors. One factor is the environment. This Project will not have significant impact on noise or environmental impacts. Is it unlikely that there would be an impact on property values.

Letter 77

Ed Datz

Comment Number	Comment	Response
77.5	I would appreciate a further understanding of the health risks...	General information on this topic can be found on the following EPA and PA DEP websites: <a href="http://www.epa.gov/ttn/atw/index.html">http://www.epa.gov/ttn/atw/index.html</a> <a href="http://www.epa.gov/region4/air/airtoxic/index.htm">http://www.epa.gov/region4/air/airtoxic/index.htm</a> <a href="http://www.epa.gov/superfund/programs/risk/index.htm">http://www.epa.gov/superfund/programs/risk/index.htm</a> <a href="http://cfpub2.epa.gov/ncea/">http://cfpub2.epa.gov/ncea/</a> <a href="http://www.dep.state.pa.us/">http://www.dep.state.pa.us/</a> <a href="http://www.dep.state.pa.us/dep/deputate/airwaste/aq/toxics/toxics.htm">http://www.dep.state.pa.us/dep/deputate/airwaste/aq/toxics/toxics.htm</a>
77.6	noise study be updated to include the present aircraft volumes and airline makeup...	The noise analysis is accurate and the FAA believes it accurately predicts the difference in noise levels between the future No-Action condition and the Preferred Alternative. The model was based on the best available data which included information from 2003 and three months of 2004.
77.7	...benefits in light of the restrictions of landing as shipping travels up the Delaware.	The delay reduction analysis and corresponding environmental analyses, assume that arrivals on Runway 35 are suspended when ships are in the approach path, approximately four times per 24-hour period and for 15 minutes each.
77.8	...demand the restriction of aircraft in the night hours...	There is an existing voluntary noise abatement procedure in place for Runway 17-35. Every attempt is made to limit departures on Runway 35 (to the north) and arrivals on Runway 17 (from the north) between the hours of 11 PM and 6 AM. However, from time to time, the noise abatement procedure may not be used based on operational safety criteria conditions (weather/wind, visibility, volume of traffic, delays, pilot discretion, construction, etc.). This existing noise abatement procedure is voluntary and will remain so in the future. The Part 150 Study further describes the nature of the night time runway use plan. Any permanent access restriction would need to be considered as part of a FAR Part 161 Study, which can only be initiated by the airport sponsor.
77.9	...seems to be several alternatives that have not been fully vetted...	The commentor has not recommended any additional alternatives that the FAA should evaluate. As described in Chapter 3, all reasonable alternatives were considered and analyzed for the Project. These alternatives were eliminated because they would not achieve the project's purpose and need in the short term.



Philadelphia International Airport  
Runway 17-35 Extension Project  
Environmental Impact Statement

Public Hearings  
November 15, 16, 17, and 18, 2004

Public Comment Form

The Federal Aviation Administration (FAA) encourages all interested parties to provide comments concerning the scope and content of the DEIS. Comments should be as specific as possible and address the analysis of potential environmental impacts and the adequacy of the proposed action or merits of alternatives and the mitigation being considered. Reviewers should organize their participation so that it is meaningful and makes the agency aware of the viewer's interests and concerns using quotations and other specific references to the text of the DEIS and related documents. Matters that could have been raised with specificity during the comment period on the DEIS may not be considered if they are raised later in the decision process. This commenting procedure is intended to ensure that substantive comments and concerns are made available to the FAA in a timely manner so that the FAA has an opportunity to address them.

Please clearly print your contact information and your comment on the DEIS in the space below. Space is also available on the back page. Please either drop this form off tonight at the sign-in table or mail this form to the contact and address listed at the bottom of the back page. You can also submit your comments via email ([smcdonald.faa.17-35@vhb.com](mailto:smcdonald.faa.17-35@vhb.com)) or the Project web site ([www.phlrunway17-35eis.com](http://www.phlrunway17-35eis.com)), where the DEIS is available.

Comments must be received by **December 1, 2004** in order to be considered.

Thank you for participating.

Name: DONALD W. DAVIS

Address: 6 BEECH PLACE

City: WOODBURY (POST OFFICE); (WEST DEPTFORD TWP)

State: N.J. Zip Code: 08096

E-mail Address: —

PLEASE PRINT CLEARLY

Comment: MY WIFE AND I ATTENDED THE NOV 17<sup>th</sup> HEARING  
ON THE EXTENSION OF RUNWAY 17-35. THERE, AN AIR  
TRAFFIC CONTROLLER STATED, THAT 17-35 OFTEN CAN-  
NOT BE USED BECAUSE OF FOGGY CONDITIONS, SO  
I QUESTION WHETHER LENGTHENING THIS RUNWAY  
IS A VIABLE SOLUTION. HE SUGGESTED RELIEVING  
CONGESTION BY LENGTHENING A NORTH-SOUTH  
RUNWAY.

(OVER)



Philadelphia International Airport  
Runway 17-35 Extension Project  
Environmental Impact Statement

Public Hearings  
November 15, 16, 17, and 18, 2004

Comment (cont.) I WONDER WHAT WAS THE COMPOSITION  
OF THE GROUP WHICH FOUND ONLY THESE TWO  
PLANS. WERE AIR TRAFFIC CONTROLLERS  
CONSULTED FOR THEIR OPINIONS? WERE ANY  
CONTROLLERS ON THE PANEL?

IF RELIEVING CONGESTION AND FLIGHT  
DELAYS IS THE OBJECTIVE, THEN LENGTHENING  
A RUNWAY WHICH FREQUENTLY MIGHT NOT BE  
AVAILABLE DOESN'T SEEM TO BE THE BEST CHOICE.

RECENTLY WE HAVE NOTICED AN INCREASE IN  
NOISE, IN NUMBER OF FLIGHTS AND IN LOWER AIR-  
CRAFT, (PERHAPS BECAUSE OF CIRCLING WHILE  
WAITING TO LAND). IN ANY CASE, WE DON'T WANT  
THE PRESENT INCREASE AND CERTAINLY ANY  
FURTHER INCREASE IN NOISE, LOW FLYING  
AIRCRAFT AND NUMBER OF FLIGHTS, WOULD BE  
UNACCEPTABLE.

Please drop off this form at the sign in table before you leave the hearing or mail this form to the following address:

Susan McDonald, FAA Environmental Protection Specialist  
c/o VHB  
101 Walnut Street  
PO Box 9151  
Watertown, MA 02471-9151

Additional Page Included  Yes  No

Letter 78

Donald Davis

Comment Number	Comment	Response
78.1	An air traffic controller stated that 17-35 often cannot be used because of foggy conditions; so I question whether lengthening this runway is a viable solution. He suggested relieving congestion by lengthening a north-south runway.	This project involves the extension of Runway 17-35, which is a north-south runway. Runway 17 is a precision instrument runway that can be used in poor weather conditions.
78.2	I wonder what was the composition of the group which found only these two plans. Were air traffic controllers consulted for their opinions? Were any controllers on the panel?	The two alternatives presented in the EIS were among many candidate alternatives that were screened for their ability to meet the project's purpose and need. As described in Chapter 3, the candidate alternatives were identified in the Master Plan Update, through NEPA scoping, and by the FAA. FAA staff involved in the screening included airspace experts. Air Traffic controllers were involved throughout the planning and EIS process.
78.3	If relieving congestion and flight delays is the objective, then lengthening a runway which frequently might not be available doesn't seem to be the best choice.	The delay reduction analysis and corresponding environmental analyses, assume that Arrivals on Runway 35 are suspended when ships are in the approach path, approximately four times per 24-hour period and for 15 minutes each. Even if ship traffic were to increase in the future, extending Runway 17-35 would still achieve the Project's Purpose.
78.4	We don't want the present increase and certainly any further increase in noise, low flying aircraft and number of flights would be unacceptable.	The FAA has noted and considered your comment. No significant increase in flights or noise are projected for this Project.

From: Ruth[SMTP:MRDEFRANCESCO1@PEOPLEPC.COM]  
Sent: Sunday, November 28, 2004 4:30:31 PM  
To: PHL 17-35 EIS  
Subject: Proposed expansion runway 17-35 @ Phila. Internatl Airport  
Auto forwarded by a Rule

My husband and I have lived in our present home for over 29 years and I can tell you that we are still unhappy about the noise and safety from the air traffic over our residence.

I cannot imagine what the impact would be if the proposal is approved for putting larger aircraft at lower altitudes in our neighborhood. Our township is among, if not the, largest in Pennsylvania, with a very large concentration of housing and children.

I do hope that you will take all these facts into consideration.

Thank you.

Ruth De Francesco



## Letter 79

Ruth DeFrancesco

Comment Number	Comment	Response
79.1	...safety from the air traffic over our residence...I cannot imagine what the impact would be if the proposal is approved for putting larger aircraft at lower altitudes in our neighborhood.	<p>Safety is the FAA's highest priority, and the agency will ensure that the design of the Runway 17-35 Extension Project properly protects the public safety. The Preferred Alternative will meet all FAA safety standards and design criteria. The extended runway will reduce congestion in the current primary east-west operating direction, and will reduce the reliance on Runways 9L/27R and 9R/27L during heavy demand. This will enhance safety and reduce the potential for accidents.</p> <p>The Proposed Project will not result in any noticeable change in flight tracks, which are determined by the location of the centerline of the runway. The number of aircraft using Runway 17-35 is anticipated to increase, but will not result in significant noise impacts at any location, nor will the elevation at which aircraft approach the runway change substantially as a result of the runway extension.</p>

**From:** Rich DeNick[SMTP:DENICK@NETCARRIER.COM]

**Sent:** Sunday, November 21, 2004 10:40:40 AM

**To:** PHL 17-35 EIS

**Subject:** Fw: runway 17-35

----- Original Message -----

**From:** [Rich DeNick](#)

**To:** [smcdonald.faa17-35@vhb.com](mailto:smcdonald.faa17-35@vhb.com) ; [sensweeney@njleg.org](mailto:sensweeney@njleg.org) ; [asmburzichelli@njleg.org](mailto:asmburzichelli@njleg.org) ; [asmfisher@njleg.org](mailto:asmfisher@njleg.org) ; [senmadden@njleg.org](mailto:senmadden@njleg.org) ; [asmmayer@njleg.org](mailto:asmmayer@njleg.org) ; [asmrsmith@njleg.org](mailto:asmrsmith@njleg.org)

**Sent:** Sunday, November 21, 2004 10:27 AM

**Subject:** runway 17-35

**We moved to Riverwinds in Thorofare N.J. 3 years ago. The only planes that we saw were small commuter planes that flew south of us over Paulsboro. For the past 6 months or so there has been more air traffic. Some of the commuters appear to be lost. They sometimes fly over our house toward the air port, then they have to bank rather steep to make the runway. Some don't make it and have to go around. There are reports that when a large tanker is going by on the Delaware River some planes can't land because the ships interrupt the radar.**

**I don't think it is very safe to extend the runway. The planes will fly lower, the planes will be bigger, the noise will be louder, the radar will have more problems, and if they get lost we are liable to have one in our house!**

**Margaret and Richard DeNick  
182 Blue Heron Dr.  
Thorofare N.J. 08086**

Letter 80

Margaret and Richard DeNick

Comment Number	Comment	Response
80.1	I don't think it is very safe to extend the runway. The planes will fly lower, the planes will be bigger, the noise will be louder, the radar will have more problems.	<p>As documented in this EIS, there are forecast to be 528,400 annual operations at the Philadelphia International Airport in 2007, whether the Runway 17-35 Extension is constructed or it is not constructed. This is an increase of 82,433 annual operations from the annual 445,967 operations in 2003.</p> <p>In the No-Action Alternative, 103,279 of these operations would occur on Runway 17-35, with 36,177 of them departures to or arrivals from the north over Pennsylvania and 67,102 departures to or arrivals from the south over New Jersey. In the Preferred Alternative (Alternative 1) 148,088 of these operations would occur on Runway 17-35, with 60,161 of them departures to or arrivals from the north over Pennsylvania and 77,927 departures to or arrivals from the south over New Jersey. Thus, the difference between the No-Action Alternative and the Preferred Alternative (Alternative 1) is 44,809 operations on Runway 17-35, with 33,984 of them departures to or arrivals from the north over Pennsylvania and 10,825 departures to or arrivals from the south over New Jersey.</p> <p>As shown in the flight track figures, (Figure 4.2-2 and 4.2-3, not all of the operations fly over the same point on the ground.</p> <p>As a result of the runway extension to the north and south, departures from Runway 17 35 would be at a slightly higher altitude over the communities and arrivals would be at a slightly lower altitude than for the No-Action Alternative. This difference would be on the order of approximately 20 feet and would likely not be noticeable.</p> <p>The Air Traffic Control Tower has adequate capacity to safely handle the projected air traffic.</p>

**From:** Vince D[SMTP:EAGLEDAD@SNIP.NET]  
**Sent:** Friday, November 19, 2004 10:18:34 AM  
**To:** PHL 17-35 EIS  
**Cc:** PHL 17-35 EIS  
**Subject:** Expansion of Runway at PHL

I'm a resident of Thorofare, NJ, and against the expansion of runway 15-35 at PHL, that will directly effect my community.

I understand that there are other alternatives to this plan.

I urge you to seek out one of those alternatives to the 17-35 plan.

Sincerely,

Vincent DiTullio 407 Stuart CT. Thorofare, NJ 08086

**Letter 81****Vincent DiTullio**

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
81.1	I understand that there are other alternatives to this plan. I urge you to seek out one of those alternatives to the 17-35 plan.	As described in Chapter 3, a number of alternatives were considered and analyzed for the Project. These alternatives were eliminated because they would not achieve the project's purpose and need.

**From:** Stephen Donato[SMTP:SDONATO@COMCAST.NET]  
**Sent:** Thursday, December 02, 2004 12:00:27 AM  
**To:** PHL 17-35 EIS; jim.byers@faa.gov; carolyn\_casey@carper.senate.gov  
**Cc:** Reeb Ralph (DelDOT)  
**Subject:** EIS Comments -- Does 2 week extension included Delaware?

108th Congress  
H.R. 2989: Transportation, Treasury, and Independent Agencies Appropriations Act,  
2004

Section 109 -

Declares that it is the sense of the Senate that the Secretary of Transportation must, in connection with the Philadelphia International Airport Capacity Enhancement Program, consider the impact of aircraft noise on northern Delaware: (1) within the scope of the environmental impact statement prepared in connection with the Program; and (2) as part of any study of aircraft noise required under the National Environmental Policy Act of 1969 and conducted pursuant to specified regulations.

Please extend comment period for 17-35 as we believe the FAA has not satisfied the requirement for the amendment above. The noise models **do not accurately model total noise exposure for the residents of Northern Delaware and I assume other communities in PA like Chester, PA.** Other noise sources include highways and railroads.

Stephen Donato  
2304 Graywood Rd.  
Wilmington DE, 19810.

**Letter 82****Stephen Donato**

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
82.1	The noise models do not accurately model total noise exposure for the residents of Northern Delaware and I assume other communities in PA like Chester, PA. Other noise sources include highways and railroads.	The potential noise impacts of the alternatives under consideration for the Runway 17-35 Extension were assessed in accordance with FAA Order 1050.1E. This order sets forth the policy and procedures for implementing the NEPA process for airport projects. Consideration of the potential noise impact of non-aviation sources would be limited to those sources that are included as part of an airport project such as surface transportation improvements in the vicinity of the airport, e.g. the construction of a new access road or the relocation of an existing road. Only aircraft noise is taken into account when assessing impacts of changes in aircraft operations. While there are areas in some communities with high levels of ambient noise, the contribution of aircraft is not significant.

**From:** jwismer@comcast.net[SMTP:JWISMER@COMCAST.NET]  
**Sent:** Monday, November 29, 2004 12:45:58 PM  
**To:** PHL 17-35 EIS  
**Cc:** jwismer@comcast.net  
**Subject:** Runway Extension Proposal

I am writing to protest the extension of Runway 17-35. West Deptford Township already suffers enough noise and particulate pollution from Philadelphia International Airport. I have asthma and it is exacerbated by the particulate pollution from air traffic. Inept scheduling and runway management has already resulting in excess traffic percolating over my neighborhood, contributing to the noise and particulate pollution and in general eroding the quality of life in West Deptford. How about some residents in Philadelphia County taking all the new flight traffic, build the runway so there is another flight path over the city. I oppose any extension to runway 17-35.

Sincerely,

Alice Doosey  
154 Ashton Ct.  
Mantua, NJ  
08051



**Letter 83**

Alice Doosey

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
83.1	West Deptford Township already suffers enough noise and particulate pollution from Philadelphia International Airport. I have asthma and it is exacerbated by the particulate pollution from air traffic.	As shown in Tables 4.5-7 and 4.5-12 of this EIS, the airport's contribution to regional emissions of all air pollutants will be reduced with the implementation either alternative of the Proposed Project. It is reasonable to expect that these reductions will include decreases in particulate emissions from aircraft.
83.2	How about some residents in Philadelphia County taking all the new flight traffic, build the runway so there is another flight path over the city.	This project does not involve the construction of any new runways. The Capacity Enhancement Project (CEP) may include the construction of other runways. CEP, as noted in Chapter 1, is a long-term, major redevelopment project that would result in additional capacity and, as a result, more comprehensive and longer-term delay reduction.

**From:** thedorsetts@comcast.net[SMTP:THEDORSETTS@COMCAST.NET]  
**Sent:** Tuesday, November 30, 2004 8:27:09 PM  
**To:** PHL 17-35 EIS

I have been a West Deptford resident 30 years, and i would like to agree with Tom McDonald when he suggested that fewer flights be scheduled to reduce delays. I also am not happy with the amount of aircraft already flying over my house.

**Letter 84****The Dorsetts**

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
84.1	I have been a West Deptford resident 30 years, and I would like to agree with Tom McDonald when he suggested that fewer flights be scheduled to reduce delays. I also am not happy with the amount of aircraft already flying over my house.	Chapter 3 of the EIS describes the administrative approaches, including demand management, that were evaluated for this Project.

Nov 21, 2004

Susan McDonald:

Re: Philadelphia International  
Airport Expansion

I and my family have lived  
in West Deptford, New Jersey  
along Highway 295. We  
have put up with ground  
traffic for thirty-eight (38)  
years, along with air  
traffic. We don't need  
air planes flying over my  
house any closer than they  
are doing it now.

"No Expansion", "No Planes"  
over my home any more!

We don't care about the  
delays because of runways  
17-35. I fly sometimes  
and I don't care if I have  
to wait ten (10) more  
minutes on the runway.

Sincerely,

William<sup>3rd</sup> Maryland  
Rougherty

360 Ripley Place  
Northbury, NJ  
08096

**Letter 85****William and MaryAnn Dougherty**

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
85.1	We don't need airplanes flying over my house any closer than they are doing it now. No expansion, no planes over my home any more!	The FAA has noted and considered your comment.

----- Original Message -----

**From:** [Linda](#)

**To:** [smcdonald.faa.17-35@vhb.com](mailto:smcdonald.faa.17-35@vhb.com)

**Sent:** Monday, November 29, 2004 7:23 AM

**Subject:** Runway Extension 17-35

Dear Ms. McDonald,

I am writing concerning my objections to the proposed extension of runway 17 over West Deptford. I am a recent resident of the RiverWinds Reserve and presently are upset at the number of planes that fly at low levels over the housing development. I particularly noticed that the number has seemed to increase over the last year or is it that they are flying at lower levels. I moved to the Reserve because of it's beauty and peacefulness. The impact of the air traffic is not pleasant and I am concerned about the property values. My home was a very large investment and I had saved for many, many years in order to purchase. It is distressing to think what a bad investment it maybe with the impact of the proposed runway. I would think knowing the coastline in this area that an alternate route would be available.

PLEASE CONSIDER AN ALTERNATE ROUTE .... the citizens of West Deptford only hope that our voice will be heard. Thank you, Linda Driscoll ... 13 Starling Court ...Reserve at RiverWinds.

Letter 86

Linda Driscoll

Comment Number	Comment	Response
86.1	I am a recent resident of the RiverWinds Reserve. The impact of the air traffic is not pleasant and I am concerned about the property values. My home was a very large investment and I had saved for many, many years in order to purchase. It is distressing to think what a bad investment it maybe with the impact of the proposed runway.	Property values depend on many factors. One factor is the environment. This Project will not have significant impact on noise or environmental impacts. It is highly unlikely that any property values will decrease as a result of this Project.
86.2	PLEASE CONSIDER AN ALTERNATE ROUTE.	As described in Chapter 3, a number of alternatives were considered and analyzed for the Project. These alternatives were eliminated because they would not achieve the project's purpose and need. Alternate routes do not alleviate delay, which is caused by the increased number of regional jets on the primary runways.

**From:** FDrye8110@aol.com[SMTP:FDRYE8110@AOL.COM]

**Sent:** Wednesday, December 01, 2004 12:30:39 PM

**To:** PHL 17-35 EIS

**Subject:** Phila. International Airport: Runway 17-35 Extension Environmental Impact

This list of names and residents living in close proximity to the Philadelphia International Airport are among those who are concerned about the noise and air pollution levels which will escalate when Runway 17-35 becomes extended and impact our neighborhood with lethal and dangerous pollutants: be it noise or air pollutants.

Robert Ladson, 8113 Titan Pl.

Daryl and Eloise Moore, 8111 Titan Pl.

Deloris Parker, 8109 Titan Pl.

Martha Thomas, 8107 Titan Pl.

Lewis Smith, 8105 Titan Pl.

Ministers Jackie and Myrtle Cannon, 8103 Titan Pl.

Harvey Moat, 8101 Titan P.

Katie Echols and Varis Jones, 8145 Chelwynde Ave.

Donald Canty, 8143 Chelwynde Ave.

Rachel Leach, 8141 Chelwynde Ave.

Earl and Crystal Jefferson, 8139 Chelwynde Ave.

Vivian and Ted Bythewood, 8137 Chelwynde Ave.

Price Mathis, 8135 Chelwynde Ave.

Sampson and Shirley Banks, 8125 Chelwynde Ave.

Bill and Doris Williams, 8123 Chelwynde Ave.

Gene L....., 8138 Chelwynde Ave.

Rev and Mrs. Wood, Jr., 8120 Chelwynde Ave.

Geraldine Richardson, 8118 Chelwynde Ave.

Robin Summers, 8116 Chelwynde Ave.

Rev. and Mrs. Waters, 8114 Chelwynde Ave.

Dorothy Porcellini, 8112 Chelwynde Ave.

Foster and Edna Drye, 8110 Chelwynde Ave.

The above list of residents all live in Philadelphia, Pennsylvania 19153.

Foster Drye: Block Captain. E-mail address Fdrye8110@aol.com



**From:** FDrye8110@aol.com[SMTP:FDRYE8110@AOL.COM]  
**Sent:** Wednesday, December 01, 2004 3:39:35 PM  
**To:** PHL 17-35 EIS  
**Subject:** Impact of Runway 17-35

Earlier this afternoon I sent a list of concerned residents. They are concerned about the lethality of air pollution and the stress of noise pollution. Please include Mr. and Mrs. Willie Williams to that list. Their address is 8205 Lindbergh Blvd., Phila., Pa. 19153.

Thank You,

Foster Drye, Block Captain  
E-mail address: FDRYE8110@AOL.COM

**Letter 87****Foster Drye**

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
87.1	...concerned about the noise and air pollution levels which will escalate when Runway 17-35 becomes extended and impacts our neighborhood with lethal and dangerous pollutants: be it noise or air pollutants.	The DEIS demonstrated that compared to the No-Action Alternative, either alternative of the Proposed Project will reduce air pollution emissions in the region, and that ambient pollutant concentrations will remain well below the National and Pennsylvania Ambient Air Quality Standards. (See Tables 4.5-7 and 4.5-12 of this EIS, and DEIS Appendix H of the Air Quality Technical Report).

Ray Edwards  
431 Wyndom Terr.  
Holmes, Pa. 19043

11-24-04

Dear Susan,

yesterday I got from a friend back issues of our local paper, the Delaware County Daily Times.

In the 11-12 + 11-15 issues are two bizarre stories of upper Darby opposing your runway extension plan. Apparently they think your expanded runway will somehow endanger the school. This is so far-out and crazy that these ridiculous claims must be totally dismissed. It's like something out of the Twilight Zone! How in the world can this Superintendent Lou DeVilger be serious?

Upper Darby is at least 10 miles away from the airport and they're worried about an airplane hitting the school?! It's total insanity! And they are also worried about airplanes hitting hospitals!

This is just so weird. I had to read these two stories about six times. I thought I was missing something. Just the 11-12 headline alone evokes a strangeness, "Upper Darby Joins Chorus Against Runway Project". Everybody knows Upper Darby is miles and miles away. Where are the concerns from neighboring communities schools and hospitals? There are none! Because common sense says that

there is no threat. Why aren't all the schools in, let's say a 10 mile radius protesting? Why aren't all the hospitals in a 10 mile radius protesting? It's because there simply is no threat, and to say there is, is just weird, twisted, illogical; and questionable thinking.

I can't believe that this even made it into the newspaper. These people must just be dismissed as your typical wackos. Once again we have proof that not everyone in high positions have brains. Go ahead and build your runway, and don't worry about these idiots.

Sincerely,

Ray Edwards

P.S.

What scares me is that these people are serious about this, and they don't care that their twisted; bizarre; illogical thinking has been exposed to thousands of readers.

Local

# Airport runway opponents take off at public hearing

Residents likely to be impacted by expansion have their say to DEIS officials.

By JOHN M. ROMAN  
jroman@delcotimes.com

**RIDLKY TOWNSHIP** — Opponents of the Runway 17-35 Extension Project of the Philadelphia International Airport Monday night ranged from homeowners to Upper Darby School District officials and a Lower Merion police superintendent.

They were among a dozen speakers who voiced their concerns about the effects of the expansion that is supposed to reduce airport delay times. Only some 20 people filled the audience at the public hearing on the Draft Environmental Impact Statement at the Ridley Community Center.

Louis DeVlieger, Upper Darby assistant superintendent, school board president William Gaul Jr. and board member Rose Conley appeared at the microphone together.

"Do you know that in our own township you are flying over six different schools and a hospital?" DeVlieger said. "Now already tonight numerous people have mentioned to you the concern for another Sen. Heinz tragedy."

"You who deal with planes every day may say it will never happen again, the statistics don't fit that," he said. "Well, you play statistics; we play concern for our children."

If the latter factor isn't enough to change the flight pattern, DeVlieger said, then he cited another issue

about Upper Darby schools.

"You are severely impacting on the instruction taking place in those schools," he said.

"We are all concerned, residents are concerned about the students being in harm's way ... a total of 12,000 students in the district," Conley said. "We urge you and we hope it's not a done deal."

Gaul said he also serves as Upper Darby emergency management coordinator, "... so I have a dual responsibility and a concern about the flight pattern and also the possible catastrophe that could happen with not just the school buildings..." but also area hospitals.

Lower Merion Police Superintendent Joseph J. Daly recalled the tragic aviation crash on April 4, 1991, above a Lower Merion elementary school that resulted in the death of two 6-year-olds and severe injuries to others as well as the death of Sen. John Heinz.

Speaking on behalf of township commissioners, he asked Federal Aviation Administration officials to attend a meeting in his township, include Lower Merion in the EIS and postpone the project to allow input.

John Denning of Ridley Park, who moved to the borough five years ago, said one of the reasons he moved there was "... because it's a quiet community."

"My main concern as a resident of Ridley Park is to maintain the quiet environment that I live in now,"

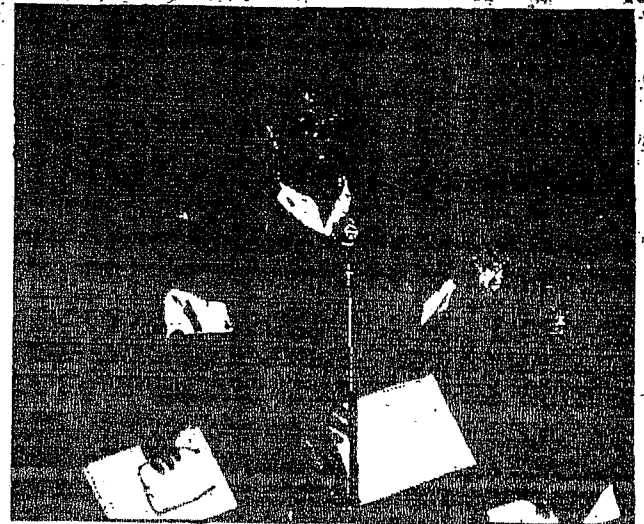
Denning said. "On my way in tonight, I stood outside and looked up at the sky and I didn't see any planes. I didn't hear any noise. I saw the stars; I didn't see clouds..."

"I would like to see it to remain that way," he said. Sal Ferraro of Haverford, a member of the Coalition of Communities Against Runway 17-35, a citizens group formed about six weeks ago, said, "our goal is to unite

“Do you know that in our own township you are flying over six different schools and a hospital?”

LOUIS DeVIEGER,  
Upper Darby School District  
assistant superintendent

”



Times staff / ROBERT J. GURECKI

Upper Darby Assistant Superintendent Lou DeVlieger, center, is flanked by school board President Bill Gaul and school board member Rose Conley as he speaks at Monday night's meeting.

the communities of Delaware County and neighboring communities to block the extension" of the runway.

Members of the coalition include Haverford commissioners, League of Women Voters of Haverford Township, Haverford Civic Council, U.S. Rep. Curt Weldon, R-7, state Sen. Connie Williams, D-17, state Sen. Edwin "Ted" Erickson, R-26, Upper Darby, Tinicum, Lower Merion commissioners and Yeadon, Ferraro said.

Public hearings are also scheduled 7-9 p.m. Wednesday at Brandywine High School, 1400 Foulk Road, Wilmington, Del., and 7-9 p.m. Thursday at Eastwick at the Meadows, 6630 Lindbergh Blvd., Philadelphia.

In addition to public comment at the hearings, residents can submit comments on a public comment form, which must be received by Dec. 1 in order to be considered.

Comments can also be submitted via e-mail: smcdonald.faa.17-35@vbb.com or the project Web site: www.phlrunway17-35eis.com, where the DEIS is available.

Local

# Upper Darby joins chorus against runway project

By LINDA REILLY  
Times Correspondent

**UPPER DARBY** — Opposition to Philadelphia International Airport's Runway 7-35 extension project is taking off in the township.

Councilman Thomas Micozzie, chairman of the Public Safety Committee, recommended the board adopt a resolution officially opposing the plan at the work session this week.

Board President Jack Clark previously announced someone from the township could attend the FAA public hearing.

Marcia Brunelli, of Agnew Drive, a mem-

ber of the Coalition of Communities Against Runway 17-35, has addressed both Upper Darby Council and Upper Darby School Board members several times, urging their support in opposing the extension plans and attending an FAA public hearing.

"I appeal to the school board to send a representative from our district to testify at one of the two FAA hearings for the airport extension project," Brunelli said. "We need to send a strong message to the FAA that our students will be put in harm's way by this project. I strongly urge residents and parents to attend. It's really important to get a good representation.

"Runway 17-35 is on a fast track, and as it stands, Dec. 1 is the cutoff date for all input," he said, stressing the urgency of making their opposition known. "We will discuss it and try to get somebody there," school board President William Gaul said.

Solicitor Francis J. Catania announced the FAA will accept written comments.

The next public hearings on Runway 17-35 will be 7-9 p.m. Monday at the Ridley Community Center, 801 Morton Ave.,

Folsom, and Thursday at Eastwick at the Meadows, 6630 Lindbergh Blvd., Philadelphia.

The deadline to submit a written comment is Dec. 1.

Letters can be forwarded by mail to Susan McDonald, U.S. Department of Transportation, FAA, Harrisburg Airports District Office, 3905 Hartzdale Drive, Suite 508, Camp Hill, PA 17011; or through the Web site at [smcdonald.faa.17-35@vhb.com](mailto:smcdonald.faa.17-35@vhb.com).

**Letter 88**

**Ray Edwards**

**Comment  
Number**

**Comment**

**Response**

88.1	See letter.	The FAA has noted and considered your comment.
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Nov 3, 2009

Dear Ms Mc Small,

I live in West Deptford and would like to comment about the runway at Philadelphia Airport. It's probably passed the deadline, but I wanted to make my comments heard.

I have lived in West Deptford for 28 years. Hearing the noise from air planes is a part of our every day lives here. Some are louder than others. At times you have to stop conversation because you can't hear the planes are so loud. You can't hear on the phone, watch TV or talk with your family while the planes are over head. Sometimes they sound sound like the planes are landing on our roof. Please change the runways so we don't hear any more noise from air planes.

One last comment. On the night of 9-11 my husband + I kept saying to each other, it's so quiet, why is it so quiet? We both realized there were no planes flying at the air port.

Sincerely,

J. Ann Egan

30 H St

West Deptford NJ 08096



**Letter 89**

**JoAnn Egan**

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
89.1	Sometimes they ...sound like the planes are landing on our roof. Please change the runways so we don't hear any more noise from airplanes.	Increased noise and traffic is projected to occur at PHL over the next 3 to 11 years and will cause noise exposure levels in all areas near the airport to increase to some degree, regardless of whether the proposed project is implemented or not. This is illustrated in Figure 4.2-5 of this EIS.



Philadelphia International Airport  
Runway 17-35 Extension Project  
Environmental Impact Statement

Public Hearings  
November 15, 16, 17, and 18, 2004


Public Comment Form

The Federal Aviation Administration (FAA) encourages all interested parties to provide comments concerning the scope and content of the DEIS. Comments should be as specific as possible and address the analysis of potential environmental impacts and the adequacy of the proposed action or merits of alternatives and the mitigation being considered. Reviewers should organize their participation so that it is meaningful and makes the agency aware of the viewer's interests and concerns using quotations and other specific references to the text of the DEIS and related documents. Matters that could have been raised with specificity during the comment period on the DEIS may not be considered if they are raised later in the decision process. This commenting procedure is intended to ensure that substantive comments and concerns are made available to the FAA in a timely manner so that the FAA has an opportunity to address them.

Please clearly print your contact information and your comment on the DEIS in the space below. Space is also available on the back page. Please either drop this form off tonight at the sign-in table or mail this form to the contact and address listed at the bottom of the back page. You can also submit your comments via email ([smcdonald.faa.17-35@vhb.com](mailto:smcdonald.faa.17-35@vhb.com)) or the Project web site ([www.phlrunway17-35eis.com](http://www.phlrunway17-35eis.com)), where the DEIS is available.

Comments must be received by **December 1, 2004** in order to be considered.

Thank you for participating.

Name:  Ms. Michele K. Ellison  
1568 Center St  
Thorofare NJ 08086

Address: \_\_\_\_\_

City: \_\_\_\_\_

State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

E-mail Address: \_\_\_\_\_

PLEASE PRINT CLEARLY

Comment: I live in the other Thorofare - not Riverwinds  
(08043)  
you must go past National Park to get here. Please  
NO MORE AIR TRAFFIC, I hate cold weather but  
at least the windows are closed to cut down on  
the noise. Because of medicinal problems I sleep  
whenever I can. I am up all night at times and  
after 11:30pm the planes arrive and depart much lower  
than day time - at times I am sure I have tire prints

→



Philadelphia International Airport  
Runway 17-35 Extension Project  
Environmental Impact Statement

Public Hearings  
November 15, 16, 17, and 18, 2004

Comment (cont.)

on my roof. I hear the tires going back in the planes which adds to noise level. When the weather is cloudy they (the planes) are much lower. When they (the planes) are low my windows shake and rattle and the dog and my cats hide in fear. The air traffic is endless.

When the planes are overhead I can't hear the television nor anyone that called me. It seems as if I have no right to peace and quiet. That is what my family planned on when they moved from Phila and bought this house in 1926! I am waiting for a crash at anytime because I can hear one over my roof the same time I can hear and watch one coming down the river - knowing they are arriving at the same time

Once again please no more planes. Take the planes over the city that gets benefits from having the airport - not here!!

Please drop off this form at the sign in table before you leave the hearing or mail this form to the following address:

Susan McDonald, FAA Environmental Protection Specialist  
c/o VHB  
101 Walnut Street  
PO Box 9151  
Watertown, MA 02471-9151

Additional Page Included  Yes  No

**Letter 90**

**Michele K. Ellison**

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
90.1	Please no more planes. Take the planes over the city that gets the benefits from having the airport--not here!!	Chapter 3 of the EIS describes the administrative approaches, including demand management, that were evaluated for this Project. The Airport provides regional benefits to Delaware Valley and surrounding areas. Aircraft do fly over the City of Philadelphia.

**From:** Engelman, Ross[SMTP:ROSS.ENGELMAN@IRONMOUNTAIN.COM]  
**Sent:** Tuesday, November 09, 2004 3:04:24 PM  
**To:** PHL 17-35 EIS  
**Cc:** sferraro@mindspring.com  
**Subject:** PHL runway 17-35 expansion questions

Susan,

I am a resident of Lower Merion township, Montgomery County in Pennsylvania. I live about 11 miles directly on the center line for the PHL runway 17-35 and have turbo prop traffic periodically down this center line over my house for landing at PHL.

I have many questions regarding this project and the dramatic impact it will have on the Main Line of Philadelphia (which is what the neighborhood is called). This is a very densely residential area.

Given the short time remaining for official comments, please submit your response ASAP.

1. Why are you not considering extending runway 8-26 which puts air traffic over the river instead of 17-35? There is no details on this alternative in the EIS document. How much more time or money would extending 8-26 cost instead of 17-35? Please provide the details on this other 8-26 alternative.

2. What will the following noise and distance parameters be for planes as follows based on your extensive modeling:

@ Distance down the center line from #17 runway over Pennsylvania                      12 miles    10 miles    8 miles    6 miles    4 miles

- Minimum allowable altitude during landing at above distance
- Minimum allowable altitude during takeoff at above distance
- Landing DB level of a 737 at 4,000 feet directly overhead
- Landing Db level of a 737 at 3,000 feet directly overhead
- Landing DB level of a 737 at 1,500 feet directly overhead
- Takeoff DB level of a 737 at 4,000 feet directly overhead
- Takeoff Db level of a 737 at 3,000 feet directly overhead
- Takeoff DB level of a 737 at 1,500 feet directly overhead

3. Will we have the ability to require much higher altitudes of landing and takeoff as well as reduction of engine thrust similar to what I have heard was implemented in Orange County, CA airport?

4. What are the number of flights per day on average expected if the runway is extended based on your extensive modeling?

@ Distance from #17 runway over Pennsylvania                      12 miles    10 miles    8 miles    6 miles    4 miles

- Takeoffs w/in 1 mile of the center line at the above distance
- Landings w/in 1 mile of the center line at the above distances

5. Is there an ability to mandate varying the approach from either side of the center line to minimize the concentrated noise disruption if only over the center line at the various above distances?

6. Which of the alternatives 1 or 2 will create more traffic as follows over Pennsylvania into and out of the #17 side based on your extensive modeling?

@ Distance from #17 runway over Pennsylvania                      12 miles   10 miles   8 miles  
6 miles   4 miles

- Alt 1 or 2 with more traffic on takeoffs at above distances
- Alt 1 or 2 with more traffic on landings at above distances

7. What regulations or controls are there preventing aircraft from discharging fuel or water during takeoff and landings at the various altitudes?

8. Who has jurisdiction over the decision to extend or do nothing? What government bodies have influence on this and an ability to change the decision (include state legislators, county legislators, federal legislators, with names please for Pennsylvania)?

Given the short time for final comments, please submit your response ASAP.

Thank you for the information.

Regards,

Ross Engelman  
President  
Comac, Inc. and  
Iron Mountain Latin America, Ltd.  
An Iron Mountain Company  
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[www.comac.com](http://www.comac.com)

Comment Number	Comment	Response
91.1	Why are you not considering extending Runway 8-26 which puts air traffic over the river instead of 17-35? There is no details on this alternative in the EIS document. How much more time or money would extending 8-26 cost instead of 17-35? Please provide the details on this other 8-26 alternative.	As described in Section 3.4, an extension of Runway 8-26 was considered and analyzed for the Project. This alternative was eliminated because it would not achieve the project's purpose and need in that it could not be accomplished in the short term because of the need to relocate the U.S. Army Corps of Engineers dredge facility. The Capacity Enhancement Project (CEP), which is a long-term redevelopment project, is considering extending Runway 8-26. The reasons mentioned are precisely why Runway 8-26 can't be implemented in the short term.
91.2	What will the following noise and distance parameters be for planes as follows based on your extensive modeling at distance down the center line from #17 runway over Pennsylvania (12 miles; 10 miles; 8 miles; 6 miles; and 4 miles): Minimum allowable altitude during landing at above distance; Minimum allowable altitude during takeoff at above distance; Landing dB level of a 737 at 4,000 feet directly overhead; Landing dB level of a 737 at 3,000 feet directly overhead; Landing dB level of a 737 at 1,500 feet directly overhead; Takeoff dB level of a 737 at 4,000 feet directly overhead; Takeoff dB level of a 737 at 3,000 feet directly overhead; and Takeoff dB level of a 737 at 1,500 feet directly overhead.	<p>The table provided in Responses to Comments Attachment #2 summarizes typical altitudes of an aircraft on approach to Runway 17 from the north and to Runway 35 from the south at representative distances of 8, 4, and 2 miles from the present runway ends; it also compares the altitudes to those of an aircraft approaching the extended runway for each of the proposed Build Alternatives.</p> <p>Altitudes of aircraft on departure from Runway 17 or Runway 35 under either of the proposed Build Alternatives will be slightly higher than the No-Action Alternative because the aircraft will begin their takeoff roll on the extended pavement, slightly farther from the communities they overfly. The amount of increase depends on the climb capability of each individual aircraft and the length of the extension.</p> <p>For a given distance to the runway, differences in the individual sound levels of a landing aircraft at the different altitudes identified in the table are only on the order of a few tenths of a decibel. Changes of that magnitude, up or down, are not likely to be discerned on an event-by-event basis.</p>
91.3	Will we have the ability to require much higher altitudes of landing and takeoff as well as reduction of engine thrust similar to what I have heard was implemented in Orange County, CA airport?	<p>Such measures would normally be evaluated through a FAR Part 150 Noise Compatibility Study. While the airport completed a Part 150 Study, it did not propose reduction in engine thrust procedures as a result of this study.</p> <p>Orange County did have an arrival procedure that was discontinued for safety reasons, however, Orange County does have a special departure procedure. It is the airport who generates a request for a noise abatement procedure. This procedure would be voluntary; however, there are no significant impacts that would warrant implementing such a procedure.</p> <p>Mandatory nighttime use restrictions are not within the purview or authority of the FAA to initiate; they can be initiated only by the Airport operator, in this case the City of Philadelphia, and only if their justification is established through a FAR Part 161 Study. The Part 161 Study has to be approved by the FAA before any mandatory noise restrictions can be implemented.</p>
91.4	What are the number of flights per day on average expected if the runway is extended based on your extensive modeling at a distance (12 miles; 10 miles; 8 miles; 6 miles; and 4 miles) from #17 runway over Pennsylvania: Takeoffs w/in 1 mile of the center line at the above distance and Landings w/in 1 mile of the center line at the above distances.	<p>As documented in this EIS, there are forecast to be 528,400 annual operations at the Philadelphia International Airport in 2007, whether the Runway 17-35 Extension is constructed or it is not constructed. This is an increase of 82,433 annual operations from 2003 operations.</p> <p>In the Preferred Alternative in 2007, there would be an increase of approximately 123 daily operations on Runway 17-35, with approximately 93 of them departures to or arrivals from the north over Pennsylvania and approximately 30 departures to or arrivals from the south over New Jersey. In the Preferred Alternative in 2015, there would be an increase of 156 daily operations on Runway 17-35, with approximately 96 of them departures to or arrivals from the north over Pennsylvania and approximately 60 departures to or arrivals from the south over New Jersey. As shown in the flight track figures, (EIS Figures 4.2-2 and 4.2-3, not all of the operations fly over the same point on the ground.</p>

Letter 91

Ross Engelman

Comment Number	Comment	Response
91.5	Is there an ability to mandate varying the approach from either side of the center line to minimize the concentrated noise disruption if only over the center line at the various above distances?	No, not at the relatively close-in distances cited. An aircraft is typically lined up on the runway centerline on the order of 6 to 8 miles from touchdown in order to assure a stable and safe final approach to land. These distances typically increase to 10 to 12 miles or more when multiple aircraft are approaching to land or when visibility is poor or cloud cover is low. Also note, all aircraft don't fly exactly over the same point. There is some reasonable dispersion over a backbone flight track.
91.6	Which of the alternatives 1 or 2 will create more traffic as follows over Pennsylvania into and out of the #17 side based on your extensive modeling at a distance (12 miles; 10 miles; 8 miles; 6 miles; 4 miles) from #17 runway over Pennsylvania: Alternative 1 or 2 with more traffic on takeoffs at above distances and Alternative 1 or 2 with more traffic on landings at above distances.	As documented in Section 4.2 of the EIS, in 2007 there are anticipated to be 528,400 annual operations at PHL. Approximately 19.6 percent of operations will use Runway 17-35 under the No-Action Alternative, approximately 28.1 percent with Alternative 1, and approximately 26.5 percent with Alternative 2. With Alternative 1 (the FAA's preferred alternative), approximately 407 take-offs and landings per day would use Runway 17-35. The Runway 17 end accounts for arrivals from the north (landings on Runway 17) and departures to the north (departures on Runway 35). As shown in Section 4.2, under Alternative 1, these operations would account for approximately 6.9 percent of all operations (approximately 100 per day), and 13.3 percent under Alternative 2 (approximately 193 per day).
91.7	What regulations or controls are there preventing aircraft from discharging fuel or water during takeoff and landings at the various altitudes?	FAA regulations prohibit aircraft from discharging fuel or water over land.
91.8	Who has jurisdiction over the decision to extend or do nothing? What government bodies have influence on this and an ability to change the decision (include state legislators, county legislators, federal legislators, with names please for Pennsylvania)?	<p>The FAA must decide whether to approve the changes to the Airport Layout Plan (ALP) necessary to proceed with this project. Additionally, the FAA will make a decision as to whether to fund the project under the ALP. It is the City of Philadelphia's decision, as owner and operator of PHL, to decide whether to construct the approved ALP changes.</p> <p>Early in the environmental process, the FAA began coordinated with Federal, state and local officials (see Appendix D for the Interagency Stewardship and Streamlining Agreement). This agreement details the roles and responsibilities on the Project.</p> <p>The agencies with responsibility for issuing permits (see Section 1.5) also have jurisdiction over portions of the project.</p>



**From:** Engelman, Ross[SMTP:ROSS.ENGELMAN@IRONMOUNTAIN.COM]

**Sent:** Thursday, November 11, 2004 2:42:21 PM

**To:** PHL 17-35 EIS

**Subject:** More questions on 17-35

Some additional questions on 17-35 project:

- Are the arrival and departure flight paths in figure 4.2.2 and 4.2.3 modeling the actual flight paths actual flights that actually occurred during 2003 or of the projected redirected traffic for the arrival/departures that could have taken off on 17-35 in the new projected pattern if 17-35 was amended?

- What is the projected peak daily volumes instead of average daily volumes which were projected in table 3-10 and 3-11? For instance if peak days are Monday and the wind was blowing North all day or South all day (or east or west), whatever would cause a full day of peak traffic in the North and South Daily operations?

Regards,

Ross Engelman  
President  
Comac, Inc. and  
Iron Mountain Latin America, Ltd.  
An Iron Mountain Company  
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Letter 92

Ross Engelman

Comment Number	Comment	Response
92.1	Are the arrival and departure flight paths in figure 4.2.2 and 4.2.3 modeling the actual flight[s] ... that actually occurred during 2003 or of the projected redirected traffic for the arrival/departures that could have taken off on 17-35 in the new projected pattern if 17-35 was amended?	Figures 4.2-2 and 4.2-3 show actual 2003 and early 2004 flight tracks used to Model 2003 noise levels. Pages 4-12 and 4-13 of this EIS explain that in the model, the flight tracks were modified to reflect for Alternatives 1 and 2 where each aircraft begins its takeoff roll -- the starting point for each track is effectively shifted north or southward the distance of the extension. Thus, for example, the 400 foot extension at the south end of Runway 35 for Build Alternatives 1 and 2 means that departures from that runway will start their takeoff 400 feet closer to the Delaware River and begin any turns after takeoff 400 feet closer to the airport than they would without the extension. That difference on the two flight track figures would be so small as to be difficult to discern; hence only one set of flight track plots was included in the document.
92.2	What is the projected peak daily volumes instead of average daily volumes which were projected in Table 3-10 and 3-11? For instance, if peak days are Monday and the wind was blowing North all day or South all day (or east or west), whatever would cause a full day of peak traffic in the North and South Daily operations?	Average daily volumes are presented because they represent the operational conditions reflected in the required analyses of average daily noise exposure. Operations data for peak days were not developed for this noise study. Typically, Friday is the busiest day of the week.

November 15, 2004

Federal Aviation Administration  
Attn: Susan McDonald  
Harrisburg Airports District Office  
3905 Hartzdale Avenue, Suite 508  
Camp Hill, PA 17011

Re: My objections to the Philadelphia Airport Runway 17-35 Extension Project

To the FAA and PHL officials:

I want to go on record as objecting to the findings of the FAA EIS regarding the Philadelphia Airport Runway 17-35 Extension project and the process which was used to determine the feasibility and impact of this extension.

I have been a resident of the Bryn Mawr section of Lower Merion for over 10 years. I moved out of Philadelphia, after living there for 14 years, so that my family could enjoy a quieter, safer place to live. I have two daughters ages 5 and 3 that I expect to bring up in a great community.

We currently do not have any low altitude jet aircraft traffic over Bryn Mawr flying into this runway. My house and family will be directly in the landing and takeoff flight paths of jet aircraft at low altitudes, should this extension be approved. Additionally, I am a heavy user of the airport, flying over 100,000 miles per year in and out of this airport to all over the world. I know the impact of potential delays first hand and what the reality is.

The following are my reasons and concerns about the impact to my community in Lower Merion Township, Montgomery County, PA.

Notice:

- I don't believe that proper notice was given to potentially impacted residents:
  - o No notice was given to Main Line Times newspaper which is the key newspaper for Lower Merion. Lower Merion is only 6 miles from the proposed extension of 17-35 and is directly in the center line of the path for departures and arrivals.
  - o No maps were given for potentially impacted areas in any of the notices given to any community groups, townships, or newspapers.
  - o It is impossible to have understood that you would be in an effected area without this proper notice
  - o That is the reason for no public turnout for these meetings – no one knows they are impacted

Impact:

- There has been no information given as to:
  - o Altitude that flights will be at including minimums and maximums at different points of the flight path
  - o Peak sound levels at those various altitudes, which will be much higher than the DNL and significantly impact our communities
  - o Peak volumes of inbound and outbound traffic instead of average daily volumes
  - o Projected flight paths if historical east west jet take offs are transferred to 17-35 takeoffs. Only historical actual flight paths of turbo prop and private jets are shown on the 17-35 arrival and departure maps.
- However from what I can tell from your own information:
  - o We basically have no jet arrival or departures per day currently North of and onto 17-35
  - o In 2015, there will be an increase from 1 regional jet flight arriving per day to 120 – 140 commercial and regional jets per day arriving and departing on an average day and night if this is extended. On a peak day this could easily be 240 – 300 jet flights.
  - o Those jets will be landing at an altitude of 1,500 feet to 3,000 feet from as far out as 10 miles.
  - o The sound level of a 737 at these altitudes is about 90 – 100 dba at peak which is 10 dba louder than a diesel train passing by at 45 MPH.
- The FAA has stated that there will be no restrictions on the number of flights in or out, the spacing of the flights, restrictions on night use and altitudes of arrival and departure. All of these restrictions should be an appropriate response to a concerned community base.
- No analysis was done as to the impact of vibrations to our communities and homes
- No analysis was done as to the ability for the fire and police departments in the new direct flight path to respond to a crash appropriately, nor was there any discussion with these affected departments in the flight path
- No analysis was done to determine the impact of this additional noise and vibrations to residents in at least 2 hospitals (Bryn Mawr and Lankenau Hospitals) and 4 universities (Bryn Mawr, Haverford, Villanova, Rosemont Colleges) that are directly in the new flight path. The health and well being of many thousands more students in local kindergarten, grade schools and high schools now in the path that have not been taken into account.
- No analysis was done on the enormous reduction in property values that could occur if this is approved.
- All of this and yet you state that there will be no impact? I guess you could say there is no impact if you really don't look for any real impact.

#### Alternatives:

- The impacted communities of Southern New Jersey, Delaware County and Montgomery County Pennsylvania have no jurisdiction over the decision process of the City of Philadelphia and the FAA regarding their options at the PHL

airport, nor do we have any ability to change or influence those decisions. Even though we are the only communities that are impacted by this.

- I believe that allowing for jet traffic into a runway that previously could not support this traffic is like opening an entirely new airport. The impact, communication and decision making process should be like opening a new airport rather than trying to slip in an extension.
- I don't see any discussion in any of the documents as to why runway 8-26 cannot be extended instead or why there cannot be a construction of another parallel runway each, with incoming and outgoing traffic directed over the river, in the short to medium term instead of impacting a whole new community.
- I have heard from PHL officials that the air traffic controllers would rather have a parallel plan instead of a perpendicular layout for ease of management and safety of flight paths. However, I have heard no discussion of this in decision process.
- No one from the Philadelphia Airport or FAA will tell me how, as an effected resident, I can change this decision. There must be a way for me to change this, but no one will tell us how (for obvious reasons, I'm sure).

I have communicated the above issues, questions and concerns to the FAA through Susan McDonald per the instructions on your web site and have received NO response. I don't think the FAA or the City of Philadelphia actually cares about communicating the real issues this will create or having an open mind to changing the proposed alternatives other than to push through your own approach.

I plan on being actively involved in getting our Federal Senators and Congressmen as well as State and Local elected officials actively involved in seeking out the real story and providing a solution that actually works for the people that could be affected, rather than a solution that is easy for the FAA and City of Philadelphia.

Sincerely,



Ross Engelman  
615 Woodleave Road  
Bryn Mawr, PA 19010  
610-283-2325

Cc:

Senator Arlen Specter  
Senator Rick Santorum  
Congressman Jim Gerlach  
State Representative Connie Williams  
Lower Merion Township Board of Commissioners

Letter 93

Ross Engelman

Comment Number	Comment	Response
93.1	I don't believe that proper notice was given to potentially impacted residents.	The Federal Aviation Administration (FAA) used several methods to reach out and notify the public about the project and public meetings. These methods included placing notices in area newspapers, such as the Philadelphia Inquirer, sending information letters to township officials, sending meeting flyers to area churches and libraries, and sending newsletters or post cards about upcoming meetings to everyone on the project mailing list. The project mailing list includes Federal, state and local officials, anyone who signed up for the mailing list at the public information meetings or through the website and anyone who sent a communication to the project and provided contact information. Section 1.3 provides a detailed description of the public participation program.
93.2	There has been no information given as to altitude that flights will be at including minimums and maximums at different points of the flight path.	<p>The table (Attachment #2) summarizes typical altitudes of an aircraft on approach to Runway 17 from the north and to Runway 35 from the south at representative distances of 8, 4, and 2 miles from the present runway ends; it also compares the altitudes to those of an aircraft approaching the extended runway for each of the proposed Build Alternatives. Altitudes assume the aircraft is on a 3-degree approach to the runway and crosses the runway threshold 50 feet in the air.</p> <p>Altitudes of aircraft on departure from Runway 17 or Runway 35 under either of the proposed Build Alternatives will be slightly higher than the No-Action Alternative because the aircraft will begin their takeoff roll on the extended pavement, slightly farther from the communities they overfly. The amount of increase depends on the climb capability of each individual aircraft and the length of the extension.</p>
93.3	There has been no information given as to peak sound levels at those various altitudes, which will be much higher than the DNL and significantly impact our communities.	<p>Though no "peak" sound levels were reported at the requested distances from Runway 17-35, similar information is presented at numerous specific points within the DEIS study area. For example, the Noise Technical Report in the DEIS presents computed maximum sound levels (Lmax values) from individual events at the noise monitoring sites for the 2003 Existing scenario as well as for the future No-Action and Build Alternatives, and at each site compares the maximums to comparable DNL values under the same scenario. Thus, for example, on page E-3, Site LT-1 in Darby Borough is expected to experience a maximum level of 91.0 dBA in 2007 under the No-Action Alternative, while the comparable DNL value is expected to be 53.1 dB, clearly illustrating the difference in magnitude between the level of the loudest noise event and the overall average daily exposure.</p> <p>In addition, Appendices G.1 through G.7 list hundreds of cultural resource locations where similar comparisons are made between DNL values, maximum levels, and other supplemental noise metrics.</p>
93.4	There has been no information given as to peak volumes of inbound and outbound traffic instead of average daily volumes.	Average annual days are used in the noise analysis to more accurately depict conditions that will be encountered most often.

Letter 93

Ross Engelman

Comment Number	Comment	Response
93.5	There has been no information given as to projected flight paths if historical east west jet take offs are transferred to 17-35 takeoffs. Only historical actual flight paths of turbo prop and private jets are shown on the 17-35 arrival and departure maps.	<p>Figure 4.2-3 of this EIS shows the modeled flight paths of all types of aircraft using Runway 17-35 for departure -- not just private jets, since a number of commercial aircraft utilize that runway now. Figure 4.2-2 shows a similar figure for modeled arrivals. Based on 2003 and 2004 radar data, these exact tracks are used for modeling all cases that utilize the current runway configuration -- the 2003 Existing case, as well as the 2007 and 2015 No-Action scenarios.</p> <p>For the two Build Alternatives, pages 4-12 and 4-13 of this EIS explain that the only differences between the existing modeled tracks and those of the Build Alternatives are where each aircraft begins its takeoff roll -- the starting point for each track is effectively shifted north or southward the distance of the extension. Thus, for example, the 400 foot extension at the south end of Runway 35 for Build Alternatives 1 and 2 means that departures from that runway will start their takeoff 400 feet closer to the Delaware River and begin any turns after takeoff 400 feet closer to the airport than they would without the extension. That difference on the two flight track figures would be so small (only a few hundred feet several miles from the runway) as to be difficult to discern; hence only one set of flight track plots was included in the document. Changes in the modeled arrival tracks for the two Build Alternatives were accomplished in a similar vein.</p>
93.6	The FAA has stated that there will be no restrictions on the number of flights in or out, the spacing of the flights, restrictions on night use and altitudes of arrivals and departures. All of these restrictions should be an appropriate response to a concerned community base.	There is currently a voluntary mitigation procedure that restricts use of Runway 17-35 at night. There is no proposal to change this procedure.
93.7	No analysis was done as to the impact of vibrations to our communities and homes.	Noise-induced vibration levels caused by aircraft overflights around Philadelphia International Airport are not considered sufficiently high to cause structural damage. In fact, in most airport noise environments, footfalls and doors closing produce vibration levels higher than those from aircraft overflights. (Source: HMMH, Inc.)
93.8	No analysis was done as to the ability for the fire and police departments in the new direct flight path to respond to a crash appropriately, nor was there any discussion with these affected departments in the flight path.	<p>Safety is the FAA's statutory mission as well as its highest priority. Both Alternative 1 and Alternative 2 will meet all FAA safety standards for airports.</p> <p>As a Part 139 Certified Airport, Philadelphia International Airport has an emergency plan and holds annual emergency drills that are coordinated with emergency personnel in surrounding communities. The Airport encourages fire and rescue managers in the study area to contact the City of Philadelphia Fire Department or the Airport Fire Department to discuss future coordination.</p>
93.9	No analysis was done to determine the impact of this additional noise and vibrations to residents in at least 2 hospitals (Bryn Mawr and Lankenau Hospitals) and 4 universities (Bryn Mawr, Haverford, Villanova, Rosemont Colleges) that are directly in the new flight path. The health and well being of many thousands more students in local kindergarten, grade schools and high schools now in the path that have not been taken into account.	<p>These land uses are located outside the 60 dB DNL contour. Figures 4.2-14 through 4.2-17 in this EIS depict the changed noise exposure for those areas experiencing aircraft noise levels between 45 and 60 dB DNL as a result of the Project within the 27-mile radius Noise Study Area. Based on the noise analysis, the changed noise exposure for those areas would be less than 5 dB for all future forecast cases.</p> <p>As stated in section 4.2 of this EIS, "increases of 5 dB or greater in areas that would be exposed to DNL values between 45 dB and 60 dB are considered to reflect slight-to-moderate change because noise unrelated to the project can have a significant influence on total exposure at these lower levels. The increases in noise at these levels are enough to be noticeable and potentially disturbing to some people, but the cumulative noise level is not high enough to constitute a significant impact."</p>
93.10	No analysis was done on the enormous reduction in property values that could occur if this is approved.	Property values depend on many factors. One factor is the environment. This Project will not have significant impact on noise or environmental impacts. Is it unlikely that there would be an impact on property values.

Letter 93

Ross Engelman

Comment Number	Comment	Response
93.11	The impacted communities of Southern New Jersey, Delaware County and Montgomery County, Pennsylvania have no jurisdiction over the decision process of the City of Philadelphia and the FAA regarding the options at the PHL airport, nor do we have any ability to change or influence those decisions. Even though we are the only communities that are impacted by this.	The FAA has carefully considered each and every comment provided in this EIS process. Members of the public have been provided with opportunities to provide information for consideration during the scoping process and the FAA has kept the public updated on the project with Public meetings while the DEIS was being developed.
93.12	I believe that allowing for jet traffic into a runway that previously could not support this traffic is like opening an entirely new airport. The impact, communication and decision making process should be like opening a new airport rather than trying to slip in an extension.	The same EIS process would be required for a new Airport.  The FAA has carefully considered each and every comment provided in this EIS process. Members of the public have been provided with opportunities to provide information for consideration during the scoping process and the FAA has kept the public updated on the project with Public meetings while the DEIS was being developed.
93.13	I don't see any discussion in any of the documents as to why runway 8-26 cannot be extended instead or why there cannot be a construction of another parallel runway each, with incoming and outgoing traffic directed over the river, in the short to medium term instead of impacting a whole new community.	As described in Section 3.4, an extension of Runway 8-26 was considered and analyzed for the Project. This alternative was eliminated because it would not achieve the project's purpose and need in that it could not be accomplished in the short term. Extending Runway 8-26 would require relocating a substantial part of the Corps of Engineers' dredge disposal facility, which is not feasible in a short time period. The Capacity Enhancement Project (CEP), which is a long-term redevelopment project, is considering extending Runway 8-26. The reasons mentioned are precisely why Runway 8-26 can't be implemented in the short term.
93.14	I have heard from PHL officials that the air traffic controllers would rather have a parallel plan instead of a perpendicular layout for ease of management and safety of flight paths. However, I have heard no discussion of this in decision process.	The parallel plan is one of the plans being considered for the Capacity Enhancement Program (CEP). CEP is a long-term, major redevelopment project that would result in additional capacity and, as a result, more comprehensive and longer-term delay reduction.
93.15	No one from the Philadelphia Airport or FAA will tell me how, as an effected resident, I can change this decision. There must be a way for me to change this, but no one will tell us how (for obvious reasons, I'm sure).	No decision to proceed has been made. The FAA will carefully consider all comments it received during the environmental process before making a decision in the Record of Decision (ROD) on whether to approve a build alternative. The ROD will be developed after the public has an opportunity to review the FEIS.



12/3/04  
200 Howard Ave  
Aurham

Marion Blakey  
FAA Administrator  
810 Independence Ave. SW  
Washington, D.C. 20591

Dear Ms Marion Blakey,

I recently moved out of the city of Philadelphia in search of a healthier, quieter environment.

I am very distressed to read that plans are underway for airport expansion that would negatively impact many residential areas in Delaware County.

I urge further consideration of alternative options.

Thank you,  
Jacob Evans  
Citizen Voter

**Letter 94****Sarah Evans**

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
94.1	I am very disturbed to read that plans are underway for airport expansion that would negatively impact many residential areas in Delaware County.	Quality of life depends on a number of factors. Because there will be no significant impacts, it is unlikely that the Proposed Project would adversely affect quality of life, however, the FAA has noted your comment.

**From:** RLBNFisher@cs.com[SMTP:RLBNFISHER@CS.COM]  
**Sent:** Tuesday, November 30, 2004 8:35:39 PM  
**To:** PHL 17-35 EIS  
**Subject:** Runway 17-35 Extension Project

Philadelphia International Airport is a half century old airport surrounded by, and constricted by, the Delaware River, John Heinz Wildlife Refuge, and various residential areas. The residents of Tinicum Township have been complaining of ever increasing noise and pollution from the airport for twenty years. The noise levels in this area *already* violate existing laws by exceeding levels which cause permanent hearing loss. How do you plan to "mitigate" permanent hearing loss? I can tell you from personal experience that insulating houses and putting up storm window does not shut out the noise of low flying aircraft.

The FAA made a major mistake in allowing this facility to be changed from an airport serving the immediate area to one which is a regional hub. This is substantiated by your own findings that delays at the airport have been made worse by faster than predicted changes in the types and numbers of aircraft using this facility. The increase in traffic as the result of the change to a regional hub has been exponential and this has resulted in these increasingly bothersome delays.

I have heard it said that those of us affected by this change should somehow put up with it for "the greater good". The negative effects seem to be borne primarily by the residents of Brandywine Hundred in Delaware, parts of New Jersey, and those in the immediate vicinity of the airport, while the "greater good" seems to be enjoyed primarily by those with a financial interest in the airport itself, or those from outside this region. None of these planes fly over the City of Philadelphia.

The extension of runway 17-35 would appear at first glance to be beneficial to those of us who live in states other than Pennsylvania, but, since it is only the first step in an even more major expansion of PHL, it should be stopped. PHL will always be an unsatisfactory facility for a major hub, so why pour more money down a black hole? A better site needs to be found. Baltimore did it. Denver did it. The Midwest did it. Pennsylvania (or New York, or New Jersey) needs to do it. Southern Delaware is probably too close to Baltimore to make it a reasonable alternative.

As to how this increase in air traffic has affected us here in Brandywine Hundred, we have had ever increasing noise, especially bothersome over night, since it makes sleep difficult. We have had raw frozen sewage dropped in our yards, only to be told that usually we wouldn't notice such a thing because, if the planes are high enough, the sewage would melt before it reaches the ground. What other industry can get away with this one? We have increased air pollution. This is critical to us in Delaware, since we are always on the edge of loosing our Federal highway assistance because of high pollution levels from automobiles. How many cars is a thousand planes equal to on our highways?

With regard to specific areas addressed in the DEIS:

S.8.1 - Noise: *Any* increase in noise is unacceptable.

S.8.4 - Air quality: Neither Alternative 1 or 2 would result in reduced emissions because any short term reduction resulting from decreased delays would be offset by ever increasing traffic.

S.8.5 - Environmental Justice etc.: It is apparent from news reports that PHL has been

adversely affecting the health and safety of its residential neighbors for decades. This expansion can only worsen the situation. The FAA is fond of using the term "significant impact". Any worsening of an already bad situation is significant.

S.8.6 - Water Quality: Here again we see "minor" adverse effect on water quality. We have struggled for a half century to improve the quality of the Delaware and Schuylkill Rivers to the point where we are seeing the return of fish which used to be plentiful in these waters. Any reversal in this process is unacceptable.

S.8.8 - Historical, Cultural, etc. - The increase in noise from PHL over the last five years has already had a negative impact on cultural events in the Ardens. Any increase in this, or in any other areas such as Fort Mifflin or the John Heinz Nat'l Wildlife Refuge is unacceptable.

S.8.9 and S.8.10 - Biotic Communities and Endangered Species: Leave the red-bellied turtle's habitat alone. If something is on an endangered list that applies to airports as well as everywhere else.

S.8.11 - Wetlands and Waterways: Alternatives 1 and 2 would have similar, unavoidable, impacts to Church Creek and the SEPD. You said it.

S.8.12 - Floodplains: Alternatives 1 and 2 result in unavoidable encroachment on the Delaware River floodplain.

S.8.16 - Cumulative Impacts: Both Alternatives 1 and 2 result in significant cumulative impacts on the Tri-State area surrounding PHL. Most of the burden is borne by the states of Delaware and New Jersey. The No-Action Alternative is the *only* alternative which does not increase deleterious effects to the environment. The negative impacts mentioned with this alternative ( increased emissions as a result of delays, and water contamination from deicing) can be eliminated by returning PHL to its former status as a local airport serving the Greater Philadelphia area only.

Barbara Fisher\_\_

Letter 95

Barbara Fisher

Comment Number	Comment	Response
95.1	The residents of Tinicum Township have been complaining of ever increasing noise from the airport for twenty years. The noise levels in this area already violate existing laws by exceeding levels which cause permanent hearing loss. How do you plan to "mitigate" permanent hearing loss? I can tell you from personal experience that insulating houses and putting up storm window does not shut out the noise of low flying aircraft.	Tinicum Township is not on the approach/departure path for Runway 17-35 and would not be affected by noise changes associated with the proposed project, as documented in Section 4.2 of the EIS. The U.S. Occupational Safety and Health Administration (OSHA) regulation identifies the maximum permissible A-weighted exposure of 90 dB for eight hours. It is extremely unlikely that aircraft noise around airports could ever produce hearing loss. For example, it would take more than 9,000 over-flights per day with an average sound exposure level of 90 dB to produce an eight-hour Leq of 85 dB on the ground. If this occurred five days a week for 40 years, and if people were exposed to this outdoors without any attenuation from buildings, the resultant noise exposure would start to produce a noise-induced permanent threshold shift (NIPTS) of less than 10 dB in the most sensitive 10% of the population. As the EIS shows (see Section 4.2), approximately 74% of annual operations use Runways 9L/27R and 9R/27L, potentially passing over Tinicum Township. In 2003, this was equivalent to approximately 900 over-flights per day, and noise levels in residential areas of Tinicum are less than 70 dB DNL. These values are significantly less than the thresholds associated with hearing loss.
95.2	The FAA made a major mistake in allowing this facility to be changed from an airport serving the immediate area to one which is a regional hub. This is substantiated by your own findings that delays at the airport have been made worse by faster than predicted changes in the types and numbers of aircraft using this facility. The increase in traffic as the result of the change to a regional hub has been exponential and this has resulted in these increasingly bothersome delays.	As noted in Chapter 2, the airlines, not the FAA or the Sponsor, are responsible for schedules and decisions on where to create an airline hub. The purpose of this project is to address these increasing delays as soon as possible.
95.3	The negative effects seem to be borne primarily by the residents of Brandywine Hundred in Delaware, parts of New Jersey, and those in the immediate vicinity of the airport, while the "greater good" seems to be enjoyed primarily by those with a financial interest in the airport itself, or those from outside this region. None of these planes fly over the City of Philadelphia.	As the flight tracks for Alternative 1 (EIS Figures 4.2.2 and 4.2.3) show, aircraft using Runway 17-35 do fly over Philadelphia. Increased traffic is projected to occur at PHL over the next 3 to 11 years and will cause noise exposure levels in all areas near the airport to increase to some degree, regardless of whether the proposed project is implemented or not. This is illustrated in Figure 4.2-5 of this EIS. However, the purpose of this document is to evaluate two proposed Build Alternatives involving extensions to Runway 17-35, and results of the noise analyses for those extensions show no significant effect on noise levels in northern Delaware. If anything, levels in that area will decrease very slightly due to reduced operations on the parallel Runway 9R-27L and 9L-27R, as indicated in Figures 4.2-14 through 4.2-17 of this EIS.
95.4	PHL will always be an unsatisfactory facility for a major hub, so why pour more money down a black hole? A better site needs to be found. Baltimore did it. Denver did it. The Midwest did it. Pennsylvania (or New York, or New Jersey) needs to do it. Southern Delaware is probably too close to Baltimore to make it a reasonable alternative.	As described in Chapter 3, a number of alternatives, including construction of a new airport, were considered and analyzed for the Project. These alternatives were eliminated because they would not achieve the project's purpose and need of reducing delay in the short term.
95.5	We have had raw frozen sewage dropped in our yards, only to be told that usually we wouldn't notice such a thing because, if the planes are high enough, the sewage would melt before it reaches the ground. What other industry can get away with this one?	The proposed Runway 17-35 Extension Project would not create new risks of ice falling from aircraft. Aircraft are prohibited from discharging toilet waste.
95.6	We have increased air pollution. This is critical to us in Delaware, since we are always on the edge of losing our Federal Highway assistance because of high pollution levels from automobiles. How many cars is a thousand planes equal to on our highways?	The DEIS demonstrated that compared to the No-Action Alternative, either alternative of the Proposed Project will reduce air pollution emissions in the region and will comply with the NAAQS. (See Table 4.5-7 of this EIS and DEIS Appendix H of the Air Quality Technical Report).
95.7	Any increase in noise is unacceptable.	Increased traffic is projected to occur at PHL over the next 3 to 11 years and will cause noise exposure levels in all areas near the airport to increase commensurately, regardless of whether the proposed project is implemented or not. This is illustrated in Figure 4.2-5 of this EIS.

Letter 95

Barbara Fisher

Comment Number	Comment	Response
95.8	Neither Alternative 1 or 2 would result in reduced emissions because any short term reduction resulting from decreased delays would be offset by ever increasing traffic.	The total number of aircraft flights (operations) is not predicted to change due to the Proposed Project. This EIS demonstrates that compared to the future No-Action Alternative, either future build scenario of the Proposed Project will reduce air pollution emissions in the region, and that ambient pollutant concentrations will remain well below the National and Pennsylvania Ambient Air Quality Standards. (See Table 4.5-7 of this EIS and DEIS Appendix A-2, the Air Quality Technical Report).
95.9	Environmental Justice: It is apparent from news reports that PHL has been adversely affecting the health and safety of its residential neighbors for decades. This expansion can only worsen the situation. The FAA is fond of using the term "significant impact." Any worsening of an already bad situation is significant.	Executive Order 12898 requires federal agencies to identify and address potential disproportionate high and adverse impacts on minority and low income populations. As demonstrated in Section 4.2 and 4.5 of this EIS, the proposed Runway 17-35 Extension would not have significant direct or cumulative adverse effects especially in the areas of noise or air quality in the vicinity of the Philadelphia International Airport, and would not have high or adverse impacts to any population (minority, low income, or otherwise).
95.10	S.8.6 - Water Quality: Here again we see "minor" adverse effect on water quality. We have struggled for a half century to improve the quality of the Delaware and Schuylkill Rivers to the point where we are seeing the return of fish which used to be plentiful in these waters. Any reversal in this process is unacceptable.	The proposed extension of Runway 17-35 would result in a minor increase in pavement (impervious surface) at the airport, primarily associated with the 1,500-foot extension of the runway and its parallel taxiways. This would increase runoff rates to the on-airport Southeast Ponding Ditch and to Mingo Creek. Since the runway and taxiway do not generate substantial quantities of pollutants, the increased pavement is not anticipated to adversely affect water quality in the Schuylkill or Delaware Rivers.
95.11	The increase in noise from PHL over the last five years has already had a negative impact on cultural events in the Ardens. Any increase in this, or in any other areas such as Fort Mifflin or the John Heinz Nat[ional] Wildlife Refuge is unacceptable.	The Proposed Project will not have any significant increases in noise in any of these locations.
95.12	Leave the red-bellied turtle's habitat alone. If something is on an endangered list that applies to airports as well as everywhere else.	Measures to avoid and minimize impacts to protect the state-listed red-bellied turtle and its habitat have been considered. Additional coordination with the appropriate agencies will continue during this EIS process and continue into the permitting process.
95.13	The No-Action Alternative is the only alternative which does not increase deleterious effects to the environment. The negative impacts mentioned with this alternative (increased emissions as a result of delays, and water contamination from deicing) can be eliminated by returning PHL to its former status as a local airport serving the Greater Philadelphia area only.	Neither the Preferred Alternative nor Alternative 2 would have significant adverse effects on the environment. The Preferred Alternative would, as documented in Section 4.5.3, reduce the emission of air pollutants. As a matter of Federal law, the City, as owner and operator of PHL, must make PHL available for aeronautic uses on a fair and reasonable basis without unjust discrimination and cannot prohibit hubbing operations at PHL.

**From:** RLBNFisher@cs.com[SMTP:RLBNFISHER@CS.COM]  
**Sent:** Wednesday, December 01, 2004 9:07:14 PM  
**To:** PHL 17-35 EIS  
**Subject:** Runway 17-35ext

Two issues which I failed to mention in my previous e-mail, and which I have not heard mentioned in any previous meetings, are the proximity of the current approach patterns to AstraZeneca's research facility and the DuPont Experimental Station, and the increased traffic resulting from extending 17-35 to refining facilities in Philadelphia. Since chemical sites have been a subject of increasing worry as terrorist targets, and since the current flight patterns take planes within about one mile of both these sites, any increase in traffic could result in a major catastrophe either accidentally, or on purpose.

With regard to the refineries in Philadelphia, any accident involving what is the major source of fuel for the Northeastern U.S. would be a significant event. Extending 17-35, with its consequent increase in air traffic over this area would seem to me to be a hazardous undertaking.

Barbara Fisher

Letter 96

Barbara Fisher

Comment Number	Comment	Response
96.1	<p>Two issues which I failed to mention in my previous e-mail, and which I have not heard mentioned in any previous meetings, are the proximity of the current approach patterns to AstraZeneca's research facility and the DuPont Experimental Station, and the increased traffic resulting from extending 17-35 to refining facilities in Philadelphia. Since chemical sites have been a subject of increasing worry as terrorist targets, and since the current flight patterns take planes within about one mile of both these sites, any increase in traffic could result in a major catastrophe either accidentally, or on purpose. With regard to the refineries in Philadelphia, any accident involving what is the major source of fuel for the Northeastern U.S. would be a significant event. Extending 17-35, with its consequent increase in air traffic over this area would seem to me to be a hazardous undertaking.</p>	<p>Safety is the FAA's highest priority, and the agency will ensure that the design of the Runway 17-35 Extension Project properly protects the public safety. The Preferred Alternative will meet all FAA safety standards and design criteria. The extended runway will reduce congestion in the current primary east-west operating direction, and will reduce the reliance on Runways 9L/27R and 9R/27L during heavy demand. This will enhance safety.</p>



**From:** Earl Fisher[SMTP:EFISHER999@COMCAST.NET]  
**Sent:** Tuesday, November 30, 2004 11:47:04 PM  
**To:** PHL 17-35 EIS  
**Subject:** Runway expansion

As a new resident to Gloucester Co. (Mantua, NJ) my family was surprised by the existing flight patterns approaching Philadelphia. Currently, although very noticeable, the impact of the existing flight traffic is tolerable. This is mostly due to what appears to be smaller aircraft. Our concern with any extension of the runways is that larger aircraft would be accommodated thus making a change in the size of the approaching aircraft which will have a negative impact on our quality of life. This would occur because of the increase in traffic from present conditions as well as greater noise levels. I would ask that the above issue be examined fully before allowing such an expansion.

Thank you, Earl Fisher

Letter 97

Earl Fisher

Comment Number	Comment	Response
97.1	Our concern with any extension of the runways is that larger aircraft would be accommodated thus making a change in the size of the approaching aircraft, which will have a negative impact on our quality of life. This would occur because of the increase in traffic from present conditions as well as greater noise levels.	As the commentor noted, increased traffic is projected to occur at PHL over the next 3 to 11 years and will cause noise exposure levels in all areas near the airport to increase commensurately, regardless of whether the proposed project is implemented or not. This is illustrated in Figure 4.2-5 of this EIS. However, the purpose of this document is to evaluate two proposed Build Alternatives for extensions to Runway 17-35. As shown in Figures 4.2-14 and 4.2-16, Alternative 1 would have a greater negative effect on aircraft noise exposure in New Jersey in both 2007 and 2015, than would Alternative 2. It is important to note that even though some areas of New Jersey would experience increases in aircraft noise exposure as a result of the project, the increases would not constitute a significant impact per FAA guidelines.

December 1, 2004

Susan McDonald  
FAA Environmental  
Protection Specialist  
c/o VHB, 101 Walnut Street  
P.O. Box 9151  
Watertown, MA 02471-9151

Re: Runway Extension

Dear Ms. McDonald:

This letter is in response to the article in the 11/29/04 Gloucester County Times on the proposed Philadelphia Airport runway extension directed over West Deptford.

I am definitely opposed to any more air traffic over West Deptford. Route it over the Delaware River.

I have lived here 42 years. When I first moved here the air traffic was so bad you couldn't hear anyone on your telephone or hear the television.

December 1, 2004

Page 2

They eventually changed the flight pattern, I believe because of Underwood Memorial Hospital's renovations. That was a big improvement.

We now have slightly more air traffic because it sets off my car alarm.

I am afraid if the air traffic increases my property value will go down and I will not be able to alarm my car. I feel I have the right to protect my property.

Very truly yours,

Elaine L. Flanagan

301 9<sup>th</sup> Street

Thorofar P.O., West Deptford, NJ 08086

856-845-4790

## Letter 98

Elaine F. Flanigan

Comment Number	Comment	Response
98.1	I am definitely opposed to any more air traffic over West Deptford. Route it over the Delaware River.	The extension of Runway 17-35 would not create new flight paths. As a result of the runway extension, aircraft using Runway 17-35 for approaches or departures would be shifted approximately 640 feet north (in areas north of the airport) and 400 feet south (in areas south of the airport). Because Runway 17-35 is perpendicular to the Delaware River, aircraft cannot follow the river on approach or departure under either existing or proposed conditions. Aircraft require an approach lined up with the centerline of the runway, in order to land safely.
98.2	I am afraid if the air traffic increases my property value will go down and I will not be able to alarm my car. I feel I have the right to protect my property.	Property values depend on many factors. One factor is the environment. This Project will not have significant impact on noise or environmental impacts. Is it unlikely that there would be an impact on property values.

**From:** Diane Richter[SMTP:DERICHTER2@COMCAST.NET]

**Sent:** Friday, November 19, 2004 2:32:47 PM

**To:** PHL 17-35 EIS

**Subject:** Runway 17-35 Comments

Ms. McDonald-

I was not able to attend the hearing held in West Deptford, NJ, earlier this week regarding the Runway 17-35 plans, and I'd like to let you know how I feel about the proposal.

I live in Mantua Township, NJ, and the increased air traffic above my home is really disturbing to me. In the early summer, I noticed that I could not keep the windows open at night, if I expected to get a full night's rest. If I went to bed early, the roar of the planes overhead would prevent me from sleeping. If I tried to sleep past 6AM, the roar of the airplanes overhead would wake me up. One morning, I just counted the airplanes I heard and realized that there was about 1 per minute from 6AM - 7AM flying above/around my house. So, I have to keep the windows closed. I still hear the roar of the planes, but at least it isn't deafening! During some times of the day, it impossible to carry on a conversation outside because of the frequency of planes overhead. They are loud and disruptive! The increased number of planes overhead makes me want to move. I can't stand the noise as it is. Just the other night, I was trying to watch TV, and for a 10 - 15 minute period of time, a plane flew overhead each minute. I couldn't hear the TV. There are some times when planes are so loud and flying so low that my house shakes.

The frequency of airplanes overhead increased during the summer timeframe and continues to do so . As I write this email, I hear plane after plane after plane.

When I first moved to Mantua, the airplane traffic was not as frequent as it is now, and it really wasn't an issue. But, as the traffic has increased, so has my annoyance with it. To think that the current level of traffic could increase even more is unbearable. If anything, I think that something needs to be done to reduce the traffic overhead. I am not only concerned about the noise overhead but also the impact that the additional traffic is having on air quality. This is something that I can't measure. But, it is a concern that I have.

I ask that you please consider my comments and ensure that any future projects at the Philadelphia airport are focussed on reduced impact to it's neighbors. The impact of this air traffic to my and my family's quality of life is something that I think about several times each day -- not because I want to but because the sounds from above are impossible to ignore.

Thank you for your time.

Diane Flynn  
30 Creek Lane  
Mount Royal, NJ 08061

Letter 99

Diane Flynn

Comment Number	Comment	Response
99.1	I am not only concerned about the noise overhead but also the impact that the additional traffic is having on air quality.	The total number of aircraft flights (operations) and the total number of motor vehicles accessing the Airport will not change due to the Proposed Project. Airport-related pollutant emissions will be reduced by implementing either alternative of the Proposed Project.
99.2	The impact of this air traffic to my and my family's quality of life is something that I think about several times each day -- not because I want to but because the sounds from above are impossible to ignore.	Quality of life depends on a number of factors. Because there will be no significant impacts, it is unlikely that the Proposed Project would adversely affect quality of life, however, the FAA has noted your comment.



Philadelphia International Airport  
Runway 17-35 Extension Project  
Environmental Impact Statement

Public Hearings  
November 15, 16, 17, and 18, 2004

Public Comment Form

The Federal Aviation Administration (FAA) encourages all interested parties to provide comments concerning the scope and content of the DEIS. Comments should be as specific as possible and address the analysis of potential environmental impacts and the adequacy of the proposed action or merits of alternatives and the mitigation being considered. Reviewers should organize their participation so that it is meaningful and makes the agency aware of the viewer's interests and concerns using quotations and other specific references to the text of the DEIS and related documents. Matters that could have been raised with specificity during the comment period on the DEIS may not be considered if they are raised later in the decision process. This commenting procedure is intended to ensure that substantive comments and concerns are made available to the FAA in a timely manner so that the FAA has an opportunity to address them.

Please clearly print your contact information and your comment on the DEIS in the space below. Space is also available on the back page. Please either drop this form off tonight at the sign-in table or mail this form to the contact and address listed at the bottom of the back page. You can also submit your comments via email ([smcdonald.faa.17-35@vhb.com](mailto:smcdonald.faa.17-35@vhb.com)) or the Project web site ([www.phlrunway17-35eis.com](http://www.phlrunway17-35eis.com)), where the DEIS is available.

Comments must be received by **December 1, 2004** in order to be considered.

Thank you for participating.

Name: CHARLES J. FOSTER

Address: 122 SANDPIPER LANE

City: THOROFARE

State: NJ Zip Code: 08086

E-mail Address: \_\_\_\_\_

PLEASE PRINT CLEARLY

Comment: I feel the property value of my house will decrease if this becomes a reality also air and noise pollution will become a problem. I also would feel unsafe in my home if this runway is allowed to be built. The fear of planes flying over head and the possibility of accident would be a concern.



Letter 100

Charles J. Foster

Comment Number	Comment	Response
100.1	I feel the property value of my house will decrease if this becomes a reality. Also air and noise pollution will become a problem.	Property values depend on many factors. One factor is the environment. This Project will not have significant impact on noise or environmental impacts. Is it unlikely that there would be an impact on property values.
100.2	I also would feel unsafe in my home if this runway is allowed to be built. The fear of planes flying over head and the possibility of accident would be a concern.	<p>Safety is the FAA's highest priority, and the agency will ensure that the design of the Runway 17-35 Extension Project properly protects the public safety. The Preferred Alternative will meet all FAA safety standards and design criteria. The extended runway will reduce congestion in the current primary east-west operating direction, and will reduce the reliance on Runways 9L/27R and 9R/27L during heavy demand. This will enhance safety and reduce the potential for accidents.</p> <p>The extension of Runway 17-35 would not create new flight paths. As a result of the runway extension, aircraft using Runway 17-35 for approaches or departures would be shifted approximately 640 feet north (in areas north of the airport) and 400 feet south (in areas south of the airport). The extension of Runway 17-35 does not increase the potential for crashes in areas under these existing flight tracks.</p>

-----Original Message-----

**From:** MC Greene [mailto:bejakajo@yahoo.com]

**Posted At:** Wednesday, December 01, 2004 6:21 PM

**Posted To:** Microsoft Outlook Embedded Message

**Conversation:** PHL Runway 17-35

**Subject:** PHL Runway 17-35

December 1, 2004

6:20 P.M.

I am a resident of New Castle County, Delaware. I live in a subsidized housing building for seniors and the disabled called Bnai Brith House at 8000 Society Hill Drive, Claymont, DE 19703. Our building is in the direct flight path currently for planes landing at Philadelphia airport. These planes come in low and loud and frequently. When the weather is bad and the cloud cover is low, the noise is intolerable, both standing alone and when combined with the CSX trains and I-95 roadway noise. I don't know whether or not you have received a statement from our tenant association or management, but just in case I would like to put this information on your record. In addition, my one year old grandson lives with his parents in Blymeade, a small community off Naaman's Road between Marsh and Foulk. On his behalf I would like to note that he is almost able to distinguish one airplane from another because they fly so low and loud over his house. He has to sleep with "white noise" to block out the airplane noises. Please consider his health as well.

Sincerely yours,

A senior with frazzled nerves

Letter 101

MC Greene

Comment Number	Comment	Response
101.1	<p>I live in a subsidized housing building for seniors and the disabled called Bnai Brith House at 8000 Society Hill Drive, Claymont, DE 19703. Our building is in the direct flight path currently for planes landing at Philadelphia airport. These planes come in low and loud and frequently. When the weather is bad and the cloud cover is low, the noise is intolerable, both standing alone and when combined with the CSX trains and I-95 roadway noise. I don't know whether or not you have received a statement from our tenant association or management, but just in case I would like to put this information on your record. In addition, my one year old grandson lives with his parents in Blymeade, a small community off Naaman's Road between Marsh and Foulk. On his behalf I would like to note that he is almost able to distinguish one airplane from another because they fly so low and loud over his house. He has to sleep with "white noise" to block out the airplane noises. Please consider his health as well.</p>	<p>The FAA has noted and considered your comment.</p>

Rochelle  
Claypoole/AWA/FAA  
12/02/2004 07:46 AM

To  
cc  
bcc  
Subject Fw: Phila Intl Airport Draft EIS



"David Hart"  
<hart@acnatsci.org>  
11/29/2004 03:13 PM

To Marion Blakey/AWA/FAA@FAA  
<curtpa07@mail.house.gov>,  
cc <robert.a.brady@mail.house.gov>,  
<arlen\_specter@specter.senate.gov>  
Subject Phila Intl Airport Draft EIS

29 November 2004

Ms. Marion Blakey  
Administrator  
Federal Aviation Administration  
800 Independence Avenue, SW  
Washington, D.C. 20591

Dear Administrator Blakey:

As an environmental scientist with more than 30 years of professional experience developing and reviewing environmental impact statements, I am deeply troubled by the FAA's inadequate public comment period regarding Philadelphia International Airport's Runway 17-35 Draft Environmental Impact Statement. Moreover, I am shocked that the FAA has refused to release the Integrated Noise Model files for public review.

My overarching concern is that the draft EIS is a very lengthy and complicated document, which makes it very difficult to assimilate and understand. Thus, I suspect that many stakeholders have not had adequate time to read the draft EIS carefully, so they are not yet able to evaluate its content. Given the critical need to get full public participation from our region in evaluating the pros and cons of proposed project, I urge you to extend the deadline for public comment until at least January 15, 2005.

It is also essential that the public clearly understand the basis for the proposed project's traffic and noise projections that have been used by the FAA. This is only possible, however, if FAA staff make the Integrated Noise Model files available to the public. Thus, I was shocked to learn that the FAA has refused to make these files available to the County of Delaware! As a citizen of Delaware County and a taxpayer, I can tell you that I will actively oppose any publicly-funded project which withholds such relevant information from the public. Please let me know when and how you plan to release these files to the public.

I look forward to hearing your responses to my concerns.

Sincerely,



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Office of the Associate  
Administrator for Airports

Response to Letter #102

800 Independence Ave., SW.  
Washington, DC 20591

DEC 20 2004

Mr. David D. Hart, Ph.D  
335 Park Avenue  
Swarthmore, PA 19081

Dear Mr. Hart:

Administrator Blakey has asked me to respond to your November 29 transmittal about the Philadelphia International (PHL) Airport Runway 17-35 Extension Project. You requested an extension to the deadline for public comment on the Draft Environmental Impact Statement (DEIS) until at least January 15, 2005. You also asked when and how the Federal Aviation Administration (FAA) plans to release Integrated Noise Model (INM) data files to the public.

The Federal Aviation Administration (FAA) is sensitive to the concerns of residents surrounding PHL. Because of this, we have conducted extensive public outreach to keep the public informed and to hear their concerns. While it is not possible for us to meet individually with all townships and local communities in the project area, we have attempted to notify communities of upcoming events and to conduct public meetings in centralized locations. Our first step in notifying the public was to publish a Notice of Intent to prepare an environmental impact statement in the Federal Register on August 1, 2003. Since then, we established a project Web site ([www.phlrunway17-35eis.com](http://www.phlrunway17-35eis.com)) and published, several newsletters. We also conducted a public scoping meeting on August 12, 2003 and held three sets of public outreach meetings in April, May, and September 2004 in Pennsylvania, Delaware, and New Jersey. We engaged the expertise of State and Federal agencies during DEIS development.

We also briefed congressional members on November 5, 2004 and held public hearings on November 15, 16, 17, and 18, 2004 at locations recommended by congressional members. At every meeting, we let the attendees know about upcoming events, the DEIS schedule, ways to get information, and how to get a copy of the DEIS. We also provided this information on the project Web site.

We released copies of the DEIS on October 14, 2004, one month before the public hearings. We mailed Executive Summaries, compact disks of the full DEIS, and technical studies to over 1,000 households. We also sent copies to local, State, and Federal officials. We gave out hard copies of the entire six-volume set to 40 public libraries. We made available Executive Summaries and compact disks at the hearings to anyone who asked for one. They were available via the project Web site, e-mail, telephone, fax, or letter.

We have conducted procedures and analyses to the rigorous standards prescribed by the Council on Environmental Quality (CEQ). CEQ standards include a minimum 45-day

public comment period. This project had a 47-day comment period. The CEQ regulations (section 1506.10 (d)) allow the lead Federal agency or the Environmental Protection Agency to extend the public comment period if "compelling reasons of national policy" are shown. Considering the extensive public involvement outlined above, the FAA believes the 47-day public comment period was satisfactory.

About your concern regarding the release of Integrated Noise Model data files, I assure you that all information requested by Delaware County has been released. If you would like to receive copies of this or other information that supports the conclusions in the DEIS, please make a written request to the FAA. Please send any written request for information to Ms. Susan McDonald, FAA Harrisburg District Office, 3905 Hartzdale Drive, Suite 508, Camp Hill, Pennsylvania 17011.

The FAA is aware that Delaware County Council has hired a consultant to review the DEIS and prepare comments. The FAA has and will continue to provide any information asked for by Delaware County Council or their consultants to aid in their review. Although the comment period is closed, the FAA will make every reasonable effort to consider comments filed after that deadline and before we publish the Final Environmental Impact Statement (FEIS). We expect to publish the FEIS in late February 2005.

If I can be of further help, please let me know.

Sincerely,

Original Signed by:  
Woodie Woodward

Woodie Woodward  
Associate Administrator  
for Airports

> ----- Original Message -----

> From: "thomas hayburn" <t.hayburn@worldnet.att.net>

> To: <smcdonald.faa17-35@vhb.com>

> Sent: Thursday, November 18, 2004 9:55 PM

> Subject: runway 17-35 extension

> > I am totally against the proposal to extend runway 17-35 at PHL for the  
> > following reasons;

> >

> > 1. I live in the Riverwinds section of West Deptford Township in  
Glouster

> > County, NJ that is located directly across the Delaware River directly  
in

> > line with this runway.

> >

> > 2. The present noise level is already too much and too often. The  
> frequency

> > of this intrusion on peoples quality of life should be reduced NOT  
> > increased by additional flights.

> >

> > 3. There are also several safety issues that would be created by this  
> > extension such as the increased possibility of a plane crashing into a  
> > tanker while unloading crude oil at the Sunoco facility. this facility  
is

> > directly in line with the runway. Do not extend the runway any closer to  
> > this facility.

> >

> > 4. There are also many tankers and container ships that travel the  
> Delaware

> > River and an accident could severely affect the commerce of the entire  
> > Delaware Valley.

> >

> > 5. Transfer the operations of these smaller aircraft to Philadelphia's  
> > other airport - Northeast Philadelphia.

> >

> > Margaret Hayburn

> > 130 Sandpiper Lane

> > Thorofare, NJ 08086

> >

>

Letter 103

Margaret Hayburn

Comment Number	Comment	Response
103.1	The present noise level is already too much and too often. The frequency of this intrusion on people's quality of life should be reduced not increased by additional flights.	Quality of life depends on a number of factors. Because there will be no significant impacts, it is unlikely that the Proposed Project would adversely affect quality of life, however, the FAA has noted your comment.
103.2	There are also several safety issues that would be created by this extension such as the increased possibility of a plane crashing into a tanker while unloading crude oil at the Sunoco facility. This facility is directly in line with the runway. Do not extend the runway any closer to this facility.	The existing Sunoco docks (the Sunoco Fort Mifflin Terminal Pier) is approximately 1800 feet east of the existing Runway 17-35, while the Hog Island Pier is approximately 1500 feet west of the existing runway. Neither unloading facility is in direct line with the runway, and both facilities are outside of the runway safety and protection zones. Extending Runway 17-35 to the south by 400 feet would not create an increased risk of a crash.
103.3	There are also many tankers and container ships that travel the Delaware River and an accident could severely affect the commerce of the entire Delaware Valley.	The Preferred Alternative (Alternative 1) incorporates safety procedures to eliminate the potential for aircraft approaching Runway 35 to collide with the taller ships that use the Delaware River channel. These safety procedures are required under the existing and future No-Action conditions as well. The Runway 17-35 Extension project does not increase the potential for a ship collision.
103.4	Transfer the operations of these smaller aircraft to Philadelphia's other airport - Northeast Philadelphia.	As described in Section 3.3.1 (Alternative A2), FAA evaluated more extensive use of existing regional airports, including Philadelphia's Northeast Airport (PNE). Neither FAA nor the Project Sponsor can dictate an increase in service or require airline service to an airport. Therefore, these alternatives cannot be guaranteed or relied upon to reduce delay at PHL and were therefore eliminated because they would not achieve the project's purpose and need.



Philadelphia International Airport  
Environmental Impact Statements  
Public Information Meetings  
September 28, 29, and 30, 2004  
Public Input Form

I am very concerned about any type of runway expansion at the Philadelphia International Airport. I can understand the need for a business to expand in order to keep up with changes and meet growing demands. However, given the nature of your business, your actions have a direct impact on a tremendous number of people...people who LIVE in the county in which you operate your business.

I believe that you must go beyond the business "bottom line", and consider how your proposals for expansion are going to negatively affect the QUALITY of LIFE for Delaware County residents. At this point, you already have individuals who are in need of insulating their homes to void themselves of the unhealthy noise levels created by the Philadelphia International Airport. With the expansions you are proposing, this situation is only to worsen. And, to further this point, what kind of life is this for anyone...HAVING TO INSULATE YOUR HOME from outside noises. Imagine living with a noise level so intense that you cannot keep your windows open, you cannot entertain family and friends outside during the warm months or play with your children in the yard, and you have to maintain indoor electronic devices at higher than normal levels just to compensate for the noise that leaks into your home (and, imagine the damage this could cause someone's auditory functions). If that is not enough, imagine not being able to escape from this hell because you are unable to sell your home because no one would want to live in such a location...I seriously doubt anyone from the panel.

Outside of the noise factor, there is always the danger associated with air traffic. No mode of transportation is without risk of accident. Neighborhoods that fall within a flight pattern have the constant worry that at some point in time a plane could crash down onto THEIR ground. With your expansion proposals, you are further increasing the risk of these same neighborhoods as well as additional neighborhoods. And, statistics prove that if you increase a situation (air traffic), the possible outcome of that situation (airplane accidents) will increase as well. Try thinking of that as you tuck your small child or grandchild into their bed at night.

In addition to the possibility of an accident, is the increase in the air pollution levels. We already have residents who suffer serious health problems associated with our poor air quality. If we increase the air traffic, we will not only add to the deterioration of health for these individuals, but we will ultimately create new health problems for more of our residents.

Please consider the residents of Delaware County. This may be a place where you conduct business, but it is a HOME to so many. This is where we live, where we raise our families, and it is not fair to rob anyone of quality of life...

Thank you,

Donna Howarth  
Newtown Square  
Delaware County

Cc: Congressman Curt Weldon  
Senator Arlen Specter  
Senator Rick Santorum ✓  
Senator Edwin Erickson  
Representative Thomas Gannon  
Representative Tom Killion

Philadelphia International Airport  
Environmental Impact Statements  
Public Information Meetings  
September 28, 29, and 30, 2004

Public Input Form

I am very concerned about any type of runway expansion at the Philadelphia International Airport. I can understand the need for a business to expand in order to keep up with changes and meet growing demands. However, given the nature of your business, your actions have a direct impact on a tremendous number of people... people who LIVE in the county in which you operate your business.

I believe that you must go beyond the business "bottom line", and consider how your proposals for expansion are going to negatively affect the QUALITY of LIFE for Delaware County residents. At this point, you already have individuals who are in need of insulating their homes to void themselves of the unhealthy noise levels created by the Philadelphia International Airport. With the expansions you are proposing, this situation is only to worsen. And, to further this point, what kind of life is this for anyone... **HAVING TO INSULATE YOUR HOME** from outside noises. Imagine living with a noise level so intense that you cannot keep your windows open, you cannot entertain family and friends outside during the warm months or play with your children in the yard, and you have to maintain indoor electronic devices at higher than normal levels just to compensate for the noise that leaks into your home (and, imagine the damage this could cause someone's auditory functions). If that is not enough, imagine not being able to escape from this hell because you are unable to sell your home because no one would want to live in such a location... I seriously doubt anyone from the panel.

Outside of the noise factor, there is always the danger associated with air traffic. No mode of transportation is without risk of accident. Neighborhoods that fall within a flight pattern have the constant worry that at some point in time a plane could crash down onto **THEIR** ground. With your expansion proposals, you are further increasing the risk of these same neighborhoods as well as additional neighborhoods. And, statistics prove that if you increase a situation (air traffic), the possible outcome of that situation (airplane accidents) will increase as well. Try thinking of that as you tuck your small child or grandchild into their bed at night.

Please consider the residents of Delaware County. This may be a place where you conduct business, but it is a **HOME** to so many. This is where we live, where we raise our families, and it is not fair to rob anyone of quality of life...

Thank you,  
George Howarth  
Newtown Square  
Delaware County

Comment Number	Comment	Response
104.1	<p>...consider how your proposals for expansion are going to negatively affect the QUALITY OF LIFE for Delaware County residents. At this point, you already have individuals who are in need of insulating their homes to void themselves of the unhealthy noise levels created by the Philadelphia International Airport. With the expansions you are proposing, this situation is only to worsen. And, to further this point, what kind of life is this for anyone...HAVING TO INSULATE YOUR HOME from outside noises. Imagine living with a noise level so intense that you cannot keep your windows open, you cannot entertain family and friends outside during the warm months or play with your children in the yard, and you have to maintain indoor electronic devices at higher than normal levels just to compensate for the noise that leaks into your home (and, imagine the damage this could cause someone's auditory functions).</p>	<p>Section 4.2, Noise, of this EIS summarizes the threshold of "significant impact," as defined in FAA Order 1050.1E. Per FAA Order 1050.1E, if a location of incompatible land use is exposed to a project-related increase in noise level of DNL 1.5 dB or more, and that location lies within the DNL 65 dB noise contour for the Proposed Action, then the location is considered significantly impacted by noise. Significant impact is not expected to occur in Delaware with either of the Project Alternatives. However, FAA recognizes that adverse community reaction to aircraft noise may occur outside the DNL 65 dB contour as noted in Section 4.2, Noise, of this EIS. Consequently, the noise analysis considered the changed exposure for noise-sensitive areas outside the DNL 65 dB contours, including areas of Delaware County. One of the objectives of the noise analysis was to identify noise-sensitive areas that would experience a changed noise exposure of 3 dB between 60 and 65 dB DNL, as a result of the Proposed Action. Another objective was to identify noise-sensitive areas that would experience a changed noise exposure of 5 dB outside 60 dB DNL, for locations exposed to Project DNLs as low as 45 dB. As documented in the Section 4.2, Noise, of this EIS changed noise exposures of these magnitudes would not occur in Delaware County or anywhere else as a result of either build alternative under consideration for the proposed extension of Runway 17-35. No additional areas within Delaware County would require soundproofing.</p>
104.2	<p>Outside of the noise factor, there is always the danger associated with air traffic. No mode of transportation is without risk of accident. Neighborhoods that fall within a flight pattern have the constant worry that at some point in time a plane could crash down onto THEIR ground. With your expansion proposals, you are further increasing the risk of these same neighborhoods as well as additional neighborhoods. And, statistics prove that if you increase a situation (air traffic), the possible outcome of that situation (airplane accidents) will increase as well.</p>	<p>Safety is the FAA's highest priority, and the agency will ensure that the design of the Runway 17-35 Extension Project properly protects the public safety. The Preferred Alternative will meet all FAA safety standards and design criteria. The extended runway will reduce congestion in the current primary east-west operating direction, and will reduce the reliance on Runways 9L/27R and 9R/27L during heavy demand. This will enhance safety.</p>
104.3	<p>In addition to the possibility of an accident, is the increase in the air pollution levels. We already have residents who suffer serious health problems associated with our poor air quality. If we increase the air traffic, we will not only add to the deterioration of health for these individuals, but we will ultimately create new health problems for more of our residents.</p>	<p>The DEIS demonstrated that compared to the No-Action Alternative, either alternative of the Proposed Project will reduce air pollution emissions in the region, and that ambient pollutant concentrations will remain well below the National and Pennsylvania Ambient Air Quality Standards. (See Tables 4.5-7 and 4.5-12 of this EIS, and DEIS Appendix H of the Air Quality Technical Report).</p>

**From:** Kardea@aol.com[SMTP:KARDEA@AOL.COM]

**Sent:** Saturday, November 20, 2004 12:57:40 PM

**To:** PHL 17-35 EIS

**Subject:** Comments

Hello Ms McDonald:

Thanks for providing your name to receive comments.

I briefly would like you to know that the air traffic noise is absolutely horrible when the descending pattern is over our house in North Wilmington. It's frustrating that we are powerless to do anything, and I certainly feel like the FAA does not care and has been totally unresponsive.

My point is: I vehemently object to any airport expansion because I am sure that if there is room for more planes to land, additional flights will land at PHL, and additional aircraft will continue to fly directly over top of our houses. Thanks for reading this.

Regards,

Eric A. Kardash  
3205 S. Landsdowne Dr  
Wilmington, DE 19810

(302) 479-5757

**Letter 105****Eric Kardash**

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
105.1	I vehemently object to any airport expansion because I am sure that if there is room for more planes to land, additional flights will land at PHL, and additional aircraft will continue to fly directly over top of our houses.	The project is aimed at reducing delays caused by an increasing number of regional jets on the parallel runways by shifting those operations to Runway 17-35. While the FAA cannot guarantee that air carriers would not schedule additional aircraft during peak periods, the forecast indicates that the fleet mix and predicted operations (given that delays will still occur) will not result in increased operations at the airport.

**From:** RJMKELLY@aol.com[SMTP:RJMKELLY@AOL.COM]  
**Sent:** Monday, November 29, 2004 10:53:33 AM  
**To:** PHL 17-35 EIS  
**Subject:** Runway Plans

Ms. McDonald: I attended the hearing which you conducted on 18 November 2004 at Eastwick at the Meadows. I was able to talk with people who spoke, as well as view the exhibits which you provided. I had returned from a trip just two days earlier in which the Mesa Airways jet used the 17-35 runway. I object to any expansion of the runway.

I believe that the proposed expansion is unjustified. Airline schedules can and should be adjusted to use the existing facilities in a more efficient fashion. I experienced a departure delay on the runway, and no wonder-- there were at least four flights scheduled within ten minutes of each other from the same terminal F. Adjusting the scheduled departures may have minimal passenger impact. A passenger currently scheduled for a 10 AM flight might not leave the ground until 10:30, whereas a flight scheduled for 11 AM might leave the ground at 11:10 AM if the 10 AM "logjam" were relieved.

My second reason for objecting is a "quality of life" issue. The current use of runway 17-35 allows smaller jets to follow a flight path which negatively impacts the environment in southern New Jersey and in Pennsylvania, particularly the Eastwick neighborhood where your hearing was held. If expansion permits use of this runway by larger jets and more jets, the neighborhoods mentioned will have a much worse situation than they already have. The noise and pollution are serious problems, as you heard in the testimony.

In summary: I believe the expansion is unjustified and would cause additional environmental damage to the neighborhoods currently affected by the existing flight path.

Thank you.  
Richard J. Kelly, 506 N. Broadway, Pitman, NJ 08071  
856-256-8354

Letter 106

Richard Kelly

Comment Number	Comment	Response
106.1	The proposed expansion is unjustified. Airline schedules can and should be adjusted to use the existing facilities in a more efficient fashion. I experienced a departure delay on the runway, and no wonder-- there were at least four flights scheduled within ten minutes of each other from the same terminal F. Adjusting the scheduled departures may have minimal passenger impact.	Delay cannot be reduced simply by adjusting published flight schedules. Effective delay reduction requires that the actual causes of delay be addressed. The proposed project would address one cause of delay (runway congestion) and reduce annual delay. In addition, as discussed in Section 3.3.1, governmental authorities have relatively little control over the airlines' routing and scheduling.
106.2	My second reason for objecting is a "quality of life" issue. The current use of runway 17-35 allows smaller jets to follow a flight path which negatively impacts the environment in southern New Jersey and in Pennsylvania, particularly the Eastwick neighborhood where your hearing was held. If expansion permits use of this runway by larger jets and more jets, the neighborhoods mentioned will have a much worse situation than they already have. The noise and pollution are serious problems, as you heard in the testimony.	Quality of life depends on a number of factors. Because there will be no significant impacts, it is unlikely that the Proposed Project would adversely affect quality of life, however, the FAA has noted your comment.

**From:** S15Kern@aol.com[SMTP:S15KERN@AOL.COM]

**Sent:** Monday, November 29, 2004 7:43:14 AM

**To:** PHL 17-35 EIS

**Subject:** Re: 17-35

I am adamantly opposed to the extension of Runway 17-35 which will adversely effect the quality of life in West Deptford. The noise pollution, air pollution and property values will all suffer. Many planes already fly over my house and wake me up at night.

It is interesting to see that much added expense and effort is made to protect one turtle and little concern is given to protect the residential neighborhoods and extensive recreation area here.

Please add my no vote to the extension of Runway 17-35.

Sally Kern  
136 Blue Heron Drive  
Thorofare, NJ 08086



**Letter 107**

**Sally Kern**


<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
107.1	The extension of Runway 17-35 which will adversely effect the quality of life in West Deptford. The noise pollution, air pollution and property values will all suffer. Many planes already fly over my house and wake me up at night.	Quality of life depends on a number of factors. Because there will be no significant impacts, it is unlikely that the Proposed Project would adversely affect quality of life, however, the FAA has noted your comment.

Dear Ms. Blakey,


The proposed expansion of the Philadelphia Airport is objectionable to us. The so-called 17-35 expansion will increase the noise level and add pollution affecting the quality of our lives.

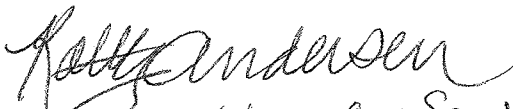
We the undersigned want the airport expansion to be reconsidered and opened for continued discussion.

Thank you for your attention to this matter.


  
Andrew Kosciuszko  
316 Union Ave  
Swarthmore PA 19081

Paula Lachum  
324 Union Ave  
Swarthmore, Pa.

  
Ariel Copel-Kosciuszko  
316 Union Ave  
Swarthmore, PA 19081

  
Kelly Andersen  
317 Union Ave Swarthmore

Amy Semenuk  
511 Yale Ave., Swarthmore, PA

  
Ann Neuman  
418 Park Ave  
Swarthmore

Jeffrey A Semenuk  
511 Yale Ave. Swarthmore, PA

Molly Anderson

Eugene G. Lee  
310 Brighton Ave  
Swarthmore Pa 19081

Julia Montague

Joyce L. Perry  
345 Park Avenue  
Swarthmore, Pa 19081

Daniel R. Anderson

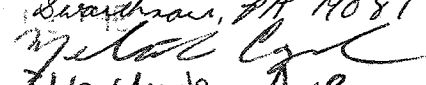
Mark S. Kilgus

Rafael Dennis 340 Union Ave  
Swarthmore

Betty Ann Nelson  
345 Union Avenue  
Swarthmore Pa 19081

Christine Harris

Barry Duchy

Kevin Wilson  
345 Union Avenue  
Swarthmore, PA 19081  
  
Janet Lutens  
316 Union Ave.  
Swarthmore, PA 19081

Jan Lutens  
319 Union Ave Swarthmore

**Letter 108****Andrew Kosciesza et al.**

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
108.1	The so-called 17-35 expansion will increase the noise level and add pollution affecting the quality of our lives. We the undersigned want the airport expansion to be reconsidered and opened for continued discussion.	<p>Quality of life depends on a number of factors. Because there will be no significant impacts, it is unlikely that the Proposed Project would adversely affect quality of life, however, the FAA has noted your comment.</p> <p>The Proposed Project would not expand the airport. The purpose of the proposed project is to reduce delay at the Philadelphia International Airport, an action which would have benefits to all users of the airport, and would benefit the regional and national airspace system.</p>

To: smcdonald.faa.17-35@vhb.com  
Subject: Airport Noise - Runway Expansion

Sue:

My main purpose in contacting you is to express my concern about airplane noise in my neighborhood - HOCKESSIN, DE. As a background, I had previously lived in the Brandywine, DE area for over 10 years. Finally, I could not take the airport noise & disruptions any more. I also knew things would only get worse in the future.

I moved to Hockessin 16 years ago. I have been very happy with my decision to move away from the airport traffic. However, after 16 years of no airplane noise. my worse night mare is now a reality. For no good reason, airplanes are now flying over my house MORNING, NOON & NIGHT! WHAT THE HECK IS GOING ON?

Late at night, early in the morning. They wake me up. Where are these airplanes coming from after a 16 year absence? I need an answer because I do not plan to move again. I want things to get back to the way they were for the past 16 years - where I could sit on my back porch, relax & enjoy. Now, out of the blue, airplanes are disrupting my life again.

What has happened for this change & what can I do to help change it back?

Sincerely,  
Ron Kovac  
Hockessin, DE 19707

**Letter 109**

**Ron Kovac**

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
109.1	After 16 years of no airplane noise, my worse night mare is now a reality. For no good reason, airplanes are now flying over my house [in Hockessin, DE]. Where are these airplanes coming from after a 16 year absence?	The FAA has noted and considered your comment. Flight tracks will not be changed under this Proposed Project. These increases are not the result of the Proposed Project.

**From:** jkurpis@comcast.net[SMTP:JKURPIS@COMCAST.NET]  
**Sent:** Monday, November 29, 2004 8:20:05 AM  
**To:** PHL 17-35 EIS  
**Subject:** Runway Nightmare

Mr. McDonald:

Please reconsider your preposterous proposal to increase the noise and traffic level of airplanes over our homes in West Deptford. Please also cease the propaganda you are peddling to the misinformed indicating that the runway will not affect West Deptford residents.

Why don't you sit on my deck for 10 minutes at night now and hear how annoying and deafening the air traffic is currently. Please explain to my two year old daughter why the planes have to awaken her each night after she has fallen fast asleep.

Please put yourself in our position. Our property values will decline even more than they have already with the current air traffic.

WAKE UP and start thinking about people instead of the almighty \$\$\$!!!

Sincerely,  
Joseph S. Kurpis (Disgusted West Deptford Resident)

Letter 110

Joseph Kurpis

Comment Number	Comment	Response
110.1	Reconsider your preposterous proposal to increase the noise and traffic level of airplanes over our homes in West Deptford.	<p>Increased traffic is projected to occur at PHL over the next 3 to 11 years and will cause noise exposure levels in all areas near the airport to increase commensurately, regardless of whether the proposed project is implemented or not. This is illustrated in Figure 4.2-5 of this EIS.</p> <p>A comparison of the DNL contours for 2003 Existing Conditions and the 2007 No-Action Alternative indicate that aircraft noise will increase in New Jersey to the south of the Airport along the final approach to Runway 35, whether or not the project is implemented.</p> <p>As shown in Figures 4.2-6 and 4.2-7 in this EIS, Alternative 1 is projected to cause an increase in noise exposure, when compared to the No-Action Alternative for the corresponding future year, in New Jersey directly across the Delaware River and under the flight paths to Runway 17-35. However, no one in this area is projected to experience significant noise impact according to criteria established by the FAA in ORDER 1050.1E. In fact no one in New Jersey off the south end of Runway 17-35 even falls within the 60 DNL noise contour, though some people in the River Winds development and others living along Crown Point Road are exposed to DNL levels close to 60 dB.</p> <p>Figures 4.2-8 and 4.2-9 of this EIS indicate very small reductions in noise exposure due to Alternative 2 because, though there are more aircraft projected to use the extended Runway, it will be used more for takeoffs to the north on 35 and slightly less for landings on 35 than either the Build Alternative 1 or the No-Action Alternative. In addition, aircraft arriving to land on Runway 35 will utilize the 1,444 foot displaced threshold on the extended runway so that they will actually be slightly higher in the air over this part of New Jersey than under the No-Action Alternative, and aircraft departing to the south on 17 will be using the extension at the north end of the runway so that they too will be higher over New Jersey than under the No-Action Alternative. These factors combine to produce the slight reductions in exposure relative to the No-Action Alternative that are seen in the referenced figures.</p>
110.2	Our property values [in West Deptford] will decline even more than they have already with the current air traffic.	Property values depend on many factors. One factor is the environment. This Project will not have significant impact on noise or environmental impacts. It is highly unlikely that any property values will decrease as a result of this Project.

**From:** Rmb132[SMTP:RMBL32@YAHOO.COM]

**Sent:** Tuesday, November 23, 2004 3:12:03 PM

**To:** PHL 17-35 EIS

**Subject:** Concern re: runway expansion

Ms. Susan MCDonald  
US Dept. of Transportation, FAA  
Harrisburg Airport District Office

Dear Ms. McDonald:

As a resident of nearby Delaware County, I am opposed to expansion of Runway 17-35 at Philadelphia International Airport. The expansion would put larger aircraft at lower altitudes over my community -- a safety and noise concern.

Sincerely,

Ruth Lerario



Letter 111

Ruth Lerario

Comment Number	Comment	Response
111.1	I am opposed to expansion of Runway 17-35 at Philadelphia International Airport. The expansion would put larger aircraft at lower altitudes over my community -- a safety and noise concern.	The FAA has noted and considered your comment, and has carefully considered all comments submitted on the DEIS. The Proposed Project will not result in any noticeable change in flight tracks, which are determined by the location of the centerline of the runway. The number of aircraft using Runway 17-35 is anticipated to increase, but will not result in significant noise impacts at any location, nor will the elevation at which aircraft approach the runway change substantially as a result of the runway extension. Altitudes of aircraft on approach to or departure from Runway 17 will be slightly different because aircraft will begin their takeoff roll on the extended pavement (thereby passing areas to the north at a slightly higher altitude than under the No-Action Alternative), and will approach slightly lower. The amount of increase or decrease depends on the climb capability of each individual aircraft.



Philadelphia International Airport  
Runway 17-35 Extension Project  
Environmental Impact Statement

Public Hearings  
November 15, 16, 17, and 18, 2004

Public Comment Form

The Federal Aviation Administration (FAA) encourages all interested parties to provide comments concerning the scope and content of the DEIS. Comments should be as specific as possible and address the analysis of potential environmental impacts and the adequacy of the proposed action or merits of alternatives and the mitigation being considered. Reviewers should organize their participation so that it is meaningful and makes the agency aware of the viewer's interests and concerns using quotations and other specific references to the text of the DEIS and related documents. Matters that could have been raised with specificity during the comment period on the DEIS may not be considered if they are raised later in the decision process. This commenting procedure is intended to ensure that substantive comments and concerns are made available to the FAA in a timely manner so that the FAA has an opportunity to address them.

Please clearly print your contact information and your comment on the DEIS in the space below. Space is also available on the back page. Please either drop this form off tonight at the sign-in table or mail this form to the contact and address listed at the bottom of the back page. You can also submit your comments via email ([smcdonald.faa.17-35@vhb.com](mailto:smcdonald.faa.17-35@vhb.com)) or the Project web site ([www.phlrunway17-35eis.com](http://www.phlrunway17-35eis.com)), where the DEIS is available.

Comments must be received by **December 1, 2004** in order to be considered.

Thank you for participating.

Name: MICHAEL H. LEVIN  
Address: 414 MILL ROAD  
City: HAVERTOWN,  
State: PA Zip Code: 19083  
E-mail Address: <ERAincMHL@aol.com>

PLEASE PRINT CLEARLY

Comment: 6 PAGES OF COMMENTS ATTACHED  
FOR INCLUSION IN THE PUBLIC RECORD.

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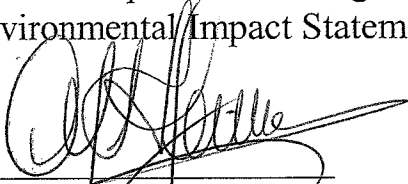
**Michael H. Levin, Ph.D., F.A.A.A.S.**

414 Mill Road, Havertown, Pennsylvania, U.S.A. 19083-3740  
VoiceTel (610) 449-7400 FaxTel (610) 449-7404 E-mail <mhl6841468@aol.com>

Federal Aviation Administration  
Harrisburg Airports District Office  
3905 Hartzdale Avenue, Suite 508  
Camp Hill, PA 17011  
ATTN: Susan McDonald

November 15, 2004

Please accept the following comment and include it in the public record for the Environmental Impact Statement on Runway 17-35.



Michael H. Levin

Attached Statement that follows

**STATEMENT IN OPPOSITION TO EXTENDING RUNWAY 17-35 WITH AN EXTENSIVELY USED FLIGHT PATH OVER DELAWARE COUNTY, PA**

The Federal Aviation Administration (FAA) is conducting a study for its sponsor, Philadelphia International Airport, that is in need of reducing flight delays. In order to accomplish about a 10 minute time savings per flight operation it would be necessary to extend an existing north south runway by up to 1,500 ft so that it could be used for arrivals and departures of both 70 passenger two-engine regional jets and long distance widebody jets. Alternatives other than extending the runway should be explored.

A time savings of a few minutes seems insignificant in view of the \$38 million price tag (plus study costs) that would be underwritten at taxpayers' expense in accordance with Presidential Executive Order 13274 for 13 high-priority airport projects, nationwide, approved by the U.S. Secretary of Transportation. The

Page 2

## STATEMENT IN OPPOSITION TO RUNWAY 17-35 EXTENSION

November 15, 2004

period of time over which this proposed flight time savings benefit would occur requires justification.

A number of elected officials have stated that the runway extension project is a waste of money in view of its short-term use.

Acknowledging some of these uncertainties during October 2004, the FAA, with assistance of subcontractors, has recently completed a Draft Environmental Impact Statement (DEIS) as required by law under the National Environmental Policy Act (NEPA) of 1969.

Some interesting highlights of the DEIS document includes knowledge that the runway will use a runway safety area (RSA) at the north end of Engineered Materials Arresting System (EMAS) to prevent heavily laden aircraft from overshooting the runway and running too far into Delaware County. Noteworthy, in addition, is working with the U.S. Coast Guard to provide notification when passing ships on the Delaware might interfere with aircraft landings so that increased low-flying air traffic would be delayed until ships pass; a steeper flight path is also under consideration.

Deepening the Delaware River so that it can accommodate greater capacity and volume of shipping, along with the possibility that refineries or storage facilities along the Delaware might expand their capabilities, points up lack of foresight for reducing the possibility that landing or departing aircraft won't run into ship traffic; passing ships are acknowledged as causing flight delays several or more times each day.

The boundaries used for the airport's local study area of the Environmental Impact Study have been "shrunk-fit" around the existing major runways at Philadelphia International Airport with little attention afforded to adjacent territory, counties or municipalities. Although the more regional study area boundary is illustrated as extending to 25 miles from the airport, this is more artifice than reality because impacts upon municipalities in Delaware, Montgomery, Bucks, Chester, and Philadelphia Counties have been assessed by some undefined guesswork "modeling" rather than by actual data or testing. Demonstrating that the airport's

STATEMENT IN OPPOSITION TO RUNWAY 17-35 EXTENSION

November 15, 2004

runway extension plan will not have an impact has been the paramount concern, effects on the extended range of the affected area have been ignored. Statements of null or negative effects are nearly impossible to disprove; FAA know this. It is only recently that funds have been earmarked for residential noise abatement near the airport where owners have long complained about the noise from low-flying aircraft.

If the runway is extended to accommodate more flights, the effects of increased air traffic – a primary reason for extending a runway – will become evident in the surrounding area as: frequent increased disturbance from low-flying aircraft; loud noise and structure-cracking vibration at all hours of day and night; localized increases in air pollution from jet fuel exhaust with its seasonal mixtures of fuel additives; contribution of hazardous and unhealthful substances in the air such as those that contribute to acid rain, pollutants in local waters and ground level smogs. Loss of property desirability and value are other drawbacks.

An intricate web of arriving and departing flight paths suggests that air safety should be a major concern within a few miles of an airport; it raises questions about who trains, equips and pays early responders, develops emergency plans, and identifies facilities to be used in emergencies.

Diverse human illnesses such as asthma and cancers could result from exposure to hazardous substances. Cracking and deterioration of buildings from increased vibration and acid rain would occur. Overall, the impact of the runway extension with its unabashed need to augment the number of flights departing and landing can only be adverse to Delaware County whatever the method of computing it. And, speaking of an overarching method for determining environmental impact, none has been applied; the study is riddled with “no significant or adverse impact” when undoubtedly there will be with increased frequency and decreased altitude from Runway 17-35. While there may be some economic stimulus to business dependent upon the airport, effects upon local counties, like Delaware County, remain to be assessed.

Mayor Street’s representative who gave recent testimony at a hearing of a bipartisan (a committee of three Republicans and two Democrats is bipartisan in

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STATEMENT IN OPPOSITION TO RUNWAY 17-35 EXTENSION

November 15, 2004

name only) House Select Committee chaired by Rep. Ron Raymond of Delaware County on three airports (Pittsburgh, Reading, and Philadelphia and SEPTA) declared that Philadelphia would never relinquish control of its airport. The next day Rep. Raymond declared that maybe Philadelphia is looking for a "deal."

There have been suggestions of a Regional Airport Authority operating Philadelphia's airport and there has been talk of an airport takeover by the State.

Following these presentations, the Environmental Impact Statement could become Final (it could go through later drafts, but it seems doubtful that the FAA will pursue this possibility in the fast track program that it is following); afterwards, the FAA will make up its collective mind and publish a Record of Decision or ROD. This irreversible decision, whatever it is, will affect residents of five counties in Pennsylvania and the population of three states.

Five Pennsylvania counties – Chester, Delaware, Montgomery, Bucks and Philadelphia have been identified as non-attainment for air quality according to the U.S. Environmental Protection Agency. Increasing the number of flights into and out of Philadelphia International Airport on an extended Runway 17-35 would likely ensure that attainment of improved air quality becomes much more difficult in the future. Reportedly, air traffic is one of the worst sources of air pollution – jet aircraft don't have catalytic converters – and low-flying air traffic below 3,000 feet is within the mixing zone where localized effects may be greater than anticipated. At my home during the past month there have been overflights less than 2,200 feet above ground level. Will the Environmental Protection Agency – or any of the consultative agencies that the FAA reports that it has engaged – weigh in with complete responses on the effects of airborne pollutants?

The FAA's public comment period – the date after which citizen's input won't be considered – will abruptly end on December 1, 2004, however, a Coalition of Communities Against Runway 17-35 has met with and/or personally prevailed upon local, county, state and federal officials to extend the public comment period for several months in order to secure more representative views and concerns about the impact of the extension of runway 17 -35. The success of this organization is evident in Haverford where township commissioners' passed a

STATEMENT IN OPPOSITION TO RUNWAY 17-35 EXTENSION

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unanimous resolution authorizing the township and its residents to voice their concerns to the FAA and they have done so. At present, other communities and municipalities such as Lansdowne, Tinicum, Upper Darby, and Yeadon are voicing their own concerns. Delaware County Council recently executed a \$36,000 contract to review the EIS produced by the FAA.

Some local legislators have already publically voiced their opinions. Among them is State Sen. Edwin B. Erickson – whose district includes communities that would be affected by the runway extension. Sen. Erickson, himself a former EPA Region III Administrator in Philadelphia has opposed the Runway extension plainly stating that he “thinks the FAA decided to expand (sic) [extend] the runway and now they’re simply trying to justify their decision by using this draft EIS.” State Sen. Connie Williams appeared at the last FAA informational meeting in September, asked questions and subsequently expressed her opposition to the project to the FAA on October 18. Like some others who made inquiries to the FAA, she didn’t get a response.

One legislator from Delaware County who vigorously campaigns on an environmental platform thinks that the airport wouldn’t be asking for runway lengthening unless it needed it; a number of attempts by concerned citizens to inform him of the dangers of accepting limited information from an abbreviated Microsoft PowerPoint presentation given at an unvetted private pre-meeting showing to this legislator by FAA failed to change his position; this legislator hasn’t attended recent public meeting.

Recently reelected U.S. Representative Curt Weldon has expressed his concern about the short-term runway expansion (sic) [extension]; reportedly, he thinks that it squanders public funds for its short-term use.

A runway extension would precede and is separate from Philadelphia International Airport’s proposed Capacity Enhancement and Expansion Program that would, if approved, restructure the airport. Apparently, an extended Runway 17-35 would be used for about 10 year until still other runways are built; however, don’t count on an extended \$38 million Runway 17-35 being removed; such a reconstructed runway has its own indeterminate life.

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STATEMENT IN OPPOSITION TO RUNWAY 17-35 EXTENSION

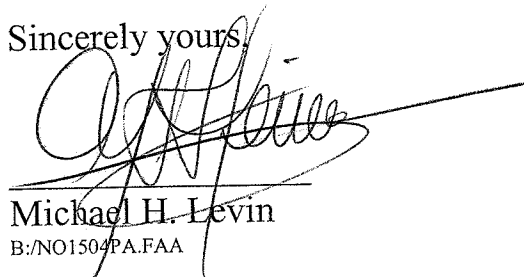
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Funds for the rest of the airport expansion and capacity enhancement project might not be authorized; with the emphasis being placed on Runway 17-35 extension, rather than just overall capacity enhancement, funds for the rest of might be long-delayed.

Extension of the runway, with or without capacity enhancement and expansion of Philadelphia International Airport, and the resulting impact upon the environment in the five county area of the Delaware Valley, will be felt for decades, if not through all of the 21<sup>st</sup> century.

I am now asking you to disapprove and vote against Runway 17-35 extension; this is a project that is unwanted by residents of Delaware County. I want to continue to enjoy my home in the healthful surroundings which I decided to live in 15 years ago. I want my surroundings and living space to be without frequent noise intrusions, clean air and not to be beneath a busy flight path, day after day.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Michael H. Levin", with a long horizontal line extending to the right from the end of the signature.

Michael H. Levin

B:/NO1504PA.FAA



Letter 112

Michael H. Levin

Comment Number	Comment	Response
112.1	A time savings of a few minutes seems insignificant in view of the \$38 million price tag (plus study costs) that would be underwritten at taxpayers' expense in accordance with Presidential Executive Order 13274 for 13 high-priority airport projects, nationwide, approved by the U.S. Secretary of Transportation. The period of time over which this proposed flight time savings benefit would occur requires justification.	The cost-benefit analysis for the proposed project will be taken into consideration in any funding decision.
112.2	Deepening the Delaware River so that it can accommodate greater capacity and volume of shipping, along with the possibility that refineries or storage facilities along the Delaware might expand their capabilities, points up lack of foresight for reducing the possibility that landing or departing aircraft won't run into ship traffic; passing ships are acknowledged as causing flight delays several or more times each day.	The delay reduction analysis and corresponding environmental analyses, assume that Arrivals on Runway 35 are suspended when ships are in the approach path, no more than four times per 24-hour period and for 15 minutes each. Dredging will not have any effect on the height of ships that can come up the river. The Commodore Barry Bridge downstream of the Airport is the controlling factor. Even if ship traffic were to increase in the future, extending Runway 17-35 would still achieve the Project's Purpose.
112.3	The boundaries used for the airport's local study area of the Environmental Impact Study have been "shrunk-fit" around the existing major runways at Philadelphia International Airport with little attention afforded to adjacent territory, counties or municipalities. Although the more regional study area boundary is illustrated as extending to 25 miles from the airport, this is more artifice than reality because impacts upon municipalities in Delaware, Montgomery, Bucks, Chester, and Philadelphia Counties have been assessed by some undefined guesswork "modeling" rather than by actual data or testing. Demonstrating that the airport's runway extension plan will not have an impact has been the paramount concern, effects on the extended range of the affected area have been ignored.	<p>The local study area is an estimate made at the start of the study intended to encompass the area in which a significant noise impact might occur. The regional study area extends out 27 miles from the airport in order to take into account the concerns of communities under the PHL flight paths. As defined by FAA Order 1050.1E, a significant is a change of 1.5 dB or greater within the 65 DNL noise contour. The results of the noise analysis show that the estimate is a reasonable approximation of the 65 DNL contour. The Integrated Noise Model is an approved and tested methodology.</p> <p>The Study Area included not only the immediate airport environs where aircraft flight paths are aligned with the runways, but also included other potentially affected areas beyond that, over which aircraft will join the surrounding airspace.</p> <p>Initially, a Local Study Area was defined within which all residential areas, cultural resources and historic sites were identified for subsequent noise analyses, as described in Section 4.2, Noise, of this EIS. The geographical extent of this close-in area was determined based on guidance from FAA Notice 7210.360.</p> <p>Figure 4.3-1 in this EIS shows the extent on the Local Study Area; its shape reflects the fact that most of the aircraft are still aligned with the runways at these lower altitudes. Then, the geographical extent of "other potentially affected areas beyond the immediate airport area" (the Regional Study Area), was determined. The shape of the Regional Study is shown in Figure 4.3-3 of this EIS; a circular area with a radius of approximately 27 miles, which includes Lower Merion and Haverford. This area was used to conduct all noise analyses.</p> <p>The Study Area is not an arbitrary 27-mile radius around the airport but was configured based on FAA's requirements that environmental review be completed for areas up to 10,000 feet AGL for departures and 7,000 feet AGL for arrivals. These AT requirements must be considered where there are expected changes in departure or arrival tracks, which are not anticipated for this project.</p>
112.4	If the runway is extended to accommodate more flights, the effects of increased air traffic - a primary reason for extending a runway - will become evident in the surrounding area as: frequent increased disturbance from low-flying aircraft; loud noise and structure-cracking vibration at all hours of day and night.	<p>The runway is not forecasted to increase the number of operations. Chapter 4 of this EIS discloses the changes in noise that are expected as a result of the various Alternatives. Not all areas are affected equally or negatively.</p> <p>Noise-induced vibration levels caused by aircraft overflights around Philadelphia International Airport are not considered sufficiently high to cause structural damage. In fact, in most airport noise environments, footfalls and doors closing produce vibration levels higher than those from aircraft overflights.</p>

Letter 112

Michael H. Levin

Comment Number	Comment	Response
112.5	Localized increases in air pollution from jet fuel exhaust with its seasonal mixtures of fuel additives; contribution of hazardous and unhealthful substances in the air such as those that contribute to acid rain, pollutants in local waters and ground level smogs.	Emissions of project-related Hazardous Air Pollutants (HAPS) will be reduced with either Alternative of the Proposed Project. See Table 4.5-12 of this EIS.
112.6	An intricate web of arriving and departing flight paths suggests that air safety should be a major concern within a few miles of an airport; it raises questions about who trains, equips and pays early responders, develops emergency plans, and identifies facilities to be used in emergencies.	Safety is the FAA's highest priority, and the agency will ensure that the design of the Runway 17-35 Extension Project properly protects the public safety. The Preferred Alternative will meet all FAA safety standards and design criteria. The extended runway will reduce congestion in the current primary east-west operating direction, and will reduce the reliance on Runways 9L/27R and 9R/27L during heavy demand. This will enhance safety.  As a Part 139 Certified Airport, Philadelphia International Airport has an emergency plan and holds annual emergency drills that are coordinated with emergency personnel in surrounding communities. The Airport encourages fire and rescue managers in the study area to contact the City of Philadelphia Fire Department or the Airport Fire Department to discuss future coordination.
112.7	Diverse human illnesses such as asthma and cancers could result from exposure to hazardous substances.	The Preferred Alternative would reduce emissions in comparison to the No-Action Alternative. See Table 4.5-12 of this EIS.
112.8	Cracking and deterioration of buildings from increased vibration...	The Project would not result in vibration levels in Havertown (or any other community) that could cause structural damage to buildings.
112.9	Speaking of an overarching method for determining environmental impact, none has been applied; the study is riddled with "no significant or adverse impact" when undoubtedly there will be with increased frequency and decreased altitude from Runway 17-35.	FAA Order 1050.1E, Environmental Impacts Policies and Procedures, establishes criteria for significant and adverse impacts in accordance with NEPA regulations. All analyses in this EIS were conducted in accordance with the regulations.
112.10	While there may be some economic stimulus to business dependent upon the airport, effects upon local counties, like Delaware County, remain to be assessed.	Section 4.4 states that the Proposed Project would not result in adverse economic impacts to surrounding communities, which includes those communities in Delaware County. Additional construction-period jobs would be created, which would have a minor regional beneficial impact. Section 4.2 demonstrates that the preferred alternative will not result in significant noise impacts nor would it notably change the existing noise environment, therefore there would be no impact to property values in Delaware County.
112.11	Five Pennsylvania counties - Chester, Delaware, Montgomery, Bucks and Philadelphia have been identified as non-attainment for air quality according to the U.S. Environmental Protection Agency. Increasing the number of flights into and out of Philadelphia International Airport on an extended Runway 17-35 would likely ensure that attainment of improved air quality becomes much more difficult in the future.	The total number of aircraft flights (operations) will not change due to the Proposed Project. Airport-related pollutant emissions will be reduced by implementing either alternative of the Proposed Project, thus, the potential for attainment of "improved air quality" will be enhanced.
112.12	Low-flying air traffic below 3,000 feet is within the mixing zone where localized effects may be greater than anticipated.	Air quality impacts of "Low-flying aircraft" were accounted for in the analysis. Aircraft emissions were accounted for up to an elevation of 3600 feet during both takeoff and landing, which is well beyond the Airport's perimeter. (See Section 3.0 and Section 3.1.2 of Appendix A (Air Quality Analysis Protocol) to Appendix A.2 (Air Quality Technical Report) of the DEIS.
112.13	Will the Environmental Protection Agency - or any of the consultative agencies that the FAA reports that it has engaged - weigh in with complete responses on the effects of airborne pollutants?	EPA and PA DEP have been involved throughout the EIS process, including the review of the analysis and the results of the air quality analysis, and concur with the results. General information on this topic can be found on the following EPA and PA DEP websites: <a href="http://www.epa.gov/ttn/atw/index.html">http://www.epa.gov/ttn/atw/index.html</a> ; <a href="http://www.epa.gov/region4/air/airtoxic/index.htm">http://www.epa.gov/region4/air/airtoxic/index.htm</a> ; <a href="http://www.epa.gov/superfund/programs/risk/index.htm">http://www.epa.gov/superfund/programs/risk/index.htm</a> ; <a href="http://cfpub2.epa.gov/ncea/">http://cfpub2.epa.gov/ncea/</a> ; <a href="http://www.dep.state.pa.us/">http://www.dep.state.pa.us/</a> ; and <a href="http://www.dep.state.pa.us/dep/deputate/airwaste/aq/toxics/toxics.htm">http://www.dep.state.pa.us/dep/deputate/airwaste/aq/toxics/toxics.htm</a> .

**Letter 112****Michael H. Levin**

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
112.14	I am now asking you to disapprove and vote against Runway 17-35 extension; this is a project that is unwanted by residents of Delaware County. I want to continue to enjoy my home in the healthful surroundings which I decided to live in 15 years ago. I want my surroundings and living space to be without frequent noise intrusions, clean air and not to be beneath a busy flight path, day after day.	The FAA has noted and considered your comment.

**From:** Leon Lilly[SMTP:FISHPOLE5@COMCAST.NET]

**Sent:** Wednesday, November 17, 2004 3:50:03 PM

**To:** PHL 17-35 EIS

**Subject:** runway

I attended the meeting the other night at West Deptford H.S.. First and foremost, I was very disappointed with the way the meeting was scheduled and advertised. It was only on the last day that I found out about the meeting in a column in the Courier-Post that was on the bottom of a page, the column being 1 1/2in by 3 in. This to me is not a serious way of notifying the public.

I spoke with some people in the hall way before the hearing was started. They were representatives of the Air Port I believe. I asked about the needed for this change to runway 35. It was explained to me that the runway as it exists now is under utilized. I asked if this renovation was done what effect would it have on the residents of West Deptford. He said it would be minimal. I asked that if the runway was made longer, wouldn't that mean the planes would come in lower over our community, he said yes, I asked about the size of the planes coming in, would they be bigger, he said yes. I asked if the planes were bigger wouldn't that mean more noise, he said yes.

I listened carefully to the air traffic controller that spoke at the hearing, he said in no uncertain terms that along with more stoppages for boat traffic, there would be more noise over our community, that the noise studies provided to us were incorrect because the number of flights would increase and that some already have and that this study was done before the increase in flights. He also stated there were some preferable alternatives, he stated very clearly that these alternatives were much more preferable than what you have planned!!

I think these alternatives ought to be looked at very carefully and then a new meeting should be scheduled with the communities involved to discuss them!! I think what you propose is wrong and very wrong for our community.

Signed, Leon Lilly

Letter 113

Leon Lilly

Comment Number	Comment	Response
113.1	I was very disappointed with the way the meeting was scheduled and advertised. It was only on the last day that I found out about the meeting in a column in the Courier-Post that was on the bottom of a page, the column being 1 1/2in by 3 in. This to me is not a serious way of notifying the public.	The Federal Aviation Administration (FAA) used several methods to reach out and notify the public about the project and public meetings. These methods included placing notices in area newspapers, such as the Jersey Courier-Post, sending information letters to township officials, including West Deptford, sending meeting flyers to area churches and libraries, and sending newsletters or post cards about upcoming meetings to everyone on the project mailing list. The project mailing list includes Federal, state and local officials, anyone who signed up for the mailing list at the public information meetings or through the website and anyone who sent a communication to the project and provided contact information. Section 1.3 provides a detailed description of the public participation program. To help advertise the September 2004 public meetings, the FAA's consultant team coordinated with West Deptford Township in placing a notice of the meeting in the Township's newsletter. Additionally, the City of Philadelphia distributed information brochures at the Airport.
113.2	Along with more stoppages for boat traffic, there would be more noise over our community, that the noise studies provided to us were incorrect because the number of flights would increase and that some already have and that this study was done before the increase in flights.	This EIS recognizes the potential increase in traffic on Runway 17-35, both in 2007 and in 2015, and points out that some of these changes in operations to that runway will occur whether one of the proposed Build alternatives is approved or not. The findings reported to date still represent reasonable estimates of future growth conditions.
113.3	I think these alternatives ought to be looked at very carefully and then a new meeting should be scheduled with the communities involved to discuss them.	All reasonable alternatives were considered and analyzed very carefully for the Project. Some alternatives were eliminated because they would not achieve the project's purpose and need in the short term.  Public outreach, including community inputs on scoping and public information meetings, are discussed in Section 1.3. During the scoping process, FAA received a number of proposed alternatives from members of the public and from agencies. As described in Chapter 3, these alternatives were considered and analyzed for the Project. These alternatives were eliminated because they would not achieve the project's purpose and need in the short term.

**From:** Laura Loges[SMTP:BOUTONL@AJJ.COM]

**Sent:** Monday, December 06, 2004 12:22:45 PM

**To:** PHL 17-35 EIS

**Subject:** 17-35eis

Good Afternoon Ms. McDonald:

I understand that the deadline for submitting a comment regarding the runway proposal is December 1st. But I am emailing you in hopes that the deadline can be extended.

I reside in Weathervane Farms, Mt Royal NJ and my neighbors and I just became aware of this proposal to expand the runway on Saturday (12/4) when we received a letter in the mail from another resident of our development, who was also very concerned.

When I built my house 3 years ago, I was attracted to the quiet suburban community and thought it would be a perfect place to raise a family. But in the last few years, I have noticed very obvious changes with air traffic. Planes are now flying lower than ever and the noise is increasingly apparent. I can no longer sit in my back yard without hearing loud rumbling from the skies. Often they are so low, it's almost scary. My neighbors and I pay plenty of taxes and we deserve the type of life we bought in to. Many of my neighbors are from Philadelphia. They moved from the city to get away from the hectic lifestyle there, the traffic and the noise pollution. Now they are facing the possibility of their dreams being taken away from them. Our quiet area is now being threatened by noise and increased air traffic. We live among the wet lands, what threat shall this pose to our wildlife?

We live in a very diverse community - many neighbors are retired folks looking for a peaceful place to reside, and many others have babies and very small children. Noise can only deteriorate their lives.

I hope that our voices can be heard now that we are aware of the situation. I hope that you can understand the despair we are feeling and move to reconsider another alternative.

Thank you kindly for your time,

Mrs. Laura Loges

Letter 114

Laura Loges

Comment Number	Comment	Response
114.1	Our quiet area is now being threatened by noise and increased air traffic.	Air traffic is projected to increase in the future, as documented in Chapter 2 of this EIS. The same increase in air traffic would occur even if no action were taken. Both build alternatives are projected to cause an increase in noise exposure in some areas, and a decrease in others. This is shown in Figures 4.2-6 and 4.2-7 in this EIS. However, none of the communities are projected to experience significant noise impacts according to criteria established by the FAA in Order 1050.1E.
114.2	We live among the wetlands, what threat shall this pose to our wildlife?	As documented in Section 4.10 of the EIS, the proposed project will have no direct impacts on wetlands or wildlife, and will not affect wildlife populations as a result of increased noise.
114.3	We live in a very diverse community - many neighbors are retired folks looking for a peaceful place to reside, and many others have babies and very small children. Noise can only deteriorate their lives.	Quality of life depends on a number of factors. Because there will be no significant impacts, it is unlikely that the Proposed Project would adversely affect quality of life, however, the FAA has noted your comment.

**From:** Craig Mangano[SMTP:CMANGO481@SNIP.NET]  
**Sent:** Tuesday, November 30, 2004 7:45:41 PM  
**To:** PHL 17-35 EIS  
**Subject:** Runway Comments  
**Auto forwarded by a Rule**

To Whom It May Concern,

My name is Craig Mangano. I live in West Deptford, in the Kings Grove Development off of Kings Highway. The planes at this present time fly directly over my house several times a day. I live directly in the traffic pattern for descending flights onto Runway 17-35. I am composing this letter to express my concerns and unhappiness about the current conditions and the increased expected conditions that will be caused by the proposed construction to Runway 17-35.

I have been living on Parliament Way for six years now. I moved to this neighborhood for several reasons, and one of those reasons was for the quietness that was here. For the years I have lived here, there was minimal air traffic over my the house. The plane traffic was not so frequent, and when there was traffic, it was not too loud. The situation was bearable. During the last several months, I have noticed a drastic change in the situation. The air traffic has increased dramatically and the planes flying overhead are much louder. When the prop planes flew over the house, the noise was not too bad. With the small jets flying over now, the increase in noise has become unbearable and unacceptable. I have a pool in my back yard, that was installed four years ago. I used to enjoy the summer in the backyard with friends and family. My wife and I have now noticed that when the jets fly over our house, we have to stop talking until the jet is gone. I have also noticed that when most of the planes fly over our house, they interrupt my satellite television signal, which has become a nuisance. The noise is so loud that we can't hear each other talking when we are only a few feet away from one another. This I feel is unacceptable.

With the proposed expansion of this runway, I have been told that air traffic will increase dramatically and the planes may be flying lower. This condition I feel is unhealthy and dangerous to this community and others in the area. It may be easy for the airport to expand this runway, but I don't feel that the magnitude of how lives will be effected is realized. Now one could say that if the noise is too much to bear, I could just sell the house and move from the situation. I don't think however, that my house would sell due to the plane traffic. No one wants to sit in their back yard and have to stop a simple conversation with a loved one because they can't hear each other talk due to low flying planes all of the time. I don't think that anyone would want to buy a home where they were not free to choose what television service they want. I feel that there must be other ways to rectify the problem at the airport other than the proposed plans that would greatly effect West Deptford Residents.

I hear that the environmental study that was done, was performed before the recent changes in air traffic over my house. I think that another study should be done, which would include a study of the noise in this area. I think that the decibel level now is too high when the planes fly over as it is, let alone an increase in air traffic coupled with lower flying planes. I know there must be other alternatives to rectify the situation. I was in attendance at the last West Deptford Hearing where the Air Traffic Controller spoke. He had some good ideas and explained that this would only be a temporary fix to the recent problem. If you need to contact me for any further comments, or if I could be of assistance in any other way, please don't hesitate to contact me.

Craig Mangano  
1119 Parliament Way  
Thorofare, NJ 08086



Letter 115

Craig Mangano

Comment Number	Comment	Response
115.1	<p>I have been living on Parliament Way for six years now. I moved to this neighborhood for several reasons, and one of those reasons was for the quietness that was here. For the years I have lived here, there was minimal air traffic over my the house. The plane traffic was not so frequent, and when there was traffic, it was not too loud. The situation was bearable. During the last several months, I have noticed a drastic change in the situation. The air traffic has increased dramatically and the planes flying overhead are much louder. When the prop planes flew over the house, the noise was not too bad. With the small jets flying over now, the increase in noise has become unbearable and unacceptable. I have a pool in my back yard, that was installed four years ago. I used to enjoy the summer in the backyard with friends and family. My wife and I have now noticed that when the jets fly over our house, we have to stop talking until the jet is gone. I have also noticed that when most of the planes fly over our house, they interrupt my satellite television signal, which has become a nuisance. The noise is so loud that we can't hear each other talking when we are only a few feet away from one another. This I feel is unacceptable.</p>	<p>The FAA has noted and considered your comment.</p>
115.2	<p>With the proposed expansion of this runway, I have been told that air traffic will increase dramatically and the planes may be flying lower. This condition I feel is unhealthy and dangerous to this community and others in the area.</p>	<p>Safety is the FAA's highest priority. The Air Traffic Control Tower is responsible for spacing between planes, elevations, approach/departure paths that maintain safe airspace. The airlines are responsible for scheduling flights, which respond to passenger demands. Neither the FAA nor the Airport can require air carriers to change schedules.</p> <p>As documented in this EIS, there are forecast to be 528,400 annual operations at the Philadelphia International Airport in 2007, whether the Runway 17-35 Extension is constructed or it is not constructed. This is an increase of 82,433 annual operations from 2003 operations.</p> <p>In the Preferred Alternative in 2007, there would be an increase of approximately 123 daily operations on Runway 17-35, with approximately 93 of them departures to or arrivals from the north over Pennsylvania and approximately 30 departures to or arrivals from the south over New Jersey. In the Preferred Alternative in 2015, there would be an increase of 156 daily operations on Runway 17-35, with approximately 96 of them departures to or arrivals from the north over Pennsylvania and approximately 60 departures to or arrivals from the south over New Jersey. As shown in the flight track figures, (EIS Figures 4.2-2 and 4.2-3, not all of the operations fly over the same point on the ground.</p> <p>As a result of the runway extension to the north and south, departures from Runway 17 35 would be at a slightly higher altitude over the communities and arrivals would be at a slightly lower altitude than for the No-Action Alternative. This difference would be on the order of approximately 20 feet and would likely not be noticeable.</p>
115.3	<p>I don't think however, that my house [in West Deptford] would sell due to the plane traffic.</p>	<p>Property values depend on many factors. One factor is the environment. This Project will not have significant impact on noise or environmental impacts. It is highly unlikely that any property values will decrease as a result of this Project.</p>
115.4	<p>The environmental study that was done, was performed before the recent changes in air traffic over my house [in West Deptford]. I think that another study should be done, which would include a study of the noise in this area. I think that the decibel level now is too high when the planes fly over as it is, let alone an increase in air traffic coupled with lower flying planes.</p>	<p>The 2003 Existing scenario represents the initial study year for this EIS. It utilizes data for a full calendar year of operation, supplemented with radar flight tracks for approximately three months of 2004 in order to adequately model the effects of a late-2003 air traffic modification that created a new departure fix to the west of PHL, which affects departures to southerly destinations as they leave the Philadelphia area.</p>

**Letter 115****Craig Mangano**

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
115.5	There must be other alternatives to rectify the situation. I was in attendance at the last West Deptford Hearing where the Air Traffic Controller spoke. He had some good ideas and explained that this would only be a temporary fix to the recent problem.	As described in Chapter 3, a number of alternatives were considered and analyzed for the Project. These alternatives were eliminated because they would not achieve the project's purpose and need. The Capacity Enhancement Program will consider a range of long-term alternatives to improve delay.