

PHILADELPHIA INTERNATIONAL AIRPORT

# Runway 17-35 Extension Project

## Final Environmental Impact Statement



credit: Rick McMullin, Philadelphia Airport System

MARCH 2005

VOLUME 4

PART 2: DEIS COMMENTS  
AND RESPONSES



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# General Public Comments and Responses

Dear Sir:

Under The Freedom of Information Act I request The Delay Analysis Simulation referenced in the EIS supporting Philadelphia's request to extend Runway 17-35.

I believe the analysis to be flawed and misleading and strongly advice the FAA to do its own analysis especially in light of the overlapping/intersecting threshold configuration that will result on the extended center line of the reconfigured Runway 35 and the existing runways 27R and 27L.

By its nature this unacceptable configuration and the traffic mix contemplated will add to the workload of the current controllers and increase the dangers to all under certain high load and wind conditions.

They FAA would never approve this configuration if this were a new Airport. Threshold separation has always been a key FAA criterion. Why would it be acceptable when there is so little to gain and, if implemented, would have the FAA approving approach and departure routes over densely populated residential ares never before exposed in this way? You folks are better than that!

Robert A. Marmon  
339 North Latch's Lane  
Merion Station, PA 19066-1728  
610-664-8072  
rmarmon@comcast.net  
rmarmon@rpfinc.com  
www.RPFInc.com

Response to Letter #116



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

**1 Aviation Plaza  
Jamaica, NY 11434  
(718) 553-3333  
(718) 995-5615 (fax)**

**Airports Division**

DEC 01 2004

Mr. Robert A. Marmon  
339 North Latch's Lane  
Merion Station, PA 19066-1728

This is in response to your November 22, 2004 e-mail Freedom of Information Act (FOIA) request regarding the delay analysis simulation referenced in the Draft Environmental Impact Statement for the Philadelphia International Airport Runway 17-35 extension project.

Enclosed is the requested material.

Duplication, search and review fees have been waived.

Any further questions regarding this FOIA, should refer to Control No. 05-001135EA

Sincerely,

Original signed by  
WILLIAM J. FLANAGAN

William J. Flanagan  
Manager, Airports Division

Enclosures

Cc: HAR-ADO, AEA-600  
AEA-600:Afleming:af:12/1/04

Wayne  
Heibeck/AEA/FAA

12/02/2004 12:46 PM  
To  
"Robert A. Marmon"  
<rmarmon@comcast.net>  
CC  
Susan McDonald/AEA/FAA@FAA,  
mengel@vhb.com  
Subject  
Re: Runway 17-35 Expansion(Document  
link: Susan McDonald)

Mr. Marmon,

By copy of this message, I have forwarded your below comments to the FAA EIS Team for inclusion in the Final EIS. Your comments will be considered and addressed as part of the Final EIS.

It was a pleasure meeting at the Eastwick Public Hearing. Thank you for your comments.

--Wayne

"Robert A.  
Marmon"  
<rmarmon@comcast.net>  
To  
Wayne Heibeck/AEA/FAA@FAA  
CC  
12/02/2004 12:33 PM  
"Bruce Eisenberg"  
<BPE1@comcast.net>, "Lita Cohen"  
<litacohen@comcast.net>, "Jim  
Ettelson"  
<jsettelson@duanemorris.com>  
Subject  
Runway 17-35 Expansion

Mr. Heilbeck:

Today by Fedex I received a copy of the Simulation Study done by Philadelphia's consultant. It is classic "by-the-inch" consulting work.

When ... a long time ago ... I worked for McKinsey and Company, Inc. , management consultants, the inside comments were that the denser the prose and the thicker the report, the more believable the conclusions must be (after all, how can anyone write that much and still be guessing) and the more we can charge for the work!

After reading this monster, it is now even clearer to me why the FAA needs to do its own math, rather than rely on that of Philadelphia's consultant.

The flaw is in the assumptions used. The report by and large glosses over the fact that the extension of runway 17 causes additional operating conflicts with ALL operations on the both 27R and 27L. What they have done is taken current operating "back of the hand" procedures with mostly Turbo-props and extrapolated those procedures to the operations of the substantially larger aircraft that will be using 17-35. Simply scaling up the number of operations on 17-35 without a hard look at what happens at the thresholds of runways 35, 27R, and 27L with the new mix is either a deliberate omission for the sake of proving a foregone conclusion ... or they just missed the point.

They state that they discussed the configuration with local ATC personnel. With all due respect, these folks are "mechanics" ... not theoretical mathematicians. Asking them if it "looks OK" when they have had no operating experience with what will be interlocking thresholds ... and then basing the entire justification on the math that results is both foolhardy and dangerous.

I ask you to look back through airport builds the FAA has approved over the last ten years. Please show me one where extensions of centerlines worsened separation problems at runway thresholds. As I said, if this were a proposed new build for a new airport there is little chance the FAA would approve this configuration ... and the reason they would give for the denial would be operating and safety concerns! How then can the FAA justify this one? Who benefits? Who is endangered?

Also, as I suspected, they do show circumstances that would actually increase delays ... and they deal with that by saying "... we won't operate that way", which means we will operate the way we are now ... which means delays will stay the same or increase under the assumptions they are using if those operating conditions present themselves.

I am a realist. Philadelphia incumbents have built up a head of steam on this project, and I expect that the actual decision making will be largely dependent on what pressure representatives at the federal level can bring to bear.

Thank you for taking time to deal with a grumpy old man.

(Embedded image moved to file: pic26058.gif)

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Letter 117

Robert Marmon

Comment Number	Comment	Response
117.1	The flaw is in the assumptions used. The report by and large glosses over the fact that the extension of runway 17 causes additional operating conflicts with ALL operations on the both 27R and 27L. What they have done is taken current operating "back of the hand" procedures with mostly Turbo-props and extrapolated those procedures to the operations of the substantially larger aircraft that will be using 17-35. Simply scaling up the number of operations on 17-35 without a hard look at what happens at the thresholds of runways 35, 27R, and 27L with the new mix is either a deliberate omission for the sake of proving a foregone conclusion...or they just missed the point.	Future delay was simulated by a computer-based simulation model, Total Airspace and Airport Modeler (TAAM), as discussed in Chapter 2 of the EIS. This model takes into account operations on Runways 9L/27R and 9R/27L. The commentor is incorrect with respect to existing airport operations; turbo-prop aircraft operate on all runways of the airport, and use runway 8/26 during peak periods. Runway 17-35 is used by a wide range of aircraft, including some RJs and narrowbody jets.
117.2	They state that they discussed the configuration with local ATC personnel. With all due respect, these folks are "mechanics"...not theoretical mathematicians. Asking them if it "looks OK" when they have had no operating experience with what will be interlocking thresholds...and then basing the entire justification on the math that results is both foolhardy and dangerous.	The FAA has reviewed and evaluated the proposed Alternative 1 runway configuration and operations, with respect to the existing and proposed thresholds, and has determined that Alternative 1 can be operated safely.
117.3	I ask you to look back through airport builds the FAA has approved over the last ten years. Please show me one where extensions of centerlines worsened separation problems at runway thresholds. As I said, if this were a proposed new build for a new airport there is little chance the FAA would approve this configuration...and the reason they would give for the denial would be operating and safety concerns! How then can the FAA justify this one? Who benefits? Who is endangered?	<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>
117.4	Also, as I suspected, they do show circumstances that would actually increase delays... and they deal with that by saying "...we won't operate that way", which means we will operate the way we are now...which means delays will stay the same or increase under the assumptions they are using if those operating conditions present themselves.	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.

**From:** Gerald McCarney[SMTP:MCCARNEG1@RCN.COM]  
**Sent:** Tuesday, November 30, 2004 6:37:52 PM  
**To:** PHL 17-35 EIS  
**Subject:** Phila Airport Extension Project.

Please do not make the planes take off any faster with more runways! With all of the waiting we do inside the Terminals, making the planes take off any faster would make us all miss our flights. Sorry a little airport humor.

It is amazing to me that after 9-11 we would think about flying more planes & bigger planes over crowded neighborhoods.

As I'm typing you this email I'm watching the news and you should see the footage of an oil spill that just happened this weekend in the airport area on the Delaware River. We deal with more than enough of our share for the good of the City but PLEASE STOP!

I wish we could be talking about how to make air travel safer, not faster.

Thanks for this opportunity to speak out.  
Gerald G. McCarney  
Prospect Park, Pa. 19076

**Letter 118****Gerald McCarney**

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
118.1	It is amazing to me that after 9-11 we would think about flying more planes & bigger planes over crowded neighborhoods. I wish we could be talking about how to make air travel safer, not faster.	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.



From: Alex McDermott[SMTP:AMCDERMO@NDIENG.COM]  
Sent: Tuesday, November 30, 2004 12:43:23 PM  
To: PHL 17-35 EIS  
Subject: 17-35  
Auto forwarded by a Rule

Dear Susan McDonald,

My name is Alexander McDermott and I currently live at 106 Windward Drive in Mount Royal, New Jersey with my wife and 10 month old daughter. I am responding to the new proposed changes to the Philadelphia airport. Where I currently live which is along county Route 678 is near the intersection of the Mantua Creek and the New Jersey Turnpike. This seems to be where a large portion of planes start to make their approach into runway 17-35.

We have already noted a large increase in noise from the current change in the planes that are landing on 17-35. I feel that your "Noise Model" is inadequate to determine the increase or decrease in the noise levels projected. There are just too many variables that can not be in your model that affect how the noise in our area is registered.

When we moved to this area three years ago there were only a few turbo-prop commuter planes landing in our path, so few that when we bought our house we could not tell there were any planes landing at the Philadelphia airport via this approach. Now the planes have changed to the larger 737 from Southwest Airlines and they are louder and are flying later at night. I thought one was going to land in my daughter's bedroom the other night it was so loud.

I have also noted unusual flight maneuvers from planes that are trying to correct their path in our area. The sight of a large plane making an unusual bank just to make another drastic turn seconds later over our area is alarming.

I am for growth, but it needs to be tempered. I do have a suggestion that would help with our fears and frustrations. Could you please have the planes stay over the Mantua Creek as long as possible before they turn and make a final approach into runway 17-35. This would keep the planes from being over residential areas and with the trees along the banks of the creek acting as noise barriers. My ultimate goal would be to see all planes taking off and landing via north/south runways, thus using the Delaware river as your natural noise trap.

Please feel free to contact me at the numbers below if you need me to clarify or expand any of my suggestions. Thank you for taking the time to hear all of our comments. I look forward to hearing from you in the future.

Alexander, Alisa and Ava McDermott  
(856) 848-0033 Work  
(856) 464-8298 Home  
(856) 986-8760 Cell

Letter 119

Alexander McDermott

Comment Number	Comment	Response
119.1	Your "Noise Model" is inadequate to determine the increase or decrease in the noise levels projected. There are just too many variables that can not be in your model that affect how the noise in our area [Mount Royal, New Jersey] is registered.	The potential noises impact of the alternatives under consideration for the Proposed Project 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, and further stipulates that the FAA-approved models, such as INM, must be used to evaluate aviation noise impacts. Various input data are required to accurately model existing and future aircraft noise exposure levels in the study area using the INM. Such input data include: aircraft noise and performance data; runway orientations; runway lengths; runway end elevations; start-of-takeoff-roll points on each runway; landing touchdown points on each runway; runway threshold crossing heights; runway approach slopes; annual average temperature, pressure, relative humidity; number of aircraft operations; aircraft fleet mix; day-night split of operations; runway utilization; and flight track geometry and utilization. See Responses to Comments Attachment #3.
119.2	I have also noted unusual flight maneuvers from planes that are trying to correct their path in our area. The sight of a large plane making an unusual bank just to make another drastic turn seconds later over our area is alarming.	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.
119.3	Could you please have the planes stay over the Mantua Creek as long as possible before they turn and make a final approach into runway 17-35. This would keep the planes from being over residential areas and with the trees along the banks of the creek acting as noise barriers. My ultimate goal would be to see all planes taking off and landing via north/south runways, thus using the Delaware river as your natural noise trap.	<p>Though increased traffic associated with the proposed Build Alternatives is projected to cause increased DNL levels in New Jersey south of Runway 17-35, the levels are not sufficiently high to cause significant noise impacts nor even to result in population counts within the 60 DNL contour in that area; thus, mitigation of noise south of 17-35 is not required as part of this project. Note that air traffic over New Jersey is also predicted to increase under the No-Action Alternative.</p> <p>Even so, arriving aircraft must typically be lined up with the centerline of the runway on which they expect to land for at least six to eight miles prior to touchdown. During poor weather conditions or when multiple aircraft are approaching, these distances typically increase to 10 to 12 miles or more. For this reason, Mantua Creek, located approximately a mile to the west of the centerline of Runway 35, could not be used effectively in the design of an instrument procedure because it would require an offset approach on the order of 20 degrees from runway heading relatively close to touchdown, with a 276-foot smoke stack nearby.</p>

From: Cheryl McHale[SMTP:MCHALEC@AJJ.COM]  
Sent: Tuesday, November 30, 2004 1:25:53 PM  
To: PHL 17-35 EIS  
Subject: Runway Expansion

Since spring of this year we have noticed a significant increase in air traffic and noise in our neighborhood (Hessian Ave). The large planes now fly directly over our home, especially in bad weather and much lower than before (we have lived here for 16 years), so much so, that when we became aware of the extension project we thought it had already happened. The volume and takeoff/landing patterns have already increased and changed and we cannot imagine what further volume would be like.

If we are sleeping with the windows open many nights we have awoken in a panic, heart pounding, when they back off the engines and the noise is so great it sounds like they're going to crash into our house.

We are close to 2 elementary schools and the high school in West Deptford and certainly cannot bear additional airplanes, at lower altitudes for all the obvious reasons: safety, noise, property values, etc.

Also, it is confusing to know exactly the reason for the expansion, we have read that it would be used for smaller planes, to allow for bigger planes to use the larger runways, then we read some of the bigger planes would use this runway.

I am sure no one wants the increased volume in their area, however, it seems it needs to be kept over the least populated location, and flying more planes, lower over schools filled with children certainly isn't the answer.

"View latest exhibit updates at  
<http://www.ajj.com/marketing/exhibitupdates.html> "

Cheryl McHale  
Marketing Manager, Exhibits  
Anthony J. Jannetti, Inc.  
856-256-2375  
mchalec@ajj.com

Letter 120

Cheryl McHale

Comment Number	Comment	Response
120.1	If we are sleeping with the windows open many nights we have awoken in a panic, heart pounding, when they back off the engines and the noise is so great it sounds like they're going to crash into our house. We are close to 2 elementary schools and the high school in West Deptford and certainly cannot bear additional airplanes, at lower altitudes for all the obvious reasons: safety, noise, property values, etc.	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.
120.2	It is confusing to know exactly the reason for the expansion, we have read that it would be used for smaller planes, to allow for bigger planes to use the larger runways, then we read some of the bigger planes would use this runway.	The purpose of the Proposed Project is to accommodate Regional Jets and narrow bodies on Runway 17-35 in order to reduce delays exacerbated by the conversions to Regional Jets (see Chapter 2, Purpose and Need).



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: Carolyn Moseley

Address: 8415 Lyons Place

City: Phila

State: Pa Zip Code: 19153

E-mail Address: Moseleycmose@aol.com

**PLEASE PRINT CLEARLY**

Comment: I am concerned about noise

level pollution & safety

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Letter 121**

**Carolyn Moseley**

**Comment  
Number**

**Comment**

**Response**

121.1	I am concerned about noise level, pollution, and safety.	The FAA has noted and considered your comment.
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**From:** OTTOBOB200@aol.com[SMTP:OTTOBOB200@AOL.COM]  
**Sent:** Thursday, December 09, 2004 10:00:45 PM  
**To:** PHL 17-35 EIS  
**Subject:** Runway 17-35 Extension Project

Robert W. Otto  
905 Lindale Avenue  
Drexel Hill PA 19026  
ottobob200@aol.com

**COMMENT:**

Enclosed are the comments that I received from Senator Erickson.  
As for my comments, I have the following;

**1. FALSE INFORMATION REGARDING NOISE LEVEL "STATS:**

Your statistics show that there would be no increase in noise level.

If the number of flights are increasing 43% ( from the current 277 per day to the proposed number of 395 / day), and the type of planes are going to be larger, there is no way that you can justify that the noise level would remain the same. You need to check you math, as this is not possible to have a 43% increase in traffic with no increase in noise level.

**2. PROPER ZONING APPROVALS:** My house is now being shook by planes that are going over my house. This was not this way a year ago. What has changed. Who approved this 17-35 run from the very beginning What zoning was required to have this built in the first place. Any other building sites requires proper water run off retaining basins in a wetland area. Has this been achieved.

**3 RISKS:** We are told that this run way is only being used when the air flow conditions are a certain way. Does this mean that there is more of a risk of using this run way in the first place. What other cities use a cross pattern of run ways, and what is there safety record. With the recent accident that occurred a few weeks ago, is this just the start of what is to come, since it is a pattern that others may not be use to.

Why would you not expand the run way in a logical pattern that is consistent with the current flow. The monies spend analyzing this proposal could have been spent on taking a less controversial route.

If this is a more riskier flight pattern, that can only be used in certain weather conditions, why would it even be an option. The risk that a business takes on is at it own risk, and the business gets its rewards for taking risks. As a community, any risk that is placed on use with out our approval is not acceptable. It does not benefit us, and the risk is all on us. As a community, we would lose all the way round. I want a name of the person who will be responsible and held accountable to claim that there will be no risk. When, God forbid, that first accident occurs, I want that person held legally accountable. When the air quality is confirmed to be contaminated from the increase in air traffic, I want a person named who will be held liable.

**4. My air space is not for sale.** I was not asked or compensated, nor do I give my approval for you to take my air space from me.  
My life now has to be put on hold as a plane goes by. We are not able to have a normal conversation as a plane goes by and shakes the house.

From a community standpoint, have planes constantly going over every 2 minutes is not healthy. I am being awoken at 4 in the morning with planes going overhead.  
The lack of sleep due to this is not healthy. To say that the noise level is unchanged, when you

have a plane going over in the early am, when there was no plane before is absurd.

#### 5. TAX PAYORS MONEY WASTED

The justification that this would save 0.2 minutes of average delay time ( option 2 compared to the no- action plan) is a ridiculous amount to be even looking at these options. To spend millions of dollars on a temporary fix, for the benefit of saving 0.2 minutes average delay time in an outright disgrace. A Federal investigation should be conducted into this waste of tax payor resources.

#### 6 WHY

Why are we even reviewing something that has already been shown to have a negative response from the community. Should this be put up for a vote. Something that impacts a community at this level must be approved by the community as a whole.

If some one group or business is benefiting at the expense of the community as a whole, this is not right. That why we have zoning laws to protect the community. As for rights of ways, this requires the proper communications, and compensation for any lost value that the right of way is taken from the owner.

Thank you  
Robert Otto

-----Original Message-----

From: Erickson, Senator Edwin [mailto:EErickson@pasen.gov]  
Sent: Monday, December 06, 2004 12:01 PM  
To: Otto, Robert W  
Subject: RE: Runway 17-35 Extension Project

Thank you for contacting my office to express your opposition to the proposed extension of Runway 17-35 at the Philadelphia International Airport. I would agree that this plan, if carried out, could have considerable adverse impacts on the quality of life in our region. In that regard, I have written to the Federal Aviation Administrator to request that the plan to extend the runway be reconsidered. A copy of the letter is attached for your review.

Thank you again for contacting me in regard to this important matter. Please do not hesitate to contact me with any state related concern.

Sincerely,

Sen. Ted Erickson

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

Dear Administrator Blakey:

As you are aware, the majority of the physical facilities of the Philadelphia International Airport (PHL) is located in Tinicum Township, Delaware County, Pennsylvania. As PHL continues to expand, Tinicum 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.

-----Original Message-----

From: Otto, Robert W [mailto:Robert.W.Otto@questdiagnostics.com]  
Sent: Monday, November 22, 2004 10:52 AM  
To: Erickson, Senator Edwin  
Subject: Runway 17-35 Extension Project

What is being done to prevent this project from impacting Delaware County.

My house is now being shook on a regular basis, since they have started to change how they utilize this runway. It will only get worse as they start to send bigger planes.

I was not asked or compensated to give up the right-of-way to my air space, nor did I give any approvals.

The risks that will be added by having planes overhead is not something that I or Delaware County should have to endure.

The issue is not just about "Noise". There are many other real issues, such as the additional pollution, quality of life and property values, and the Cost justification for this project which also impacts me as a tax payer.

Since this is solely for the purpose of business, who enjoy the profits from such an enterprise, why am I being impacted by this, while they profit from it.

Let them bare the burden of this cost, and let them go through each counties zoning board to gain any right-of-way, just like any other business.

Thank you,

Bob Otto  
610 454-4266

Letter 122

Robert Otto

Comment Number	Comment	Response
122.1	False Information Regarding Noise Level "Stats: Your statistics show that there would be no increase in noise level if the number of flights are increasing 43% (from the current 277 per day to the proposed number of 395/day), and the type of planes are going to be larger, there is no way that you can justify that the noise level would remain the same. You need to check you[r] math, as this is not possible to have a 43% increase in traffic with no increase in noise level.	As Section 4.2 of this EIS (and Appendix A.1 of the DEIS) clearly show, the noise levels within the 65 dB DNL contour are projected to increase under the future No-Action Alternative as well as Alternatives 1 and 2. The difference between the No-Action Alternative and Alternative 1, within the 65-dB contour, is less than 1.5 dB DNL and generally on the order of 0.5 dB DNL. This increase is caused by the increase in aircraft using Runway 17-35. This analysis is based on standard FAA methodology, using the INM, as described in the EIS.
122.2	Proper Zoning Approvals: My house is now being shook by planes that are going over my house. This was not this way a year ago. What has changed[?] Who approved this 17-35 run from the very beginning[?] What zoning was required to have this built in the first place[?]	The growth in airport operations in recent years has increased aircraft use of Runway 17-35, and increased flights over Upper Darby. No FAA review or approval is required for use of an existing runway, nor is this regulated by local zoning authorities. The noise analysis conducted for the EIS (see Section 4.2 of the EIS) demonstrates that there are no significant noise impacts in the area north of Runway 17-35.
122.3	Any other building sites requires proper water run off retaining basins in a wetland area. Has this been achieved[?]	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. The project will be designed to comply with the regulatory requirements of the Pennsylvania DEP under the NPDES program. Mitigation measures are described in Chapter 5 of the EIS. The proposed project would increase runoff rates to the on-airport Southeast Ponding Ditch and to Mingo Creek, but is not anticipated to adversely affect water quality in the Schuylkill or Delaware Rivers.
122.4	Risks: We are told that this runway is only being used when the air flow conditions are a certain way. Does this mean that there is more of a risk of using this runway in the first place[?] What other cities use a cross pattern of runways, and what is the[r] safety record[?] With the recent accident that occurred a few weeks ago, is this just the start of what is to come, since it is a pattern that others may not be used to[?] Why would you not expand the runway in a logical pattern that is consistent with the current flow[?] The monies spend analyzing this proposal could have been spent on taking a less controversial route. If this is a more riskier flight pattern that can only be used in certain weather conditions, why would it even be an option. The risk that a business takes on is at it own risk, and the business gets it rewards for taking risks. As a community, any risk that is placed on us without our approval is not acceptable. It does not benefit us, and the risk is all on us. As a community, we would lose all the way [a]round. I want a name of the person who will be held responsible and held accountable to claim that there will be no risk. When, God forbid, the first accident occurs, I want that person held legally accountable.	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, and does not change current operating patterns. 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.
122.5	When the air quality is confirmed to be contaminated from the increase in air traffic, I want a person named who will be held liable.	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).
122.6	My air space is not for sale. I was not asked or compensated, nor do I give my approval for you to take my air space from me. My life now has to be put on hold as a plane goes by. We are not able to have a normal conversation as a plane goes by and shakes the house. From a community standpoint, have planes constantly going over every 2 minutes is not healthy. I am being awoken at 4 in the morning with planes going overhead. The lack of sleep due to this is not healthy.	The FAA has noted and considered your comment. However, aircraft traffic will increase in the future whether or not the runway extension is constructed.

Comment Number	Comment	Response
122.7	Taxpay[e]rs money wasted: The justification that this would same 0.2 minutes of average delay time (option 2 compared to the no-action plan) is a ridiculous amount to be even looking at these options. To spend millions of dollars on a temporary fix, for the benefit of saving 0.2 minutes average delay time i[s] an outright disgra[c]e. A Federal investigation should be conducted into this waste of tax pay[e]r resources.	This project is justified by the significant current and forecasted delays experienced by PHL and the fact that PHL is a pacing airport where delays at PHL contribute to delays across the national airport system.
122.8	Why are we even reviewing something that has already been shown to have a negative response from the community. Should this be put up for a vote. Something that impacts a community at this level must be approved by the community as a whole. If some one group or business is benefiting at the expense of the community as a whole, this is not right. That[s] why we have zoning laws to protect the community. As for rights of ways, this requires the proper communications, and compensation for any lost value that the right of way is taken from the owner.	<p>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. 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:** g paranto[SMTP:GAPSNET@COMCAST.NET]  
**Sent:** Tuesday, November 30, 2004 10:25:27 AM  
**To:** PHL 17-35 EIS  
**Subject:** Runway 17-35 Expansion -- Vote NO

To all involved parties,

As a concerned citizen in West Deptford, N.J., I respectfully request the project to expand runway 17-35 at the Philadelphia Airport should be terminated/abandoned.

I have lived in this township for 20 years. In the past, we would only see jet and plane traffic coming down or up river. As a matter of fact, my father would go to the Red Bank Battlefield to watch the arrivals and departures. It seems the volume of air traffic has grown exponentially in the last 20 years. Now, you cannot stand on any local recreation field or other open space in the township and miss hearing and seeing the air traffic!

As a matter of fact, we not only see and hear air traffic coming directly overhead -- many times it is at such a low level you can read the name of the airline from the ground! On any given day this occurrence is frequent.

How much noise is too much?  
How low is too low?  
How much air traffic is enough?

It seems to me we have already passed the acceptable limits for air traffic patterns and volumes at the Philadelphia airport. There is too much noise right now. Flight patterns bring air traffic too low right now. There is too much air traffic now.

Although the quality of life here in West Deptford, NJ has been raised by a variety of other initiatives and public or private investment, the current volume and pattern of air traffic has negatively affected the quality of life here. To expand runway 17-35 would only worsen an already excessive situation.

Again, I respectfully request that the Runway 17-35 expansion project be abandoned.

Are there no other suitable alternatives?  
What about expanding the LeHigh Valley, Atlantic City or Wilmington airports to handle the added volume?

Your consideration of my thoughts, concerns and request to terminate the runway 17-35 expansion project is greatly appreciated.

Greg Paranto  
1643 Pennfield Drive  
West Deptford, NJ 08086

Letter 123

Greg Paranto

Comment Number	Comment	Response
123.1	The current volume and pattern of air traffic has negatively affected the quality of life here. To expand runway 17-35 would only worsen an already excessive situation. Again, I respectfully request that the Runway 17-35 expansion project be abandoned.	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.
123.2	Are there no other suitable alternatives? What about expanding the LeHigh Valley, Atlantic City or Wilmington airports to handle the added volume?	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.

From: mpeters@morganlewis.com[SMTP:MPETERS@MORGANLEWIS.COM]  
Sent: Tuesday, November 30, 2004 11:20:59 AM  
To: PHL 17-35 EIS  
Subject: Comments on PHL 17-35 EIS  
Auto forwarded by a Rule

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

Re: Comments on Environmental Impact Statement  
Philadelphia International Airport Proposed Expansion (PHL  
17-35)

Dear Ms McDonald:

By way of introduction, I am an attorney, a resident of Swarthmore Borough (Delaware Co., PA), and a member of the Swarthmore Borough Planning Commission. Although I write today as a private citizen and not on behalf of the Planning Commission or my firm, I believe I share many of the concerns of other Planning Commission members, as well as a large number of Swarthmore residents, regarding the proposed expansion to Runways 17-35 at the Philadelphia International Airport. After attending several meetings and presentations, and reading the extensive coverage in the Swarthmorean where the impact of the proposed expansion was described, I strongly believe that the proposed expansion will be extraordinarily expensive and wasteful of limited resources, will yield little or no real benefit to the traveling public, and will have an enormous negative impact on the residents of Swarthmore Borough, over which air traffic at a low altitude will increase dramatically.

Attached below is a memorandum forwarded to me by Alan Yen, another concerned citizen of Swarthmore, a version of which you have no doubt received. Mr. Yen's memorandum outlines, among other things, the limited actual value of the runway expansion (particularly in light of improvements that would be possible if the FAA's badly outmoded air traffic control system were upgraded from 1970's standards to 21st century standards), and the absence of meaningful public outreach by the FAA concerning this proposed expansion. Before embarking on a project of this magnitude, which at this point bears all the earmarks of an expensive boondoggle, the FAA needs to hear the public, respond to the points raised by Mr. Yen and undoubtedly many others, re-evaluate the costs and benefits, and seriously reconsider whether this project, in its proposed form, makes any sense.

Respectfully,

Michael E. Peters  
222 Dickinson Avenue  
Swarthmore, PA 19081

**Letter 124****Michael E. Peters**

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
124.1	The proposed expansion was described, I strongly believe that the proposed expansion will be extraordinarily expensive and wasteful of limited resources, will yield little or no real benefit to the traveling public, and will have an enormous negative impact on the residents of Swarthmore Borough, over which air traffic at a low altitude will increase dramatically.	The FAA has noted and considered your comment.
124.2	Before embarking on a project of this magnitude, which at this point bears all the earmarks of an expensive boondoggle, the FAA needs to hear the public, respond to the points raised by Mr. Yen and undoubtedly many others, re-evaluate the costs and benefits, and seriously reconsider whether this project, in its proposed form, makes any sense.	Through this EIS process, which includes the public scoping meeting, the Draft and Final EIS, and the public hearings, FAA is seeking public comment. This Final EIS responds to comments made during the public comment period. The cost-benefit analysis for the proposed project will be taken into consideration in any funding decision.





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@vnb.com](mailto:smcdonald.faa.17-35@vnb.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: MADELYN A. PETTOLINA

Address: 523 COLUMBIA BLVD.

City: NATIONAL PARK,

State: New Jersey Zip Code: 08063

E-mail Address: \_\_\_\_\_

PLEASE PRINT CLEARLY

Comment: I've been a resident of West Deptford Twp for 62 yrs,

AND frequently use Philad. Inter. Airport & feel fortunate to have the convenience  
of P.I.A., However my major concern is the REAL possibility of a River Vessel and  
a Airship collision which would have a disastrous result of lost  
of life + disastrous result to the environment.

As it is now when I am on the phone + speaking to in laws

1-town away we have to wait while planes fly over their home

& again wait till it flies over my home. The noise will only

get worse, THANK YOU for any consideration - on this. Sincerely  
Modelyn Pettolina

## Letter 125

Madelyn A. Pettolina

Comment Number	Comment	Response
125.1	My major concern is the real possibility of a river vessel and an airship collision which would have a disastrous result of loss of life and a disastrous result to the environment.	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.
125.2	As it is now when I'm on the phone and speaking to inlaws one town away we have to wait while planes fly over their home and again wait until it flies over my home [National Park Borough]. The noise will only get worse.	The noise analyses of this EIS indicate 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, due primarily to the slight reduction in landing traffic on parallel Runways 27L and 27R.

**From:** Bob Pollock[SMTP:BPREMODEL@COMCAST.NET]  
**Sent:** Tuesday, November 30, 2004 4:17:51 PM  
**To:** PHL 17-35 EIS  
**Subject:** corrected PHL 17-35 comment

Dear Ms. McDonald:

I hit the "send" button before I closed my first letter. Please attach this and include it as a single comment. Thank you.

My name is Amy Pollock. I live at 1500 Upsan Downs, Ardencroft, DE 19810. My #'s are 302-529-1261 and 302-598-9186.

I speak for myself and many people I know in the area. I want you to know that just because I want my Section 106 rights protected it's not the only reason to have some air traffic changes made. We shouldn't be forced to live with these conditions and continue to have no voice to explain how awful they are.

I also represent the historic Village of Ardencroft as a member of the Committee that worked for almost eight years to get the Villages listed on the National Register of Historic Places.

I am dedicated to what I believe in and I believe we have something unique, special and worth saving here in the "Ardens".  
I want us to be able to continue and to thrive. Not be pestered into non-existent history but rather to remain alive and vibrant as a part of ongoing evolution and growth of today's history.

Again, thank you for your time.

Sincerely,  
Amy Pollock

-----  
**From:** Bob Pollock[SMTP:BPREMODEL@COMCAST.NET]  
**Sent:** Tuesday, November 30, 2004 4:02:39 PM  
**To:** PHL 17-35 EIS  
**Subject:** PHL 17-35

Dear Ms. McDonald:

Please be aware that the PHL Runway Extension Plan is truly unacceptable as it relates to the quality of life that we have here in the Historic District of the three Ardens. We live a large portion of our lives outside - there are four outdoor theatres alone. Do you have any idea how awful it is to continuously have a live production interrupted? "To be..... Or not to be?"

We have footpaths throughout the woods - no sidewalks or streetlights. We live with nature. Not noise.

The Ardens are on the National Register of Historic Places not for our houses but rather for our "Culture". We are listed as a "Traditional Cultural Property". Hence our theatres, outdoor fairs, community Saturday night dinners, Concerts, Gardeners, Shakespeare and Ardensingers Gilds. We have carried on our way of life for more than 100 years. That's impressive.

The PHL airport noise is not impressive in a positive way - it is however in a very negative, disturbing and annoying way.

The Ardens were here long before the PHL Airport. Long before the "flight path" of the airport. We did not have planes overhead every 45 seconds or so (less than a minute apart) as little as ten years ago. Why are we so very disturbed today and everyday now? We certainly get more than the quoted 20-30% of the airport's traffic.

Whether or not the extended 17-35 runway plan is to "allow for additional use of the 9R and 9L runways" or not is not the issue. We all know that it will happen. And again we will be forced to deal with the noise on yet another level.

On behalf of the Historic Ardens District I strongly request and suggest and invoke my rights of protection so that someone at the FAA will do their homework and find out what it means for you (FAA) and your federal dollars to have such an enormous negative impact on a "Section 106 " federally protected and recognized property.

The FAA and the PHL Airport need to find some other alternatives - start thinking outside the box - to be able to *survive* near those that *live* here, and did so before you got here.

Thank you for your time and consideration. I can only hope that this has been read and will be referenced. If you, or anyone else has any questions about my comments, please feel free to contact me at 302-529-1261 or 302-598-9186, e-mail or my home address at 1500 Upsan Downs, Ardencroft, DE 19810.

Letter 126

Amy Pollock

Comment Number	Comment	Response
126.1	On behalf of the Historic Ardens District I strongly request and suggest and invoke my rights of protection so that someone at the FAA will do their homework and find out what it means for you (FAA) and your federal dollars to have such an enormous negative impact on a "Section 106 " federally protected and recognized property.	<p>The FAA considered potential effects to the Ardens. The Ardens are not included in the Area of Potential Effect (APE) for the Runway 17-35 Extension Project. All requirements of the National Historic Preservation Act (NHPA) with respect to Section 106 were met (see EIS Appendix D) Agency Correspondence.</p> <p>As the noise analysis described in Section 4.2 of this EIS demonstrates, the proposed Runway 17-35 Extension Project will not increase noise over Delaware. In fact, because some operations shift to Runway 17-35, the proposed project will slightly decrease noise levels over Delaware and other areas that are under the flight paths for Runway 9R/27L and Runway 9L/27R.</p>

Comments on the Draft Environmental Impact Statement for the Runway 17-35 Extension Project.  
Joseph Rhyner, PE 1138 Parliament Way, Thorofare, NJ

1. Page 1-4 section 1.3.1 Public Scoping Meeting. General comment: The FAA did not do enough for this public scoping meeting to invite people from the effected communities, especially West Deptford Twp. There was no mass mailing to township residents, there was no concerted effort by the FAA to reach out to community members. The FAA may have tried to use mass media but did not stress the effects of this proposed project in order to have the best possible community involvement.
2. The Public information meetings held in April of 2004 were an attempt by the FAA and the City of Philadelphia to mislead the communities around the airport as to the exact nature and scope of the project. This is evidenced by the fact that None of the Township officials in attendance or the County officials thought there was any planned changes that would result in an increase in the number of flights over Gloucester county. It took me several weeks of persuasion to get them to realize that the public info session had nothing to do with expanding the runway.
3. Chapter 2 Purpose and Need. Key Points Paragraph 4: Last sentence: "This congestion of the primary runway complex contributes to delays." This is not a quantified statement. How much of the current and projected delays are because of the congestion on the runways? How much is due to weather, how much is due to airfield configuration, how much is due to the configuration of the terminals.
4. Section 2.1.2 8<sup>th</sup> paragraph. Why is there a time limit of 15 minutes for not using the runway when a ship is in the channel? Is transit time that long, has data on this timing been collected or is this an assumed time?
5. Section 2.2.1 Aircraft Fleet Mix; This paragraph and the associated table are making false comparisons. It is using a percentage of total flights to compare narrow body planes and turbo props but then it compares the number of regional jets against only regional jets to show an increased need by using a large percentage. The numbers should be compared consistently. Either use percentage of total fleet or compare each of the aircraft types to the numbers for that aircraft type.. Otherwise the inconsistency makes the comparison flawed.
6. Section 2.2.1 Runway Length Requirements for Regional Jet and Narrow body Aircraft; Again inconsistent comparisons by comparing percentages of aircraft vs. themselves and vs. total fleet. Be consistent.
7. Section 2.2.1 Runway Length Requirements for Regional Jet and Narrow body Aircraft, Second paragraph; There is no quantification of the amount of the delay cause by regional jets needing to use the larger runways. See comment # 3 above.
8. Section 2.2.1 Delay first paragraph, last sentence; In my work I count on travel delays and plan for it by bringing work. The vast majority of the people I work with also take the same approach. The vast majority of the people I see at the airport who are business travelers also seem to be working or doing productive things. The majority of the people I have spoke to about this have all stated the same thing to me. The delay of 10 minutes now and 20 minutes in the future does not account for lost work time, in the scheme of spending several hours trying to get through security, baggage claim, ground transportation, it is nothing. The FAA and the Airport cannot use businesses for lost revenue.
9. Section 2.2.2 Forecast Aircraft Fleet Mix; second paragraph; Upon what data is the forecast developed? How have the numbers been created?
10. Chapter 2, There is no information on the change of the operations of Scheduled flight carriers from the old model of Hub and Spoke to Serial operations which may create a reduction of flights

in and out of the airport at high volume times. There is also no information about the latest change to USAIRWAYS scheduling to reduce the delays in the document anywhere.

11. Section 3.3 Candidate Alternatives and Screening; Why was not the idea moving all cargo operation such as UPS, FEDEX and DHL to the Northeast Airport considered or even mentioned? Maybe they could shift their operations there, provide jobs in the Northeast, if given enough incentive to move.
12. Chapter 3. Alternative A2.1 Commercial Services Airports: A comment on some of the reasoning for the elimination of this alternative. The second to last paragraph states that Southwest and Frontier Airlines have chosen to use PHL instead of PNE or Trenton. Since they moved in knowing the situation of delays then they should not be considered in the scenario. They are a contributing factor in the delays because they are increasing flights. If PHL is so bad with delays then they would not have made the business decision to move into PHL.
13. Chapter 3. Alternative B1 Automobile Travel. End of Second paragraph makes a bold assumption about reasons for why people fly vs. drive. Has a statistical survey been done to prove this claim or it is opinion? In my office where much of our travel is to the northeast. People have started driving more to save time because of delays due to increased security. If a survey has not been completed, then please note the fact that this is opinion rather than researched fact. If it has been researched, show the research.
14. Chapter 3. Alternative C1, Administrative Approaches (slots); Reason 2 of the reason for elimination is that it "Requires resolution of complex Federal Policy issues and a rulemaking by the FAA" This document is being prepared by a contractor working for the FAA, Therefore it is an FAA document. The FAA can make rules for themselves, the FAA should make a rule and maintain the Option. It is not like the FAA is asking the EPA to make a rule.
15. Chapter 3. Alternative C1, Administrative Approaches (slots); Reason 3 "It is not possible to implement in the short term." If the FAA had not been blind in eliminating this option at the start of the process then the rule making could be underway at this moment and could be complete by the time it needed to be implemented. Rules can be made quickly if there is enough incentive. Rules are easier to do than building a runway or getting public agreement with this project.
16. Chapter 3. Alternative C2 Voluntary De-Peaking and Flight Reduction. The second reason for eliminating this option states in part " it is not severely congested to the point when FAA would interfere with airline deregulation..." If the delay is not that severe then why do anything at all, why increase the flights over my house, my neighborhood, my town, and not have the airline do something? If the delay is not too severe to the airlines operating then the airport should not care.
17. Chapter 3. Alternative C2 Voluntary De-Peaking and Flight Reduction. The third reason for not maintaining this option states in part..." It is unlikely the Secretary will use his authority to seek voluntary de-peaking..." Has the Secretary of Transportation been asked? Which secretary of Transportation? Why wouldn't the Secretary do this since precedence has been set by doing it at O'hare?
18. Section 3.3.4 Category D: On-Airport Infrastructure, Alternative D2 was eliminated because it requires "significant airfield and/or terminal modifications, and therefore cannot be implemented in the short term." Two entire terminals (F and A west) were built in a short time frame, Less than three years I believe. How can the terminal end modifications or removals take longer than extending a runway. Again if this work was started at the beginning of the process then it could be well along it way to being completed. Most of the delays I face are waiting to get into a gate or for traffic to move out of the terminal so my aircraft can get into the terminal.
19. Section 3.3.4 Category E Alternative E1 Technology. Why has a technology study not been done at PHL to see what could help with the situation like at SFO? With the tech center at Pomona a

short drive away I would think that technology for the FAA would be readily available for testing at PHL.

20. Section 4.2.2 Affected environment. This section talks about historical data that was used such as FAA radar data etc. How has this data been validated? I have experienced known problems with the radar track data. In June of 2004 I called the airport Noise office to complain about large aircraft flying over my house or adjacent to my property at certain times of day I specifically noted times and type of aircraft right over my front lawn. One particular incident included two 737-400 and one Airbus 319 less than 1000 feet, in the span of 15 minutes with other aircraft following similar paths. When I provided this info to Mike Jeck, the Noise officer, he checked the radar data and found no aircraft over my property. The closest he found was 1.25 miles away and at 3000ft. The next was 1.5 miles and 2500 ft and the other was 2 miles away. Therefore I believe this data is flawed in such a manner as to be unreliable. Please provide me with the details as to how the data used for telling which aircraft were flying where and when was validated as this data is used for all aspects of the studies.
21. Section 4.2.2 Affected Environment. Population Database, The Census data for 200 was used and assumed not to change. In West Deptford Twp there has been a large increase in building in the last four years with a senior housing complex being built directly adjacent to flight path of runway 17-35. The assumption that population centers have not changed is false and the data needs to be re-analyzed.
22. Page 4-20 Alternative 1 Second bullet. This bullet describes how the contours have increased because of a 29 percent increase in regional jet arrivals and a 14 percent change in the arrivals of small narrow body jets. However reading the noise analysis write-up and using the projected daily average numbers from table 3-10 of the noise technical report, the percentages shown here are patently wrong. The actual projected increase in arrivals of regional jets is 74 percent more (149.6 vs 81) and the increase in small narrow body jets is at least 933 percent more (31 vs 0). Since right now they say there are zero arrivals of small narrow body jets, I used a figure of three per day the minimum of which I personally have observed and compared it to the projected 31 arrivals per day to get the 933% projected daily average increase. Again this is a blatant attempt of the FAA and the contractor to misuse statistics and mislead the public in its presentation. More comments to follow about this in the review of the Noise Technical report.
23. Page 4-23, paragraph 7, There is a significant impact on south jersey from the noise. The contours shown do not incorporate the Locations of the River Winds community which may very well be within the New 65 dB contour over south jersey. The so called undeveloped area is actually developed. This needs to be reviewed for accuracy.
24. Table 4.2-20 There is only one location near the actual flight path of the jets landing on runway 35. LT-5 This site was not monitored for a long time in 2004 to determine what impact the additional flights of larger jets will have on the DNL. Also the site does not appear to be in a direct line with the flight path or directly under most of the aircraft.
25. Section 4.2.4 Mitigation, Last paragraph. "The FAA notes that the Sponsor has committed to update its 2003 Part 150 Study... and would evaluate expanding the noise attenuation program to the Eastwick neighborhood at that time" What is the "Sponsor" going to do about West Deptford Township people who experience the large increase in noise?
26. Section 4.3.4 Environmental Consequences; This section speaks about increase in noise levels over recreational land use areas, but nowhere does it speak to the River Winds Athletic fields, or Community Park. This area is definitely within the 65 dB contour area yet the FAA and the Sponsor have chosen to ignore it. Please address this area.
27. Section 4.4 Social Impacts, Induces Socio Economic Impacts and Secondary Impacts. This is the section that should contain some discussion of the loss of property values associated with living in



the flight path of an expanded runway. The perception that this is impossible to do was given at the public meeting however there is a method that could be employed. Compare the cost of a similar size house in a similar setting except for being under a flight path. This would be a simplistic yet effect way to compare the potential loss of property values. Living under a flight path that is occasionally used is not too bad. I have lived in my house for 14 years now and have not though about moving until the last year because of the increase in numbers of flights and increase in noise levels. Now the FAA and the Sponsor want to increase the average daily flights by 73% that means basically any time that I go outside I will have aircraft overhead. This would be noticeable to anyone and would detract for the enjoyment of my outdoor living. This detracts from property value and there is a minimal effort that the FAA could do to compare that loss.

28. Section 4.5 Air quality; This chapter mainly speaks to PADEP rules and air quality standards, and only addresses idle time, wait time, and run up for takeoff. It has not addressed the increase in number of flights over New Jersey nor the added pollution to New Jersey's Air. It also does not address New Jersey's Air quality regulations, which are stricter than Pennsylvania. There has been no quantification of the increase, or decrease, of air pollution deposited by the Aircraft flying over New Jersey and in particular West Deptford Twp.
29. Page 4-54 Conformity with PA SIP. Has there been any comparison to the New Jersey SIP, since the over flights will have an effect on New Jersey Air quality?
30. Page 4-58 Emission of Criteria Pollutants in 2003. The assumption that PM10 emissions are zero is a major falsehood. Any combustion of jet fuel, which is very similar in composition to diesel fuel, will have a PM10 associated with it. Just because the FAA does not have data does not excuse this use of bad assumptions. There is a Tech center in Pomona, there are jet engine test cells all over America, there are gas turbine power plants, this data could be generated fairly easily by either the FAA or the EPA.
31. Page 4-59 Table 4.5-4 Maximum Estimated Ambient Pollutant Concentrations. Again there is a huge amount of assumption to say that there is no PM emissions from aircraft. With the Number of flights and the number of different engines, there has to be PM emissions and they are most likely significant to the environment. The FAA and/or the EPA should collect more information in order to use accurate data for making decisions that will impact thousands of people in the area adjacent to the airport.
32. Page 4-60 Emissions of HAP Second paragraph, why was not data from Gloucester County used in this comparison of data? Gloucester County abuts the airport.
33. Page 4-64 and page 4-68 and page 4-70 Ambient Concentrations; First bullet states " All of the modeled maximum concentrations for NO2, CO, SO2 and PM10 are below NAAQS" The last one may be because of the assumption of an emission rate of 0 ppm of PM10 for aircraft.
34. Page 4-67 both VOC and NOx emissions were said to decrease in part because of the decrease in the size of the economy parking lot however in the description of the project the parking spaces will be moved to the former area of sr-291. So the Total parking area may even increase not decrease having a net increase in these emissions.
35. Page 4-67 Both VOC and NOx emissions are said to decrease due to reduced idling time, however the most reduction in wait time is only 2 minutes. What time number has been used to determine the reduction in emissions. This information has not been provided.
36. Page 4-70, Indirect and Secondary Impacts; Second paragraph. Please provide the data that proves that Aircraft emissions are "negligible" in comparison to the remainder of the area. In West Deptford there are not many large sources of air emissions. However the flights of thousands of aircraft per day in a significant source of air pollution. Adding more flights and aircraft can only mean more pollution.

37. Section 4.5.4 General Conformity Analysis. This analysis compares the previous section's information to a tons per year threshold for significance. The problem with the comparison is that the previous data only accounted for Idling and taxiing emissions. It did not include the most emissions producing portion of aircraft operations, Take off and Landing, as well as flights over a specific area. These emissions may very well be significant, however the data has not been collected or presented to enable that determination. Therefore the FAA should collect and compare the information to see if indeed this would cause an exceedance of the tons per year threshold. Any argument that vehicles are not considered is bunk because the emissions from taxiing and idling are considered.
38. Section 4.5.4 General Conformity Analysis. Page 4-73, First paragraph This paragraph only compares the amount of emissions to the Pennsylvania portion of the Non Attainment area. Since all of the flights arriving on Runway 35 and those taking off from runway 17 will fly over New Jersey why haven't the emissions from those flights been compared to the New Jersey Portion?
39. Section 4.5.5 Mitigation; Since the previous sections were not complete the assumption that there was no significant impact from aircraft operations is not ready to be determined and therefore discussions of no mitigation are not appropriate at this time.
40. Section 4.5.6 Please provide copies of the letters from the regulatory agencies in the EIS to show that all items have been satisfied.
41. Section 4.6.4 Children's Environmental Health and Safety Risk. Section 4.5 did not fully disclose the air quality impacts of the flights over New Jersey or Pennsylvania therefore the statement that no disproportionate health or safety impacts to children would result has not been fully investigated or proven.
42. Section 4.7 Water Quality, page 4-79 Study Area third paragraph. Please define what an SSA is. It is not in the Acronym list.
43. Section 4.7 page 4-80 Drainage Area 3- Outfall 003, Please define SEPD and provide a map of the area.
44. Section 4.7 page 4-81 Surface Water Quality- Local Study Area fourth paragraph. Airport operations have a reasonable potential to discharge VOCs into the waterways, from Deicing operations and fueling operations. Therefore the statement of the last sentence of this paragraph is false.
45. Section 4.7 page 4-83 Regional Groundwater Flow, last sentence, the lower aquifer flow to the east-northeast is in the direction of NJ and can be considered as part of the SSA. Therefore the area does in fact contribute to the SSA.
46. Section 4.7 Deicing Operations page 4-86 first paragraph. Please describe the inspection process of the water in the impoundment area. Is it only a visual inspection, or is the water sampled for pollutants prior to being released? If it is only a visual inspection what properties are checked for? Can the inspector tell if the water is contaminated with deicing fluids readily by sight? Is there an inspection check sheet that is maintained?
47. Section 4.7 Hydrologic Impacts page 4-89 second column, first paragraph begins with the words "Without mitigation"... What mitigation is planned to avoid the increase in erosion and suspension of materials? Because the first paragraph in the first column of page 4-90 state that there are no significant impacts to water quality however nowhere does it say in the description how the erosion and suspension of materials will be dealt with. Same comment for alternative 2 on page 4-90

48. Page 4-91 first paragraph discusses the approach of aerating the spent deicing fluid prior to discharging it to the Delaware River. While this may be acceptable why not recycle the glycol/water mix and save money?
49. Page 4-93 Sediment and erosion control. This section only discusses the approaches that will be used to reduce and eliminate erosion during construction activities. There is no discussion about what to do about the increase in erosion cause by large pavements areas and increased flow rates of the runoff.
50. Page 4-99 second paragraph state that Little Tinicum Island is not designated for public recreation, however, the island does receive many visitors in the summer boating season and should be considered as a public recreation area.
51. Table 4.8-2 DNL levels should not be used for this comparison. Recreation areas are generally used during the day and the review should reflect this information.
52. Section 4.12.2 Existing Wetlands and Waterways-Project area, CMC-4, the last sentence in the first paragraph discusses a sewage odor noted at this site, and that the site is downstream from CMC-3 where a septic waste dumping site from the winter of 2003-2004. Was any further investigation of the site performed? There may be an illicit connection from the airport site to a storm drain, which is illegally dumping sewage to the stream. If the smell lingered more than several day after the dumping event. The dates of the event and the dates of the investigation would be helpful to determine if this is an isolated case or something more serious to the water quality of the stream.
53. Section 4.12.3 Direct impacts. Page 4-144 Alternative 1 states that any macro invertebrate activity would be lost. The goal of the clean water act is to improve waterways. If the project cannot be done without improving water quality then it should not be undertaken. Any further loss of water quality is unacceptable.
54. Section 4.12.3 Last paragraph of the section on page 4-146, Change the word may to will in the last sentence of the paragraph. "The increase in impervious areas... will increase runoff... and also will increase pollutant and toxicant load..."
55. Section 4.12.4 Mitigation, last paragraph uses the word could to describe that mitigation could be done. The question is what will be done? A determination that there are no negative impacts cannot fully be understood without knowing what the mitigation measures are.
56. Section 4.14.2 Surface transportation, affected environment. Page 4-159 first paragraph, for this proposed project, LOS -D or better is considered to be acceptable. How was this determination made? Was it determined prior to doing the survey or after doing the survey? Who made the determination?
57. Section 4.15.2 Affected Environment, please provide a description of the known releases and what the contaminants of concern are at each of the sites.
58. Section 4.15.2 Existing and Former Underground ad Above ground storage tanks. Last sentence. Just because a tank has not had a reported release does not mean that it hasn't happened. These tanks should be investigated in accordance with PADEP rules and should have been removed or upgrade prior to the December 1998 deadline.
59. Section 4.15.3 Unknown Status USTS. These tanks should have been remove or upgrade by December 1998, in accordance with federal law. Is the Airport in violation of this requirement and what is being done to correct the situation?

60. Section 4.15.4 Mitigation: Fill Sampling page 4-178, Any sampling of Fill material should include PCB and Dioxin sampling since these contaminant may reasonably be expected to be in fill from unknown sources.
61. Section 4.15.4 Mitigation Contaminated Groundwater management. Since POTWs do not normally treat for industrial contaminants, what pretreatment of the groundwater will occur prior to discharge to the POTW?
62. Section 4.18 Cumulative Impacts FAA order 1050.1e states "if the proposed action causes the cumulative impacts of these non-project actions to exceed and applicable significant threshold, then the proposed action would be the one causing the significant impact." The past action of allowing regional and larger jets to land on runway 35 was not analyzed for noise impacts on the surrounding area. That change in conjunction with the extension of the runway will have a total increase of DNL level that may be considered significant. Since the before and after are not available at this time the cumulative effects cannot be compared. Please compare the DNL from a time period prior to having regional jets and other jet aircraft use the runway 35 for landing and compare it to the expected noise from both alternatives.

#### Noise Technical Report

1. Section 2.2.1 FAA's Integrated Noise Model page 2-6 First paragraph discusses historical flight track data used to run this model. As commented above, How has this data been validated? I have experienced known problems with the radar track data. In June of 2004 I called the airport Noise office to complain about large aircraft flying over my house or adjacent to my property at certain times of day I specifically noted times and type of aircraft right over my front lawn. This included two 737 400 and one Airbus 319 less than 1000 feet, in the span of 15 minutes with other aircraft following similar paths. . When I provided this info to Mike Jeck, the Noise officer he checked the radar data and found no aircraft over my property. The closest he found was 1.25 miles away and at 3000ft. The next was 1.5 miles and 2500 ft and the other was 2 miles away. Therefore I believe this data is flawed in such a manner as to be unreliable. Please provide me with the details as to how the data used for telling which aircraft were flying where and when was validated as this data is used for all aspects of the studies.
2. Section 2.2.2 page 2.7 first full paragraph. The Model information was based upon radar tracks. Again please describe in full how this data was validated to be used.
3. Page 2-9 Last paragraph. This paragraph describes how narrow body flights were increased on runway 17-35 in 2004 yet the rest of the paragraph states that the model used th3e flight tracks from the 2003 year to be modeled. Since the Narrow body jets are louder and fly lower on landing onto runway 35 shouldn't the most recent data have been used for the model?
4. Page 2-21 Measured DNL for January 2004, First sentence states that the Model was not calibrated or adjusted to the measure noise levels. I work with several different types of environmental models notable, groundwater contamination and surface water flow models. Every model I have ever seen has had to be calibrated to match actual real life conditions for it to be acceptable to the regulatory community and the public. If this model is not calibrated then how can the public or regulators be sure that the model is indeed accurate? The acoustics in this area are different from other areas so to say that the model works here as well as other areas may not be entirely true. More work should be done to be sure that the model is showing actual conditions.
5. Page 2-21 Measured DNL for January 2004. First bullet. The noise measurements from a two week period in January of 2004 do not show the long term trend of noise from larger jets that have been landing on runway 35 with increasing frequency. The long term average number of aircraft

should be compared to a long term average of aircraft, not to a two week period. Also it is not the average noise that is bothersome it is the increased frequency of large noise pockets that is bothersome.

6. Page 2-24, Table 2-9, ST-22 site at River Winds Community Center. How is this site not considered to be applicable to the project. Aircraft landing on runway 35 or taking off from runway 17 pass within ½ a mile from the center. Please calculate the DNL at the site since it is an important part of the West Deptford community.
7. Page 2-27 Meteorological Conditions during the Measurement period. These conditions do not indicate wind speed or direction during the time of the measurements. These are important factors in the landing pattern of aircraft. If the wind happened to be out of the south predominantly then this short term measurement of Noise would have been biased because the aircraft would not have been traveling as much over West Deptford as if the wind was coming out of the north. However since this information has not been presented, the public, nor the regulators can take this into account.
8. Section 3.2.6 Runway use. Page 3-12 This paragraph state that the use of runway 17-35 would go up from 55,311 aircraft to 103,270. Pleas explain how doubling the number of flight events thereby doubling the time that a certain noise level is attained does not raise the average noise level more than 1 dB. Since the math of the model is not provided in the document, these calculations cannot be checked.
9. Table 3.10 Breakdown or Runway 17-35 Operations for 2007 Average Annual Day. Besides the fact that this is an average, how can you have a tenth of an operation per day? This data should be rounded to the nearest whole number.
10. Table 3.10. Where is the data for comparison for either 2003 or 2004? The numbers presented here are only estimates for 2007.
11. Section 3.2.10 Grid Point Analysis page 3-20. This analysis did not take into account new developments that have been in the planning stages prior to 2000 and have been built since 2000. Field work could have been done to estimate the number of effected communities, and to survey the population. Therefore the analysis of the number of people effected is inaccurate at best.
12. Section 3.3 page 3-21 first full paragraph states that only non-residential land use would be effected on the south side of the area. This is inaccurate for the reasons stated above.
13. Figure 3-3. This figure shows the lines that the FAA calls significant for noise exposue at 60-75 dB. However there is criteria that ,muat be addressed if areas outside of these contours experience a 3-5dB change. How are the public or regulators to compare these levels if the contours are not shown?
14. Page 3-22 describes table 3-12 as the prediction of population exposed to larger noise levels. However as stated above the analysis of number of effected people is erroneous due to the fact that new communities have not been considered.
15. Page 3-25 fist paragraph. This paragraph describe the concern of the FAA and the sponsor about including one person at Ft. Mifflin even though no one lives there, however the neither the FAA nor the Sponsor has enough concern about its neighbors in south jersey to correctly identify whether or not there are actually people living there.
16. Page 3-26 Second Bullet. This statement that “To the south... due to a 29 percent increase in arrivals for regional jets and a 14 percent increase in arrivals for small narrow body jets” However, the date provided in table 3-10 shows that the average daily increase in arrivals to runway 35 from the south will be 82.61% more for regional jets and 933% more for narrow body

jets. For the narrow Body calculation I used the average of 3 narrow body jet landings on runway 35 instead of the 0 figure provided. If the noise model uses percentages as inputs then the noise model may be wrong since the data provided does not support the text shown. Please reconcile the math prior to inserting it into text.

17. Page 3-33 Second bullet, again the percentages provided I the text do not match the data provided in the tables. The regional increase in projected to be 70 percent not the 28 percent given in the text and the narrow body jets increase is going to be 355 percent not 16 as given in the text. Please reconcile the numbers.
18. Page 3-37 Second Bullet: The expected increase in departures to the south increase by over 100%, even though the number of flights increasing in departures is small the percentage is not. Again there is inconsistency in the analytical approach the FAA is taking, using percentages where it is convenient and actual numbers when it is not.
19. Section 3.3.3 Other indicators of Changed Cumulative Noise Exposure. Page 3-39. Last paragraph states that the grid size used for the modeling effort is a uniform grid spacing of 3000 ft. This is equivalent to over 206 acres per grid square, roughly the size of a golf course or two hundred football fields. Noise is a localized event for the most part. It is very noisy directly under an aircraft and less noisy the further to the side you get. Most numerical models that use finite element or finite difference use tighter grid spacing in areas of higher concern. The Model should be run with tighter grid spacing over the backbone flight paths and runways. This would give a more detailed look at the effects of the backbone flight paths and would better predict where noise is a problem. Without a tighter grid spacing what the FAA is doing is in effect diluting the noise from an event over 206 acres. This assumption is made because there is no other discussion of the mathematics of the model, the grid spacing, and how the numbers are calculated
20. Section 3.3.3 page 3-40, Changed Noise Exposure Within the 65 dB contour. First bullet states that the only area to the south that would have an increase in the noise exposure would be an undeveloped area. This is not true there is development with people living in the area. And as stated in the previous comment, the noise model dilutes the sound over 206 acres so that the true increase in noise is not known. Further analysis is needed.
21. Page 3-46 Changed Noise Exposure between the DNL 45 and 60 dB contours. The contours for the 45 to 60 are not shown. Color-coded squares that are 206 acres is not enough detail to know if an area will experience more noise than can be considered significant. Again the model should be run with a finer grid in order to show a truer representation of reality.
22. Section 3.3.4 First paragraph, Editorial note: Gloucester county is in New Jersey Not Pennsylvania.
23. Section 3.4.3 INM Computed Nighttime DNL, Lmax, and TA at specific points. Page 3-57 While these items may be of interest to the FAA, one item is of interest to me is a worst-case single day cumulative noise exposure. By this I mean, what is the worse possible noise exposure I will have over the term of a day when the aircraft are landing to the north onto runway 35 on a constant basis. Much like the majority of the time. Aircraft fly over my house or in close proximity and I have not seen any analysis to show what exactly I am being exposed to on a daily basis. The average DNL means little to me since there is not much nighttime flights however, during the day I have counted upwards of 21 aircraft over my property in a forty minute span. This happens so often during a normal day that I can almost set my watch by the times. The worst part is it happens at times when I would like to be outside enjoying my deck and garden but with the noise it is becoming unbearable. The long-term average is not what bothers me it is the short-term day to day hours of noise from aircraft.
24. Table 3-24 does not indicate noise data from flights of narrow body jets landing and taking off from runway 17-35 since the data was from 2003 and not 2004.

25. Section 3.6 Cumulative Noise Impacts. Page 3-67, The FAA has not prepared any environmental documentation of the effects of landing regional Jets and Narrow Body jets on Runway 17-35. This documentation should have been prepared to compare the noise exposures prior to approving this action. This action has created a "new standard" by which the future actions are being considered. The cumulative effect of landing large numbers of Jets along with the Turbo Props most likely has had a significant noise effect, More than 5 dB, but the data has not been prepared and can only be inferred.
26. Appendix A pg A-8 Day Night Average Sound Level, DNL the requirement to use this metric was developed over thirty years ago when there were less people and less flights around to disturb them. Has any newer work been done to develop a better measure as to what people find disturbing when it comes to noise?
27. Appendix A, pg A-9, the description of the DNL should have the mathematical equation used so people can see that it indeed includes the number of flights.
28. Appendix A, Figure A-6, page A-10 shows that 8 miles from touchdown at a major airport and 3.5 miles from takeoff at a small airport have a noise level of 62-63dB. The results of the noise model do not appear to match these numbers.
29. Appendix C, The numbers presented here are only percentages. No actual numbers of aircraft are given. This data does not assist in the comparison of existing to predicted flights and flight paths.
30. Nowhere in either the Noise technical report or in the EIS was data provided about the noise levels of any of the aircraft at the flying levels. The equation for the DNL includes a summation of the noise from aircraft per event. I would like to have this data to see what the calculated noise level at my house would be so I can compare it to the large grid cell given in the report.
31. The only place where the time of flight delays is discussed is in the first part of the EIS. However nowhere in the EIS or the Noise study does it say what the time reduction would be if either of the alternatives are picked.
32. The Executive Summary states that the best improvement that will be gained for alternative 1 is 1.4 minutes in 2007 and 6.5 minutes in 2015 and Alternative 2 give improvements of .2 minutes in 2007 and 4.1 minutes in 2015. These improvements in times are not worth the Millions of taxpayer dollars to be spent on this project the cost to benefit ration is too high. Neither of the alternatives will alleviate the situation and in fact will exacerbate the noise problems in West Deptford. I urge the FAA to reject both alternatives and focus on the CEP to gain real time savings.
33. Reviewing the Correspondence provided in Appendix D, Only the NJ SHPO was contacted. No other regulatory agency was contacted in NJ. How can the FAA plan on sending more pollution into NJ air space for the benefit of the City of Philadelphia without having contact with the NJDEP?

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127.1	The FAA did not do enough for this public scoping meeting to invite people from the effected communities, especially West Deptford T[ownship]. There was no mass mailing to township residents, there was no concerted effort by the FAA to reach out to community members. The FAA may have tried to use mass media but did not stress the effects of this proposed project in order to have the best possible community involvement.	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.
127.2	The public information meetings held in April of 2004 were an attempt by the FAA and the City of Philadelphia to mislead the communities around the airport as to the exact nature and scope of the project. This is evidenced by the fact that none of the Township officials in attendance or the County officials thought there was any planned changes that would result in an increase in the number of flights over Gloucester County. It took me several weeks of persuasion to get them to realize that the public info session had nothing to do with expanding the runway.	The April 2004 public information meetings were held to give the public the opportunity to learn more about how the Philadelphia International Airport operates, including information about the airport layout, air traffic control issues, and airport delays. The topic of those meetings was based on many of the comments and questions that were received at the August 2003 scoping meetings. All local officials received scoping information documents at the start of the project in the Summer of 2003.
127.3	Chapter 2 Purpose and Need. Key Points Paragraph 4: Last sentence: "This congestion of the primary runway complex contributes to delays." This is not a quantified statement. How much of the current and projected delays are because of the congestion on the runways? How much is due to weather? how much is due to airfield configuration? how much is due to the configuration of the terminals?	The delay analysis presented in the EIS compares the future No-Action Alternative (which assigns the majority of regional jets and narrowbody jets to the primary runways) with Alternatives 1 and 2. Alternative 1, the Preferred Alternative, would result in 28.1% of the total annual operations using Runway 17-35. The delay analysis demonstrates that this shift in runway use by RJs and narrowbody aircraft 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.
127.4	Section 2.1.2 8" paragraph. Why is there a time limit of 15 minutes for not using the runway when a ship is in the channel? Is transit time that long, has data on this timing been collected or is this an assumed time?	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.
127.5	Section 2.2.1 Aircraft Fleet Mix; This paragraph and the associated table are making false comparisons. It is using a percentage of total flights to compare narrow body planes and turbo props but then it compares the number of regional jets against only regional jets to show an increased need by using a large percentage. The numbers should be compared consistently. Either use percentage of total fleet or compare each of the aircraft types to the numbers for that aircraft type. Otherwise the inconsistency makes the comparison flawed.	The text summarizes two major points from the table regarding each aircraft type. Table 2-3 provides information on the fleet mix for 1999, 2002, and 2004. The first point is that regional jets consisted of only 4.2 percent of the fleet in 1999. The second point is that between 1999 and 2002, the number of regional jet operations increased by 262.5 percent. As a result, in 2002, regional jets comprised 15.8 percent of the fleet.
127.6	Section 2.2.1 Runway Length Requirements for Regional Jet and Narrow body Aircraft. Again inconsistent comparisons by comparing percentages of aircraft vs. themselves and vs. total fleet.	Similarly, the table provides detailed information while the text summarizes one major points - that the shift fleet mix between 1999 and 2002 was almost exclusively from turboprops to regional jets.



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127.7	[For the] Runway Length Requirements for Regional Jet and Narrow body Aircraft...There is no quantification of the amount of the delay cause by regional jets needing to use the larger runways.	<p>The delay analysis presented in the EIS compares the future No-Action Alternative (which assigns the majority of regional jets and narrowbody jets to the primary runways) with Alternatives 1 and 2. Alternative 1, the Preferred Alternative, would result in 28.1% of the total annual operations using Runway 17-35. The delay analysis demonstrates that this shift in runway use by RJs and narrowbody aircraft would reduce annual delay.</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 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>
127.8	The delay of 10 minutes now and 20 minutes in the future does not account for lost work time, in the scheme of spending several hours trying to get through security, baggage claim, ground transportation, it is nothing. The FAA and the Airport cannot use businesses for lost revenue.	The FAA has noted and considered your comment.
127.9	Section 2.2.2 Forecast Aircraft Fleet Mix; second paragraph; Upon what data is the forecast developed? How have the numbers been created?	The FAA-approved forecast is based on an analysis of historic trends, and assumptions regarding key factors affecting airline traffic at PHL. Additional information can be found in the "Forecast of Aviation Demand", Final Technical Report 2004.01 of the Philadelphia International Airport, Master Plan Update (23 February, 2004).
127.10	There is no information on the change of the operations of Scheduled flight carriers from the old model of Hub and spoke to Serial operations which may create a reduction of flights in and out of the airport at high volume times.	There is no indication that US Airways is transitioning away from Hub operations. In fact, US Airways has increased their service at PHL. PHL is a high origin and destination airport.
127.11	There is also no information about the latest change to US AIRWAYS scheduling to reduce the delays...	While US Airways has indicated that it would voluntarily change flight schedules to reduce delays, this has not yet been demonstrated to be effective. It is likely that, as occurred at O'Hare following voluntary de-peaking by the major carriers, other air carriers would take advantage of less congested conditions and increase their flight schedules. In fact, US Airways has recently increased service.
127.12	Why wasn't the idea of moving all cargo operations such as UPS, FEDEX and DHL to the Northeast Airport considered or even mentioned?	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. Cargo operations were not singled out because they operate at times that generally do not contribute to significant delays. In any event, neither FAA nor the Airport can force a cargo operation to relocate.
127.13	[The DEIS] states that Southwest and Frontier Airlines have chosen to use PHL instead of PNE or Trenton. Since they moved in knowing the situation of delays, they should not be considered [as a factor in the elimination of Alternative A.2.1] in the scenario. They are a contributing factor in the delays because they are increasing flights. If PHL is so bad with delays then they would not have made the business decision to move into PHL.	Alternative A.2.1 (Commercial Service Airports) was eliminated from further consideration because it would not achieve the project's purpose and need in the short term. In order to make more extensive use of other airports and reduce delay at PHL, commercial operations (and passengers) would have to shift from PHL. As discussed in Section 3.3.1, governmental authorities have relatively little control over the airlines' routing and scheduling. Under deregulation (1978), domestic airlines can establish and drop routes, start or end service at any airport. While all airlines at PHL contribute in some way to the delays, airlines base their business decisions on a number of factors, including passenger demand and potential markets, and not just on delays. Similarly, people base their decisions on which highway to use based on their needs and the convenience, not just on the amount of congestion.

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127.14	[There is the] assumption about reasons for why people fly vs. drive. Has a statistical survey been done to prove this claim or it is opinion? In my office where much of our travel is to the northeast, people have started driving more to save time because of delays due to increased security. If a survey has not been completed, then please note the fact that this is opinion rather than researched fact. If it has been researched, show the research.	As observed by the commentor, travel by car is generally competitive with air travel for short-range trips including travel along the north east corridor. Chapter 3 discusses these aspects of automobile travel as an alternative to air travel and accounted for the fact that automobile is preferred over air travel for shorter distances. There are a number of surveys and reports that back up the commentor's conclusion. These include a 2004 USA Today analysis, a cost comparison that found that shorter trips are more economical (smarterliving.com), and the 2002 U.S. Frequent Business Traveler Survey, Conducted by the Business Travel Coalition, that surveyed travel and purchasing executives from 184 corporations that spent \$2.9 billion dollars on domestic air transportation services in 2001 and found that 77% of survey participants observe that more travelers are driving their cars in short-haul markets.
127.15	Alternative C1, Administrative Approaches (slots): Reason 2 of the reasons for elimination is that it "Requires resolution of complex Federal Policy issues and a rulemaking by the FAA." [The] FAA should make a rule and maintain the Option. It is not like the FAA is asking the EPA to make a rule.	As the EIS (Section 3.3.3) states, FAA has eliminated Alternative C1, Administrative Approaches, from further review because (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) Past FAA actions indicate that the agency is not likely to undertake rulemaking absent a severe and extraordinary level of delay and effect on the NAS, which does not exist at PHL.
127.16	Alternative C1, Administrative Approaches (slots): Reason 3 [states] "It is not possible to implement in the short term." If the FAA had not been blind in eliminating this option at the start of the process then the rule making could be underway at this moment and could be complete by the time it needed to be implemented. Rules can be made quickly if there is enough incentive. Rules are easier to do than building a runway or getting public agreement with this project.	As the EIS (Section 3.3.3) states, FAA has eliminated Alternative C1, Administrative Approaches, from further review because (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) Past FAA actions indicate that the agency is not likely to undertake rulemaking absent a severe and extraordinary level of delay and effect on the NAS, which does not exist at PHL.
127.17	Alternative C2 Voluntary De-Peaking and Flight Reduction. The second reason for eliminating this option states in part "it is not severely congested to the point when FAA would interfere with airline deregulation.. ." If the delay is not that severe then why do anything at all?	Chapter 3 discusses the unique situation at O'Hare Airport. ORD is the most delayed airport in the U.S.; has twice as many operations as PHL; has five times as many delayed operations; and has six times PHL's total annual minutes of delay. ORD ranked last among the Nation's 31 major airports for on-time performance in 2003. O'Hare is a network hub for two of the largest domestic airlines; the origin and destination for many international flights by US and foreign carriers; and is a connecting point for significant passenger flows across the U.S. Because of its status, the level of congestion at ORD can and has caused significant disruption to the NAS. As the EIS explains, while PHL is delayed, it is not severely congested to a point where FAA would invite scheduled air carriers to a scheduling reduction meeting.
127.18	Alternative C2 Voluntary De-Peaking and Flight Reduction. The third reason for not maintaining this option states in part.. ." It is unlikely the Secretary will use his authority to seek voluntary de-peaking.. ." Has the Secretary of Transportation been asked? ...Why wouldn't the Secretary do this since precedence has been set by doing it at O'Hare?	As explained in Section 3.3.3 of this EIS, voluntary de-peaking and flight reduction approaches to Demand Management were not carried forward because 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 O'Hare and PHL. The flight reduction approach (scheduling reduction meetings) is an interim stop-gap measure and is not intended to fill a void of many years, as would be required because major capacity enhancements at PHL, if approved, could not be fully implemented until 2015. PHL is not as severely delayed as O'Hare, and delays at PHL do not cause the same severe disruptions to the NAS.

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127.19	Alternative D2 was eliminated because it requires "significant airfield and or terminal modifications and, therefore, cannot be implemented in the short term." Two entire terminals (F and A west) were built in a short time frame. Less than three years I believe. How can the terminal end modifications or removals take longer than extending a runway?	The type of airfield or terminal modifications required to reduce delays (Alternative D2) are significantly more complex than the construction of new terminals. Measures to reduce delays involve relocation or realignment of runways, relocation of runways and/or buildings to allow for wider taxiways, etc. These measures are being considered for the Capacity Enhancement Program (CEP), which is a long-term airport redevelopment project that would result in additional capacity and, as a result, more comprehensive and longer-term delay reduction.
127.20	Alternative E1 Technology. Why has a technology study not been done at PHL to see what could help with the situation like at SFO? ... I would think that technology for the FAA would be readily available for testing at PHL.	The findings of the San Francisco International Airport study determined that technology-related operational capabilities alone would not eliminate San Francisco International Airport's existing and projected delays. Since the San Francisco International Airport study was conducted relatively recently, its findings are also applicable to PHL. As discussed in Chapter 3, new technologies may be able to help reduce delays in the future. However, these technologies are in research and development, and will not be able to be implemented in the short term.
127.21	Section 4.2.2- This section talks about historical data that was used such as FAA radar data, etc. How has this data been validated? ...Please provide me with the details as to how the data used for telling which aircraft were flying where and when was validated, as this data is used for all aspects of the studies.	The radar data used in the noise analysis was taken from the Airport's Total Airport Management Information System (TAMIS), an integrated noise and operations monitoring system. The Airport conducted acceptance testing of the system at the time of installation in 1996 and has been utilizing its output to address various noise-related issues ever since. The flight tracking data stored by TAMIS and used in the noise analyses of this EIS come directly from the FAA's STARS radar system, the same radar used by FAA Air Traffic Control staff to control aircraft within Philadelphia's airspace. This is standard procedure and the EIS team has no reason to doubt its reliability.
127.22	The Census data for 2000 was used and assumed not to change. In West Deptford Township, there has been a large increase in buildings in the last four years with a senior housing complex being built directly adjacent to flight path of runway 17-35. The assumption that population centers have not changed is false and the data needs to be re-analyzed.	All population counts are based on U.S. Census data for the year 2000. The River Winds development, which has been largely constructed since the census and continues to undergo expansion in West Deptford, is located just east of the centerline of Runway 17-35, and though heavily populated, does not fall within the 60 DNL contour for any alternative. New smaller developments in other locations may, though, be excluded from these counts. However, new residential developments within the Study Area were identified through field reconnaissance and discussions with local officials. For areas within the 65 DNL contour census data were supplemented with field reconnaissance and discussions with local officials.
127.23	Alternative 1, second bullet: This bullet describes how the contours have increased because of a 29 percent increase in regional jet arrivals and a 14 percent change in the arrivals of small narrow body jets. However, reading the noise analysis write-up and using the projected daily average numbers from Table 3-10 of the noise technical report, the percentages shown here are patently wrong. The actual projected increase in arrivals of regional jets is 74 percent more (149.6 vs 81) and the increase in small narrow body jets is at least 933 percent more (31 vs 0). Since right now they say there are zero arrivals of small narrow body jets, I used a figure of three per day the minimum of which I personally have observed and compared it to the projected 31 arrivals per day to get the 933% projected daily average increase.	Section 4.2.3 of this EIS has been changed to respond to the comment.
127.24	There is a significant impact on south [New] Jersey from the noise. The contours shown do not incorporate the locations of the River Winds community which may very well be within the new 65 dB contour over south [New] Jersey. The so called undeveloped area is actually developed. This needs to be reviewed for accuracy.	A comparison of recent aerial photography and the DNL contours shown in Figures 4.2-4 through 4.2-9 of this EIS indicate that the River Winds community to the southeast of the Airport in New Jersey would be located outside the 65 dB DNL contours. Those land uses in New Jersey that would be within the 65 dB DNL contours are not considered noise-sensitive.

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127.25	There is only one location near the actual flight path of the jets landing on runway 35. LT-5 This site was not monitored for a long time in 2004 to determine what impact the additional flights of larger jets will have on the DNL. Also the site does not appear to be in a direct line with the flight path or directly under most of the aircraft.	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).
127.26	What is the "Sponsor" going to do about West Deptford Township people who experience the large increase in noise?	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.  While some noise-sensitive locations in West Deptford, New Jersey would experience an increase in aircraft noise exposure as a result of the Project, none of these noise-sensitive locations would be exposed to a significant impact as defined by FAA.
127.27	This section speaks about increase in noise levels over recreational land use areas, but nowhere does it speak to the River Winds Athletic fields, or Community Park. This area is definitely within the 65 dB contour area.	According to FAA Order 1050.1E, Appendix A, Table 1, parks are compatible in the <65, 65-70, and 70-75 dB DNL contours. These parks are located outside the 60 dB DNL Contour so there is no land use incompatibility.
127.28	Compare the cost of a similar size house in a similar setting except for being under a flight path. This would be a simplistic yet effect way to compare the potential loss of 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. It is highly unlikely that any property values will decrease as a result of this Project.
127.29	I have lived in my house for 14 years now and have not though about moving until the last year because of the increase in numbers of flights and increase in noise levels. Now the FAA and the Sponsor want to increase the average daily flights by 73% that means basically any time that I go outside I will have aircraft overhead. This would be noticeable to anyone and would detract for the enjoyment of my outdoor living. This detracts from property value and there is a minimal effort that the FAA could do to compare that loss.	The actual increase in operations over New Jersey, when comparing the No-Action Alternative to Alternative 1 is 16 percent in 2007 and 30 percent in 2015. Property values depend on many factors. One factor is the environment. This Project will not have significant impact on noise or environmental impacts. We believe it is highly unlikely that any property values will decrease.
127.30	[The Air Quality section] mainly speaks to PADEP rules and air quality standards, and only addresses idle time, wait time, and run up for takeoff. It has not addressed the increase in number of flights over New Jersey nor the added pollution to New Jersey's Air.	The air quality analysis addressed the impacts of four aircraft operating modes: takeoff, climbout, approach, and taxi/idle. Project-related air pollution impacts in New Jersey were addressed by including two receptors in the dispersion modeling network. As shown in Appendix A (Final Air Quality Analysis Protocol) of Appendix A.2 (Air Quality Technical Report); Receptor R23 is located at the Red Bank Battlefield National Park, Red Bank, NJ and Receptor R24 is located at a residence in Paulsboro, NJ. Appendix H of the Air Quality Technical Report (Detailed Dispersion Modeling Results) presents the results of the modeling analysis for these two receptors and shows that the concentrations estimated for the Proposed alternatives remain well below the National, New Jersey, and Pennsylvania Ambient Air Quality Standards. (See Tables H-3 through H-8 for these results.)
127.31	Has there been any comparison to the New Jersey SIP, since the over flights will have an effect on New Jersey Air quality?	Because emissions in the future years due to construction activities will be less than the General Conformity de minimis thresholds and emissions for both Build Alternatives will be less than the emissions from the No-Action Alternative, and thus, less than the de minimis thresholds, the General Conformity evaluation applies equally to New Jersey and Pennsylvania and is comparable to the New Jersey SIP.

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127.32	The assumption that PM10 emissions are zero is a major falsehood. Any combustion of jet fuel, which is very similar in composition to diesel fuel, will have a PM10 associated with it. Just because the FAA does not have data does not excuse this use of bad assumptions.	FAA does not claim that actual PM10 emissions from aircraft are zero, only that analysts should not attempt to compute PM10 emissions. As stated in Section 4.5.2, "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." This describes both the current state-of-the-art and FAA's technical position. See FAA Order 1050.1E for further information.
127.33	Again there is a huge amount of assumption to say that there is no PM emissions from aircraft. With the number of flights and the number of different engines, there has to be PM emissions and they are most likely significant to the environment. The FAA and/or the EPA should collect more information in order to use accurate data for making decisions that will impact thousands of people in the area adjacent to the airport.	As documented in Section 4.5-3, PM10 emissions from aircraft are assumed to be the same as PM 2.5 emissions (see Table 4.5-10).
127.34	Why was [HAP] data from Gloucester County [not] used?	Since the Airport-related pollutant emissions are very small compared to the two counties in Pennsylvania, combining the additional emissions from Gloucester County, NJ would only skew the results even farther. This would tend to make the airport's contributions look even smaller than was presented in Table 4.5-6 of this EIS.
127.35	Page 4-64 and page 4-68 and page 4-70 Ambient Concentrations: First bullet states [Alternative 2] " All of the modeled maximum concentrations for NO2, CO, SO2 and PM10 are below NAAQS" The last one may be because of the assumption of AM emission rate of 0 ppm of PM10 for aircraft.	While this is likely to be the case, the data needed to assess PM10 emissions from aircraft are not available. As stated in Section 4.5.2, "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." 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 for additional information.
127.36	[Alternative 2] VOC and NOx emissions were said to decrease in part because of the decrease in the size of the economy parking lot however in the description of the project the parking spaces will be moved to the former area of SR-291. So the Total parking area may even increase not decrease having a net increase in these emissions.	The analysis of NOX and VOCs primarily considers emissions from aircraft, which would decrease substantially with Alternative 1. The emission of VOCs from aircraft would decrease by 36.6 tons per year in 2007 and 109.2 tons per year in 2015. Motor vehicle emissions (which take into account all vehicles using the airport's parking facilities as well as all vehicles dropping off or picking up passengers at the airport) are a small percent of the overall emissions, and would decrease by only 0.2 tons per year in 2007 or 0.1 tons per year in 2015. The analysis presented in this EIS assumes a slight decrease in parking spaces in the Economy Lot, but assumes that these vehicles would be redistributed to other parking facilities at or near the airport. The reductions in the emissions of air quality pollutants from Alternative 1 would be substantial regardless of the change in number of parking spaces in the Economy Lot.
127.37	VOC and NOx emissions are said to decrease [for Alternative 1] due to reduced idling time, however the most reduction in wait time is only 2 minutes. What time number has been used to determine the reduction in emissions. This information has not been provided.	Annual Average Taxi-Delay-Queue Time per LTO Cycle (in minutes) is provided in Table B-4 of Appendix B (Aircraft Data) of the Air Quality Technical Report (Appendix A.2 of the DEIS). For the 2003 Existing Condition, the Annual Average Taxi-Delay-Queue Time per Landing and Takeoff Cycle (LTO) is approximately 22 minutes. The Preferred Alternative is estimated to improve this delay by approximately five minutes in 2007 and eleven minutes in 2015, when compared to the No-Action Alternative.
127.38	Page 4-70, Indirect and Secondary Impacts; Second paragraph. Please provide the data that proves that Aircraft emissions are "negligible" in comparison to the remainder of the area. In West Deptford there are not many large sources of air emissions. However the flights of thousands of aircraft per day in a significant source of air pollution. Adding more flights and aircraft can only mean more pollution.	Appendix A-2 of the DEIS provides a detailed assessment of the air quality impacts of the Proposed Project. As documented in the Appendix and the EIS, the Proposed Project would reduce the emissions of air pollutants.

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127.39	Section 4.5.4 General Conformity Analysis. This analysis compares the previous section's information to a tons per year threshold for significance. The problem with the comparison is that the previous data only accounted for idling and taxiing emissions. It did not include the most emissions producing portion of aircraft operations, take off and landing, as well as flights over a specific area. These emissions may very well be significant, however the data has not been collected or presented to enable that determination. Therefore the FAA should collect and compare the information to see if indeed this would cause an exceedance of the tons per year threshold. Any argument that vehicles are not considered is bunk because the emissions from taxiing and idling are considered.	As indicated in Section 3.1.2 of the Air Quality Analysis Protocol (Appendix A of the Air Quality Technical Report which is Appendix A.2 of the DEIS): Aircraft emissions [are] based on individual aircraft and engines operating in four modes, namely takeoff, climbout, approach, and taxi/idle. Thus aircraft emissions during "Takeoff and landing" are explicitly accounted for in the DEIS.
127.40	Section 4.5.4 General Conformity Analysis, page 4-73, first paragraph: This paragraph only compares the amount of emissions to the Pennsylvania portion of the Non Attainment area. Since all of the flights arriving on Runway 35 and those taking off from Runway 17 will fly over New Jersey why haven't the emissions from those flights been compared to the New Jersey Portion?	Modeled emissions are total amounts with respect to the region. Data regarding pollutant emissions during discrete portions of aircraft flight modes (i.e., portions of flight tracks over New Jersey) cannot be readily determined from the available analytical tools (specifically the EDMS program).
127.41	Section 4.5.5 Mitigation: Since the previous sections were not completed the assumption that there was no significant impact from aircraft operations is not ready to be determined and therefore discussions of no mitigation are not appropriate at this time.	The "previous sections" are complete based on the current state-of-the-art methods and the methodology for the analyses was approved by the Environmental Protection Agency and the Pennsylvania and New Jersey Department of Environmental Protection.
127.42	Section 4.5.6 Please provide copies of the letters from the regulatory agencies in the EIS to show that all items have been satisfied.	Correspondence with the regulatory agencies is included in the appendix to this EIS.
127.43	Section 4.5 did not fully disclose the air quality impacts of the flights over New Jersey or Pennsylvania therefore the statement that no disproportionate health or safety impacts to children would result has not been fully investigated or proven.	The air quality analysis presented in this EIS uses standard FAA methodologies and evaluates the regional air quality impacts (including New Jersey and Pennsylvania) of the proposed project. The analysis takes into account emissions of air pollutants from the airport itself, as well as from aircraft. The methodology was reviewed and approved by EPA Region II and Region III, and by both the Pennsylvania and New Jersey DEP. All air quality impacts of the proposed project (which will reduce the emission of air pollutants) have been disclosed in the EIS.
127.44	Please define what an SSA is.	An SSA is an EPA-designated Sole Source Aquifer, as defined in the Glossary of Terms in this EIS (page G-14).
127.45	Drainage Area 3- Outfall 003, please define SEPD and provide a map of the area.	SEPD-2 is the abbreviation used for the second branch of the Southeast Ponding Ditch, as defined in the Acronyms and Glossary of Terms sections of this EIS. This waterway is shown on the graphics referenced in Sections 4.7, 4.10, and 4.12 of this EIS.
127.46	Section 4.7 page 4-81 Surface Water Quality-Local Study Area, fourth paragraph: Airport operations have a reasonable potential to discharge VOCs into the waterways, from Deicing operations and fueling operations. Therefore the statement of the last sentence of this paragraph is false.	This statement has been deleted. Fueling operations at the airport have the potential to discharge VOCs to surface waterways, although the airport implements a spill prevention and containment program to mitigate for accidental spills.
127.47	Section 4.7 page 4-83 Regional Groundwater Flow, last sentence. The lower aquifer flow to the east-northeast is in the direction of NJ and can be considered as part of the SSA. Therefore the area does in fact contribute to the SSA.	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.

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127.48	Section 4.7 Deicing Operations, page 4-86, first paragraph. Please describe the inspection process of the water in the impoundment area. Is it only a visual inspection, or is the water sampled for pollutants prior to being released? If it is only a visual inspection what properties are checked for? Can the inspector tell if the water is contaminated with deicing fluids readily by sight? Is there an inspection check sheet that is maintained?	Runoff from the deicing pad is captured in a sump. An automated sampling device in the sump continuously measures total organic carbon. If TOC concentrations exceed the PA DEP interim threshold limit, the water is directed to the storage tanks. If concentrations are less than the DEP threshold, water is discharged to the North Ponding Ditch. The Philadelphia Water Department sewer discharge permit requires monitoring and annual reporting of discharge flow rates and concentrations.
127.49	Section 4.7 Hydrologic Impacts page 4-89 second column, first paragraph begins with the words "Without mitigation". . . What mitigation is planned to avoid the increase in erosion and suspension of materials? Because the first paragraph in the first column of page 4-90 state that there are no significant impacts to water quality however nowhere does it say in the description how the erosion and suspension of materials will be dealt with. Same comment for alternative 2 on page 4-90	The Proposed Project is not anticipated to result in erosion of, or sedimentation into, adjacent waterbodies. The drainage system will be designed to mitigate runoff rates. At the south end of the proposed project, the Southeast Ponding Ditch will reduce water velocity and allow suspended sediments to settle out prior to discharge to the Delaware River. At the north end of the proposed project, the Mingo Creek basin would reduce velocity and allow suspended sediments to settle. No increased velocity or suspended sediment discharges to the Schuylkill River are anticipated.
127.50	Page 4-91 first paragraph discusses the approach of aerating the spent deicing fluid prior to discharging it to the Delaware River. While this may be acceptable why not recycle the glycol/water mix and save money?	It is not feasible or practicable to collect all of the stormwater runoff from Runway 17-35, separate the propylene glycol component, and recycle the glycol. There is not sufficient land area at the airport to construct the required facilities, and the cost of installation of such a system is not reasonable in light of the small amounts of glycol present in stormwater runoff and the absence of off-airport adverse effects. The airport does collect and recycle the majority of deicing compound used to deice aircraft.
127.51	Page 4-93 Sediment and erosion control. This section only discusses the approaches that will be used to reduce and eliminate erosion during construction activities. There is no discussion about what to do about the increase in erosion cause by large pavements areas and increased flow rates of the runoff.	The Proposed Project is not anticipated to result in erosion of, or sedimentation into, adjacent waterbodies. The drainage system will be designed to mitigate runoff rates. At the south end of the proposed project, the Southeast Ponding Ditch will reduce water velocity and allow suspended sediments to settle out prior to discharge to the Delaware River. At the north end of the proposed project, the Mingo Creek basin would reduce velocity and allow suspended sediments to settle. No increased velocity or suspended sediment discharges to the Schuylkill River are anticipated.
127.52	Page 4-99 second paragraph states that Little Tinicum Island is not designated for public recreation, however, the island does receive many visitors in the summer boating season and should be considered a public recreation area.	As stated in Section 4.8, Little Tinicum Island is not considered to be a park or recreation area because it has not been officially designated as such. Rather, it has been officially designated by the Pennsylvania Department of Conservation and Natural Resources as a natural area for the protection of unique plant communities.
127.53	Table 4.8-2 DNL levels should not be used for this comparison. Recreation areas are generally used during the day and the review should reflect this information.	FAA 1050.1E, Appendix A, Section 6, states that it is appropriate to use the DNL in order to evaluate the constructive or indirect use of lands devoted to recreational activities. Section 6 states that "FAA may primarily rely upon the average day night sound levels (DNL)...rather than single event noise analysis because DNL is the best measures of significant impact on the quality of the human environment, is the only noise metric with a substantial body of scientific data on the reaction of people to noise..." DNL represents noise events over a 24 hour period so takes into account noise during the day and night.
127.54	Section 4.12.2 Existing Wetlands and Waterways-Project area, CMC-4, the last sentence in the first paragraph discusses a sewage odor noted at this site, and that the site is downstream from CMC-3 where a septic waste dumping site from the winter of 2003-2004. Was any further investigation of the site performed? There may be an illicit connection from the airport site to a storm drain, which is illegally dumping sewage to the stream. If the smell lingered more than several day after the dumping event. The dates of the event and the dates of the investigation would be helpful to determine if this is an isolated case or something more serious to the water quality of the stream.	FAA has recommended that the Airport investigate.

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127.55	Page 4-144 Alternative 1 states that any macro invertebrate activity would be lost. The goal of the clean water act is to improve waterways. If the project cannot be done without improving water quality then it should not be undertaken. Any further loss of water quality is unacceptable.	Both Alternative 1 and Alternative 2 require that two short open-channel segments of the Church Creek ditch be placed in culverts. This is an unavoidable impact, as the open ditches would be a safety hazard within the runway protection zone. Although this would result in the loss of habitat for any invertebrates currently found in the ditch sediments, the culverting of these ditch channels would not adversely affect water quality, as there would be no new sources of contaminants, and the project would be designed to mitigate any effects of increased pavement area, as described in Section 4.7 and Chapter 5 of this EIS. All analysis of impacts, and the proposed mitigation measures, have been reviewed and approved by the appropriate resource and regulatory agencies.
127.56	Last paragraph of the section on page 4-146, Change the word may to will in the last sentence of the paragraph. "The increase in impervious areas... will increase runoff... and also will increase pollutant and toxicant load..."	The text in Section 4.12 of this EIS has been modified. The proposed project would increase stormwater runoff to certain on-airport wetlands, and would slightly increase the discharge of certain pollutants (including propylene glycol).
127.57	Section 4.12.4 Mitigation, the last paragraph uses the word could to describe that mitigation could be done. The question is what will be done? A determination that there are no negative impacts cannot fully be understood without knowing what the mitigation measures are.	Section 4.12.4 Mitigation of this EIS identifies those mitigation measures that will be implemented to avoid or minimize impacts.
127.58	Page 4-159 first paragraph, for this proposed project, LOS -D or better is considered to be acceptable. How was this determination made? Was it determined prior to doing the survey or after doing the survey? Who made the determination?	Level of Service (LOS) D is considered acceptable by industry standards for regions such as this study area. Therefore, this standard was applied to the intersections studies as part of this project.
127.59	Section 4.15.2 Affected Environment, please provide a description of the known releases and what the contaminants of concern are at each of the sites.	Section 4.15.2 Affected Environment has been revised to include additional information regarding the circumstances and contaminants of concern for the known releases (see DEIS Appendix A-11 for additional information).
127.60	Section 4.15.2 Existing and Former Underground and Aboveground storage tanks, last sentence: Just because a tank has not had a reported release does not mean that it hasn't happened. These tanks should be investigated in accordance with PADEP rules and should have been removed or upgrade prior to the December 1998 deadline.	Should a release from a tank with no previously reported releases be identified during the Project, response actions would be conducted in accordance with the "Assessment and Remediation of Newly Identified Releases" mitigation measure described in Section 4.15.4. FAA has recommended that the airports investigate these tanks as noted by DEP.
127.61	Section 4.15.3 Unknown Status USTS. These tanks should have been removed or upgraded by December 1998, in accordance with federal law. Is the Airport in violation of this requirement and what is being done to correct the situation?	Any unknown status USTs encountered during construction activities will be assessed and removed under the "Underground Storage Tank Removals" mitigation measure described in Section 4.15.4. FAA has recommended that the airports investigate these tanks as noted by DEP.
127.62	Section 4.15.4 Mitigation, Fill Sampling page 4-178: Any sampling of fill material should include PCB and Dioxin sampling since these contaminant may reasonably be expected to be in fill from unknown sources.	PCBs and dioxins has been added to the list of anticipated contaminants of concern for fill materials.
127.63	Section 4.15.4 Mitigation Contaminated Groundwater management. Since POTWs do not normally treat for industrial contaminants, what pretreatment of the groundwater will occur prior to discharge to the POTW?	Specific groundwater treatment and disposal plans will be developed in response to actual contaminant concentration levels to be encountered during excavation dewatering.



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127.64	The past action of allowing regional and larger jets to land on Runway 35 was not analyzed for noise impacts on the surrounding area. That change in conjunction with the extension of the runway will have a total increase of DNL level that may be considered significant. Since the before and after are not available at this time the cumulative effects cannot be compared. Please compare the DNL from a time period prior to having regional jets and other jet aircraft use the Runway 35 for landing and compare it to the expected noise from both alternatives.	Changes to flight paths are major federal actions within the meaning of NEPA. Once flight paths/procedures have been established, no further analysis is required for a particular type of aircraft to use these procedures. The noise analysis for the Runway 17-35 Extension Project 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 Noise analysis compares the future No-Action Alternative to the future build scenarios.  Cumulative effects were addressed in the noise analysis. The Summary Section of the Noise Technical Report (Appendix A.1 of the DEIS) acknowledges that the contours for the 2003 Existing Conditions in the current study were smaller than the 2001 contours in the FAR Part 150 Noise Compatibility Study.
127.65	Section 2.2.1 FAA's Integrated Noise Model, page 2-6, first paragraph discusses historical flight track data used to run this model. As commented above, How has this data been validated? I have experienced known problems with the radar track data. In June of 2004 I called the airport Noise office to complain about large aircraft flying over my house or adjacent to my property at certain times of day I specifically noted times and type of aircraft right over my front lawn. This included two 737 400 and one Airbus 319 less than 1000 feet, in the span of 15 minutes with other aircraft following similar paths. When I provided this info to Mike Jeck, the Noise officer, he checked the radar data and found no aircraft over my property. The closest he found was 1.25 miles away and at 3000ft. The next was 1.5 miles and 2500 ft and the other was 2 miles away. Therefore I believe this data is flawed in such a manner as to be unreliable. Please provide me with the details as to how the data used for telling which aircraft were flying where and when was validated as this data is used for all aspects of the studies.	The radar data used in the noise analysis was taken from the Airport's Total Airport Management Information System (TAMIS), an integrated noise and operations monitoring system supplied and installed in 1996 by BAE Systems of Austin, Texas. The Airport conducted acceptance testing of the system at the time of installation and has been utilizing its output to address various noise-related issues ever since. The flight tracking data stored by TAMIS and used in the noise analyses of this EIS come directly from the FAA's STARS radar system, the same radar used by FAA Air Traffic Control staff to control aircraft within Philadelphia's airspace. The EIS team has no reason to doubt its reliability.
127.66	Section 2.2.2, page 2.7, first full paragraph: The Model information was based upon radar tracks. Again please describe in full how this data was validated to be used.	The radar data used in the noise analysis was taken from the Airport's Total Airport Management Information System (TAMIS), an integrated noise and operations monitoring system supplied and installed in 1996 by BAE Systems of Austin, Texas. The Airport conducted acceptance testing of the system at the time of installation and has been utilizing its output to address various noise-related issues ever since. The flight tracking data stored by TAMIS and used in the noise analyses of this EIS come directly from the FAA's STARS radar system, the same radar used by FAA Air Traffic Control staff to control aircraft within Philadelphia's airspace. The EIS team has no reason to doubt its reliability.
127.67	Page 2-9, last paragraph. This paragraph describes how narrow body flights were increased on Runway 17-35 in 2004 yet the rest of the paragraph states that the model used the flight tracks from the 2003 year to be modeled. Since the Narrow body jets are louder and fly lower on landing onto Runway 35 shouldn't the most recent data have been used for the model?	This EIS was initiated early in 2004 and uses radar and other data for the most recent full calendar year preceding that date as the basis for many existing assumptions regarding fleet mix, numbers of nighttime operations, runway use, flight track locations, and track use. The 2003 data were then supplemented with radar flight tracks for approximately three months of 2004. These operational inputs serve as the basis for the 2003 Existing scenario reported in this EIS. The modeled flight tracks and aircraft operations for the future No-Action Alternative as well as Alternatives 1 and 2 assume increased use of Runway 17-35 by narrowbody jets.

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127.68	Page 2-21 Measured DNL for January 2004, First sentence states that the Model was not calibrated or adjusted to the measure noise levels.	The measurements in this study were used only to check for the reasonableness of the noise modeling results and to capture representative samples of the DNL values as well as samples of maximum sound levels from individual operations. As indicated, the measurement data were not used to calibrate the FAA's INM noise model -- much more rigorous tests are carried out on the INM prior to the release of any new versions for public use. Also, FAA Order 1050.1E specifically states that "[n]oise monitoring data may be included in an EA or EIS at the discretion of the responsible FAA official. Noise monitoring is not required and should not be used to calibrate the noise model." (page A-63)
127.69	If this model is not calibrated then how can the public or regulators be sure that the model is indeed accurate? The acoustics in this area are different from other areas so to say that the model works here as well as other areas may not be entirely true. More work should be done to be sure that the model is showing actual conditions.	Regulators require the use of the INM through documents such as FAA Order 1050.1E, which states "All detailed noise analyses must be performed using the current version of the FAA's Integrated Noise Model (INM), Helicopter Noise Model (HNM), or Noise Integrated Routing System (NIRS)." (page A-60). Table 2-6 on page 2-19 of Appendix A.1 is the best indication that the model is reflecting actual conditions; the table compares 2003 annual average DNL values computed by the INM with 2003 measured aircraft-only DNL values at the Airport's six permanent noise monitors.
127.70	Page 2-21 Measured DNL for January 2004, first bullet: The noise measurements from a two week period in January of 2004 do not show the long term trend of noise from larger jets that have been landing on Runway 35 with increasing frequency. The long term average number of aircraft should be compared to a long term average of aircraft, not to a two week period. Also it is not the average noise that is bothersome it is the increased frequency of large noise pockets that is bothersome.	As described in Section 4.2, Noise, of this EIS, temporary "long-term" noise measurements were conducted at a number of representative locations throughout the study area over a two-week period in January 2004. Noise measurement data for more than a two-week period are not available for any of the temporary monitoring locations that are identified in this EIS. However, as shown in Table 4.2-3, measured 2003 Aircraft DNLs were obtained for six of the permanent monitors in the Airport's Noise and Operations Monitoring System (NOMS), and then compared to 2003 Existing DNLs as computed with the INM. Note that the noise level data from the NOMS system covered all of 2003. It should be noted that a comparison of measured noise data to computed DNLs provides a useful check of the reasonableness of the assumptions used in the INM modeling effort. However, it should also be noted that noise monitoring data should not be used to calibrate the noise model per FAA Order 1050.1E.  Appendix A.1 of the DEIS provides INM-computed noise metrics, in addition to DNL, that were computed for a multitude noise-sensitive locations throughout the study area. Additional noise metrics that were included in the noise analysis include the Night DNL (NDNL), the maximum A-weighted Sound Level (Lmax), the Time Above Sound Levels of 65, 75, and 85 dB for a 24-hour day (TA-65, TA-75, and TA-85), and the sound exposure level (SEL).

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127.71	Page 2-24, Table 2-9, ST-22 site at River Winds Community Center: How is this site not considered to be applicable to the project? Aircraft landing on Runway 35 or taking off from Runway 17 pass within a mile from the center. Please calculate the DNL at the site since it is an important part of the West Deptford community.	<p>The FAA's Integrated Noise Model (INM) Version 6.1 was used to compute various noise metrics at each of the measurement sites, including ST-22. Appendix E, INM-Computed Noise Metrics at Measurement Sites, of the Noise Technical Report (Appendix A.1 of the DEIS) reports the computed Day-Night Sound Level (DNL), Night DNL (NDNL), Maximum A-weighted Sound Level (Lmax), Sound Exposure Level (SEL), and Time Above (TA) Sound Levels of 65, 75, and 85 dB for ST-22 in the River Winds Community. INM-computed noise metrics for each measurement site are reported for the 2003 Existing Conditions and all future forecast cases.</p> <p>In addition to the computed noise metrics, noise measurement data from the temporary noise monitoring program in January 2004 are summarized in Tables 2-7 through 2-10 and also reported in Appendix D, Additional Noise Measurement Data, of the Noise Technical Report (Appendix A.1 of the DEIS). For each temporary short-term site, Table 2-9 includes the total time monitored, the Total DNL, and the Aircraft DNL. Note that for many temporary short-term sites, including ST-22, an Aircraft DNL was not reported. Aircraft DNL were derived from the measurement data for a representative sample of measurement sites. While a measured Aircraft DNL was not obtained from the data for ST-22, Aircraft DNL were obtained for five other sites in New Jersey including NMS-4, NMS-5, NMS-8, LT-5, and ST-13.</p> <p>Note that even though a measured Aircraft DNL was not obtained for ST-22, a Total DNL was indeed measured. The measured Total DNL includes contributions from all sources in the vicinity of the monitoring site, including both aircraft and community sources. In short, the measured Aircraft DNL and the measured Community DNL when combined yield the measured Total DNL. An important note to make is that the measured Aircraft DNL is the same as, or lower than, the measured Total DNL.</p>
127.72	Page 2-27 Meteorological Conditions during the Measurement period: These conditions do not indicate wind speed or direction during the time of the measurements. These are important factors in the landing pattern of aircraft. If the wind happened to be out of the south predominantly then this short term measurement of Noise would have been biased because the aircraft would not have been traveling as much over West Deptford as if the wind was coming out of the north. However, since this information has not been presented, the public, nor the regulators can take this into account.	While it is true that the measured wind speed and direction were not obtained for the two-week period in January 2004, it should be noted that Section 4.2 of this EIS summarizes the total operations by category of fixed-wing aircraft and runway utilization for January 12 to 26, 2004.
127.73	Section 3.2.6 Runway use, page 3-12: This paragraph state that the use of runway 17-35 would go up from 55,311 aircraft to 103,270. Please explain how doubling the number of flight events thereby doubling the time that a certain noise level is attained does not raise the average noise level more than 1 dB.	As Section 4.2 of this EIS (and Appendix A.1 of the DEIS) clearly show, the noise levels within the 65 dB DNL contour are projected to increase under the future No-Action Alternative as well as Alternatives 1 and 2. The difference between the No-Action Alternative and Alternative 1, within the 65-dB contour, is less than 1.5 dB DNL and generally on the order of 0.5 dB DNL. This increase is caused by the increase in aircraft using Runway 17-35. This analysis is based on standard FAA methodology, using the INM, as described in the EIS.
127.74	Table 3.10 Breakdown of Runway 17-35 Operations for 2007 Average Annual Day. Besides the fact that this is an average, how can you have a tenth of an operation per day? This data should be rounded to the nearest whole number.	Fractional operations per day are shown for precision and in fact are input into the INM noise model in increments as small as a thousandths of an operation. In addition, however, tenths of operations also have meaning. For example, some flights only operate on certain days of the week. Thus, a flight scheduled to operate only Monday through Friday throughout the year will produce an average daily operation of 0.7.

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127.75	Table 3.10. Where is the data for comparison for either 2003 or 2004? The numbers presented here are only estimates for 2007.	An EIS requires evaluation of alternatives during the first year of implementation of a proposed project as well as a forecast period during which Build and No-Action Alternatives can be compared. In this case, the year of implementation is 2007. Section 4.2.2 and Appendix A.1 of the EIS discuss 2003 existing conditions as informative background material to help define the context for the forecast scenarios, but it is discussed in less detail than the future cases. Tables such as 3.10 are added to help judge differences between the Build and No-Action Alternatives.
127.76	Section 3.2.10 Grid Point Analysis page 3-20. This analysis did not take into account new developments that have been in the planning stages prior to 2000 and have been built since 2000. Field work could have been done to estimate the number of effected communities, and to survey the population. Therefore the analysis of the number of people effected is inaccurate at best.	All population counts are based on U.S. Census data for the year 2000. The River Winds development, which has been largely constructed since the census and continues to undergo expansion in West Deptford, is located just east of the centerline of Runway 17-35, and though heavily populated, does not fall within the 60 DNL contour for any alternative. New smaller developments in other locations may, though, be excluded from these counts. However, new residential developments within the Study Area were identified through field reconnaissance and discussions with local officials. For areas within the 65 DNL contour census data were supplemented with field reconnaissance and discussions with local officials.
127.77	Section 3.3, page 3-21, first full paragraph states that only non-residential land use would be effected on the south side of the area. This is inaccurate.	The affected land use referred to in Section 3.3, page 3-21, of Appendix A.1 (Noise Technical Report) of the DEIS, is located to the south of the Airport, in New Jersey, within the DNL 65 dB contour. The affected land use to which the reference is made is non-residential and is compatible with the noise levels as a result of this Project.
127.78	Figure 3-3. This figure shows the lines that the FAA calls significant for noise exposure at 60-75 dB. However there is criteria that must be addressed if areas outside of these contours experience a 3-5dB change. How are the public or regulators to compare these levels if the contours are not shown?	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 that experience aircraft noise levels between 45 and 60 dB DNL would be less than 5 dB for all future forecast cases.
127.79	Page 3-22 describes table 3-12 as the prediction of population exposed to larger noise levels. However as stated above the analysis of number of effected people is erroneous due to the fact that new communities have not been considered.	All population counts are based on U.S. Census data for the year 2000. The River Winds development, which has been largely constructed since the census and continues to undergo expansion in West Deptford, is located just east of the centerline of Runway 17-35, and though heavily populated, does not fall within the 60 DNL contour for any alternative. New smaller developments in other locations may, though, be excluded from these counts. However, new residential developments within the Study Area were identified through field reconnaissance and discussions with local officials. For areas within the 65 DNL contour census data were supplemented with field reconnaissance and discussions with local officials.

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127.80	<p>Page 3-26, second bullet: This statement that "To the south.. . due to a 29 percent increase in arrivals for regional jets and a 14 percent increase in arrivals for small narrow body jets." However, the data provided in table 3-10 shows that the average daily increase in arrivals to runway 35 from the south will be 82.61% more for regional jets and 933% more for narrow body jets. For the narrow body calculation I used the average of 3 narrow body jet landings on runway 35 instead of the 0 figure provided. If the noise model uses percentages as inputs then the noise model may be wrong since the data provided does not support the text shown. Please reconcile the math prior to inserting it into text.</p>	<p>The second bullet on page 3-26 of Appendix A.1 in the DEIS could have more clearly stated that:</p> <p>To the south, the Alternative 1 contours expand along the extended centerline of Runway 17-35 due to an increase of 29 percent in the use of Runway 35 for landing by regional jets and an increase of 14 percent in the use of 35 for landing by small narrow-body jets when compared to the No-Action Alternative.</p> <p>Similarly, the fourth bullet on the same page could have more clearly stated that:</p> <p>To the north, the Alternative 1 contours expand along the extended centerline of Runway 17-35 due to a 4 percentage point increase in the use of Runway 17 for landing by regional jets and an increase of 5 percentage points in the use of 17 for landing by small narrow-body jets, compared to the No-Action Alternative. In addition, the contours expand to the north and northwest because of an increase of 45 percentage points in the use of Runway 35 for departure by regional jets and an increase of 5 percentage points in the use of 35 for departure by small narrow-bodies, offset by a decrease of 12 percentage points in the use of the runway for takeoff by corporate jets, thereby limiting the amount of expansion in the DNL contours to the north.</p>
127.81	<p>Page 3-33, second bullet: Again the percentages provided in the text do not match the data provided in the tables. The regional increase in projected to be 70 percent not the 28 percent given in the text and the narrow body jets increase is going to be 355 percent not 16 as given in the text. Please reconcile the numbers.</p>	<p>The second bullet on page 3-33 of Appendix A.1 in the DEIS could have more clearly stated that:</p> <p>The contours for Alternative 1 would expand to the south along the extended centerline of Runway 17-35 because of an increase of 28 percentage points in the use of Runway 35 for landing by regional jets and an increase of 16 percentage points in the use of 35 for landing by small narrow-body jets when compared to the No-Action Alternative.</p> <p>Similarly, the fourth bullet on the same page could have more clearly stated that:</p> <p>The contours for Alternative 1 would expand to the north along the extended centerline of Runway 17-35 due to a 3 percentage point increase in the use of Runway 17 for landing by small narrow-bodies and an increase of 4 percentage points in the use of 17 for landing by regional jets, compared to the No-Action Alternative. In addition, the contours expand to the north and northwest because of an increase of 39 percentage points in the use of Runway 35 for departure by regional jets and an increase of 5 percentage points in the use of 35 for departure by small narrow-bodies, offset by a decrease of 16 percentage points in the use of the runway for takeoff by corporate jets, thereby limiting the amount of expansion in the DNL contours to the north.</p>
127.82	<p>Page 3-37, second Bullet: The expected increase in departures to the south increase by over 100%, even though the number of flights increasing in departures is small the percentage is not. Again there is inconsistency in the analytical approach the FAA is taking, using percentages where it is convenient and actual numbers when it is not.</p>	<p>There are several ways that changes in operations are typically reported. In some cases it is a judgment as to whether numbers or percentages are better for explaining the differences, but the intent is to be helpful in interpreting the change. This bullet accurately reports the reason for the change in noise contours for Alternative 2.</p>

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127.83	Section 3.3.3 Other indicators of Changed Cumulative Noise Exposure. Page 3-39. Last paragraph states that the grid size used for the modeling effort is a uniform grid spacing of 3000 ft. This is equivalent to over 206 acres per grid square, roughly the size of a golf course or two hundred football fields. Noise is a localized event for the most part. It is very noisy directly under an aircraft and less noisy the further to the side you get. Most numerical models that use finite element or finite difference use tighter grid spacing in areas of higher concern. The Model should be run with tighter grid spacing over the backbone flight paths and runways. This would give a more detailed look at the effects of the backbone flight paths and would better predict where noise is a problem. Without a tighter grid spacing what the FAA is doing is in effect diluting the noise from an event over 206 acres. This assumption is made because there is no other discussion of the mathematics of the model, the grid spacing, and how the numbers are calculated	The INM noise model does use a grid algorithm, which develops a tighter grid spacing in areas of changing noise levels. Typically in areas under the flight paths the grid spacing is as small as 100 feet for this project.  The uniform grid with spacing of 3,000 feet, which is discussed in Section 3.3.3 of Appendix A.1 of the DEIS, is a user-defined grid that has been created to analyze noise levels over the larger Regional Study Area and is used to compute DNL exposure levels below 60 dB down to a cutoff of 45 dB. At these larger distances from the airport, exposure levels change much more gradually from one point to another, and visual interpolation between two or four grid points provides a relatively easy means of estimating exposure.
127.84	Section 3.3.3 page 3-40, Changed Noise Exposure Within the 65 dB contour. First bullet states that the only area to the south that would have an increase in the noise exposure would be an undeveloped area. This is not true there is development with people living in the area.	The affected land use referred to in Section 3.3.3, page 3-40, of the Noise Technical Report (Appendix A.1 of the DEIS), is located to the south of the Airport, in New Jersey, within the DNL 65 dB contour. The affected land use to which the reference is made is non-residential. This area is directly south of the runway and west of Riverwinds.
127.85	Page 3-46 Changed Noise Exposure between the DNL 45 and 60 dB contours. The contours for the 45 to 60 are not shown.	Per FAA Order 1050.1E, noise exposure contours were developed for DNL 75 dB, DNL 70 dB, DNL 65 dB, and DNL 60 dB. Contours for noise levels between 45 and 60 dB DNL were not produced per FAA Order 1050.1E. Changes in noise exposure between DNL 45 and 60 dB are shown in Figures 3-12 and 3-15 of the Noise Technical Report (Appendix A.1 of the DEIS).
127.86	Section 3.3.4 First paragraph, Editorial note: Gloucester County is in New Jersey not Pennsylvania.	The FAA has noted your comment.
127.87	Section 3.4.3 INM Computed Nighttime DNL, Lmax, and TA at specific points, page 3-57: While these items may be of interest to the FAA, one item is of interest to me is a worst-case single day cumulative noise exposure. By this I mean, what is the worst possible noise exposure I will have over the term of a day when the aircraft are landing to the north onto runway 35 on a constant basis. Much like the majority of the time. Aircraft fly over my house or in close proximity and I have not seen any analysis to show what exactly I am being exposed to on a daily basis.	The runway utilization data used in the noise analyses were generated as average daily values. Worst-day conditions cannot be predicted from the available information produced by the TAAM model. Even so, the scenario identified -- continuous use of Runway 35 for landings -- is highly unlikely, since that would create worse delays than exist now.
127.88	Table 3-24 does not indicate noise data from flights of narrow body jets landing and taking off from runway 17-35 since the data was from 2003 and not 2004.	The comment is generally correct. The maximum levels reported in the table are generated by takeoffs of loud corporate jets such as the Gulfstream G-II and older models of LearJets, both of which create higher single event noise levels than a typical 737 or A-319. The G-II SEL is as much as 18 dBA higher than an A-319.
127.89	Section 3.6 Cumulative Noise Impacts, page 3-67: The FAA has not prepared any environmental documentation of the effects of landing regional Jets and Narrow Body jets on Runway 17-35. This documentation should have been prepared to compare the noise exposures prior to approving this action. This action has created a "new standard" by which the future actions are being considered. The cumulative effect of landing large numbers of Jets along with the Turbo Props most likely has had a significant noise effect, more than 5 dB, but the data has not been prepared and can only be inferred.	The FAA, through the approval of operation specifications, does approve routes and equipment operated by a carrier. Once the FAA has approved specific routes of operations and specific equipment, the FAA does not have approval, absent safety issues, over a carrier's decisions on the number of flights and the type of equipment used to operate that flight. Changes to flight paths are major federal actions within the meaning of NEPA. Once flight paths/procedures have been established, no further analysis is required for a particular type of aircraft to use these procedures.

Letter 127

Joseph Rhyner

Comment Number	Comment	Response
127.90	Appendix A, page A-8, Day Night Average Sound Level: DNL the requirement to use this metric was developed over thirty years ago when there were less people and less flights around to disturb them. Has any newer work been done to develop a better measure as to what people find disturbing when it comes to noise?	<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]. These supplemental metrics are presented in DEIS Appendix A-1.</p>
127.91	Appendix A, pg A-9, the description of the DNL should have the mathematical equation used so people can see that it indeed includes the number of flights.	The formula for DNL (or Ldn, as the FAA prefers in mathematical equations) can be found within the Federal Aviation Regulation Part 150 Study, Airport Noise Compatibility Planning, Appendix A, Part C, Sec. A150.205 Mathematical computations.
127.92	Appendix A, Figure A-6, page A-10 shows that 8 miles from touchdown at a major airport and 3.5 miles from takeoff at a small airport have a noise level of 62-63dB. The results of the noise model do not appear to match these numbers.	The commentator is correct. The Figure A-6 is for illustrative purposes and is taken from a U.S. EPA document produced in 1974 prior to a number of effective regulatory actions taken by the FAA to reduce noise emission levels of aircraft at the source. The more notable of these were the establishment of FAR Part 36 Stage 3 noise standards followed by the phaseout of older, noisier Stage 1 and heavy Stage 2 aircraft. These measures have effectively reduced noise exposure at many major as well as smaller U.S. airports such as the ones cited in the EPA report. Philadelphia International Airport, too, is a much quieter facility than it was prior to 2000 when the last heavy Stage 2 aircraft were permitted to operate there.
127.93	Appendix C, The numbers presented here are only percentages. No actual numbers of aircraft are given. This data does not assist in the comparison of existing to predicted flights and flight paths.	Tables 3-4 through 3-9 in the Noise Technical Report provide number of aircraft by runway usage. There will be no significant changes in flight paths as a result of Alternative 1.
127.94	Nowhere in either the Noise technical report or in the EIS was data provided about the noise levels of any of the aircraft at the flying levels. The equation for the DNL includes a summation of the noise from aircraft per event. I would like to have this data to see what the calculated noise level at my house would be so I can compare it to the large grid cell given in the report.	A copy of the INM input files used in the noise analyses of all alternatives evaluated in this EIS is available through the FAA's Eastern Region office and can be used to compute noise levels at individual homes. A copy of the INM noise model, itself, is available for a minimal charge through FAA's Office of Environment and Energy at FAA Headquarters in Washington, D.C.
127.95	The only place where the time of flight delays is discussed is in the first part of the EIS. However nowhere in the EIS or the Noise study does it say what the time reduction would be if either of the alternatives are picked.	Chapter 3 discusses the two alternatives and the delay reduction benefits associated with the two alternatives. As the EIS shows, Alternative 1 (the Preferred Alternative) is predicted to reduce average annual delay by 1.4 minutes per operation in 2007, and by 6.5 minutes in 2015. Alternative 2 is predicted to reduce delay by 0.2 minutes in 2007 and 4.1 minutes in 2015.

Letter 127

Joseph Rhyner

Comment Number	Comment	Response
127.96	<p>The Executive Summary states that the best improvement that will be gained for alternative 1 is 1.4 minutes in 2007 and 6.5 minutes in 2015 and Alternative 2 give improvements of .2 minutes in 2007 and 4.1 minutes in 2015. These improvements in times are not worth the Millions of taxpayer dollars to be spent on this project the cost to benefit ration is too high. Neither of the alternatives will alleviate the situation and in fact will exacerbate the noise problems in West Deptford. I urge the FAA to reject both alternatives and focus on the CEP to gain real time savings.</p>	<p>Since there are many variables that contribute to delay (including weather), no project can eliminate delay. The analysis demonstrates that the proposed runway extension will meet the project's purpose by reducing delay. This project is aimed at reducing delay as soon as possible, while 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.</p>
127.97	<p>Reviewing the Correspondence provided in Appendix D, Only the NJ SHPO was contacted. No other regulatory agency was contacted in NJ. How can the FAA plan on sending more pollution into NJ air space for the benefit of the City of Philadelphia without having contact with the NJDEP?</p>	<p>The Federal Aviation Administration also coordinated with the New Jersey Department of Environmental Protection. Also provided in Appendix D, is the Interagency Stewardship and Streamlining Agreement, which details New Jersey Department of Environmental Protection's roles and responsibilities on the project. Review and comment on the Air Quality Technical Report and the Draft Environmental Statement are two examples of their responsibilities on this project. The NJ DEP attended several agency coordination meetings.</p>



**From:** Mark Ricci[SMTP:MRICCI14@YAHOO.COM]

**Sent:** Friday, November 19, 2004 12:39:01 PM

**To:** PHL 17-35 EIS

Dear Ms. Susan McDonald,

My name is Marco Ricci. I am a resident of Gloucester County, NJ. My home is directly under the flight path of aeroplanes for this runway #17-35. I can see the windows of these aeroplanes as they fly above my head. I know the people on them can see me in my garden. I want to tell you that I am not happy with this runway #17-35 getting bigger. I know if it happens I will see much bigger aeroplanes and much lower. Please do not allow this to happen. I wish you could live here then you can understand what I tell you. Do not allow more planes and more noise to happen. I read in the paper that a controller say other runways can get bigger to allow these bigger aeroplanes and number. Please understand what I tell you, I do not have much other to tell you than this. Please help us!

Thank You

Letter 128

Mark Ricci

Comment Number	Comment	Response
128.1	I want to tell you that I am not happy with this runway #17-35 getting bigger. I know if it happens I will see much bigger airplanes and much lower. Please do not allow this to happen. I wish you could live here then you can understand what I tell you.	If the Preferred Alternative is constructed, the number of flights using Runway 17-35 will increase because a greater percentage of narrow-body jets will use the runway. However, some narrow-body and regional jets are currently using Runway 17-35 for arrivals: the longer runway will permit these aircraft to depart on Runway 17-35 as well. 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.

F r o m   t h e   d e s k   o f



J e a n n e   M .   R o h l o f f



November 29, 2004

Dear Ms. McDonald,

I am writing in concern to the proposed Philadelphia Airport runway extension and how it will be affecting those of us in New Jersey, especially those who happen to be in their pathway.

First of all, the West Deptford/Thorofare area has spent incredible amounts of money (taxpayer's and otherwise) in building an enviable area in which to live, as well as an exclusive recreational facility for its residents. We who choose to live in this area are willing to pay the extra taxes for this entitlement, as well as the increased home prices, which this attraction brings with it. Our residents are hard working, decent citizens and deserve to come home to a safe and pleasant environment at the end of their day.

The noise from your airport, for which we receive no tax relief, is already hazardous enough without adding to it from your proposed extension that would invade our area. This, along with the decreased value of our properties which we have paid dearly for, are major concerns for our neighborhoods. I have read in the newspaper that you could head in the opposite direction with the runway without affecting many, if any, community homes in that area, and that it would serve the same purpose quite successfully for you. If that is so, why aren't you looking in that direction instead of New Jersey? We already have the highest taxes, the highest car insurance, the highest cancer rate, etc. Do we really need for it to get any worse?

We implore you to please go with the alternate plan and put the proposed airport runway extension in the opposite direction from New Jersey residents and their families. As our neighbors across the river, please consider how your extension in this direction would affect our well-being and the future of our families. We would appreciate your consideration in this very major dilemma.

Thank you for listening and considering our request. Please put us down as two of the many votes for "**NO**" to the proposed runway extension plans toward New Jersey.

Sincerely,  
Ty and Jeanne Rohloff  
West Deptford Residents

Letter 129

Ty &amp; Jeanne Rohloff

Comment Number	Comment	Response
129.1	The noise from your airport, for which we receive no tax relief, is already hazardous enough without adding to it from your proposed extension that would invade our area [of West Deptford].	<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>
129.2	The decreased value of our properties which we have paid dearly for, are major concerns for our neighborhoods [West Deptford].	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.
129.3	I have read in the newspaper that you could head in the opposite direction with the runway without affecting many, if any, community homes in that area, and that it would serve the same purpose quite successfully for you. If that is so, why aren't you looking in that direction instead of New Jersey?	Runway 17-35 is a bi-directional runway and aircraft operations occur both to the north and to the south. The direction of operation is dictated by the weather because aircraft have to land and take off into the wind. Depending on wind direction, aircraft will approach the runway over Pennsylvania and depart over New Jersey, or will approach over New Jersey and depart over Pennsylvania. Impacts of these flight tracks to both states have been evaluated and considered in this EIS.

From: Stephen Ruskai[SMTP:RUSZCAT3@COMCAST.NET]  
Sent: Tuesday, November 30, 2004 10:32:50 PM  
To: PHL 17-35 EIS  
Subject: Opposition ot phlrunway17-35 expansion

Dear Susan McDonald-

As a resident of West Deptford, Gloucester County, NJ, I'd like to voice my opposition to the proposed expansion of runway 17-35. I feel there is already too much noise from air traffic over West Deptford Township, worse over Gloucester County, and even worse over the Camden County - particularly areas like Gloucester City, and over the state of New Jersey as a whole - from the air traffic to and from the Philadelphia International Airport.

I understand that PHL has problems with delays, but I fail to see how this will help alleviate them. There have to be other alternatives to explore, and I feel that Pennsylvania does not share the load of air traffic caused by PHL. While the airport does serve southern NJ, I'm sure it serves greater numbers of residents of Pennsylvania, as well as providing a gretaer amount of tax revenue, jobs, etc for the state of Pennsylvania.

In addition, it is not a solution you are proposing, rather a diversion. It is not fair to simply shift the volume from one place to another - to reduce traffic over one part of southern New Jersey and simply move it to another part of southern New Jersey. Why aren't some of the approaches to PHL over Pennsylvania? Why couldn't runway 17-35 be turned around in the other direction and expanded, so that the approach is over Pennsylvania?

I am against this expansion, and any other plans that would increase air traffic and noise pollution over my township, and for that matter over southern NJ. Thank you for allowing me to voice my concerns.

Sincerely,

Mr. Stephen J. Ruskai  
809 Locksley Lane  
West Deptford, NJ 08096-3112  
856-853-9203

Letter 130

Stephen Ruskai

Comment Number	Comment	Response
130.1	There is already too much noise from air traffic over West Deptford Township, worse over Gloucester County, and even worse over the Camden County - particularly areas like Gloucester City, and over the state of New Jersey as a whole - from the air traffic to and from the Philadelphia International Airport.	The FAA has noted and considered your comment.
130.2	There have to be other alternatives to explore, and I feel that Pennsylvania does not share the load of air traffic caused by PHL. While the airport does serve southern NJ, I'm sure it serves greater numbers of residents of Pennsylvania, as well as providing a [greater] amount of tax revenue, jobs, etc for the state of Pennsylvania.	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.
130.3	It is not fair to simply shift the volume from one place to another - to reduce traffic over one part of southern New Jersey and simply move it to another part of southern New Jersey. Why aren't some of the approaches to PHL over Pennsylvania? Why couldn't runway 17-35 be turned around in the other direction and expanded, so that the approach is over Pennsylvania?	As shown by Figures 4.2-2 and 4.2-3 in this EIS, air traffic (flight tracks for approaches and departures) are dispersed over Pennsylvania, New Jersey and Delaware. Runway 17-35 is a bi-directional runway - depending on weather conditions, aircraft may approach from the north (landing on Runway 17) or the south (landing on Runway 35). Because of the prevailing wind directions, most approaches are from the south.

**From:** Schwebe1849@aol.com[SMTP:SCHEBE1849@AOL.COM]

**Sent:** Sunday, November 21, 2004 11:48:18 AM

**To:** PHL 17-35 EIS

**Subject:** Fwd: Airport expansion

To whom it may concern,

As a resident of West Deptford I am inundated with a variety of noise each day. The constant noise from Rt. 295, the ungodly hours of train whistles blowing because conductors deem it "OK" to lay on their horn continuously, as they cross small roads with no crossing gates, and airline noise when your in your backyard trying to relax by your pool, interrupting your conversation, like a child interrupting their parents. How much noise do you think one community can take. You compare this to a lawnmower. Lawnmowers are not allowed to run in the middle of the night and do not continuously run throughout the day.

As far as it inconveniencing flyers, that is the way of flying. Why should your business and your flyers interrupt my peace of mind in my own home? You talk about the money this cost you, well guess what, my home cost me a lot of money to live in. My taxes go up every year (remember I live in N.J.), my gas and electric go up, getting material for the up keep of my home goes up, water, groceries, car insurance, etc., etc., etc....and we are supposed to care that this is costing you more. Well guess what, "WE DON'T". You will also pass any cost on to the consumer, whether you get your expansion or not and as far as I am concerned, I haven't gotten a raise in 4 years because of the economy, so why should you? No matter what we do, it seems the hard working people of our community get the \_ \_ \_ \_ \_ end of the stick and the people with money justify taking what is ever left of our money and our sanity for their convenience. Another thing is, "WHAT IS IN IT FOR OUR COMMUNITY" for the sacrifices we have to make for this expansion. Will you pay our taxes? Make our community center free to use (oh yeah, since we already pay for it through our taxes any way)? You may be asking, "What this has to do with you?", but we are asking, "What does an airport, that is located in Pennsylvania, have to do with us?"

I know you probably do not care about the feelings of our N.J. residents and you probably will get your way to rattle our house further, but if there is another way to expand or use another airport, please do so.

Laurie Schwebel  
West Deptford

**Letter 131**

Laurie Schwebel

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
131.1	If there is another way to expand or use another airport, please do so.	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:** judy[SMTP:SHE\_LUVS\_DA\_BLUES@YAHOO.COM]

**Sent:** Friday, November 19, 2004 9:31:30 AM

**To:** PHL CEP EIS

**Subject:** runway 17-35

Dear Ms McDonald,

I attended the meeting held at the West Deptford high School Nov. 16th. I was not surprised by the low turn out as most never knew about the meeting. I have spoken with alot of people here in town about it and most were upset that they missed it and never knew about it. I'd like to know how you expect an honest turnout if the agencies do not give ample notification to the public. I happened to find out about it online while looking for heating oil prices, I luckily stumbled across a tiny little article that gave me the date, time and place of the meeting. Being late at night I only had a small amount of time to call friends and neighbors to give them information about the meeting date. Upon hearing from severel speakers Iam more than concerned about this project. With the shipping lanes in the river and the fact that 17-36 is a visual runway, I cannot understand why it is even being considered.

Iam writing to you today to request another meeting be held in West Deptford, not just for us to speak out but to be able to ask the panel questions. Also for the deadline for public comment to be extended until January 31st 2005 so more people have time to voice their concerns. As taxpayers we demand the right to be able to have our concerns addressed. We have to live with the continous noise and pollution from the airport. We understand the airport is important to the area. Our community wants answers they we have not be able to get. Please reschedule another meeting so that we may have our questions answered.

Iam forwarding this letter to several news agencies as well, in the hopes that the next meeting will be more publicized.

Sincerely,  
Judy Shaw

Laugh often...Love deeply...Live life to its fullest.

Letter 132

Judy Shaw

Comment Number	Comment	Response
132.1	I'd like to know how you expect an honest turnout if the agencies do not give ample notification to 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.

From: BETTIE AND BOB[SMTP:BETTIE\_BOB@JUNO.COM]  
Sent: Tuesday, November 23, 2004 12:28:56 PM  
To: PHL 17-35 EIS  
Subject: PHL runway extensions  
Auto forwarded by a Rule

Reading in the Delco Times regarding your 11/18 meeting,  
I agree with the citizen's remark regarding filling, if necessary, parallel  
to the river for an additional runway.

My wife and I travel frequently and, both SFO and ORD have simultaneous  
aircraft landings on parallel runways.(others may also)

This would avoid the necessity of the extension of 17/35.

Robert S. Shields  
610-399-0223

Letter 133

Robert Shields

Comment Number	Comment	Response
133.1	I agree with the citizen's remark regarding filling, if necessary, parallel to the river for an additional runway. My wife and I travel frequently and, both SFO and ORD have simultaneous aircraft landings on parallel runways (others may also). This would avoid the necessity of the extension of 17/35.	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. Filling of the river and construction of a new 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 project. PHL can accommodate simultaneous operations on Runway 8-26 and Runway 9R-27L. An additional parallel runway in the Delaware River is being considered in the long-term CEP.

**From:** Glenn Sinclair[SMTP:SINCLAIR@CALVERTRETAIL.COM]

**Sent:** Tuesday, November 23, 2004 9:46:01 AM

**To:** PHL 17-35 EIS

**Subject:** Runway Extension Concern

I am writing this to express my concern about the impact of the runway extension plans for the Philadelphia Airport. If there is resignation in the tone of this email, I am sorry. But from all I hear it sounds as if it may already have been decided that another neighborhood - a real neighborhood - will be hurt for the convenience of those who pass through the area.

I live in Upper Darby. Linda, our son and I moved into our house here about ten years ago. We now have two daughters, too. We moved here, and like to live here, because this is a real neighborhood to us. The houses are close together. Most homes share a wall with their neighbor's. Front doors are just feet from the sidewalk. They are sidewalks that people actually use. If I look out my front door I will always see someone walking down my sidewalk.

There are two kinds of families in the houses on my block. Older people whose kids have grown up and moved out, and people my age with young kids. It's pretty much split in half. That means on my block alone there are dozens of kids. It also means that we are not the only people who think this the kind of place to live and raise the kids.

I can picture looking down on Upper Darby. Block after block after block just like ours. Lots of families and lots of kids. It's not real fancy. There are no "Open Spaces," just some playgrounds. No big malls, just stores. The EI runs above Market Street, and the trolley runs along Garrett. And every so often - some days every few minutes - a prop plane passes pretty low overhead on the way to the airport.

I now think about the planes being jets.

Please rethink this runway extension idea.

**Letter 134****Glenn Sinclair**

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
134.1	Every so often, some days every few minutes, a prop plane passes pretty low overhead on the way to the airport. I now think about the planes being jets. Please rethink this runway extension idea.	The FAA has noted and considered your comment.

**From:** jane smith[SMTP:JSMITH6142@RCN.COM]  
**Sent:** Tuesday, November 16, 2004 2:32:12 PM  
**To:** PHL 17-35 EIS  
**Cc:** jsmith6142@rcn.com  
**Subject:** airway

DEAR SIR, WHEN MY DAUGHTER MOVED TO DREXEL HILL SHE WAS COMMENTING HOW SHE HEARD AIR PLANES MORE OFTEN THAN WHEN SHE WAS AT HOME IN PROSPECT PARK. IN A TAPE WE HAVE YOU CAN HEAR THE LOUDNESS OF THE HELICOPTER OR PLANE, THE NEXT DAY A PLANE WITH GOV. HEINZ ON IT, DID CRASH CLOSE BY. ALSO NEAR BY ST. BERNADETTE SCHOOL, ST ANDREWS, ST DOROTHY'S, HILLCREST AND ARONIMINK SCHOOL, 3 HIGH SCHOOLS AND 1 HOSPITAL LETS NOT IGNORE THE HUGE DANGER THAT EXISTS WITH BRING PLANES IN THIS AREA.

THANK YOU  
JOHANNA R SMITH  
719 PROSPECT AVE  
PROSPECT PARK PA. 610-534-8741

[JSMITH6142@RCN.COM](mailto:JSMITH6142@RCN.COM)

Letter 135

Johanna Smith

Comment Number	Comment	Response
135.1	Also nearby [is the] St. Bernadette School, St. Andrews, St. Dorothy's, Hillcrest and Aronimink School, 3 high schools and 1 hospital. [L]ets not ignore the huge danger that exists with bring[ing] planes in this area.	<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>



Rochelle  
Claypoole/AWA/FAA  
12/02/2004 08:30 AM

To  
cc  
bcc  
Subject Fw: Stop runway 17-35 extention-- allow more time for the residential community



Philafem@aol.com  
12/01/2004 04:20 PM

To Marion Blakey/AWA/FAA@FAA  
Philafem@aol.com, pfaafc@co.delaware.pa.us,  
cc Planning\_Department@co.delaware.pa.us,  
robert.a.brady@mail.house.gov, CurtPA07@mail.house.gov  
Subject Stop runway 17-35 extention-- allow more time for the residential community

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 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 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,

carolann straubinger  
116 myrtle ave  
Havertown pa 19083

Municipal Elected Officials



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

Office of the Associate  
Administrator for Airports

Response to Letter #136

800 Independence Ave. SW  
Washington, DC 205

JAN - 4 2005

Ms. Carolann Straubinger  
116 Myrtle Avenue  
Havertown, PA 19083

Dear Ms. Straubinger:

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

In your letter you requested an extension to the deadline for public comment on the DEIS until at least January 15, 2005. You also raised concerns about the FAA's release of Integrated Noise Model (INM) data files to the public.

The Secretary of Transportation selected the PHL Runway 17-35 Extension Project for environmental streamlining under Executive Order 13274, "Environmental Stewardship and Transportation Infrastructure Project Review". Despite the project's streamlined nature, we conducted all procedures and analyses to the same rigorous standards prescribed by the Council on Environmental Quality (CEQ).

The FAA is sensitive to the concerns of residents surrounding PHL. Because of this, we actively sought to engage the State and Federal agencies and the public throughout the project. Our first step was to publish a Notice of Intent in the Federal Register on August 1, 2003. Since then, we have kept a project Web site, published several newsletters, 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 upcoming events, the DEIS schedule, ways to get and provide information, and how to get a copy of the DEIS.

We released copies of the DEIS on October 14, 2004, one month before the public hearings. At the same time, Executive Summaries and compact disks of the DEIS and technical studies were mailed to over 1,000 households, local, State and Federal officials. We provided hard copies of the entire six-volume set to 40 public libraries. At the public hearing, we set up and staffed information boards to address concerns or answer questions about the DEIS. 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.

As stated above, we have upheld or exceeded CEQ standards and requirements to include the minimum 45-day public comment period. The comment period started when we released the DEIS. Given the limited impact that could potentially result from this project as disclosed in the DEIS and the scope and nature of this project, the FAA believes the minimum public comment period (45 days) is sufficient.

For the above reasons, we do not believe that a request for extension is justified. The FAA will, however, make every reasonable attempt to consider comments filed after the deadline and before we publish the Final Environmental Impact Statement.

About your concern about the release of INM data files, I assure you that the FAA has released all information requested by Delaware County. 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 requests for information to Ms. Susan McDonald, FAA Harrisburg District Office, 3905 Hartzdale Drive, Suite 508, Camp Hill, Pennsylvania 17011.

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

Sincerely,

Original Signed by:  
Woodie Woodward

Woodie Woodward  
Associate Administrator  
for Airports



**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: MRS THERESA TOBIN

Address: 7723 JASON PL.

City: PHILA.

State: PA Zip Code: 19153

E-mail Address: \_\_\_\_\_

**PLEASE PRINT CLEARLY**

Comment: I'VE BEEN A RESIDENT OF PENROSE PARK, FOR 35 YRS. THE NOISE LEVEL HAS INCREASED GREATLY AND HAS AFFECTED MYSELF & OUR WHOLE NEIGHBORHOOD. PHYSICALLY & MENTALLY I'VE ~~BEEN~~ HAD TO TRY<sup>TO</sup> COPE WITH THE NOISE. WHY DO WE PAY SO MUCH IN TAXES & ARE FORCED TO ACCEPT PROJECT #1735? IT'S A HARD PILL TO SWALLOW! ARE ANY PEOPLE ON YOUR COMMITTEE <sup>LIVING</sup> NEAR THE AIRPORT?



Philadelphia International Airport  
Runway 17-35 Extension Project  
Environmental Impact Statement  
Public Hearings  
November 15, 16, 17, and 18, 2004

Comment (cont.) *What if any, are the benefits that the residents, closer to the airport have to look forward to, if the extension goes through #1735*

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 137**

**Theresa Tobin**

Comment Number	Comment	Response
137.1	The noise level has increased greatly and has affected myself and our whole neighborhood. Physically and mentally. I've had to try to cope with the noise.	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 involving extensions to Runway 17-35, and results of the noise analyses for those extensions show that aircraft noise levels will increase to the north of the Airport in Eastwick. Although the Proposed Action will increase aircraft noise levels in Eastwick, the magnitude of the increase does not constitute a significant impact, as defined in FAA Order 1050.1E, for either Build Alternative in either forecast year.
137.2	What, if any, are the benefits that the residents closer to the airport have to look forward to if the extension goes through #17-35?	The purpose of the Runway 17-35 extension is to reduce delays at the Philadelphia International Airport which will provide economic benefits to the local area and reduce the emissions of air pollutants, as well as provide a more efficient air transportation system. The Proposed Project will generate construction jobs which may benefit local residents.

From: kevin.traynor@verizon.net[SMTP:KEVIN.TRAYNOR@VERIZON.NET]  
Sent: Wednesday, December 01, 2004 8:14:13 PM  
To: PHL 17-35 EIS

We the residents of Southeastern Delaware County have enough to deal with than to have to worry about planes crashing in our neighborhoods. Do the prudent thing and keep the planes as far out of harms way as possible. Also the notion of getting more planes in the air with less delays is kind of a moot point, taking into account our heightend security measures. Also, the airlines are not expanding. Most are in dire financial straits. I personally cannot see in these circumstances where the ends will justify the means.

Letter 138

Kevin Traynor

Comment Number	Comment	Response
138.1	We the residents of Southeastern Delaware County have enough to deal with than to have to worry about planes crashing in our neighborhoods. Do the prudent thing and keep the planes as far out of harms way as possible.	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.
138.2	Also, the airlines are not expanding. Most are in dire financial straits. I personally cannot see in these circumstances where the ends will justify the means.	As noted in Chapter 2, aircraft operations and enplaned passengers increased in the first six months of 2004 compared to the same period in 2003. The purpose of the project is to reduce delay that is caused by a shift in operations from turboprops to regional jets, a shift that has already happened and is expected to continue in the future (Refer to Table 2-3 for historic and forecasted changes in the fleet mix).



From: mary trzeciak[SMTP:TRZCKM@HOTMAIL.COM]  
Sent: Tuesday, November 16, 2004 3:09:38 PM  
To: PHL 17-35 EIS

I live in norwood, delaware county and strongly oppose the airports attempt to change the flight patterns so that they would fly over my community. it is unhealthy, unsafe and unconducive to any type of quality of life to have airplanes constantly flying over. i don't live far from the airport as it is and i am aware of what the people of tinicum, lester and essington have to put up. if the airport needs more room then it can move to new jersey or chester county where there is plenty of open space!  
mary trzeciak

**Letter 139****Mary Trzeciak**

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
139.1	It is unhealthy, unsafe and unconducive to any type of quality of life to have airplanes constantly flying over.	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.
139.2	If the airport needs more room then it can move to New Jersey or Chester County where there is plenty of open space.	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.

2932 Belmont Avenue  
Ardmore, PA. 19003  
September 21, 2024

Dear Mr. Byers,

I am writing to inform you that I don't want additional aircraft flying over my home. I am protesting the proposed extension of Runway 17-35. Aircraft should use the long-established flight paths on East-West Runways along the Delaware River. I do not want my community's air polluted by low flying aircraft.

Thank you for your attention. Please take appropriate action to keep my community healthy.

Sincerely,

Natalie Joel Tyler

**Letter 140**

**Natalie Tyler**

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
140.1	I am writing to inform you that I don't want additional aircraft flying over my home. I am protesting the proposed extension of Runway 17-35. Aircraft should use the long-established flight paths on East-West Runways along the Delaware River. I do not want my community's air polluted by low-flying aircraft.	The FAA has noted and considered your comment.

119 Allgates Drive  
Haverford, Pa.  
19041

September 28, 2009

Jim Byers  
Environmental Specialist  
Federal Aviation Administration  
Airport District Office  
3905 Hartzdale Drive  
Suite 508  
Camp Hill, Pa.  
17011

Dear Mr. Byers:

I just want to voice my strongest objections to the airport's proposal to extend the runway, that will result in increased low flying airplanes (with all its noise and pollution) over our peaceful residential community.

We chose Haverford because of its lovely environment. This will ruin it!

Sincerely,

Linda Aron

P.S. Why not continue to use the flight paths on East ~~the Delaware River?~~ West runway on the Delaware River?

**Letter 141****Linda Ungar**

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
141.1	Extend the runway that will result in increased low flying airplanes (with all its noise and pollution) over our peaceful residential community.	The FAA has noted and considered your comment.
141.2	Why not continue to use the flight paths on East-West runways on the Delaware River?	The extension of Runway 17-35 would not create new flight paths. The flight paths over the Delaware River will continue to be used. 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.

20 S. Princeton Ave.  
Swastonia, Mo 65755

11/27/09

Ms. Marion Blakey  
Administrator

FRTD

800 Independence Ave SW

Washington DC 20591

Dear Ms. Blakey -

I am writing regarding the Draft EIS for the proposed Philadelphia Airport expansion. I am concerned that there has not been sufficient time for the public to review the DEIS. The data on which the conclusions of the report have been made have not been made available to the public. The proposed expansion will increase noise and decrease quality of life significantly. Indeed, not yet the FAA has not made sufficient exp for the P-35 expansion. I am concerned also regarding the validity of the noise measurement system used.

Please address these concerns ASAP

Sincerely,

Margaret Joan Urban  
Margaret Joan Urban

**Letter 142****Margaret Joan Urban**

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
142.1	The proposed expansion will increase noise and decrease quality of life significantly indeed...	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:** The Wagners[SMTP:SANWAG@BELLATLANTIC.NET]  
**Sent:** Wednesday, December 01, 2004 10:00:03 PM  
**To:** PHL 17-35 EIS  
**Subject:** PHL expansion

We moved to an adult community at RiverWinds in West Deptford Twp. over three years ago. We knew at the time that there was an airport just across the river. We watched the take off and landing patterns and thought we could live with that. Most of the planes came down the Delaware River and were relatively quiet. We are now told we will have planes flying low over our homes. Homes that we have invested in very heavily. Homes that will be the last we will buy. Homes that we thought would appreciate because of their location. Homes that we love. Homes we are proud to live in. All that could change to give the airport a few less minutes of delay. When we attended one of your meetings in the spring, and complained about the future noise levels we would have to endure, we were told to sound proof our homes or move. That was an insult! I think there has to be another alternative plan that will not affect the quality of life for hundreds of families in Gloucester County. Please reconsider the extension of 17-35.

Sincerely,  
Sandra and Howard Wagner  
186 Blue Heron Dr.  
Thorofare, NJ 08086

**Letter 143****Sandra and Howard Wagner**

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
143.1	I think there has to be another alternative plan that will not affect the quality of life for hundreds of families in Gloucester County.	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.

You can't imagine what's coming to your neighborhood without your consent. . .

Currently, both the Federal Aviation Administration (FAA) and Philadelphia International Airport (PHL) are busy planning for both airport expansion and the extension of North - South Runway 17 - 35. If it is eventually approved, Runway 17 - 35 would be lengthened to accommodate vastly increased air traffic by long-distance wide-bodied jets as well as shorter-flight regional jets; these will both take-off and land on flight paths 3000 feet or less over Haverford.

Excessive and stressful noise, filth and air pollution from partially burned Jet-A fuel — which is \$2.00/gal kerosene — depositing combustion products (jet engines don't have pollution control; one jet aircraft can equal the pollution of thousands of cars), cancer-causing agents and sooty substances, house shaking/cracking vibration will result from increased low-flying air traffic over Haverford. Even if you don't live directly under the flight path, you will be affected by these nuisances, threats to health and air safety concerns if Runway 17 - 35 extension is approved for increased jet aircraft traffic.

Is this runway extension and the low flight path over Haverford really necessary? FAA claims that it is because "aircraft operations at Philadelphia International Airport are delayed an average of 10 minutes per operation." But, also according to FAA, most of those delays are due to bad weather . . . and much bad weather is caused by increased air traffic itself putting cloud and bad weather forming substances into the atmosphere

at the wrong times such as late afternoon. So, when is it safest to fly and when are you going to be subjected to low flying aircraft? Early morning and later at night. Isn't that just what you want: low flying aircraft over your house at those hours?

If there are flight delays, who pays? The airlines, because employee overtime, rebooking flights, displaced travelers, and misplaced baggage result and incur increased costs. The airlines can't decrease airfares if they have those increased costs, can they?

Who is really going to shoulder the costs of airfare slashing competition. You are. Are you ready for that?

If you aren't, go on record right now with your local commissioner, your state and congressional representative, your state and federal senator, the FAA, PHL and anyone else you can think of; tell them you don't want the aircraft over your homes and that they should use long-established flight paths on East-West Runways along the Delaware River.

Your commissioners unanimously adopted Resolution No. 1492-2004 on April 19, 2004 to convey your concerns to local, state and federal officials. Voice your concerns now.

Tell them not to make the airlines' financial problems into your problem. Just say you want to continue to enjoy your home in your healthful community.

Michael H. Levin  
Environmental Scientist  
E-mail: [ERAincMHL@aol.com](mailto:ERAincMHL@aol.com)

Contacting the Federal Aviation Administration

October 4/04

Mary Jane Wallace  
68 Park Ridge Dr,  
Bryn Mawr, Pa, 19010  
J. D. [unclear]

This is a terrible plan and my neighbors and I are very upset that you are trying to go ahead with this. We will let all our friends know about the Air Port expansion plan and will do everything to stop it from going through.  
Mary Jane Wallace

**Letter 144****Mary Jane Wallace**

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
144.1	This is a terrible plan and my neighbors are very upset that you are trying to go ahead with this.	The column attached to this comment letter contains numerous errors. The purpose of the Proposed Project is to reduce delay at PHL. The proposed runway extension (to 6,500 feet) will allow more Regional Jets (RJs) and narrowbody aircraft to use Runway 17-35, but will not accommodate widebody jets. The analysis of noise and air quality presented in the EIS, show that the Proposed Project will not result in a significant noise impact in Haverford and will reduce the emission of air pollutants. As the EIS documents, the proposed change in runway length will reduce delays, which has benefits throughout the National Airspace System.

**From:** Jim Wilson[SMTP:JIMMYW3@MSN.COM]  
**Sent:** Monday, November 29, 2004 9:03:55 PM  
**To:** PHL 17-35 EIS  
**Subject:** Runway extention comment.

Dear Susan McDonald,

I am a relatively new resident to Mantua, NJ (Since June 2004). There is a lot of air traffic directly overhead already. Some days are worse than others. I can't believe that the runway extension will not increase air traffic and/or decrease the angle of flight, after all isn't that the whole reason for the extension in the first place, to increase capacity? Couldn't another airport be built to accommodate Philadelphia such as most other big cities have? The townships are taking steps to preserve the land, the FAA should do the same for the air. These South Jersey areas are wholesome communities that are growing at a substantial rate because of their natural appeal. That's why we moved here. Please don't take it away.

Yours very truly,  
Jim & Vera Wilson & Family  
87 Candlewood Drive  
Mantua, NJ 08051

## Letter 145

Jim and Vera Wilson

Comment Number	Comment	Response
145.1	I can't believe that the runway extension will not increase air traffic and/or decrease the angle of flight, after all isn't that the whole reason for the extension in the first place, to increase capacity?	The purpose of the proposed runway extension is not to increase capacity, but to reduce delays. 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. The glide slopes (angle of approach) would not change.
145.2	Couldn't another airport be built to accommodate Philadelphia such as most other big cities have?	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 in the short term. The Philadelphia market is also served by New York airports to the north and the Baltimore-Washington Airports to the south.

From: Susan Wright[SMTP:MINTOR2@COMCAST.NET]  
Sent: Wednesday, December 01, 2004 5:42:01 AM  
To: PHL 17-35 EIS  
Cc: arlen\_specter@specter.senate.gov; CurtPA07@mail.house.gov;  
Planning\_Department@co.delaware.pa.us; webmaster@co.delaware.pa.us  
Subject: Comments on the DEIS for 17-35 project

Dear Ms. McDonald,

After carefully reviewing the comprehensive and well considered comments authored by Dr. Alan Yen that had been copied to me, I find I am in complete agreement with them. Since Dr. Yen's analysis was so thorough and well expressed, rather than repeating essentially the same points in a second but inferior memorandum, I am attaching Dr. Yen's comments to this communication. Please consider me to have joined Dr. Yen in his concerns.

I am particularly concerned with the fact that alternatives to the the 17-35 have not been adequately explored and the FAA seems determined to proceed on some very speculative bases with a project that may very well not be the best or least cost solution. Other alternatives might obviate the need for this extension altogether.

The public has not been provided with sufficient information to properly evaluate the DEIS, very recently released, yet is confronted with this December 1st deadline on which it needs to submit its comments. The residents of Delaware County were not even provided with an opportunity in their county to participate in a scoping meeting. This is hardly the good faith stance any public agency needs to take with the public it serves, especially a public that will suffer real adverse impact as a result of the project being proposed.

I am also very concerned with the FAA's apparent unwillingness to re-evaluate the noise metric being used or fully recognize the harmful impact of single noise events, despite the charge expressed in the preamble of its Order 1050.1 E. Recent research on the impact of noise demonstrates conclusively that the difference between an average noise level of 40 decibels and one of 50 decibels has a huge impact on the ability of school children to learn effectively. In response to this type of research, the American National Standards Institute last year issued tough new acoustic standards for schools, recommending that future classrooms have an ambient noise level of 35 decibels. I refer you also to Paul Schomer's excellent whitepaper on the FAA standard of DNL 65, which is available at <http://www.nonoise.org/library/schomer/assessmentofnoiseannoyance.pdf>. The full cost to the public affected by these projects in stress and lost sleep and learning and work capacity must be fully acknowledged and entered into any proper evaluation and analysis of the environmental impact of any project.

I thank you for your consideration of my concerns,

Sincerely,

Susan L. Wright  
147 Park Avenue  
Swarthmore, PA 19091-1536

cc:

State Representative Gannon

State Senator Erickson

Senator Specter

Representative Weldon

Delaware County Council (Webmaster at Delaware County, please forward  
to Delaware County Council)

Delaware County Planning Department



Letter 146

Susan Wright

Comment Number	Comment	Response
146.1	Concerned with the fact that alternatives to the 17-35 have not been adequately explored and the FAA seems determined to proceed on some very speculative bases with a project that may very well not be the best or least cost solution. Other alternatives might obviate the need for this extension altogether.	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.
146.2	The public has not been provided with sufficient information to properly evaluate the DEIS, very recently released, yet is confronted with this December 1st deadline on which it needs to submit its comments.	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)). Extensions are only warranted when there are significant issues of national policy.
146.3	The residents of Delaware County were not even provided with an opportunity in their county to participate in a scoping meeting.	The FAA has noted and considered your comment. However, a scoping meeting was held immediately adjacent to the airport, in a location easily accessible and Delaware County officials were notified.
146.4	Concerned with the FAA's apparent unwillingness to re-evaluate the noise metric being used or fully recognize the harmful impact of single noise events, despite the charge expressed in the preamble of its Order 1050.1 E. Recent research on the impact of noise demonstrates conclusively that the difference between an average noise level of 40 decibels and one of 50 decibels has a huge impact on the ability of school children to learn effectively. In response to this type of research, the American National Standards Institute last year issued tough new acoustic standards for schools, recommending that future classrooms have an ambient noise level of 35 decibels. I refer you also to Paul Schomer's excellent whitepaper on the FAA standard of DNL 65, which is available at <a href="http://www.nonoise.org/library/schomer/assessmentofnoiseannoyance.pdf">http://www.nonoise.org/library/schomer/assessmentofnoiseannoyance.pdf</a> . The full cost to the public affected by these projects in stress and lost sleep and learning and work capacity must be fully acknowledged and entered into any proper evaluation and analysis of the environmental impact of any project.	FAA believes that the commentor overstates the findings of these studies. For example, Passchier-Vermeer and Vermeer, well-recognized researchers from the Netherlands who have contributed significantly to the body of information used by the World Health Organization in identifying noise criteria, conclude in a March 2000 paper entitled Noise Exposure and Public Health, cited by Dr. Schomer in his white paper, that "if adjustments are made for age, main language spoken at home, and social deprivation, the differences in reading comprehension failed to be significant". The new ANSI standard for classroom is not 35 decibels, as the commenter stated, but is 40 dB (Paragraph 4.3.1 states "the limits on A-weighted background noise levels in Table 1 shall be increased by 5 dB" for unsteady background noises from transportation noise sources. Most significantly, Dr. Schomer's white paper states that "The Federal Aviation Administration uses the DNL metric for assessing the noise in environmental assessments...and recommends a minimum criterion value of 65 DNL to assess the impacts in residential areas". This EIS conforms to FAA requirements for the use of DNL in assessing the impacts of aircraft noise on people, in accordance with FAA Order 1050.1E, and supplemental metrics have been incorporated into the document to provide additional insight into the changes that will result from the proposed project.

**From:** Oliver Yeaton[SMTP:VZE4C8YE@VERIZON.NET]

**Sent:** Saturday, November 20, 2004 2:40:29 PM

**To:** PHL 17-35 EIS

**Cc:** Bob J. Valihura,Jr.; Wayne Smith

**Subject:** Noise from Low Flying Planes at Philadelphia

These public meetings which your organization holds periodically will never convince those who must live under landing approaches that they're not noisy. If it were one plane per day or even one per hour, the noise might be acceptable but when the planes come in at intervals of 45 seconds or so, that is not fair to anybody's ears. You will always have justifiable complaints unless you change the landing approach by either keeping them high or bringing them in low over the empty Delaware River. How about developing the technology to do this, one way or the other? Planes already use special landing and take off procedures when using Reagan Intl Airport so please develop the technology needed for the Philadelphia Airport to benefit planes as well as those who must live under them. I'm sending copies of this to State Representatives Wayne Smith and Robert Valihura with the hope that you will consider and implement these ideas rather than burying them in smcdonald's files.

Wayne and Bob: Do all you can yourselves and with the help of the Committee being formed by HR26

Good Luck, Ollie Yeaton 2524 Deepwood Drive, Foulk Woods, 19810, 475-7085

Letter 147

Ollie Yeaton

Comment Number	Comment	Response
147.1	You will always have justifiable complaints unless you change the landing approach by either keeping them high or bringing them in low over the empty Delaware River. How about developing the technology to do this, one way or the other? Planes already use special landing and take off procedures when using Reagan Intl Airport so please develop the technology needed for the Philadelphia Airport to benefit planes as well as those who must live under them.	The proposed project is to alleviate delay at the Philadelphia International Airport in the short term. Changing flight tracks or approaches to the airport would not reduce delay, and would not meet the project purpose. Existing flight tracks follow the Delaware River on approach or departure to the extent that this is safe, generally under visual flight conditions. However, the Delaware River does not line up with Runway 9L/27R or Runway 9R/17L. Aircraft must approach the runway on a straight line. Reagan International Airport has a unique problem with obstructions in the vicinity of the airport which require special approach procedures; these procedures cannot be applied at Philadelphia.

## DRAFT COMMENTS ON 17-35 EIS

### INSINCERE PUBLIC OUTREACH

#### **1. *No scoping meeting was held in Delaware County.***

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

Swarthmore Borough had never been contacted by the FAA or PHL before the meetings, even though it is directly underneath the flight paths shorter after takeoffs and before landings. Publishing the notices on Federal Register is a minimum requirement and it just does not guarantee effective outreach. Small municipalities like Swarthmore do not have the resource to read the Federal Register everyday. The FAA and PHL should have notified Swarthmore and all the neighboring municipalities directly.

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 in the scoping process does not comply with the NEPA. It is an extremely serious omission.

#### **2. *The scoping meetings dates were chosen to minimize 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. The sincerity of the outreaching is questionable.

#### **3. *Little disclosure and public participation on the Master Plan Update***

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 CEP is closely related to the 17-35 Project.

The FAA and PHL have failed to disclose any information on how and why it chose the two Build alternatives for the CEP. Swarthmore requested the information months ago under the Freedom of Information Act and has not received any documents from the FAA so far.

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 reference in the draft EIS (DEIS) for the Project. Yet, neither the FAA nor PHL has made this report available to the public. We cannot support the results of the DEIS without reading this report.

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

## **WEAK JUSTIFICATIONS FOR THE 17-35 PROJECT**

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

The FAA has inappropriately advocated the PHL 17-35 and CEP projects without presenting a through analysis of the needs in the DEIS.

There are many causes of the delays - the antiquated air traffic control system, airline operational snafus, bad weather, just to name a few. The DEIS needs to provide an analysis on the impact of each cause on the delays at PHL, and how elimination of each cause affect the traffic at PHL.

Without such analyses, the 17-35 Project cannot be justified. The FAA/PHL falls short of proving the need for the Project.

### **2. *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 the other delay-reducing programs, such as the Airspace Redesign, and the Master Plan Update. The FAA's current forecast for delays at PHL is speculative at best.

Before spending millions of dollars on Band-Aid fixes, such as the 17-35 runway extension, the FAA must wait until the effects of the other regional and national corrective measures on the PHL traffic are known. These projects must be completed before the 17-35 EIS can be written.

### **3. *The FAA must fix its air traffic control before expanding runways.***

The FAA must first fix its air traffic control system before it can justify the extremely costly and environmentally damaging 17-35 and CEP projects.

According to The Wall Street Journal<sup>1</sup>, the air traffic control system of the U. S. is most technologically backward in the Western world. The antiquated system has contributed to costly delays, inefficient routing and perpetual gridlock. The

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<sup>1</sup> The Wall Street Journal, "The Coming Revolution In Air Traffic Control", August 18, 2004; Page A11

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

The recent statistics compiled by the Department of Transportation has 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 solution has been obvious for years: Using the Pentagon's global positioning system (GPS). The FAA is the stumbling block for wide use of GPS in aviation. GPS is technically viable. Europe will be launching Galileo, which will become operational in 2008. 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.

The Wall Street Journal indicates that the FAA's mental state these days is aptly reflected in an emergency meeting called last March to explore the theme "Growth Without Gridlock."<sup>2</sup> In fact, flirting with gridlock has become a permanent feature of the agency's way of doing business.

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

**4. Airlines operational snafus have also significantly contributed to delays.**

DOT's statistics have also shown that airline 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%.

The FAA needs to provide the leadership to address the delays caused by airlines before advocating building more runways and airports.

**5. The airlines are increasing spacing between flights to reduce delays.**

The projections of the delays at PHL are based on false assumptions that airlines' operations will stay the same. Facts clearly indicate otherwise.

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<sup>2</sup> The Wall Street Journal, "The Truth About Flight Delays, April 21, 2004; Page D1

For example, American Airline<sup>3</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 the hub-centric operations. In November, AA shrank St. Louis hub and shifted flights to more profitable routes out of Dallas and Chicago. This would increase the spacing between flights.

These facts somehow escape the FAA.

**6. *The public cannot verify the FAA and PHL's estimates.***

The FAA and PHL have not made available the documents referenced in the DEIS or the CEP. The public cannot determine the validity of the projections. It is possible that the operational assumptions in the DEIS.

All the supporting documents and sufficient review time must be made available to the public. The DEIS comment period must be extended accordingly.

**ARBITRARY TIME FRAMES FOR THE 17-35 AND CEP PROJECTS**

**1. *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. Other FAA's national and regional delay-reducing alternatives must be implemented before the Project should be implemented.

**2. *The time frame for 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.

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 can be issued by the end of 2006. Design, permitting and construction bid would take another 2 or 3 years. The construction could start as early as 2009, and the new CEP runways become operational in 2014 or 2015, not 2020.

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<sup>3</sup> The Wall Street Journal, "American Airlines Shrinks a Hub, Reduces Plane Polishing Looking Beyond Business Class", June 7, 2004; Page A1

## **FLIMSY ALTERNATIVE ANALYSIS**

### **1. *The FAA dismissed alternatives without strong justifications.***

As mentioned earlier, the DEIS should have identified all the root causes for air traffic delays, and how these causes, if eliminated, 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 control has caused more than 40% of the delays. GPS may be a more cost-effective solution than 17-35 extension. The FAA needs to perform a more thorough analysis and provide better justifications to reject the alternatives.

### **2. *Combinations of alternatives were not considered***

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

### **3. *The FAA conveniently downplays its influence on the airlines.***

The FAA contends that governmental authorities have relatively little control over the airlines' routing and scheduling. Although the FAA may not have a complete control on airlines, it does have indirect leverage, as it has demonstrated at ORD, where AA and UAL have "voluntarily" changed their schedules to significantly reduce the delay during the rush hours.

### **4. *Routing of the connecting traffic was not evaluated.***

The DEIS indicates that passengers who connect passengers making up 37 percent of the traffic through PHL. The DEIS did evaluate an alternative that shift some of the traffic to other hubs to alleviate the delays at PHL.

The FAA contends that an airline's decision to establish connecting operations at an airport is based on economics, location, and other factors and that the FAA or 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. Advocating PHL's proposal for the expansion is without attempting to solve the problem by operational changes is inappropriate.

### **5. *No preferred alternative is identified***

The FAA has not indicated which of the Build alternatives is it prefers. The public needs to know FAA's position to offer meaningful comments.



## **INAPPROPRIATE NOISE METRICS USED FOR IMPACT ASSESSMENT**

### **1. 65 dB Day-Night Average Sound Level (DNL) is a bad metric.**

The FAA concludes that the Project does 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. DNL is a bad metric because it is an average noise level. The DNL 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 of noise on individuals by single noise events, such as nighttime air cargo flights. DNL greatly waters down the significant impact of single-event aircraft noise.

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

### **2. The DNL methodology does not reflect the reality.**

The FAA adopted the DNL methodology recommended by the Federal Interagency Committee on Noise (FICON)<sup>4</sup>. The FICON claims that noise affects individuals differently and no metric is superior to DNL.

A large-scale survey of the residents in the communities directly below the flight tracks will provide strong evidence to the contrary. The FAA/PHL should have allowed a survey of a larger area and reveal the true pervasiveness of sound that was not identified in the DEIS.

### **3. The FAA policies and guidelines have ignored single noise events.**

Regardless of the DNL, loud single events of aircrafts disturbs sleep; intrude on conversations; television viewing, reading; and speaking on the telephone, robbing people of a decent quality of life. Single-event aviation noise impact on wildlife has been observed as disruptions to feeding and mating patterns.

Sleep disturbance is one of the most devastating aviation noise impacts largely dismissed by the bureaucrats at the FAA and FICON. Noise induced sleep loss can be caused by noise spikes of 8-10 dB above ambient noise levels<sup>5</sup>. It is common for aircraft to cause sleep interference, when single event aircraft noise exceeds 55 dB. Sleep interference without awakenings, too, deteriorates the quality of sleep by shifting sleepers out of deeper levels of sleep.

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<sup>4</sup> Federal Interagency Committee on Noise, Federal Agency Review of Selected Airport Noise Analysis Issues, August 1992

<sup>5</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

**4. The FAA policies and guidelines have ignored sleep disturbance.**

Sleep disturbance is one of the most devastating aviation noise impacts largely ignored by the bureaucrats at the FAA and FICON. Noise induced sleep loss can be caused by noise spikes of 8-10 dB above ambient noise levels<sup>6</sup>. It is common for aircraft to cause sleep interference, when single event aircraft noise exceeds 55 dB. Sleep interference without awakenings, too, deteriorates the quality of sleep by shifting sleepers out of deeper levels of sleep.

**5. 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 of FICON. As mentioned previously, the FICON asserted that no other metrics are of sufficient scientific standing to replace DNL and that the available evidence indicates that DNL continues to be the superior metric to account for variations in the noise environment.

Because the 65 dB DNL metric ultimately determine whether a federal-funded airport project have significantly adverse impact and if the project complies with the NEPA regulations, the FAA cannot adopt FICON's recommendations without a thorough public review. To our knowledge, the FAA has not done so.

Borough of Swarthmore certainly had not been given an opportunity to comment on the metric. Neither was any municipality in Delaware County, which is adversely impacted by the ever increasing noise created by PHL.

**6. 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 ecological environment. We firmly believe that the metric must be re-evaluated in the light new scientific evidences.

**7. The DEIS fails to address impact of nighttime air cargo traffic.**

One of the most glaring deficiencies of the DEIS is the failure to address the ever increasing nighttime air cargo traffic and the effect on sleep. In view of the significantly increase in nighttime cargo flights that will occur, an analysis of the Project's impact on sleep is critical to enable nearby residents to understand how the Project will affect their lives. This is a serious omission considering PHL is a hub by UPS, and serves five other dedicated cargo carriers.

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<sup>6</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

The courts have repeatedly affirmed that an EIS must evaluate the noise impact of air cargo. In the case of *Davison v. Department of Defense*<sup>7</sup>, the court sided with the plaintiffs 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.

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 important 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.

Likewise, the California state court reaffirms the merits of evaluating noise impact of air cargo traffic in the *Berkeley Jet* case<sup>8</sup>. It 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, the FAA/PHL must address air cargo traffic issue in the EIS.

**8. *FAA must also use single-event noise metric for impact analysis.***

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, and other consequences.

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

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<sup>7</sup> S.D. Ohio 1982, 560 F.Supp. 1019 and *Davison v. Department of Defense*, supra, 560 F.Supp. at p. 1037.

<sup>8</sup> Case Nos. A086708, A087959 and A089660. California Court of Appeal, First District, Division 2, California. Aug. 30, 2001.

**9. FAA must promulgate numeric standards for single noise event metrics.**

Although Paragraph 14.5f the FAA Order 1050.1E provides the agency discretion 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 published numeric standards such that they can be used to more definitively determine if the FAA has complied with the NEPA requirements 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 establish the numeric standards, including seven key issues identified by EPA over 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>9</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

**10. The promulgation numeric noise standards must be subjected to full public review.**

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

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

**INADEQUATE CUMULATIVE IMPACT ANALYSIS**

**1. The cumulative impact analysis falls short of meeting the 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."

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<sup>9</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.

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”.

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 in the cumulative analysis does not comply with the CEQ/NEPA requirements.

If the impacts of the future programs or projects cannot be fully determine at present, the FAA needs to 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 defined, as further discussed next.

**2. *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.

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.

**3. *The FAA circumvents NEPA by selecting the 2020 design year for CEP.***

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

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

## **ENVIRONMENTAL INJUSTICE**

### **1. *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 nearby 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.

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

The FAA has already have the discretionary authority Order 1050.1E to evaluate noise impacts using the metrics that are more appropriate than DNL. Yet, 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 seized this opportunity to push the DEIS beyond mere minimum standards and assert 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 amount to environmental injustice.

### **2. *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 No Build Alternative are essentially the same, and therefore. Even so, the extended 17-35 will significantly increases of the ground-level concentrations of hazardous air pollutants in Eastwick and the other communities. The localized increases have not mentioned in the DEIS.

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 and 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-come residents would be exposed to.

The residents in Eastwick and the other communities are obviously extremely concerned with the adverse impact of the Project, as clearly demonstrated by the large turnout at the public meetings. Yet the FAA and PHL have not gone beyond the minimum requirement for impact analysis on air quality is without environmental justice.

### **SAFETY ISSUES NOT ADDRESSED**

#### ***1. The DEIS does considered air 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, safety (emphasis added)....”

The FAA’s lack of concern of safety issues had contributed to the September 11, 2001 attacks at the World Trade Center. The then FAA Administrator was forced to resign in disgrace. The FAA apparently has not learned from the tragedy.

Letter 148

Alan Yen

Comment Number	Comment	Response
148.1	No scoping meeting was held in Delaware County. Delaware County will be significantly impacted by the 17-35 Extension Project (the "Project" hereinafter) and the Capacity Enhancement Program (CEP). Yet the FAA/PHL did not hold any scoping meeting in the County. Swarthmore Borough had never been contacted by the FAA or PHL before the meetings, even though it is directly underneath the flight paths shorter after takeoffs and before landings. Publishing the notices on Federal Register is a minimum requirement and it just does not guarantee effective outreach. Small municipalities like Swarthmore do not have the resource to read the Federal Register everyday. The FAA and PHL should have notified Swarthmore and all the neighboring municipalities directly.	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).
148.2	The scoping meetings dates were chosen to minimize 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.
148.3	Little disclosure and public participation on the Master Plan Update. 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 CEP is closely related to the 17-35 Project. The FAA and PHL have failed to disclose any information on how and why it chose the two Build alternatives for the CEP. ...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 reference[d] in the draft EIS (DEIS) for the Project. Yet, neither the FAA nor PHL has made this report available to the public. We cannot support the results of the DEIS without reading this report.	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.
148.4	FAA has not adequately assessed the root causes of air traffic delay. The FAA has inappropriately advocated the PHL 17-35 and CEP projects without presenting a through analysis of the needs in the DEIS. There are many causes of the delays - the antiquated air traffic control system, airline operational snafus, bad weather, just to name a few. The DEIS needs to provide an analysis on the impact of each cause on the delays at PHL, and how elimination of each cause affect the traffic at PHL.	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.
148.5	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 the other delay reducing programs, such as the Airspace Redesign, and the Master Plan Update. The FAA's current forecast for delays at PHL is speculative at best.	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.



Letter 148

Alan Yen

Comment Number	Comment	Response
148.6	Before spending millions of dollars on Band-Aid fixes, such as the 17-35 runway extension, the FAA must wait until the effects of the other regional and national corrective measures on the PHL traffic are known. These projects must be completed before the 17-35 EIS can be written.	The purpose of this Proposed Project is to reduce current and projected airfield delays at the Airport in the short term. Other projects, such as the New York/New Jersey/Philadelphia Metropolitan Area Airspace Redesign Project, are being conducted independently and the public will have an opportunity to comment on those initiatives separately. The delay analysis conducted for this project demonstrated that changing the runway length (holding everything else in the model constant) would reduce delays.
148.7	The FAA must first fix its air traffic control system before it can justify the extremely costly and environmentally damaging 17-35 and CEP projects. According to The Wall Street Journal, the air traffic control system of the U. S. is most technologically backward in the Western world. The antiquated system has contributed to costly delays, inefficient routing and perpetual gridlock... Improved air traffic control system can significantly reduce traffic congestion and delays. The needs for the 17-35, and the CEP, cannot be accurately assessed until the FAA fixes the system. The projected delays in the DEIS are therefore highly speculative and premature.	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.
148.8	Airlines operational snafus have also significantly contributed to delays. DOT's statistics have also shown that airline 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%. The FAA needs to provide the leadership to address the delays caused by airlines before advocating building more runways and airports.	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.
148.9	The airlines are increasing spacing between flights to reduce delays. 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 Airline[s] 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.	While US Airways has indicated that it would voluntarily change flight schedules on a temporary basis to reduce delays, this has not yet been demonstrated to be effective. It is likely that, as occurred at O'Hare following voluntary de-peaking by the major carriers, other air carriers would take advantage of less congested conditions and increase their flight schedules.
148.10	The public cannot verify the FAA and PHL's estimates. The FAA and PHL have not made available the documents referenced in the DEIS or the CEP. The public cannot determine the validity of the projections. All the supporting documents and sufficient review time must be made available to the public. The DEIS comment period must be extended accordingly.	The commentor 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)).
148.11	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.

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148.12	The 2007 design year for the 17-35 Project is arbitrary. Other FAA's national and regional delay-reducing alternatives must be implemented before the Project should be implemented.	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.
148.13	The time frame for 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 can be issued by the end of 2006. Design, permitting and construction bid would take another 2 or 3 years. The construction could start as early as 2009, and the new CEP runways 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.
148.14	The FAA dismissed alternatives without strong justifications. As mentioned earlier, the DEIS should have identified all the root causes for air traffic delays, and how these causes, if eliminated, 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 control has caused more than 40% of the delays. GPS may be a more cost-effective solution than 17-35 extension. The FAA needs to perform a more thorough analysis and provide better justifications to reject the alternatives.	<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>
148.15	Combinations of alternatives were not considered. The FAA has never demonstrated combinations of some the dismissed alternatives are not viable. While a single alternative alone might not solve the problems, a combination of the alternatives may. For example, a combination of convenient inter-airport train services may shift some of the traffic from PHL to EWR, significantly reducing delays at PHL.	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).

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148.16	<p>The FAA conveniently downplays its influence on the airlines. The FAA contends that governmental authorities have relatively little control over the airlines' routing and scheduling. Although the FAA may not have a complete control on airlines, it does have indirect leverage, as it has demonstrated at ORD, where AA and UAL have "voluntarily" changed their schedules to significantly reduce the delay during the rush hours.</p>	<p>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.</p>
148.17	<p>Routing of the connecting traffic was not evaluated. The DEIS indicates that passengers who connect passengers making up 37 percent of the traffic through PHL. The DEIS did evaluate an alternative that shift some of the traffic to other hubs to alleviate the delays at PHL. The FAA contends that an airline's decision to establish connecting operations at an airport is based on economics, location, and other factors and that the FAA or 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. Advocating PHL's proposal for the expansion is without attempting to solve the problem by operational changes is inappropriate.</p>	<p>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.</p>
148.18	<p>No preferred alternative is identified. The FAA has not indicated which of the Build alternatives is it prefers. The public needs to know FAA's position to offer meaningful comments.</p>	<p>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.</p>

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148.19	<p>65 dB Day-Night Average Sound Level (DNL) is a bad metric. The FAA concludes that the Project does 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. DNL is a bad metric because it is an average noise level. The DNL 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 of noise on individuals by single noise events, such as nighttime air cargo flights. DNL greatly waters down the significant impact of single-event aircraft noise. Although DNL applies 10 dB "penalty" to the noise events occur between the hours of 10 p.m. and 7:00 a.m. to account of human sensitivity to noise during these hours, it 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>

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148.20	<p>The DNL methodology does not reflect the reality. The FAA 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. A large-scale survey of the residents in the communities directly below the flight tracks will provide strong evidence to the contrary. The FAA/PHL should have allowed a survey of a larger area and reveal the true pervasiveness of sound that was not identified in the DEIS.</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]. These supplemental metrics are presented in DEIS Appendix A-1.</p> <p>The noise study conducted for the Runway 17-35 Extension project followed FAA methodology, and examined noise changes within approximately 27 miles of the airport. This distance is based on the distance from the runway that aircraft (on departure) reach an altitude of 10,000 feet, and (on arrival) an altitude of 7,000 feet.</p>
148.21	<p>The FAA policies and guidelines have ignored single noise events. Regardless of the DNL, loud single events of aircrafts disturbs sleep; intrude on conversations; television viewing, reading; and speaking on the telephone, robbing people of a decent quality of life. Single-event aviation noise impact on wildlife has been observed as disruptions to feeding and mating patterns.</p>	<p>The noise analysis completed for this project was done in accordance with FAA requirements. To supplement the standard DNL metric, and present a clear picture of changes in the noise environment associated with the proposed project, single-event noise metrics were calculated at each of the more than 600 specific locations using the INM, including the Maximum A-weighted Sound Level (Lmax), the Time Above Sound Levels of 65, 75, and 85 dB for a 24-hour day (TA24), and the Sound Exposure Level (SEL). The following appendices to the Noise Technical Report (Appendix A.1 of the DEIS) contain tables of computed single event noise metrics: Appendix E, INM-Computed Noise Metrics at Measurement Sites; Appendix G, INM-Computed Noise Metrics at Non-Residential Noise-Sensitive Sites; and Appendix H, Computed Time-Above Metric at Cultural Resources. As Table 4.2-20 shows, there is a negligible difference between the Lmax values for the No-Action Alternative and either Alternative 1 or Alternative 2.</p>

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148.22	<p>The FAA policies and guidelines have ignored sleep disturbance. Sleep disturbance is one of the most devastating aviation noise impacts largely ignored by the bureaucrats at the FAA and FICON. Noise induced sleep loss can be caused by noise spikes of 8-10 dB above ambient noise levels. It is common for aircraft to cause sleep interference, when single event aircraft noise exceeds 55 dB. Sleep interference without awakenings, too, deteriorates the quality of sleep by shifting sleepers out of deeper levels of sleep.</p>	<p>Noise can awaken people from sleep and several studies have examined the relationship between aircraft sound level and awakening. [e.g. 1) Federal Interagency Committee on Aircraft Noise (FICAN), Effects of Aviation Noise on Awakenings from Sleep, dated June 1997; 2) Passchier-Vermeer, et al, "Sleep disturbance and aircraft noise exposure, Exposure-effect relationships," Division of Public Health, The Netherlands, TNO report 2002.027, 30 June 2002; 3) Basner, M., et al, "Effects of Nocturnal Aircraft Noise," Volume 1, Executive Summary, German Aerospace Center, Institute of Aerospace Medicine, Cologne, Germany, July 2004; 4) J.B. Ollerhead et al, Report of a Field Study of Aircraft Noise and Sleep Disturbance, London: Department of Safety, Environment and Engineering, 1992; 5) S. Fidel et al, Noise-induced Sleep Disturbance in Residential Settings, Report AL/OE-TR-1994-0131, Occupational &amp; Environmental Health Division, Armstrong Laboratory, Wright Patterson Air Force Base, Ohio, 1994; 6) S. Fidel et al, "Field study of noise-induced sleep disturbance," Journal of the Acoustical Society of America, 98 (2), Pt. 1, August 1995; 7) S. Fidel et al, "Effects on sleep disturbance of changes in aircraft noise near three airports," Journal of the Acoustical Society of America, 107 (5), Pt. 1, May 2000.] These studies were conducted in people's homes and were able to identify the percent of awakenings that would occur in a population as a function of the sound level in the sleeping room. In general less than 10 percent awaken for Sound Exposure Levels (SEL) less than 80 dBA (about 70 dBA maximum) in the bedroom. Assuming that houses provide a minimum of 15 dB outdoor-to-indoor reduction of sound levels, then maximums outdoors of 85 dB should not awaken more than 10 percent of the population. Levels this loud from a departing aircraft such as a 737-500 should occur at no more than about a half mile from the runway end.</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). Values are computed at each of 35 measurement locations analyzed in this EIS for each study alternative and each study year, and also at 567 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, 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>

Comment Number	Comment	Response
148.23	<p>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 of FICON. As mentioned previously, the FICON asserted that no other metrics are of sufficient scientific standing to replace DNL and that the available evidence indicates that DNL continues to be the superior metric to account for variations in the noise environment. Because the 65 dB DNL metric ultimately determine whether a federal-funded airport project have significantly adverse impact and if the project complies with the NEPA regulations, the FAA cannot adopt FICON's recommendations without a thorough public review. To our knowledge, the FAA has not done so. Borough of Swarthmore certainly had not been given an opportunity to comment on the metric. Neither was any municipality in Delaware County, which is adversely impacted by the ever increasing noise created by PHL.</p>	<p>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.</p>
148.24	<p>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 ecological environment. We firmly believe that the metric must be re-evaluated in the light new scientific evidences.</p>	<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
148.25	<p>The DEIS fails to address impact of nighttime air cargo traffic. One of the most glaring deficiencies of the DEIS is the failure to address the ever increasing nighttime air cargo traffic and the effect on sleep. In view of the significantly increase in nighttime cargo flights that will occur, an analysis of the Project's impact on sleep is critical to enable nearby residents to understand how the Project will affect their lives. This is a serious omission considering PHL is a hub by UPS, and serves five other dedicated cargo carriers. The courts have repeatedly affirmed that an EIS must evaluate the noise impact of air cargo. In the case of Davison v. Department of Defense, the court sided with the plaintiffs 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 timeabove 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 important 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, the FAA/PHL must address air cargo traffic issue 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>
148.26	<p>FAA must also use single-event noise metric for impact analysis. The "Sound Exposure Level" (SEL), which measures the intensity of sound during a single noise event, must be used.</p>	<p>In accordance with FAA Order 1050.1E, the FAA uses DNL values to assess noise impacts. The FAA is not required to use SEL, and has not established any criteria for evaluating the significance of SEL metrics. Several supplemental noise metrics, including the SEL, are also reported in Section 4.2 of the EIS, and in the Noise Technical Appendix.</p>



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148.27	<p>FAA must promulgate numeric standards for single noise event metrics. Although Paragraph 14.5f the FAA Order 1050.1E provides the agency discretion 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 published numeric standards such that they can be used to more definitively determine if the FAA has complied with the NEPA requirements a proposed airport project. Qualitative narrative statements or guidelines are not definitive and provide the FAA too much leeway to dismiss significant impacts.</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, 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>

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148.28	<p>The promulgation numeric noise standards must be subjected to full public review. Any numeric standards or guidelines on single-event noise adopted by the FAA will affect the results of the impact analysis under the NEPA. The standards can only be adopted with full public review. Just accepting FICON's recommendations based on selective use of data is not acceptable. We strongly also recommend that the FAA postpone the 17-35 Project and the CEP EIS until numeric standards are promulgated after full public review.</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>

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Alan Yen

Comment Number	Comment	Response
148.29	<p>The cumulative impact analysis falls short of meeting the 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." ...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". 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 in the cumulative analysis does not comply with the CEQ/NEPA requirements. If the impacts of the future programs or projects cannot be fully determine at present, the FAA needs to 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 defined, as further discussed next.</p>	<p>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.</p>
148.30	<p>The 17-35 Project must be postponed until the effects of other delay reduction programs can be quantified. 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. 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>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>
148.31	<p>The FAA circumvents NEPA by selecting the 2020 design year for CEP. As discussed previously, 2020 is an arbitrary design year for the CEP and the implementation of the CEP can occur as soon as 2014. Arbitrarily selecting 2020 design year provides the FAA a convenient excuse for not performing the cumulative impact of the 17-35 and CEP projects.</p>	<p>As stated in Section 4.18, the cumulative impact analysis for the Proposed Project considers past actions and therefore takes into account the condition of the existing environment. This analysis takes into account the potential effects of the CEP, to the extent that these can be evaluated at this time. The data used in this analysis was based on the best available data for the CEP as required by CEQ regulations.</p>

Letter 148

Alan Yen

Comment Number	Comment	Response
148.32	<p>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 nearby 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.</p> <p>...The FAA has already have the discretionary authority Order 1050.1E to evaluate noise impacts using the metrics that are more appropriate than DNL. Yet, 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 seized this opportunity to push the DEIS beyond mere minimum standards and assert 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 amount to environmental injustice.</p>	<p>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.</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>
148.33	<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 No Build Alternative are essentially the same... Even so, the extended 17-35 will significantly increases of the ground-level concentrations of hazardous air pollutants in Eastwick and the other communities. The localized increases have not mentioned in the DEIS. 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 and the other communities will receive proportionally larger amounts of emissions.</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>
148.34	<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 and 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-come residents would be exposed to. The residents in Eastwick and the other communities are obviously extremely concerned with the adverse impact of the Project, as clearly demonstrated by the large turnout at the public meetings. Yet the FAA and PHL have not gone beyond the minimum requirement for impact analysis on air quality is without environmental justice.</p>	<p>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.</p>

**Letter 148****Alan Yen**

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
148.35	SAFETY ISSUES NOT ADDRESSED	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.

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PHILADELPHIA INTERNATIONAL AIRPORT  
RUNWAY 17-35 EXTENSION PROJECT EIS

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Monday, November 15, 2004  
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2 A P P E A R A N C E S:

3

4 PANEL MEMBERS:

Andrew Brooks

5 Sue McDonald

Wayne Heibeck

6 Jim Byers

7

PUBLIC COMMENTS:

8

Laureen Hagan

9 Joe Connolly

Sal Ferraro

10 Ross Engleman

Mike Levin

11 Frank McLaughlin

John Dening

12 Carolann Straubinger

Joseph Daley

13 Rose Conley

William Gaul

14 Lou DeVieger

Peggy Muir

15 Robert Otto

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MS. LILLER: Hello everyone.

If you could please find a seat and we will begin the hearing. I'll encourage you to come a bit closer if you would, please, because it's a big auditorium, to make sure you can hear. If you can hear, it's a little cozier.

Welcome everyone to the public hearing on the Draft Environmental Impact Statement. My name is Suzanne Liller, and I'm going to be your facilitator for this evening.

We're going to have a certain protocol that we'll follow, but before we get into that I'd like to introduce for you the people that are in the front of the room, our panel.

I'd like to introduce first Wayne Heibeck. Wayne is the Manager of the Harrisburg Airport's District Office for the FAA.

Sue McDonald is our Hearing Officer, you'll be hearing from her in a



1 minute. She's an Environmental Protection  
2 Specialist, and she's the FAA Project Manager  
3 for this project.

4 Jim Byers is an Environmental  
5 Protection Specialist with the FAA.

6 And Andrew Brooks is the Deputy  
7 Project Manager for the FAA.

8 And I'd like first just to turn it  
9 right over to Sue McDonald, our Hearing  
10 Officer.

11 MS. McDONALD: Thank you. Good  
12 evening.

13 This is a public hearing on the  
14 Draft Environmental Impact Statement for the  
15 Philadelphia International Airport Runway  
16 17-35 Extension Project. The Federal  
17 Aviation Administration is the lead federal  
18 agency for this project. The Notice of  
19 Intent to prepare the Environmental Impact  
20 Statement for this project was published in  
21 the Federal Register on August 1st, 2003.  
22 The Notice of Availability of the draft  
23 Environmental Impact Statement for this  
24 project was published on the Federal Register

2           The purpose of this project is to  
3           reduce aircraft delay at the Philadelphia  
4           International Airport in the short-term. At  
5           this hearing we'll be taking testimony on the  
6           draft Environmental Impact Statement. The  
7           Federal Aviation Administration encourages  
8           all interested parties to provide comments  
9           concerning the scope and content of the Draft  
10          Environmental Impact Statement. Your  
11          comments may be oral, written, or by E-mail.  
12          However, all comments must be received by  
13          December 1st, 2004.

14                 MS. LILLER: Okay. Thank you, Sue.

15                 A little bit about the protocol. A  
16          couple ground rules that -- if you -- we've  
17          already asked you when you came in, but in  
18          case you didn't get the message, that you  
19          need to sign up to speak. So there is a form  
20          that's on the back table there. He's brought  
21          one of them forward, but if you decide you  
22          want to speak and you hadn't decided  
23          previously, just go back and fill out the  
24          form and they'll be bringing it forward to

6

1           us.

2                         This is a public hearing, so it's  
                              Page 5

3 for these people up front to be hearing from  
4 you and your comments. So, there won't be  
5 questions taken during this meeting, just  
6 your public comments.

7 Speakers will be called in the order  
8 that they signed in, and I'll be taking  
9 elected officials first. There will be a  
10 time limit, and I think -- I tried to find --  
11 the time limit we'll start out with is five  
12 minutes, and we'll have a bell that will ring  
13 at four minutes to let you know about the  
14 time frame -- that Jen will wring -- Jen  
15 would you just sound the bell please so they  
16 know what it sounds like.

17 And then she'll ring it again at  
18 five minutes just to give us a sense. All  
19 comments are being recorded by our  
20 stenographer, Ron DeShields. And I've asked  
21 Ron if he needs you to slow down or repeat  
22 something, he will definitely let us know.  
23 One thing he asked is that when you come to  
24 the microphone to speak if you could say your

7

1 name first clearly, just to make sure that he  
2 gets it. It's really important.

3 And, finally, you may have noticed,  
Page 6

4 but I'll repeat it, that there's a table in  
5 the hallway that has comment forms. You can  
6 submit your comments written on a comment  
7 form, you can go to the web site, which is  
8 indicated on the comment form and submit your  
9 comments to the web site. You can also  
10 E-mail Sue McDonald or E-mail -- and you can  
11 also write to her and mail it to her address,  
12 which is on the comment form. Or give oral  
13 testimony today -- tonight at this hearing.

14 And Sue will tell you at the end of  
15 our hearing, this particular one, that there  
16 will be more during the rest of the week and  
17 she'll tell you more about that.

18 As far as the sequence, I have a  
19 list up here, I'm going to be calling the  
20 names, and I think I'll just list all the  
21 names so you know what sequence you're going  
22 to come up, come to the microphone that's  
23 handy for you. And if for some reason you  
24 decide to pass, you can just say "Pass"

1 that's okay.

2 And last but not least, the exits  
3 are here, the bathrooms are in the hallway;  
4 there's some right here and then turning the

5 corner there's another set of them. I think  
6 that's all the announcements. And I will go  
7 over the list.

8 Okay. We do elected officials  
9 first, and Laureen Hagan. Laureen is here,  
10 and she's here from Senator Erickson's  
11 office. And what she wanted me to do was  
12 tell you that the Senator, because he's in  
13 session in Harrisburg, could not be here this  
14 evening. But he wanted to recognize that his  
15 representative was here this evening.

16 The next elected official is Joe  
17 Connolly. And Joe is from Congressman  
18 Weldon's District Office.  
19 Joe.

20 Could you say your name again,  
21 please.

22 MR. CONNOLLY: Joe Connolly,  
23 Congressman Curt Weldon's office. And I just  
24 wanted to extend our appreciation to the

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1 FAA -- for coming tonight and making  
2 themselves available to the people of  
3 Delaware County to express their concerns.  
4 And to those in attendance and draft --  
5 individuals from your neighborhood who are

6 not able to make it today, just wanted to let  
7 you know the Congressman's interest. The  
8 Congressman is always interested in pursuing  
9 projects that are of benefit to the community  
10 and do not adversely affect the quality of  
11 life. We will make that commitment.

12 Again, the Congressman has met, our  
13 staff has met with a variety of the community  
14 representatives about this issue, and we're  
15 going to continue to make ourselves available  
16 for that. I'll be here again after the  
17 meeting for you to have any questions. And  
18 as I said, We'll continue to work on this  
19 project. It's something which obviously --  
20 from the calls we've gotten and attendance  
21 tonight it's something which is on  
22 everybody's mind. We had put in a request  
23 to the FAA for an extension of the December  
24 1st deadline, and we're waiting to hear on

10

1 that. And we'll keep you posted.

2 Thank you very much.

3 MS. LILLER: Thank you, Joe.

4 Okay. That's it for our on elected  
5 officials list. So let me read to you --  
6 there's five people signed up to speak this

7 evening, and let me just read through. Sal  
8 Ferraro will be first, and then Ross Engleman  
9 and Mike Levin, then Frank McLaughlin and  
10 John Denning.

11 So I would ask Sal to --

12 MS. STRAUBINGER: I just signed  
13 up --

14 MS. LILLER: Okay. Somebody will be  
15 bringing that down to me.

16 Okay. So, again, five minutes. Jen  
17 will ring the bell. And, Sal, if you could  
18 come forward and come to the closest mike.  
19 And say your name for us again clearly.

20 MR. FERRARO: Good evening. My name  
21 is Sal Ferraro, and I'm from Havertown,  
22 Pennsylvania. I am a member of the Coalition  
23 of communities against Runway 17-35. We are  
24 a citizen group that was formed approximately

11

1 six weeks ago. Our goal to unite communities  
2 in Delaware County and neighboring  
3 communities to block the extension of  
4 Philadelphia International Airport Runway  
5 17-35. After this issue is settled the  
6 coalition intends to remain intact in order  
7 to protect the interest of all communities

8 that could be adversely affected by future  
9 airport proposals.

10 We are not against the airport  
11 improving their position, but only through  
12 intelligent planning and with the honest and  
13 complete information being provided to all  
14 communities affected by their proposals.

15 We are presenting statements of  
16 concern and opposition to Runway 17-35  
17 extension from: The Board of Commissioners  
18 of Haverford Township, the League of Women  
19 Voters of Haverford Township, Haverford  
20 Township Civic Council, Congressman Curt  
21 Weldon, State Senator Connie Williams, State  
22 Senator Edwin Erickson, Upper Darby Township,  
23 Tincum Township, the Board of Commissioners  
24 of Lower Merion Township.

12

1 We also have Yeadon on board, but  
2 the representative wasn't able to --

3 THE REPORTER: I'm sorry, could you  
4 repeat that last part.

5 MR. FERRARO: I'm sorry. Yeadon  
6 Borough is also a member of the coalition,  
7 but wasn't able to make it.

8 Thank you.



9 MS. LILLER: Thank you, Sal. Okay.  
10 Ross Engleman is next. And Mike  
11 Levin will be next, and then Frank  
12 McLaughlin.

13 Carolann, I have you --  
14 MR. ENGLEMAN: Sal, it's good to  
15 finally meet you.

16 I'm Ross Engleman, I live in Bryn  
17 Mawr, Pennsylvania, Lower Merion Township. I  
18 have several letters from concerned entities  
19 of Lower Merion that I want going into the  
20 record. One of them that I give is giving  
21 you a sense for the concern in our community  
22 which we feel has been totally left out.

23 This is from Main Line Health, which  
24 runs Bryn Mawr Hospital and Lankenau

13

1 Hospital. On behalf of the patients,  
2 doctors, and employees of Bryn Mawr Hospital  
3 and Lankenau Hospital I am writing to express  
4 our concern about the proposed expansion.  
5 Bryn Mawr is located in Bryn Mawr, and is  
6 Lankenau is in Wynnewood.

7 We understand that the extension  
8 would significantly increase the volume of  
9 flights over our hospitals and, in addition,

10 those flights would be at a significantly  
11 lower altitude than the current air traffic.  
12 If so, the inevitable increase in noise, air  
13 pollution, and plane-induced vibrations has  
14 the potential to harm our patients and our  
15 hospitals, to say nothing of the quality of  
16 life in our surrounding neighborhoods.

17 Our community has already  
18 experienced firsthand the risk associated  
19 with low-flying aircraft. In 1991 a tragic  
20 plane crash over Merion Elementary School  
21 claimed the life of Senator John Heinz and  
22 six others, including two school children.

23 We are also troubled that we've  
24 never been contacted directly by the FAA or

1 Philadelphia Airport about this expansion,  
2 even though we are major institutions  
3 directly in line with the extended -- with  
4 expanded flight path. As a result, we're  
5 learning about this project with little time  
6 to fully understand its possible  
7 implications. It's unclear whether the  
8 required environmental impact study has been  
9 appropriately includes communities along the  
10 Main Line in which our hospitals are

11 located.

12                   Additionally, we go on to speak  
13 about the outrage of -- incredulous that  
14 spending between 36 and 56 million for such a  
15 minimal improvement in the airport is a  
16 responsible use of funds.

17                   We urge the FAA and the airport to  
18 suspend any further action on the runway  
19 expansion until these issues can be  
20 sufficiently addressed and steps taken to  
21 ensure the health, safety, and quality and  
22 life of the Main Line communities.

23                   Plus I have one very similar from  
24 Haverford College, and some from Bryn Mawr

15

1 College as well as from -- my own standpoint  
2 I have my own letter, of which I will  
3 summarize because it's three-pages long, but  
4 just let me summarize and say this.

5                   I travel about 100,000 to 150,000  
6 miles a year out of Philadelphia Airport. So  
7 probably, I'm guessing, in the top one to  
8 half a percent of all people who use that as  
9 far as usage is concerned. I believe the  
10 notice for this expansion -- or extension I  
11 should say, has been carefully crafted so

12 that the impacted neighborhoods, the people  
13 who live there really don't have an idea of  
14 what's going on.

15 Now, someone who flew a hundred, a  
16 hundred and fifty thousand miles a year looks  
17 at the notices in The Philadelphia Inquirer,  
18 looks at it, and has no idea that I'm  
19 impacted, all right, because there's no maps  
20 given as to what the flight paths were going  
21 to be. Right now we have no jet traffic  
22 going in and out -- at least over the north  
23 side, which is where we -- so, someone who's  
24 as educated in using airports myself has to

16

1 figure it out, because I had some time on my  
2 hands in the airport to -- and I looked it up  
3 on your web site because I found your flier.  
4 And then finally found the flight paths and  
5 looking at them said, Oh, expletive. You  
6 know, this is going right over the Main  
7 Line. I think that, you know, something  
8 wrong is going on quiet frankly. I think  
9 that's representative of how little a turnout  
10 you've been having at these meetings and how  
11 the elected officials feel that there's no --  
12 no one cares about it.

13                   But guess what, we found out about  
14                   it and now we're starting to look at it.  
15                   Okay. I don't understand -- I have a lot of  
16                   questions in here that I would like answered,  
17                   but what I can't understand is how you're  
18                   telling me that the number of flights are  
19                   going to double over our communities. Not  
20                   only are they going to double, but we're  
21                   going from zero jets going over our  
22                   communities to now being between a hundred  
23                   and fifty and two hundred and fifty in a  
24                   given day at peak time, and you're telling us

17

1                   that the sound levels are going to go down.  
2                   I don't understand that, and I think that you  
3                   need to fairly represent that to our  
4                   communities.

5                   I don't also understand why we're  
6                   only looking at this as a short-term  
7                   alternative right now, and whether or not it  
8                   really needs to be implemented versus  
9                   spending all the money and attention on going  
10                  for much longer term solutions which would  
11                  direct traffic over the rivers so it impacts  
12                  everyone in our communities a lot less than  
13                  what you're looking to do --

14                   Quite frankly, I'm really  
15                   concerned. I think that we live in a great  
16                   neighborhood on the Main Line. I moved my  
17                   family there from Philadelphia so that we'd  
18                   have a great place to live, and I have a real  
19                   mistrust as to what's going on here, and a  
20                   real mistrust in believing that this is not  
21                   going to have a dramatic impact on the way of  
22                   life there.

23                   MS. LILLER: Do you have copies of  
24                   the each of those?

18

1                   Okay. Joe Daley, did you sign in?  
2                   Did you say you wanted to speak. Okay.  
3                   Somehow you didn't get on the list so I'll  
4                   add you on the list.

5                   The next person is Mike Levin. And  
6                   after Mike will be Frank McLaughlin.

7                   So, Mike Levin.

8                   AUDIENCE MEMBER: Mike's not here  
9                   yet.

10                  MS. LILLER: Okay. Put him to the  
11                  bottom of the list for now.

12                  And, I'm sorry, Mr. Daley, your  
13                  first name was?

14                  MR. DALEY: Joseph.

15 MS. LILLER: Joseph. I'm going to  
16 put you after Carolann.

17 And you must be Frank McLaughlin.

18 MR. McLAUGHLIN: I'm Frank  
19 McLaughlin. I'm a retired statistician, and  
20 I've been in air traffic control longer than  
21 everyone on the panel. What I'm -- have as a  
22 complaint is the handling of data.

23 Now, I only examined the noise  
24 section of the manual. And to say -- it

19

1 reminds me of a doctor who says your blood  
2 pressure is a hundred and thirty-two, when we  
3 know when that it varies between a hundred  
4 and fifty and a hundred and ten. There's no  
5 measure of variability in the noise report.

6 Based upon statistics, you take a 64  
7 db noise level, and the variance of that is  
8 eight db. Because it's a quad zone variable,  
9 one-half -- and that's a lot of capabilities  
10 in there. So if it has a variability of  
11 eight, that means that three times eight is  
12 the spread. That's 24. Last time I counted  
13 it was 64 plus 24 was 88. Because you don't  
14 measure -- that says that since you use --  
15 what is it, day/night level -- the --

16 day-to-day variability could be up to an 84  
17 as -- just as an example for something that  
18 is supposed to be conversational --

19 So you have to start speaking of --  
20 in scientific terms if you're going to put  
21 this stuff out. The sampling plan is  
22 atrocious. There's no random sampling in  
23 that thing. You took 14 db -- measurements  
24 when you had the stationary long-term

20

1 measurements points. All the other points  
2 were three, four days. And you had three  
3 points. Well, three points doesn't get you  
4 very far. You take the variability of  
5 something and it's a function of a number of  
6 points. So if you take four, cut the  
7 variability in half on defining the mean, not  
8 the spread of the day-to-day variability.

9 So you're going to have to do  
10 something -- well, I'll say other than the  
11 facade that you put up. Miller and Company  
12 did a hell of a job, Herculean is the word,  
13 they generated page after page after page of  
14 numbers and data, because it's useless. It  
15 really doesn't tell you anything. You take  
16 somebody out to the Main Line and you -- 64



17 db then guy thinks there's an airplane flying  
18 over, and it could be as high as 84 today.  
19 You got to define the spread. And I haven't  
20 seen that there.

21 One other thing. I was trained as a  
22 biologist in air quality and water quality.  
23 And I think there's a clause in the law of  
24 the State of Pennsylvania that says you may

21

1 not build on wetlands. And the wetlands you  
2 say -- well, we'll just build a culvert and  
3 build the runway extension over it and that's  
4 it. Not in Pennsylvania you don't. If you  
5 do that you have to mitigate by creating  
6 another wetland. Now, where you going to do  
7 it? There isn't any space in the airport to  
8 build another wetland. And the poor turtle  
9 is going to have trouble transplanting  
10 himself. The first thing I think about is  
11 the snail -- and the Tennessee damn that was  
12 going to be built, except it was an  
13 endangered species, and I think the same  
14 thing might apply to here at the airport.

15 Thanks.

16 MS. LILLER: Thank you, Frank.

17 Okay. We next have John Dening.

18 And then after John is going to be Carolann  
19 Straubinger, and then Joseph Daley.

20 So, John Denning. If you could say  
21 your name again, John.

22 MR. DENNING: Yes, I'm John  
23 Denning. I just wanted to make a comment. I  
24 moved to Ridley Park five years ago. One of

22

1 the reasons I moved to Ridley Park was  
2 because it's a quiet community. I think the  
3 flavor of every comment so far is a concern  
4 for noise and disruption of the community.

5 I want to compliment the engineers  
6 and the people who put these reports  
7 together. Read the executive summary, but I  
8 know there's a lot of work that goes into  
9 putting this together. My main concern as a  
10 resident of Ridley Park is to maintain the  
11 quiet environment that I live in now.

12 On my way in tonight I stood outside  
13 and looked at the sky and I didn't see any  
14 planes, I didn't hear any noise, I saw the  
15 stars. I didn't see cloud -- or anything. I  
16 would like to see it remain that way.

17 The community here has invested a  
18 considerable amount of money -- a new high

19 school. Property values have increased as a  
20 result of that. It would be a tragedy for  
21 the community to suffer from improvements at  
22 the airport. If I read the data right and  
23 from the questions I've asked the  
24 engineers, Ridley Park at least -- if

23

1 alternative one is implemented we experience  
2 a reduction in noise. So from my personal  
3 standpoint that's a plus.

4 If I lived on the Main Line I'd have  
5 other comments to say. If I lived in  
6 Morristown, New Jersey, based on those maps,  
7 I would probably move, but.

8 One other thing I'd like to say  
9 that, since one of the alternatives  
10 considered was either improving or building  
11 other airports in the region. And I think  
12 it's inevitable that the traffic at  
13 Philadelphia Airport is going to increase.  
14 And in the short-term one of these solutions  
15 is certainly going to be implemented. And we  
16 all with the results of that decision.

17 However, I would hope that the  
18 responsible government people, the people at  
19 the Philadelphia Airport, the engineers and

20 all that are seriously considering an  
21 alternative to just keep putting more and  
22 more not just the air traffic in Philadelphia  
23 Airport, but land traffic at the Philadelphia  
24 Airport.

24

1 So, that's all I have to say.

2 MS. LILLER: Thank you, John.

3 Next I'd like to ask Carolann to  
4 come, and I'll let you say your last name so  
5 I don't mispronounce it. And then Joseph  
6 Daley will be after Carolann.

7 MS. STRAUBINGER: My name is  
8 Carolann Straubinger. I live in Havertown.  
9 I live a couple hundred feet away from  
10 Earlington, the proposed flight path that  
11 these planes will be coming in.

12 I want to say hello to you people.  
13 And I ponder and I hope and I pray that you  
14 can independently think and hear us. And if  
15 you do independently think and hear us, if  
16 you would have the guts, if you do decide in  
17 our favor, the guts to stop this. I hope  
18 this isn't just a meeting where we just shoot  
19 off the pressure of our resentment of not  
20 having this. I hope that this is a meeting

21 where we can be effective. And if you people  
22 do decide something, you have the power to  
23 change this. That this isn't just a mock  
24 hearing. And I want you to look into your

25

1 hearts on each one.

2 Now, because there's a few -- only a  
3 few people I can bring out plenty of my  
4 points. America's a very nice place to  
5 live. A long time ago we didn't have much of  
6 a population. Now we have a huge  
7 population. We call this area the Northeast  
8 Corridor. It starts up in Boston -- or above  
9 Boston, comes down to New York, into  
10 Philadelphia, to Baltimore to Washington and  
11 now to Atlanta, going on to St. Augustine.  
12 We don't need more population. We don't need  
13 bigger things. Think futuristically.  
14 Supplying a bigger demand. Giving this bigger  
15 demand fulfillment is not necessarily good  
16 for the area. It doesn't mean it's quality  
17 of life. We have all the substances; the  
18 food, the routes that we need. We're only  
19 going to be adding to over activity.  
20 Pollution, maybe increased population.  
21 People won't be able to get jobs, things like

22 that. So please think outside the box. We  
23 do not need more volume.

24 We are one of the biggest areas. I

26

1 think the sixth biggest area in the United  
2 States. So we don't have to pound our  
3 chest trying to get bigger. Lehigh is trying  
4 to get airport off the ground. Atlantic City  
5 is begging for more people. They give free  
6 parking now. If you go down to Florida, you  
7 can leave your car there for free. So, it  
8 isn't so necessary that Philadelphia has to  
9 have this volume. There's other people  
10 wanting to take this volume from us.

11 So that's the point. I hope you  
12 understand.

13 Now, the people have talked about  
14 air noise. In this day and age we have seen  
15 planes falling out of the air. It sounds  
16 silly, but it's becoming more and more of a  
17 common concern if you notice. Okay. So I  
18 would prefer not having airplanes coming over  
19 the pathway of my house. But I don't see the  
20 need for it. We are A, B, C, D, E, F  
21 terminals at the airport already, do we  
22 really need this. Are we getting too big.

23                   Are we getting -- remember one time  
24 people used to run around trying to get food

27

1                   when we were -- now we're all getting bigger  
2 payout. Is this going to be happening --  
3 Philadelphia access.

4                   Now, I do want to stay one thing,  
5 when the planes come in, with all the new  
6 planes, and they take off you can hear them.  
7 They go vroom. Even when they're trying to  
8 slow down, and the wings go up, the flaps go  
9 up vroom. A lot of fuel is being used on the  
10 take off and on the arrivals of planes. So  
11 much so that they don't burn the fuel  
12 economically. And you get a lot more soot.

13                   Now I lived, in the '70s, in  
14 Alameda, which is in California, around Oak  
15 -- the Oakland area. The planes that would  
16 come over were military and were -- were  
17 regular commercial. And I could not figure  
18 out what was happening. I was getting shook  
19 all over the place. What happens is that you  
20 get these little particles and they're  
21 round. You've got to look at them very  
22 closely. They look like dust or soot.  
23 They're round. They're excess -- they're the

24 waste of the fuel not completely burned. It

28

1 gets over patio furniture. . It gets in your  
2 flowers. It gets in your vegetables. It  
3 gets on the roof. It gets on the siding of  
4 the wall. The siding -- your building  
5 siding. It makes the area look dingy,  
6 because you can't weep it away everywhere.  
7 So if -- I always knew never to live under  
8 one of those.

9 MS. LILLER: Carolann, let me just  
10 ask you, because we have a couple more  
11 people.

12 MS. STRAUBINGER: I'm finished.

13 MS. LILLER: Why don't you do about  
14 three more minutes, is that okay?

15 MS. STRAUBINGER: So, I'm telling  
16 you that you're going to make our place  
17 dirtier. I'm not saying anything about the  
18 noise, which is true. But having lived under  
19 this I'm telling you about the quality of  
20 life. And I'm just telling you that it gets  
21 in your plants. It gets on your patio  
22 furniture. It gets on your siding. I am not  
23 a chemist. I don't know the chemical makeup  
24 of this residual fuel, and what damage it



1 does to the plants, the animal life, or to  
2 us.

3 Please, people, think, do we need  
4 this?

5 MS. LILLER: Thank you Carolann.

6 Joseph Daley is next. And then just  
7 so people know who comes after Joseph, I have  
8 Rose Conley, and then I have William --  
9 William, you'll have to pronounce your name  
10 for me when you get up here. And then Lou.  
11 And then I have Michael Levin. I guess  
12 Michael's going to speak with Rose. So,  
13 you'll have to clarify that to me in a  
14 minute.

15 Okay. Mr. Daley.

16 MR. DALEY: Good evening. My name  
17 is Joseph J. Daley, I'm the Superintendent of  
18 the Police Department -- (unintelligible.)

19 THE REPORTER: I'm sorry, I  
20 can't hear.

21 MR. DALEY: I'm here tonight  
22 representing 58,000 residents of Lower Merion  
23 Township, the Board of Commissioners, and --  
24 (unintelligible.)

1 THE REPORTER: I'm sorry --

2 MS. LILLER: Excuse me, Mr. Daley, I  
3 guess we need you to slow down and say that  
4 one more time.

5 Can you start your introduction  
6 again slower.

7 MR. DALEY: My name is Joseph J.  
8 Daley. I'm Superintendent of Police for  
9 Lower Merion Township, Montgomery County,  
10 Pennsylvania. I'm here tonight representing  
11 58,000 residents of Lower Merion Township,  
12 its Board of Commissioners and its -- of the  
13 Board Joseph M. --.

14 Before I give my -- (Unintelligible)  
15 I'm going to talk a little bit about a  
16 personal thing about Lower Merion Township.  
17 As your quiet aware -- (Unintelligible) --  
18 1991 we had a helicopter and an airplane  
19 collide and it -- elementary  
20 schools. Luckily God was with us that day.  
21 The airplane -- (Unintelligible.)

22 THE REPORTER: I'm sorry, I can't  
23 hear.

24 MS. LILLER: Sorry.

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(Whereupon, there was a  
break taken to reposition the court  
reporter.)

MR. DALEY: That day we were very  
fortunate the helicopter just missed the top  
of the school and landed in the backyard. We  
had a Vietnamese woman who was a school aid  
who actually dispersed a hundred and  
something children from the back. Had she  
not done that we would have had numerous  
children killed on the ground. As it turned  
out we had two dead children, six years of  
age, and four more seriously burned. And  
it's -- so the residents of Lower Merion  
Township are acutely aware of what occurs  
when an air plan -- even though these were a  
small two engine -- plane and helicopter --  
devastation that can occur.

Loss of two children is something  
that the community, even though it's 13 years  
later, we're still struggling with. I have  
some remarks to make tonight. For some time  
now I was with the Township Board of

1           Commissioners, have been receiving inquiries  
2           from many of our concerned constituents  
3           regarding the proposed suspension of Runway  
4           17-35 at the Philadelphia International  
5           Airport.

6                         In short, they feel that the  
7           proposed expansion will have an unacceptable  
8           impact on their quality of life. These  
9           concerns -- result of anticipated seeing, and  
10          more importantly, hearing more commercial  
11          aircraft flying at lower altitudes. Directly  
12          attributable to the expanded use of the  
13          existing Runway 17-35. The current increase  
14          in activity, coupled with the proposed  
15          expansion of this runway to accommodate more  
16          and larger jet aircraft has given rise to  
17          concerns over pollution, structural damage  
18          from prolonged exposure vibrations, loss of  
19          property value, and the fears of a crash. --  
20          slash airplane crash in Lower Merion as  
21          backdrop has given rise to other questions,  
22          such as the level of preparedness and the  
23          qualifications of skills of emergency  
24          personnel to effectively respond to such an

1 event. The potential use of aircraft for  
2 terrorist acts adds to this heightened fear.  
3 In attempting to determine potential impact  
4 FAA representatives, member of our township  
5 staff on -- that the impacted proposed  
6 project would only be felt in Delaware and  
7 Chester Counties in Pennsylvania, and New  
8 Castle County in Delaware.

9 We were further advised that  
10 although the Environmental Impact Study was  
11 being completed, it would assess impact in  
12 only those areas. Local FAA -- officials  
13 have declined our invitation to attend a town  
14 meeting to enlighten our citizens of our  
15 community as to the scope and projected --  
16 project and to answer their questions.  
17 Further research and input from informed  
18 residents seems to confirm that in 2005 there  
19 will be nearly 25,000 additional aircraft  
20 utilizing Philadelphia International  
21 Airport. And, particularly, Runway 17-35.  
22 Much of this will be at or below an altitude  
23 of 2000 feet over the township. These  
24 conflicting reports are disconcerting, and

1 only serve to add distrust to the broad list  
2 of concerns.

3 On behalf of the Board of  
4 Commissioners and the residents of the  
5 Township of Lower Merion, I therefore  
6 respectfully request three things. One, you  
7 arrange to have appropriate FAA personnel  
8 attend a meeting in our township.

9 Two, include our township in the  
10 pending EIS.

11 And, three, postpone the project for  
12 a considerable period of time to allow the  
13 expansion of EIS to be completed and an  
14 opportunity for input from directly affected  
15 communities be provided.

16 Thank you for your attention.

17 MS. LILLER: Thank you, Mr. Daley.

18 Do you have a copy of that --

19 MR. DALEY: Yes, I turned it in.

20 MS. LILLER: Thank you.

21 I'm not sure what this note is on  
22 here. I think it's Rose Conley is the next  
23 person. Is that William and Lou. Okay.  
24 Once you've settled, if you could all say

1 your names clearly into the microphone for  
2 us, please.

3 MR. DeVLI EGER: Good evening. It  
4 gives me great pleasure to have with me  
5 tonight our school board president, Bill  
6 Gaul, and board member Rose Conley from Upper  
7 Darby School District.

8 My name is Lou DeVlieger, I'm  
9 Assistant Superintendent for Personnel and  
10 Public Information for the school district.  
11 And there are a couple issues that we'd like  
12 to bring forward to you tonight.

13 We have heard regularly at our  
14 school board meetings already from our  
15 constituents, we're very concerned about this  
16 proposal you have before us tonight. And if  
17 I may delve into my background a little bit.  
18 I'm the oldest of 10 children. And when I  
19 was growing up I remember my father around  
20 the house would fix something and tell us,  
21 it's only temporary, I'll get to it,  
22 eventually we will fix it right.

23 I understand that this is a  
24 short-term proposal. But something tells me

1 17-35-PublicHearingTranscript\_111504.txt  
that short-term proposals become permanent  
2 fixes. And the first thing I would like to  
3 say is, if you're going to change it  
4 eventually, let's do it right the first  
5 time.

6 The second thing I'd like to say  
7 is. I don't know if you considered the  
8 flight pattern where this is taking place.  
9 But do you know that in our own township, you  
10 are applying over six different schools and a  
11 hospital?

12 Now, already tonight numerous people  
13 have mentioned to you the concern for another  
14 Senator Heinz tragedy. You deal with planes  
15 everyday and may say it will never happen  
16 again, the statistics don't fit that. Well,  
17 you play statistics, we play concern for our  
18 children. And that is our issue from being  
19 in front of you tonight.

20 In that alone is not reason to  
21 change this pattern, let me bring to you a  
22 second issue about our schools. Besides  
23 flying over Bywood Elementary School.  
24 Beverly Hills Middle School, Monsignor Bonner

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1 High School, one of our parochial schools,



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2 Arch Bishop Prendergast High School, another  
3 parochial school, Delaware County Hospital,  
4 Upper Darby High School, and Highland Park  
5 Elementary School, you are severely impacting  
6 on the instruction taking place in those  
7 schools.

8 The vast majority of those schools  
9 do not have air conditioning, and they have  
10 to operate the majority of the school year,  
11 except for the cold, cold winter days, with  
12 windows open. To have flights going  
13 regularly over those buildings, and with  
14 bigger airplanes now because you have a  
15 bigger stretch in which to land planes, is  
16 going to cause severe, severe problems with  
17 these teachers. Disruptive noise of  
18 airplanes will regularly cause frustration in  
19 these classrooms for students who are making  
20 presentations, for teachers who are  
21 teaching. Everyone's going to have to stop.  
22 Everyone's going to have to say, I said. And  
23 we're backing up and rewinding the tape and  
24 starting over again, and who knows when the

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1 next plane's going to come.

2 Because no child left behind, higher

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3 standards all the time, accountability from  
4 us, we need accountability from you. Please  
5 reconsider this proposal. Please change the  
6 flight pattern. And please don't have bigger  
7 planes flying over our schools.

8 Thank you very much.

9 MS. LILLER: Thank you, Lou.

10 So, Rose and Bill, you both each  
11 have five minutes.

12 MS. CONLEY: We're not going to take  
13 five minutes.

14 My name is Rose Conley. Not only am  
15 I a school board member of the upper Darby  
16 School District, but I'm a resident where the  
17 planes -- runway directly over my home. --  
18 The flight. We are all concerned residents,  
19 are concerned about the students being in  
20 harms way, and also about the -- You've  
21 heard about the dirt, the soot, the noise.  
22 These are all -- for us. We urge you, and we  
23 hope it's not a done deal that is going to  
24 happen in spite of all the complaints and

39

1 concerns.

2 One of the comments I'd like to make  
3 too is how heavily populated we are. Mr.

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4 DeVieger mentioned how many schools are in  
5 the path. In our school district we have  
6 12,000 children. Most of those children are  
7 in those schools. We have many, many  
8 residents in the same area. So, the concern  
9 is for many people, and certainly for our  
10 students.

11 Thank you very much for your  
12 consideration.

13 MS. LILLER: Thank you, Rose.  
14 Bill.

15 MR. GAUL: And I'll just take a  
16 minute of your time because I think a lot of  
17 what I wanted to say --

18 MS. LILLER: Say your name again.

19 MR. GAUL: I'm sorry. My name is  
20 Bill Gaul; G-a-u-l. I have a dual role with  
21 Upper Darby Township. Not only am I the  
22 President of the Upper Darby School Board, I  
23 also serve as the Emergency Management  
24 Coordinator. So I have a dual responsibility

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1 examine concern about the flight path, and  
2 also the -- the possible catastrophe that  
3 could happen with not just the school  
4 buildings, but as the Emergency Management

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5 Coordinator there are other buildings like  
6 Mr. DeVlieger had mentioned in the flight  
7 pattern. Not only do you have Delaware  
8 County Memorial Hospital, but further down  
9 the road you also have Fitzgerald Mercy  
10 Hospital.

11 The only thing I can say is I hope  
12 it's not a done deal. And I'm so pleased  
13 that people came out this evening to hear  
14 about this -- our input. But I would very  
15 much encourage you to go back to the drawing  
16 board and possibly come up with some  
17 alternative plans. And I know that we're  
18 here for you. We want to work with you,  
19 we're hoping that you're going to work with  
20 us.

21 Again, I'd just like to thank you  
22 for coming out and listening to our  
23 concerns.

24 Thank you.

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1 MS. LILLER: Thank you, Mr. Gaul  
2 letter.

3 Okay. The next person I have on the  
4 list is Dr. Michael Levin.

5 MR. LEVIN: I'm not going to read

6 17-35-PublicHearingTranscript\_111504.txt  
the entire document to you, but I've left two  
7 copies at the -- at that table. And I've  
8 also attached a copy of the same document for  
9 the public record.

10 My name is Michael Levin, I'm an  
11 environmental scientist. I was trained as an  
12 ecologist. Before that I was trained as a  
13 botanist. I've been on the faculty of  
14 several institutions in this country and in  
15 Canada. And I would like to address the  
16 subject of this Runway 17-35 extension. I  
17 also serve as an advisor to a group which is  
18 recently formed known as the Coalition of  
19 Communities opposed to Runway 17-35.

20 I'm aware that you're conducting the  
21 study for your sponsor, Philadelphia  
22 International Airport, that is in need of  
23 reducing flight delays. In order to  
24 accomplish about a ten-minute time savings

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1 per flight operation per flight, it would be  
2 necessary to extend an existing north south  
3 runway by up to 1500 feet, so that it could  
4 be used for arrivals and departures of both  
5 70 passenger, regional jets of the newer  
6 vintage, as well as long distance wide body

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7 jets. Alternatives other than expanding the  
8 runway, extending it should be thoroughly  
9 explored, and they are not in the  
10 environmental impact statement draft, which I  
11 have.

12 You people would know as well as I  
13 would that arguing against in all hypothesis  
14 is very difficult. And when you say there's  
15 is going to be no adverse -- with no  
16 significant impact, it is very difficult to  
17 argue against that statement. However, a  
18 time saving of a few minutes seems  
19 insignificant in view of \$38 million price  
20 tag, plus the study cost, which are  
21 unknown -- which we're trying to determine,  
22 that would be paid for at taxpayers'  
23 expense.

24 The time period for which this

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1 proposed flight time savings benefit would  
2 occur requires justification. I have heard  
3 approximately 10 years. It has been stated  
4 that it is a waste of money in view of its  
5 use for to short period of time. And that is  
6 probably enough time for a pay back of  
7 Federal funds under the National

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8 Environmental Policy Act, which we both know  
9 requires balancing of economic objectives  
10 with environmental affects impact.

11 You -- these uncertainties during  
12 October of 2004 with the assistance of your  
13 subcontractors you recently completed a draft  
14 environmental impact statement as required by  
15 law under the National Environmental Policy  
16 Act of 1969, which also requires that  
17 balancing of economic impact. Some  
18 interesting highlights in your document as  
19 you no include the proposed runway extension  
20 will use a runway safety area at the north  
21 end of engineered materials to prevent  
22 heavily weighed aircraft from over shooting  
23 the runway and rolling into Delaware County.

24 Noteworthy also is the fact that you

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1 are working with the U. S. Coast Guard to  
2 provide notification when passing ships.  
3 With passing ship traffic on the Delaware  
4 would interfere with landings or departures  
5 so that increased low-flying air traffic  
6 would be delayed. Even in the Delaware River  
7 so that it accommodates greater capacity and  
8 volume of shipping along with the possibility

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9 that refineries or storage facilities along  
10 the Delaware might expand they're  
11 capabilities points up lack of foresight for  
12 reducing the possibility that landing or  
13 departing aircraft won't run into ship  
14 traffic. Passing ships are acknowledged,  
15 however as causing flight delays of several  
16 or more minutes each day now. The boundaries  
17 used for the airports local study area of  
18 your Environmental Impact Study have been  
19 shrunk fit around the existing major runways  
20 at Philadelphia International Airport, with  
21 little attention afforded to adjacent  
22 municipalities or counties. Although the  
23 more regional study area boundary is  
24 illustrated as extending to about 25 miles

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1 from the airport, I think this is more  
2 artifice than reality, because impacts upon  
3 Delaware, Montgomery, Bucks, Chester and  
4 Philadelphia Counties have been assessed by  
5 some guesswork --

6 MS. LILLER: Let me --

7 MR. LEVIN: -- probably rather  
8 than --

9 MS. LILLER: Let me interrupt you



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10 for one second. You do have more time. Tell  
11 me about how much more time you would like.

12 MR. LEVIN: What I have is --

13 MS. LILLER: Another five? Why  
14 don't he finish.

15 MR. LEVIN: I would like to finish.  
16 I have approximately a page of material  
17 left. And I have abbreviated this over and  
18 above what I presented in the six pages to  
19 your panel.

20 MS. LILLER: That's fine. I just  
21 wanted to explain the bell ringing. And you  
22 continue, you have another five.

23 MR. LEVIN: Thank you.

24 I indicated the boundaries have been

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1 shrunk fit with little attention afforded to  
2 municipalities in a five-county area, which  
3 you have assessed by some guesswork modeling  
4 rather than by actual data or testing. I  
5 happen to live under the flight path, so I  
6 took an interest in the maps which were  
7 presented and the figures which were  
8 presented in your report. Demonstrating that  
9 the airways -- that the airports' runway  
10 extension plan will not have an impact is the

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11 paramount concern. Effects on the region are  
12 largely ignored. Only recently have funds  
13 been earmarked for noise abatement in  
14 residences near the airport, where others  
15 have long been complaining about the lack of  
16 -- aircraft.

17 If the runway was extended to  
18 accommodate more flights, the affects of  
19 increased air traffic, a primary reason for  
20 extending the runway, will become imminent in  
21 the surrounding area as frequent increased  
22 disturbance from low-flying aircraft. Loud  
23 noise and structural cracking vibration  
24 during both day and night. Localized

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1 increases in air pollution from jet fuel  
2 exhaust with -- substances and added to it as  
3 seasonal mixtures of de-icers, corrosion  
4 producing -- corrosion inhibiting agents --  
5 and the like. The contradiction of --  
6 substances in the air, such as those that  
7 contribute to acid rain, pollutants in local  
8 waters, and ground level smog will occur.  
9 And loss of property desirability and value  
10 will also be -- will also be significant  
11 drawbacks.

17-35-PublicHearingTranscript\_111504.txt  
12 I've noticed on your maps the dense  
13 web of arriving and departing flight paths  
14 over the region suggest that air safety  
15 should be a major concern within a few miles  
16 of airport, where most accidents occur. It  
17 raises questions about the trains -- and pays  
18 early responders. Develops emergency plans  
19 and identifies the facilities that might be  
20 used to in the event of catastrophe. --  
21 human illnesses such as asthma and cancers  
22 could increase -- deterioration will result.  
23 Overall, the impact of the runway extension  
24 with -- to augment the number of flights

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1 departing and landing can only be adverse to  
2 Delaware County, whatever the method of  
3 computing it. And speaking -- and speaking  
4 of the -- throughout this entire  
5 environmental impact study there is none.  
6 There's little -- unsubstantiated, no  
7 significant or adverse impacts without giving  
8 solid reasons for this.

9 Well, there -- some economic  
10 stimulus to -- upon the airport. Such an  
11 affect upon nearby Delaware County remains to  
12 be assessed. Five Pennsylvania counties:

13 17-35-PublicHearingTranscript\_111504.txt  
14 Chester, Delaware, Montgomery, Bucks and  
15 Philadelphia have been -- for air quality  
16 according to the U.S. Environmental  
17 Protection Agency. Increasing the number of  
18 flights into and out of Philadelphia  
19 International Airport would likely ensure  
20 that attainment of improved air quality  
21 becomes much more difficult in the future.

22 Air traffic is reported to be one of  
23 the worst sources air pollution. Jet  
24 aircraft don't have catalytic converters and  
low-flying air traffic below through 3,000

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1 feet is within the mixing zone where  
2 localized effects may be greater than  
3 anticipated. At my home during the past  
4 month there have been over flights less than  
5 2200 feet above ground level. Will the  
6 Environmental Protection Agency or any of the  
7 consultative agencies that the FAA reports it  
8 has engaged weighed in with detailed  
9 responses concerning the effects of airborne  
10 pollutants and their desire to see such  
11 pollutants reduced.

12 This Runway 17-35 extension would  
13 precede and is separate from Philadelphia

17-35-PublicHearingTranscript\_111504.txt  
14 International Airports' proposed capacity  
15 expect enhancement and expansion program,  
16 which would, if approved, restructure the  
17 airport.

18           Apparently, Runway 17-35 would be  
19 used for about 10 years until other runways  
20 are built. However, I don't count on  
21 extended -- on an extended \$38 million runway  
22 being removed. Such a constructed runway has  
23 a life of its own and it is indeterminate.

24           I'm making my concerns known to you

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1           now by contacting not only you, but my  
2 elected representation at all levels. I've  
3 asked them questions, and I have requested  
4 written answers. I am asking them to go on  
5 record to the FAA, with a copy to you, as  
6 being opposed to this project. I want to  
7 tell you that I want to ensure that my  
8 surroundings and living space and not have  
9 them beneath a busy flight path. I've  
10 requested -- in conclusion, County Council,  
11 to Congressman Weldon's office, I've  
12 requested of Ted Erickson's office, that this  
13 runway extension project and the draft EIS  
14 public comment period be extended for at

17-35-PublicHearingTranscript\_111504.txt  
15 least 90 days. And I hope that you in  
16 bringing these comments to your attention  
17 this will work to improve the Environmental  
18 Impact Statement that has been produced, and  
19 give you second thoughts about putting air  
20 traffic over Delaware County.

21 As young man I grew up in Flushing  
22 Queens, New York, which is near La Guardia  
23 Field as it was called at that time. And on  
24 afternoons I would ride out with my friends

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1 and we'd watch the Pan Am clippers come in  
2 over Flushing Bay. Times have changed  
3 considerably. It's now a major airport just  
4 like - on Jamaica Bay was a field at that  
5 time and has become J. F. K. Airport.

6 I'm suggesting to you that  
7 Philadelphia International Airport exist  
8 within a very crowded space at the present  
9 time. And I believe that you can find  
10 alternatives other than sending aircraft  
11 traffic out over Delaware County in a path  
12 that is short sure to create a mountain  
13 funnel -- at the takeoff and spread out over  
14 that -- from that -- in you a larger every  
15 flight path.

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Thank you for your attention.

MS. LILLER: Thank you, Doctor  
Levin.

MR. LEVIN: I have left copies. I  
will give you a copy.

MS. LILLER: Thank you. All right.

Well, I am now going to give -- I  
didn't see you, but if you would like to come  
up and speak and give us your name you're

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welcome to.

MS. MUIR: My name is Peggy Muir,  
I'm from Havertown.

MS. LILLER: I'm sorry, could you  
just say it one more time.

MS. MUIR: Peggy Muir from  
Havertown.

I'm with the folks here with the  
coalition, but we've come to all your public  
hearings. And I'm just here to voice my  
opposition. I am just a homeowner, parent.  
I use the airport and the airlines just like  
the gentleman from Lower Merion, probably as  
much as he does, and I'm here to tell you  
that we cancel my flights they're not  
Philadelphians, they're not from here.

17 17-35-PublicHearingTranscript\_111504.txt  
18 People getting connections going somewhere  
19 else. But they're not the ones that have to  
live underneath the flight path.

20 As a parent, also I just wanted to  
21 add, and my friends from Lower Merion, you  
22 forgot the YMCA. My kids go to summer camp  
23 and they're outside under the flight path.  
24 And I have a son that runs at Lower Merion

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1 High School and that's under the direct  
2 flight path.

3 So I can see my -- the quality of my  
4 life or quite of my older home -- we moved to  
5 Havertown, like the gentleman that moved to  
6 Lower Merion from the city, for the serenity,  
7 the peace, and that's been interrupted  
8 already. Sit outside and every 10 minutes.  
9 I can read the logos on the planes. And to  
10 say to say that there's no adverse effect,  
11 it's ridiculous now. And with the onset of  
12 the runway it's just going to get worse.

13 And I just -- I know it's not a  
14 question and answer period tonight, but I  
15 don't understand when we're examining  
16 alternatives we really don't have any  
17 alternatives. We've not taken the time.



18 We're doing the short fix because of some  
19 arbitrary '07 date. Where everyone that  
20 comes to Philadelphia loves to leave out of  
21 Lancaster or Harrisburg, Atlantic City, but  
22 we seem rushed to come to this conclusion.  
23 So I just wanted to go on record  
24 that I'm opposed to it. And I think we do

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1 need to take some time out and do this right  
2 as many of the speakers have said before.

3 MS. LILLER: Thank you, Peggy.

4 Okay. I'm going turn this back over  
5 to our hearing officer, Sue McDonald,

6 MS. McDONALD: Thank you very much  
7 for taking the time to give testimony. We  
8 will remain up here until nine o'clock should  
9 anyone else care to come forward and give  
10 testimony. So, we will remain until 9:00.

11 I'd also like to remind you that  
12 this is just the beginning of the public  
13 hearings. We will be having public hearings  
14 on Tuesday, Wednesday, and Thursday nights.  
15 Again, question and answer period from 5:00  
16 to 7:00, and 7:00 to 9:00 public hearing.

17 I'd like to thank you once again for  
18 showing up. And, again, we will remain here

17-35-PublicHearingTranscript\_111504.txt  
19 should anybody have anymore testimony they'd  
20 like to give.  
21 Thank you.  
22 MS. LILLER: If you would give us  
23 your name and then speak.  
24 Folks, I'm going to need to ask you

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1 to please keep quiet while we have our  
2 speaker.  
3 Name again, please.  
4 MS. STRAUBINGER: Thank you for  
5 letting me speak again.  
6 My name is Carolann Straubinger.  
7 And in the interim since we spoke last I was  
8 asked what the North -- Southeast  
9 Pennsylvania need for higher volume. And one  
10 of my answers is we have --  
11 THE REPORTER: I'm sorry  
12 MS. STRAUBINGER: We have enough  
13 volume already. How many times have you been  
14 on planes where there's one two-third empty,  
15 two-thirds empty.  
16 Now we have a peak lull problem  
17 around the busy hours that businessmen fly.  
18 I will admit that so -- a peak lull need  
19 around five o'clock and around the early

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20 morning when businessmen use the airlines.  
21 But on the other hours we have plenty of  
22 unused ability to seat people. So this is  
23 more of a management problem or a lull  
24 forecast problem, where -- lulls in at peak

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1 hours when you have one -- and then other  
2 hours where you have a lull rate. But we  
3 don't need volume. We have enough volume to  
4 service the area.

5 It's just that we're talking about  
6 peak lull. So, I wanted to enter that.  
7 Maybe it is the allocation of our resources  
8 in a better way. But many, many of us have  
9 been on planes where there's only seven,  
10 eight, nine people I have been on. I think  
11 all of you have been on those planes.

12 So I wanted to introduce, and I want  
13 to say I question the need for more volume  
14 being offered. More -- allocate the supply  
15 and demand better.

16 Thank you.

17 MS. LILLER: Thank you, Carolann.

18 You have five minutes, and we'll  
19 ring the bell at four. But you can have more  
20 time.

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Please say your name.

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MR. OTTO: My name is Robert Otto,

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and I'm from Drexel Hill.

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My name is Robert Otto, and I'm from

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Drexel Hill. And a lot of what's been said

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is pretty much -- things that have been

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repeated probably several times. And one

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aspect that I wanted to ask, in the

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configuration that's shown, the X pattern, is

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that something that's common among airports,

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and is there a comparability that would be --

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as far as studies, that show risk factors

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with that kind of pattern compared to what's

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the current pattern of the Philadelphia

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Airport today, would that kind of X pattern

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-- while there's flights coming through

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there now they're smaller planes, but you're

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talking about a completely different pattern

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of planes, larger planes that would be

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utilizing a runway that's different than what

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we see today.

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And as far as risk factors, with

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that kind of X pattern, what kind of studies

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are being done on that, because I'm sure that

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the -- public that where you have that kind

17-35-PublicHearingTranscript\_111504.txt  
22 of air traffic, that kind of volume going  
23 through, that the public is safe.  
24 MS. LILLER: Robert, I have to

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1 explain to you that they are not allowed to  
2 answer questions because it's a hearing, and  
3 they're only here to listen to testimony  
4 that's spoken.

5 So if there are questions, what you  
6 can do, I don't know if you're able to come  
7 to any of our other meetings between 5:00 and  
8 7:00, each of those nights, tomorrow night,  
9 Wednesday, Thursday night, you can ask them  
10 any question you want between 5:00 and 7:00.  
11 But once officially we-- the hearing officer  
12 announces we're in the public hearing, they  
13 can just listen. They can't respond to  
14 questions.

15 MR. OTTO: Thank you.

16 MS. LILLER: I hope you can cop  
17 back.

18 MR. OTTO: Okay.

19 MS. LILLER: Thank you.

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21 (Whereupon, the hearing  
22 concluded at 9:00 p.m.)

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C E R T I F I C A T E

- - - -

I hereby certify that the testimony and the proceedings in the foregoing matter are contained fully and accurately in the stenographic notes taken by me, and that the copy is a true and accurate transcript of the same.

Ronald DeShields, Notary Public

The foregoing certification does not apply to any reproduction of the same by any means unless under the direct control and/or supervision of the certifying shorthand reporter.

Comment Number	Comment	Response
149.1	[Ross Engleman] I believe the notice for this expansion -- or extension I should say, has been carefully crafted so that the impacted neighborhoods, the people who live there really don't have an idea of what's going on.	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. A total of 42 people attended the November 15, 2004 hearing.
149.2	[Ross Engleman] We're going from zero jets going over our communities to now being between a hundred and fifty and two hundred and fifty in a given day at peak time, and you're telling us that the sound levels are going to go down. I don't understand that, and I think that you need to fairly represent that to our communities.	The first statement by the commentator 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.  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.
149.3	[Ross Engleman] I don't also understand why we're only looking at this as a short-term alternative right now, and whether or not it really needs to be implemented versus spending all the money and attention on going for much longer term solutions which would direct traffic over the rivers so it impacts everyone in our communities a lot less than what you're looking to do.	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.
149.4	[Ross Engleman] I have a real mistrust as to what's going on here, and a real mistrust in believing that this is not going to have a dramatic impact on the way of life there.	The FAA has noted and considered your comment.
149.5	[Frank McLaughlin] Based upon statistics, you take a 64 db noise level, and the variance of that is 8 db. Because it's a quad zone variable, one-half and that's a lot of capabilities in there. So if it has a variability of 8, that means that 3 times 8 is the spread. That's 24. Last time I counted it was 64 plus 24 was 88. Because you don't measure -- that says that since you use what is it, day/night level -- the -day-to-day variability could be up to an 84.	The commentator is incorrect. Decibels are measured on a logarithmic scale, and cannot be simply added. There is no statistical standard deviation for the INM-calculated DNL levels. The INM is used to compare the average DNL values at specific locations for the purpose of assessing the difference between the No-Action Alternative and the proposed build alternatives.
149.6	[Frank McLaughlin] There's no random sampling in that thing. You took 14 dB - measurements when you had the stationary long-term measurements points. All the other points were three, four days. And you had three points. Well, three points doesn't get you very far. You take the variability of something and it's a function of a number of points. So if you take four, cut the variability in half on defining the mean, not the spread of the day-to-day variability.	FAA-approved methods and procedures were followed in performing the noise study for this Project. The primary means of describing the noise effects that result from the proposed No-Action and Build Alternatives studied in this EIS is not based on measurements, but on INM-computed levels. These are reported in detail throughout many sections of Chapter 4 and Appendices G.1 through G.8 and others.
149.7	[Frank McLaughlin] I think there's a clause in the law of the State of Pennsylvania that says you may not build on wetlands. And the wetlands you say -- well, we'll just build a culvert and build the runway extension over it and that's it. Not in Pennsylvania you don't. If you do that you have to mitigate by creating another wetland.	Pennsylvanian law states that a wetland cannot be filled without first acquiring a permit. The Project Team will continue to consult with local, state and Federal agencies in the future, including any subsequent permit applications. The agencies have determined that the proposed project would alter a waterway (not a wetland) and that compensatory mitigation would not be required (see Section 4.12 of the EIS).

Letter 149

November 15, 2004 Public Hearing Transcript

Comment Number	Comment	Response
149.8	[John Denning] My main concern as a resident of Ridley Park is to maintain the quiet environment that I live in now.	<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>Figures 4.2-10 through 4.2-13 in this EIS depict the changed noise exposure for those areas experiencing aircraft noise levels above 60 dB DNL as a result of the Project. As these figures show, Ridley Park would experience the same noise levels in the future No-Action Condition (less than 60 dB DNL and, in some areas, less than 45 dB DNL) as it would under either of the Build Alternatives.</p> <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."</p>
149.9	[John Denning] If I read the data right and from the questions I've asked the engineers, Ridley Park at least - if alternative one is implemented we experience a reduction in noise. So from my personal standpoint that's a plus.	The FAA has noted and considered your comment.
149.10	[John Denning] I would hope that the responsible government people, the people at the Philadelphia Airport, the engineers and all that are seriously considering an alternative to just keep putting more and more not just the air traffic in Philadelphia Airport, but land traffic at the Philadelphia Airport.	The Proposed Project is not anticipated to increase air or surface traffic volumes relative to the No-Action Alternative, as neither Alternative 1 nor Alternative 2 would result in an increase in aircraft operations or passenger demand at the Philadelphia International Airport. The forecasts state that the increase in air traffic will happen even if the Project is not constructed. The alternatives analysis (Chapter 3) evaluated all modes of transportation.
149.11	[Carolann Straubinger] Lehigh is trying to get airport off the ground. Atlantic City [Airport] is begging for more people. They give free parking now. If you go down to Florida, you can leave your car there for free. So, it isn't so necessary that Philadelphia has to have this volume. There's other people wanting to take this volume from us.	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. Additionally, passengers choose which airport to use based on a variety of factors, including the service available at the airports, and airlines respond to passenger demands. Studies have shown that delay does not factor into a passenger's choice of which airport to use.
149.12	[Carolann Straubinger] A lot of fuel is being used on the take off and on the arrivals of planes, so much so that they don't use fuel economically and you get a lot more soot.	Aircraft engines are specifically designed to maximize fuel efficiency during their operations. There will be no changes to the number of aircraft operations due to the Proposed Project.
149.13	[Carolann Straubinger] And I'm just telling you that it gets in your plants. It gets on your patio furniture. It gets on your siding. I am not a chemist. I don't know the chemical makeup of this residual fuel, and what damage it does to the plants, the animal life, or to us.	A study designed to assess the contribution of aircraft operations at the Airport to ambient deposition in the communities surrounding the airport is currently under way. FAA expects results to be similar to studies conducted at other airports in the U.S., which have shown that soot deposition is not caused by aircraft. Results are expected late in 2005 or early 2006 and will be presented in the Capacity Enhancement Program (CEP) Environmental Impact Statement (EIS). The Proposed Project would improve air quality by reducing the emissions of air pollutants.



Letter 149

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Comment Number	Comment	Response
149.14	[Joseph J. Daley] In short, they feel that the proposed expansion will have an unacceptable impact on their quality of life. These concerns -- result of anticipated seeing, and more importantly, hearing more commercial aircraft flying at lower altitudes. Directly attributable to the expanded use of the existing Runway 17-35.	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.
149.15	[Joseph J. Daley] 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 pollution, structural damage from prolonged exposure vibrations, loss of property value, and the fears of a crash.	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. Noise-induced vibration levels caused by aircraft overflights around Philadelphia International Airport are not considered sufficiently high to cause structural damage. 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 property values. 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.
149.16	[Joseph J. Daley] Airplane crash in Lower Merion as backdrop has given rise to other questions, such as the level of preparedness and the qualifications of skills of emergency personnel to effectively respond to such an event. The potential use of aircraft for terrorist acts adds to this heightened fear.	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.
149.17	[Joseph J. Daley] Local FAA officials have declined our invitation to attend a town meeting to enlighten our citizens of our community as to the scope and project and to answer their questions.	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. The City of Philadelphia, Division of Aviation, met with Lower Merion in response to the community's request.
149.18	[Joseph J. Daley] Further research and input from informed residents seems to confirm that in 2005 there will be nearly 25,000 additional aircraft utilizing Philadelphia International Airport and, particularly, Runway 17-35. Much of this will be at or below an altitude of 2000 feet over the township. These conflicting reports are disconcerting.	<p>The forecast year used for the EIS is 2007, not 2005. 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. 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>
149.19	[Lou DeVliieger] I don't know if you considered the flight pattern where this is taking place. But do you know that in our own township, you are flying over six different schools and a hospital? Now, already tonight numerous people have mentioned to you the concern for another Senator Heinz tragedy. You deal with planes everyday and may say it will never happen again, the statistics don't fit that. Well, you play statistics, we play concern for our children.	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.

Letter 149

November 15, 2004 Public Hearing Transcript

Comment Number	Comment	Response
149.20	[Lou DeVlieger] Besides flying over Bywood Elementary School, Beverly Hills Middle School, Monsignor Bonner High School, one of our parochial schools, Arch Bishop Prendergast High School, another parochial school, Delaware County Hospital, Upper Darby High School, and Highland Park Elementary School, you are severely impacting on the instruction taking place in those schools. Disruptive noise of airplanes will regularly cause frustration in these classrooms for students who are making presentations, for teachers who are teaching. Everyone's going to have to stop.	The Noise analysis presented in DEIS 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.
149.21	[Rose Conley] One of the comments I'd like to make too is how heavily populated we are. Mr. DeVlieger mentioned how many schools are in the path. In our school district we have 12,000 children. Most of those children are in those schools. We have many, many residents in the same area. So, the concern is for many people, and certainly for our students.	The FAA has noted and considered your comment.
149.22	[Bill Gaul] Concern about the flight path, and also the possible catastrophe that could happen with not just the school buildings, but as the Emergency Management Coordinator there are other buildings like Mr. DeVlieger had mentioned in the flight pattern. Not only do you have Delaware County Memorial Hospital, but further down the road you also have Fitzgerald Mercy Hospital.	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. The FAA 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.
149.23	[Bill Gaul] I would very much encourage you to go back to the drawing board and possibly come up with some alternative plans.	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 of reducing delay in the short term.
149.24	[Michael Levin] Alternatives other than expanding the runway, extending it should be thoroughly explored, and they are not in the Environmental Impact Statement Draft, which I have.	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.
149.25	[Michael Levin] Loss of property desirability and value will also be significant drawbacks.	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.
149.26	[Michael Levin] Apparently, Runway 17-35 would be used for about 10 years until other runways are built. However, I don't count on an extended \$38 million runway being removed. Such a constructed runway has a life of its own and it is indeterminate.	The cost-benefit analysis for the proposed project will be taken into consideration in any funding decision.
149.27	[Michael Levin] I believe that you can find alternatives other than sending aircraft traffic out over Delaware County.	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.
149.28	[Peggy Muir] The quality of my life or quite of my older home -- we moved to Havertown, like the gentleman that moved to Lower Merion from the city, for the serenity, the peace, and that's been interrupted already. Sit outside and every 10 minutes I can read the logos on the planes. And to say that there's no adverse effect, it's ridiculous now. And with the onset of the runway it's just going to get worse.	The FAA has noted and considered your comment.

## Letter 149

November 15, 2004 Public Hearing Transcript

Comment Number	Comment	Response
149.29	[Peggy Muir] I don't understand when we're examining alternatives we really don't have any alternatives. We've not taken the time. We're doing the short fix because of some arbitrary '07 date.	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 in the short term. 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. 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.
149.30	[Carolann Straubinger] We have enough volume already. How many times have you been on planes where there's one two-thirds empty. Now we have a peak lull problem around the busy hours that businessmen fly. I will admit that so -- a peak lull need around five o'clock and around the early morning when businessmen use the airlines. But on the other hours we have plenty of unused ability to seat people. So this is more of a management problem or a lull forecast problem.	As discussed in Section 3.3.1, governmental authorities have little control over the airlines' routing and scheduling. In addition, these authorities (including the FAA and the Sponsor) cannot regulate the load factor (percentage of occupied seats in an aircraft).
149.31	[Robert Otto] You're talking about a completely different pattern of planes, larger planes that would be utilizing a runway that's different than what we see today. And as far as risk factors, with that kind of X pattern, what kind of studies are being done on that, because I'm sure that the -- public that where you have that kind of air traffic, that kind of volume going through, that the public is safe.	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. The FAA 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.

2                   RUNWAY 17-35 EXTENSION PROJECT  
3           ENVIRONMENTAL STATEMENT PUBLIC HEARING

4  
5   -----  
6                   Tuesday, November 16, 2004  
7                   Commencing at 7:00 p.m.

8   -----  
9  
10                   HELD AT: West Deptford High School  
11                                   1600 Crown Point Road  
12                                   Westville, New Jersey

13  
14   -----  
15  
16                   REPORTED BY: Francis A. Farrell  
17                                   Professional Reporter

18  
19   -----  
20  
21                   CLASS ACT REPORTING AGENCY  
22                   Registered Professional Reporters

23   1420 Walnut Street                   133-H Gaither Drive  
24   Suite 1212                           Mt. Laurel, NJ 08054  
         Philadelphia, PA 19103           (856) 235-5108

1  
2   IN ATTENDANCE:  
3   Susan McDonald, FAA

- 4 Wayne Hei beck, FAA
- 5 Andrew Brooks, FAA
- 6 Jim Beyers, FAA
- 7 Susanna Liller, Facilitator
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1 MS. LILLER: We're ready to  
2 begin. Welcome to this public hearing on  
3 the Draft Impact and Environmental  
4 Statement. My name is Susanna Liller, and  
5 I will be your facilitator for this  
6 evening. What I want to do is introduce  
7 the folks that are up at the panel in the

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8 front of the room, and I will tell you a  
9 little bit about the protocol for tonight  
10 after that.

11 I would like to introduce to you  
12 Wayne Heibeck. Wayne is the manager of the  
13 Harrisburg district office for the FAA.

14 Sue McDonald, on the end, is our  
15 hearing officer for tonight, and she's an  
16 environmental protection specialist, but  
17 also the FAA project manager for this  
18 project.

19 Jim Byers, on the other end, is  
20 also an environmental protection specialist  
21 with the FAA at headquarters.

22 Andrew Brooks is the deputy  
23 project manager for the FAA.

24 I would like to turn things

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1 over, now, to our hearing officer, Sue  
2 McDonald for a few words from Sue.

3 MS. McDONALD: Good evening, and  
4 once again thank you for attending. This  
5 is a public hearing on the Draft  
6 Environmental Impact Statement for the  
7 Philadelphia International Airport runway  
8 17-35 extension project. The Federal  
9 Aviation Administration is the lead federal  
10 agency for this project. The Notice of  
11 Intent for preparing the Draft

12 17-35-PublicHearingTranscript\_111604.txt  
Environmental Impact Statement for this  
13 project was published in the Federal  
14 Register on August 30, 2003. The Notice of  
15 Availability of the Draft Environmental  
16 Impact Statement was published in the  
17 Federal Register on October 15, 2004.

18 The purpose of this project is  
19 to reduce aircraft, again, at the  
20 Philadelphia International Airport in the  
21 short term. At this hearing we will be  
22 taking testimony on the Draft Environmental  
23 Impact statement. The FAA encourages all  
24 interested parties to provide comments

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1 concerning the scope and content of the  
2 Draft Environmental Impact Statement. Your  
3 comments may be by oral testimony, they may  
4 be written, they may be by E-mail, but we  
5 do need your comments by December 1,  
6 2004.

7 MS. LILLER: Thank you, Sue.

8 Just a couple of things about  
9 the format for this evening. I think you  
10 already heard that if you want to speak,  
11 you can sign up to speak, and what if, as  
12 you're sitting here you decide that you  
13 want to speak, then you can go right back  
14 up to the desk and sign up, and they will  
15 be bringing that list to me, and I will be

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16 reading down the list.

17 I think that you also know that  
18 this is not a time to ask questions, that  
19 five to seven was the question time. This  
20 is a hearing. These people will be sitting  
21 here and hearing, not sitting and answering  
22 questions. I'll call you in the order that  
23 you signed up to speak and elected  
24 officials will be first. A time limit will

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1 be established. I'm thinking, right now,  
2 that with the number of people that we  
3 should start with, about, a five-minute  
4 time limit. Jennifer is going to help keep  
5 the time. She's going to ding a bell. You  
6 will hear that when there is about a minute  
7 left, and she will ding it twice so you  
8 will know when you're done. Then I will  
9 check in with you. If you still have more  
10 to say, we will give you more time. So we  
11 will work that out together.

12 All comments are being recorded  
13 by our stenographer here. I have asked him  
14 to tell me if he needs you to repeat your  
15 name or slow down a bit to make sure,  
16 because all of these comments will be part  
17 of the public record. His job is to make  
18 sure that he gets every word, so we need to  
19 help him do that. He will let me know if



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it's not happening.

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I'm also going to ask you to come to the microphone, and I will read down the list to let you know if you're the next person to come up. Our microphone

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person has asked that you speak right into the mike. I think he will probably tell us if that is not working well either.

You heard, from Sue, comment forms are out on the table. Again, there are many different ways -- you can either, do tonight your oral comment, but you can write it and you can do that by mailing it in or e-mailing it in or checking the website. There are several different ways that you can make comments. That is about it, except to tell you that the exit goes right out to the parking lot. There are exits the way you came in. If you're looking for a restroom, it's down the hall. With that, I think we can begin.

I'm going to have the elected officials, but I want to first recognize Jean Adams. Jean, where are you. There you are. Jean is here representing Congressman Andrews. She will not be speaking, but she wanted you to know that Congressman Andrews is preparing his

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comments. They will be submitted as

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1 written comments. She just wanted you  
2 folks to know that.

3 Janice Hauser is next from West  
4 Deptford Township. One more thing. I'm  
5 sorry. Our stenographer has requested that  
6 everybody say their name before they speak,  
7 slowly and clearly.

8 MS. HAUSER: Good Evening. My  
9 name is Janice Hauser, and. I'm on the  
10 township committee. I am representing West  
11 Deptford Township.

12 I thank you for this opportunity  
13 to speak on behalf of West Deptford  
14 Township residents regarding our concerns  
15 related to the Philadelphia International  
16 Airport runway 17-35 expansion project.

17 Philadelphia International  
18 airport is currently seeking approval from  
19 the Federal Aviation Administration and  
20 other regulatory agencies to expand runway  
21 17-35. At the present, this runway  
22 primarily serves commuter aircraft.  
23 However, expansion would enable this runway  
24 to accommodate regional commuter jets as

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1 well.

2 A study conducted by the  
3 Philadelphia International Airport  
4 specifies that the airport presently  
5 handles 73,242 regional jets annually. The  
6 same study also projected that there would  
7 be 178,000 regional jets by the year 2010,  
8 a 144 percent increase.

9 We recognize Philadelphia  
10 International Airport is an important  
11 economic asset to the entire Delaware  
12 Valley and an important link in the  
13 national network. We also recognize that  
14 the airport needs to improve its facilities  
15 in order to keep pace with growing air  
16 traffic. However, we have serious concerns  
17 regarding the environmental impact,  
18 effectiveness and the safety of the  
19 proposed runway expansion alternatives.

20 Our first concern is the  
21 potential for this project to significantly  
22 increase the aircraft noise impact on the  
23 residents and businesses in West Deptford.  
24 A noise monitor study conducted in January

1 of 2003 measured the impact of aircraft  
2 operations, which were then 44 percent and  
3 52 percent under the current annual average  
4 operational levels. Since that time, the

5 usage of runway 17-35 has increased to the  
6 extent that we believe that the existing  
7 noise study is no longer an accurate  
8 indicator of the potential impact of  
9 ambient noise levels in West Deptford  
10 Township.

11 While the Draft Environmental  
12 Impact Statement did not project any  
13 significant increases in average noise  
14 levels based on FAA tests and procedures  
15 for cumulative noise exposure, it did show  
16 an increase of average noise levels in West  
17 Deptford Township. This will have a  
18 serious impact on the quality of life in  
19 our township, particularly neighborhoods in  
20 the approach path of runway 17-35.

21 The Draft Environmental Impact  
22 Statement joint study assumes a  
23 continuation of the current voluntary noise  
24 abatement procedures, which restrict

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1 nighttime use of runway 17-35.

2 On behalf of West Deptford  
3 Township residents, I request that the  
4 Federal Aviation Administration make these  
5 nighttime restrictions both mandatory and  
6 permanent, regardless whether or not  
7 approvals for extension of runway 17-35 are  
8 granted.

9                   In accordance with Act 73 of the  
10 Draft Environmental Impact Statement, large  
11 tankers and container ships using the  
12 Delaware River shipping channel require  
13 that aircraft arrivals on runway 17-35 be  
14 suspended an average of four times a day.  
15 However, credible sources familiar with  
16 Philadelphia International Airport  
17 operations have told township officials  
18 that these suspensions presently occur an  
19 average of ten times a day. The number of  
20 arrivals and suspensions are expected to  
21 increase as usage of runway 17-35 increases  
22 and the separation distance between  
23 aircraft decreases to a planned 3.5  
24 nautical miles from the currently approved

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1                   6 nautical miles.  
2                   I question whether the extension  
3 of runway 17-35 is the most effective  
4 response given that an increase in arrivals  
5 and suspensions is more likely to occur as  
6 a result of the increased usage of runway  
7 17-35. In addition, tanker and container  
8 ship traffic on the Delaware River is also  
9 increasing, which is another factor that  
10 would lead to an increase of arrival  
11 suspension.

12                   Is it really prudent to invest  
  Page 10

13 millions of dollars in the extension of  
14 runway 17-35 when the benefit of that  
15 project, mainly decrease in flight delays,  
16 is likely to be significantly less  
17 effective due to an increase in arrival  
18 aircraft suspension associated with tanker  
19 and container ships. I also question  
20 whether safer alternatives could be  
21 developed, which would not increase the  
22 interaction of aircraft and large ships.

23 I'm afraid that the expansion of  
24 runway 17-35 could put the public at

13

1 greater risk of a disastrous collision  
2 between a passenger aircraft and a large  
3 tanker or container ship. There must be a  
4 safer ways to reduce flight delays at  
5 Philadelphia International Airport.

6 In closing, if the primary goal  
7 of this proposed project is to reduce  
8 flight delays, I question whether this is a  
9 sound expenditure of public funds. It is  
10 my understanding that runway 17-35 is a  
11 visual flight rules and runway. These  
12 rules limit the usage of this runway to  
13 weather conditions that provide good  
14 visibility. I also believe that millions  
15 of public dollars being spent on the  
16 expansion of runway 17-35 would be better

17 spent expanding other existing runways.  
18 For instance, runway 18-26 is currently  
19 controlled by a precision radar monitor,  
20 which makes landings relatively unaffected  
21 by visibility conditions. Therefore, an  
22 expansion of runway 18-26 may be a safer  
23 and more efficient use of public funds.

24 Another alternative approach,

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1 apparently not considered, is the  
2 construction of a new state-of-the-art  
3 runway adjacent to the Delaware River and  
4 parallel to the existing east, west, main  
5 runways. The new runway would both lessen  
6 the chance of devastating collisions with  
7 large ships and minimize the noise impact  
8 on West Deptford Township and other  
9 communities in New Jersey and Pennsylvania.

10 On behalf of the residents of  
11 West Deptford Township, I thank you again  
12 for this opportunity and hope you will  
13 seriously consider our concerns and the  
14 negative impact the runway expansion  
15 project will have on the environment and  
16 the safety of West Deptford Township  
17 residents. Thank you.

18 MS. LILLER: Thank you. Our  
19 next speaker would be Joe Rhyner, and just  
20 so you know, Tom Horsey is next and Rich

21 McHugh after Tom.

22 MR. RHYNER: Hi, my name is Joe  
23 Rhyner. I have been in all the other  
24 meetings. Just so you know, I have read

15

1 the whole technical report and noise  
2 technical report, that whole document.  
3 I've generated 95 comments just on the  
4 document itself. I don't know who I give  
5 these to.

6 First of all, I don't think the  
7 document has provided enough data to make  
8 conclusions. The basis for the noise study  
9 was 2003. It supposedly included  
10 cumulative effects. We weren't landing  
11 regional jets on this runway until 2000 or  
12 so. To me that isn't a cumulative affect.  
13 To go from turbo props to jets, to more  
14 jets, etcetera, that information wasn't  
15 included. That noise information was not  
16 considered.

17 Numbers, sometimes we use  
18 percentages, sometimes we use numbers,  
19 sometimes we use them together comparing  
20 them to each other, and some of the data  
21 that you actually prepared percentagewise  
22 are the regional jets would increase  
23 29 percent, and that is, obviously, going  
24 to affect your noise, but the data in table



1 310 shows the regional jets will increase  
2 73 percent on an average day. So things  
3 like that, it just doesn't make sense to  
4 me.

5 The model grid I found -- I  
6 thought was too large, 200 acres average  
7 noise, when I have planes flying over my  
8 house. Somebody 1500 feet away will have a  
9 lot less noise than I do. A model averages  
10 those numbers into one point in one grid  
11 square, and 3000 feet is not a fine enough  
12 grid.

13 The other thing is, I work for  
14 the Navy, and when we do EISs, we identify  
15 preferred alternatives. We still don't  
16 know what the preferred alternative is  
17 here, so we can't say go forward, no, don't  
18 go forward; we don't know, because nobody  
19 has told us. Based on all that and some of  
20 what Ms. Hauser said, the time savings of a  
21 minute in -- 1.4 minutes in 2007 or 6  
22 minutes in 2015 when I got to wait an hour,  
23 hour, hour and a half to get my baggage and  
24 45 minutes to get back to my car, things

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1 like that, those 6 minutes don't mean  
2 anything to me. So I urge that the airport  
3 doesn't spend millions of taxpayer dollars  
4 for 1.4 minutes or 6 minutes per person.  
5 That is it.

6 MS. LILLER: Thank you, Joe.  
7 Tom Horsey is next.

8 MR. HORSEY: Tom Horsey. My  
9 wife and I are about to move into River  
10 Winds, so we are going to be new members to  
11 the community. I'm really thankful that  
12 we're having this open forum, as well as  
13 thanking West Deptford Township for doing  
14 their homework. I really appreciate that,  
15 too.

16 My wife and I are looking  
17 forward to going to a nice community, which  
18 is going to be nice and quiet in our  
19 retirement years. It looks like we're  
20 going to have a little bit more noise than  
21 we anticipated.

22 My concern is two-fold. The  
23 amount of traffic that is going to increase  
24 by both alternatives, whether it be one or

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1 two, seems to be a little more significant  
2 than we're led to believe.

3 Secondly, even though the  
4 decibels out on the noise grids that you

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5 had outside are small, being in the medical  
6 industry I know that even small decibel  
7 increases are significant. So that even if  
8 they rise just a little bit, to us on the  
9 ground, so to speak, it's quite a bit. So  
10 my concern is two-fold in the fact that  
11 we're having increased traffic as well as  
12 increased noise levels. By either  
13 alternative, even though the percentages  
14 out there on utilization are small by both  
15 increases and in both runways, I think that  
16 utilization figure is based on larger  
17 numbers in the future. And we're looking,  
18 from what I understand from West Deptford  
19 Township's research, that is significantly  
20 more than what was in the report. That is  
21 my comments.

22 MS. LILLER: Thank you, Tom.

23 Rich is next. After Rich, is  
24 going to be Len Daws and then Don Davis.

19

1 MR. McHUGH: Yes, my name is  
2 Richard McHugh. I live in Oakland, New  
3 Jersey. I'm kind of unprepared to what  
4 these other people that have come up. So  
5 my main concern is reflected on what  
6 they've all said, that as my taxes  
7 skyrocket, my property value is going down.  
8 I did not move into this problem. I'm

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9 second generation in my own family. This  
10 problem has moved in on me. Philadelphia  
11 gets the tax, from what I understand, the  
12 benefits of the taxes from the airport and  
13 South Jersey gets nothing but the  
14 negatives, the noise pollution and all that  
15 goes with it. I understand that it's a  
16 necessary evil, but there must be a better  
17 alternative to redirect the traffic, of  
18 some sort, as it was stated earlier.

19 Six minutes, so what, you get  
20 down to Orlando six minutes later. Why  
21 can't there be, just, maybe, a few less  
22 planes put in the air and people get where  
23 they're going 20 minutes later, maybe  
24 schedule reshifting, something other than

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1 adding more to the airport to eliminate  
2 congestion. That's just going to bring  
3 more planes in, and then you will be right  
4 back where you started from, before you  
5 have even reaped any benefits. I can't  
6 see it going positive. It seems to be a  
7 spiraling practice. It continues to go  
8 down, but other than that, thank you for  
9 your time.

10 MS. LILLER: Thank you, Rich.

11 Len Daws? After Len, will be  
12 Don Davis and then Mel Evans.

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13 MR. DAWS: My name the Len Daws,  
14 I'm the Deputy Mayor of the township of  
15 West Deptford. I want to express a couple  
16 concerns, in addition to the ones that  
17 Ms. Hauser expressed earlier.

18 I guess, for the record, the  
19 township committee is opposed to expansion  
20 of the runway. We feel as though there  
21 are, actually, better alternatives to the  
22 ones being proposed.

23 In particular, there are two  
24 concerns. I spoke to a number of gentlemen

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1 out in the hallway, and I had a lengthy  
2 conversation with, at least, one of the  
3 gentlemen, who is actually pretty familiar  
4 with the tower operations. Of particular  
5 concern is, in the last six months, there  
6 has been a change in the actual traffic  
7 pattern for the narrow body as well as  
8 commuter jets over the township of West  
9 Deptford.

10 One of the requests that I would  
11 like to make of this committee and the FAA  
12 is to reconsider and reevaluate their noise  
13 model to reflect the 2004 radar data. The  
14 data model that you currently have, the one  
15 in the hallway, reflects the 2003 data  
16 model. I think one of the gentleman had

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18 indicated that there has been a slight  
19 change in the traffic pattern, more  
20 importantly the usage of certain approaches  
21 to the runway. These are arriving jets or  
22 aircraft that are aligning themselves to  
23 the runway for consideration. As a result  
24 of this new emergent traffic pattern, we  
have aircraft that are actually approaching

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1 the township, from what I view as the  
2 northeastern direction, although that is  
3 kind of under debate.

4 In other words, the air traffic  
5 that is arriving to this runway is not  
6 following the corridor that is documented  
7 under the diagrams that you have in the  
8 hallway. The aircraft may be 90 to 110  
9 degree bearing changes within a three-mile  
10 radius to the airport, which results in a  
11 dramatic noise elevation as a result of  
12 thrusting of engines and the dramatic shift  
13 in the bearing of the aircraft as they try  
14 to sight align themselves to this  
15 particular runway.

16 One of the things I think that I  
17 would go back to is, if you would  
18 reconsider the model that they currently  
19 have in place. I'm sure that the model and  
20 data they have doesn't include this new

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flight pattern.

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The last thing that I want to touch upon and I think Janice has brought up earlier, which is the concern that the

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community has, the community along the river front. We, in fact, have considerable merchant traffic. We have tankers. We have cargo vessels that are up and down the river. I would like to actually see the FAA and committee actually document the standard operating procedures between the bridge and the air traffic control tower, in terms of how this information, in terms of approaching vessels, is actually communicated, itself, and made itself known on the water that it's approaching the corridor.

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It's my understanding that there are four periods a day or ten periods a day that the aircraft tower will be suspending the approaching aircraft arriving on this runway. What would be interesting to know is, what is the standard operating procedure here, what are standard channels for communication that occur between the tower itself and, actually, someone on board the bridge.

One of the things that was

1 actually highlighted in the 9/11 report is  
2 lack of communication. The fact that we  
3 have various levels of local authorities,  
4 as well as civilian and other state and  
5 federal agencies, that are now being forced  
6 to interoperate with each other, yet they  
7 are using various frequencies and channels  
8 of communication. One of the things we  
9 have concern of is making sure that there  
10 is a standard operating procedure that will  
11 allow somebody on the bridge, whether it be  
12 the Coast Guard or somebody else who would  
13 be, actually, accompanying the vessel up  
14 the river as to what the standard operating  
15 procedure would be for notifying the tower  
16 that the vessel will, actually, be  
17 approaching. That is all I have. Thank  
18 you.

19 MS. LILLER: Thank you, Len.

20 Don Davis with a question mark.

21 MR. DAVIS: I have no comment.

22 MS. LILLER: Thank you, Don.

23 I think it's Mel Evans. I'm

24 sorry if I'm not pronouncing that

1 correctly.



2 MR. EVANS: I wish to hold  
3 comment until I hear some more information  
4 presented.

5 MS. LILLER: You want to just  
6 pass to the next person?

7 MR. EVANS: Yes.

8 MS. LILLER: Do you want me to  
9 come back to you after?

10 MR. EVANS: Yes.

11 MS. LILLER: Okay. I'll check  
12 in again.

13 Steve Drummond also has a  
14 question mark.

15 Do I have Steve?

16 MR. DRUMMOND: Thank you. My  
17 name is Steve Drummond, and I will just be  
18 very brief.

19 I would like to first thank  
20 Janice Hauser and Len Daws for coming out  
21 and representing the township in a position  
22 that I'm happy that they took, which is  
23 against the expansion of 17-35. It seems  
24 that it's a five-year temporary fix. The

1 attention should really be drawn to, as  
2 Janice pointed out, a third runway parallel  
3 to the Delaware River. It's very simple to  
4 quantify decibels, as we're looking at the  
5 charts that you have outside there, but to

6 live in River Winds, as we do and probably  
7 most parts of West Deptford Township, to  
8 stand outside our house on a sunny  
9 afternoon, that average decibel reading  
10 over a 12-month period is meaningless when  
11 you're standing outside on a Sunday  
12 afternoon and you hear these jets flying  
13 over us. So I would like you to take to  
14 heart what the township has represented to  
15 you, that is that we're dead set against  
16 the expansion. I would like to see 17-35  
17 close down entirely, but as Janice had  
18 said, if it can be restricted as much as  
19 possible to daytime only, that would be  
20 appreciated. Thank you.

21 MS. LILLER: Thank you, Steve.  
22 Next I have a J. Shillingsford.  
23 I'm probably not pronouncing that  
24 correctly. Just so people know, the next

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1 name would be Nancy Miller and then William  
2 Redner.

3 MS. SHILLINGSFORD: My name is  
4 Judy Shillingsford, and I live directly  
5 across from the Navy Yard, one block in  
6 off -- my address is 30 Dunham. I have  
7 noticed an increase in the air traffic this  
8 year. When the planes go over my house,  
9 it's deafening. I can't imagine what the

10 quality of life is going to be in my  
11 neighborhood if they do what they're  
12 proposing to do. I wish that you would  
13 consider the fact that the quality of life  
14 for the people that live here and try to  
15 come up with a solution that will benefit  
16 everyone. Otherwise, you're going to have  
17 a lot of people in West Deptford Township  
18 that are going to be very unhappy, because  
19 when the planes go over you can't have a  
20 conversation. If they go over at night,  
21 it's going to affect our sleep. So I hope  
22 that you'll consider all these things and  
23 come up with something that works for  
24 everyone. Thank you.

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1 MS. LILLER: Thank you for  
2 coming out.

3 Next is Nancy Miller, and after  
4 Nancy will be William Redner.

5 MS. MILLER: My name is Nancy  
6 Miller, and I would like for you to  
7 consider, perhaps, addressing the airlines,  
8 having them depeak their flights, which is  
9 what Chicago O'Hare did. As a result,  
10 their delays are no way near as long as  
11 they used to be. It's my understanding  
12 that the reason for the expansion is to  
13 eliminate some of those delays that we do

14 have at Philadelphia International Airport.

15 My other comment is, if this is  
16 the case, how come the FAA and the City of  
17 Philadelphia has allowed Southwest to come  
18 in? Last year they had 200 flights. Thank  
19 you very much.

20 MS. LILLER: William Redner.

21 MR. REDNER: My name is William  
22 Redner. I have been a West Deptford  
23 Township resident for 22 years. I have  
24 been an air traffic controller at

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1 Philadelphia for 20 years. Unfortunately,  
2 I'm part of problem here right now in  
3 vectoring airplanes over our community to  
4 land on runway 35. There has been a great  
5 change in how we use runway 35 since when  
6 Southwest came in. We are starting to land  
7 Airbus 319s, Airbus 320s, which are larger  
8 body aircraft, along with the regional jets  
9 and props that have been landing for quite  
10 a few years on runway 35.

11 I have to agree with what our  
12 township said, in that we need a new noise  
13 study. Since May, it has changed greatly.  
14 So really the noise studies that have been  
15 done are not accurate in how it found the  
16 noise that we have over our community at  
17 this time.

18                   In looking at the proposals, if  
19 you extend runway 35 to the south without  
20 the displaced threshold, you're going to  
21 have a lot of stoppages like we are right  
22 now with ships. This operation that they  
23 had set up is not working well at all. I  
24 have, myself, been caught several times

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1                   with quite a few airplanes that have been  
2 lined up for runway 35, and I had to find  
3 somewhere else to put them because runway  
4 35 is closed. It did not give me the  
5 appropriate amount time to stop my 35  
6 arrivals and get rid of them before it got  
7 closed. So there I had numerous airplanes  
8 that were being vectored that had to go to  
9 the primary runway that was already full,  
10 that were forced to go into a hold. This  
11 affects Washington Center, New York Center,  
12 all the air traffic control facilities  
13 around us. It is not a good way to  
14 operate.

15                   If you extend runway 35, and you  
16 insist on going this way, the displaced  
17 threshold would be the only alternative  
18 that would be a viable alternative. My  
19 thoughts on this would be if you could  
20 extend it to the north and stop the runway  
21 before runway 27 right 3, 9 left, it would

22 be money much better spent. We could land  
23 runway 17 and land 27 right, independently.  
24 We could land runway 17 and depart 9 left

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1 independently, which is were our major  
2 delays come in. And as was mentioned  
3 before, runway 35 is a VFR runway. We can  
4 only run to runway 35 if the weather is at  
5 least 15 or 1800 feet and at least 3 mile  
6 visibility, if not more, and usually 5  
7 miles is what we need to get the runway.  
8 Our major delays happen when it's IFR, when  
9 we have bad weather. Money would be much  
10 better spent on runway 26. We have the PRN  
11 already in place. We can land runway 26  
12 and runway 27 left and depart 27 right in  
13 bad weather.

14 Also the new runway that they're  
15 talking about along the Delaware River,  
16 again, all these options would not affect  
17 communities like ourselves, like the runway  
18 35 expansion would.

19 MS. LILLER: Thank you for  
20 coming.

21 Ann Hesse is next. I have Ann  
22 Hesse next and after Ann will be John.

23 MS. HESSE: Yes, I just signed  
24 my name when I came in because I do not

1 know what the format would be, and I'm  
2 certainly not an expert. I live in the  
3 area. We have enough noise. When I have  
4 taken a walk over in National Park, on the  
5 beach there, I mean there is one plane  
6 landing right after the other. It's like a  
7 constant thing. I think, especially,  
8 during the day, I think there should be  
9 alternatives. That one runway is going to  
10 cause a lot of problems. It sounds to me,  
11 I'm not an engineer or anything, but it  
12 sounds to me that people that have worked  
13 and know this are talking about that one  
14 runway along the Delaware River would be a  
15 really good idea. Think of our quality of  
16 living. Think of the air pollution. Think  
17 of all the other problems, the chances of  
18 having, like the lady before said, a plane  
19 hitting a ship because there is a mistake  
20 with the communications. These are all  
21 major things to consider before you just go  
22 and build at the airport.

23 Also, I would like to know, are  
24 these meetings published anywhere? I'm

1 sure there are other people that might have

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2 attended this meeting. I happen to have  
3 gone into the library and saw it in the  
4 library. How is this information getting  
5 out to the public about a major concern  
6 that they may not even know about? So  
7 there is always things advertised on TV,  
8 there are community channels where people  
9 would be able to know, oh, there is  
10 something impacting my life, I would like  
11 to attend. That is really all I have to  
12 say. Thank you.

13 MS. LILLER: Thank you.  
14 John.

15 MR. GAUB: My Gaub. I'm a  
16 township committeeman here. I've served  
17 here for 12 years. I would like to first  
18 make a couple of comments on those last two  
19 points of the lady that just spoke before  
20 me. As an elected official here, for 12  
21 years, I was not aware of the first meeting  
22 that was held in West Deptford Township  
23 until after, I believe, 5:30 or 6:00 that  
24 night. I think communication of this issue

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1 has certainly been a problem. I do agree  
2 that this place might have been filled, if  
3 the information had gotten out a little bit  
4 more to some of the rest of the people.

5 The second thing is, my comments



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6 are that the gentleman, the air traffic  
7 controller, certainly seemed like he knew  
8 the in and outs of what was going on. I  
9 really question, pertaining to the report,  
10 how much people who deal with it every day,  
11 like him, have input in regards to this  
12 report, because I think, certainly, those  
13 are the people that are dealing with it day  
14 to day. Obviously, he disagrees with some  
15 things, and he made some very valid points.  
16 I certainly hope that you guys would  
17 consider those types of people, in regards  
18 to making policies, so to speak, and in  
19 regards to this.

20 Also, I have not seen -- the  
21 hours of operation have not been documented  
22 anywhere for this expansion.

23 Finally, one of my points that I  
24 would like to make is a real life example.

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1 Some people have talked about how it has  
2 affected them. I am also a high school  
3 coach, and I have coached in our park for  
4 the last ten years. Traditionally, before  
5 every single game, I have taken my team off  
6 the field and put them in the same set of  
7 stands for somewhere between a  
8 three-and-five minute speech that I give.  
9 I cannot remember, in the prior nine years,

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10 like this year, where I would have to stop  
11 in a three-to-five minute speech, at least  
12 two, sometimes three times, in regards to  
13 traffic of planes coming over. To me, I  
14 agree with Mr. Daws in the sense that  
15 somehow the patterns have been changed,  
16 something has drastically changed, but that  
17 as it stands now, I can't even imagine, as  
18 far as I'm concerned, it's unacceptable  
19 now, how an expansion would be a bigger  
20 nightmare for us. I thank you for giving  
21 me the time.

22 MS. LILLER: Thank you, John. I  
23 apologize that maybe you should have been  
24 called on first.

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1 I told Mr. Evans that I would  
2 revisit and see if he wanted to speak.

3 Did you want to change your mind  
4 and come up and speak, sir?

5 MR. EVANS: Will you holler at  
6 me?

7 MS. LILLER: Absolutely not.

8 MR. EVANS: Apparently, the  
9 concern is the safety level when these jets  
10 take off. Of course, when they take off,  
11 there is a lot of noise and a lot of  
12 exhaust. By the same token, if it's  
13 overloaded, like the man says, and they

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14 have to go around, it's something like 8 or  
15 \$900 just for one turn around, so that is a  
16 big concern for the airlines themselves.  
17 Other than that, it can't be much worse  
18 than a tug going down the river, what is  
19 it, every five minutes, every three  
20 minutes; what is that buoy over there?  
21 What is the buoy that makes all the noise?  
22 At any rate, I appreciate the opportunity  
23 to make this statement.

24 MS. LILLER: Can you spell your

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1 name, just for the stenographer, sir?

2 MR. EVANS: Evans.

3 MS. LILLER: And your first  
4 name.

5 MR. EVANS: Sue.

6 MS. LILLER: We don't believe  
7 it.

8 MR. EVANS: Mel Evans.

9 MS. LILLER: Thank you, Mel.

10 I'm at the end of my list. I'm  
11 going to turn things back to the hearing  
12 officer, Sue McDonald. Perhaps some of you  
13 will be thinking and maybe still want to  
14 say something, so let's here from Sue, and  
15 if that is the case, all you need to do is  
16 come forward and we will write your name  
17 down and then you also get a chance to

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18 speak because we certainly have time.

19 MS. McDONALD: Once again, thank  
20 you very much for coming and speaking. We  
21 will be here until 9:00. We would also be  
22 continuing this hearing tomorrow night and  
23 Thursday night at these locations that you  
24 see here. We welcome your comments, and

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1 once again we will be here until nine if  
2 anyone else decides to speak or there are  
3 written comment sheets, if you care to do  
4 it that way. Thank you.

5 MS. LILLER: I understand that  
6 some of you will be leaving, but if some of  
7 you want to speak, you can come forward and  
8 we will just make sure that you want to  
9 leave, to leave so it isn't noisy for the  
10 folks that want to stay.

11 This is Mr. Bob Gould.

12 MR. GOULD: Yes. I'm not  
13 speaking in my official capacity of Deputy  
14 of Emergency Management here. You people  
15 have had the opportunity to work with me  
16 because I've called your offices numerous  
17 times and made myself available. You go  
18 and put on a public hearing with no times.  
19 I live close by, and I had to walk around  
20 the building to get in the door. There is  
21 no signs directing people how to get into

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the place. There is no nothing inside.

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My concern is that I found out  
about this because I belong to a community

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advisory panel. The reason we found out  
about it was that we have members that  
actually are concerned and have the jets  
flying over their homes. I have also have  
had to a chance to run Operation Windshear,  
which is the major drill and training that  
the FAA ran along the Delaware River for a  
plane crash. With that in mind, I would  
have thought, after 9/11, that we would all  
work together. During the summer, you have  
had two emergencies because you were flying  
illegally, too low and no one knew about  
it; no one was told about it. These issues  
need to be addressed.

That runway is a stopgap. It's  
not going to solve your problems. We're  
trying to find places to put dredge. We  
need to put dredge on the runway and really  
solve our problems. We don't want to take  
the short cut. You can't put Band-Aids  
where you need to put asphalt. This is  
what we need to do.

I have offered to work. No one  
has called me back. I have called, at

1 least ten times, to your Pittsburgh office  
2 and also to your Philadelphia office. I  
3 have had correspondence. I have your  
4 mailings. I've read it all. The sounds  
5 are atrocious. I am from this area, but  
6 the safety of this area -- this is the area  
7 that is exploding. Did you take that into  
8 consideration, that the people in this  
9 area -- the population explosion? There is  
10 a lot more going on, economically, along  
11 the Camden waterfront, and was that taken  
12 into consideration? I know it's hard when  
13 you're doing an environmental impact study  
14 to take in what is the environment. The  
15 environment is safety, health and then the  
16 environment. You have to worry about  
17 people's lives, the quality of their lives.

18 I appreciate your time, and I  
19 offer my assistance. I hope that Rob  
20 Andrews, who is my representative, will  
21 work with me to spend this money  
22 appropriately, because you do need to spend  
23 the money for safety at that airport in  
24 different ways. I think you've heard from

1 an expert tonight, and if you don't take  
2 advantage of the expertise, you're making a

3 very, very big mistake.

4 Thank you very much.

5 MS. LILLER: Thank you. Next we  
6 have Raymond Stanaitis.

7 MR. STANAITIS: I am from  
8 Gloucester City, New Jersey. I came here  
9 tonight not half as well prepared as most  
10 of the speakers before me. I'm on a  
11 committee that is for the reconstruction of  
12 the interchange of 295 and the 42 Freeway,  
13 in Bellmawr, Mount Ephraim, Gloucester City  
14 area.

15 Speaking of people not having  
16 any information about something, last week  
17 we had a meeting about the reconstruction,  
18 and I brought up this meeting tonight and  
19 about some changes at the Philadelphia  
20 Airport only because, with the noise level  
21 that is going to be developed in that area,  
22 because they're going to put overpasses  
23 over the highway and connect to 95, these  
24 overpasses that are going to be 80 feet up

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1 in the air, and with sound barriers and all  
2 this noise here, I'm telling them about the  
3 airport changes and how that is going to  
4 come in. None the people from that meeting  
5 from the Department of Transportation knew  
6 anything about the airport deal. When I

7 brought it up to them, they were absolutely  
8 surprised.

9 My concern is, that I understand  
10 that what we're talking about here is a  
11 short-term relief of traffic. I don't know  
12 the numbers of the runway, but part of that  
13 project, the way I understand it is, once  
14 that is completed there is a probability of  
15 changing the angle of the main runway to  
16 extend it. When they change that angle,  
17 it's going to bring even more traffic over  
18 New Jersey. It's going to bring it right  
19 over Bellmawr, right over. Then there is  
20 the Delaware River Port Authority that  
21 wants to bring a rail line up, follow 55 to  
22 42 and 42 into Camden, and that's a noise  
23 level -- reconstructed air space. It's  
24 going to become a wasteland here. You're

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1 not going to be able to give away your  
2 homes. I am very concerned. I wish I had  
3 more studies like most of those people  
4 before me had. Like I said, I just heard  
5 of the meeting the other day, and I didn't  
6 have a chance to talk to anybody. The  
7 realignment should be considered, not a  
8 future project, I think it should be  
9 considered part of the project. That's the  
10 best that I can do for the moment. I will



11 try to get in touch with other people and  
12 come up with some further studies, if there  
13 is going to be another meeting. Thank you.

14 MS. LILLER: Thank you, Raymond.

15 That is my list for the evening,  
16 and I thank you again. They will be here  
17 until 9:00. If anybody else wants to come  
18 forward. Sir, come on up and sign in.  
19 This is James Cromley.

20 MR. CROMLEY: First off, I would  
21 like to thank the FAA for holding the  
22 meeting here. I was notified by a  
23 different way. I was notified by E-mail.  
24 I was on somebody's E-mail list, so I have

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1 been a little apprised of what is going on.

2 I was just going to listen  
3 tonight, but let me explain where I'm at.

4 I'm from Mantua Township,  
5 presently. I did serve as a National Park  
6 councilman, and I remember this issue  
7 coming up years ago. One thing with these  
8 projects is, you're going to have to  
9 consider them in the totality of what is  
10 going on in the area. I have not had time  
11 to review your report. I will do that.  
12 I'm presently serving as the Mantua  
13 Township environmental commissioner now.  
14 I'm not representing the commission, but

15 I'm a member of that. What I have a  
16 concern is probably what you did not  
17 consider, and I heard points tonight about  
18 ship -- the traffic.

19 There was an announcement made  
20 by PGW about possibly they would bring up  
21 liquefied natural gas tankers up to a spot  
22 in Philadelphia, which would cross  
23 underneath the bridge and so forth. I'm  
24 familiar with these projects from years

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1 ago. The present site of the River Winds  
2 was proposed years ago. There were several  
3 citizen's groups that proposed that  
4 project. Basically, that land laid vacant  
5 until the community wisely developed it  
6 into the very beautiful community center  
7 and so forth. I think what should be  
8 considered or added to your proposal here  
9 is that the PGW is proposing this type of  
10 project, that you included this in your EIS  
11 because they have to be studied, in terms  
12 of the safety aspect, in case something  
13 catastrophic does happen. I did not  
14 realize that there was this interaction  
15 between the airport and the ship traffic.

16 I want to thank the West  
17 Deptford officials that got up. They did  
18 an excellent job. They stood up. They

19 have not been like other local communities  
20 where they stated their position on the  
21 project. I would like to thank you again  
22 for being here. I can understand the  
23 frustration from some of you. You were  
24 probably advertising this stuff on the web,

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1 and some people are not web savvy. You may  
2 have to publicize it more because that  
3 frustration was shown tonight.

4           Again, I would like to thank the  
5 local officials, and please consider the  
6 project that was just proposed just  
7 yesterday. The mayor of Philadelphia has  
8 already come out against the PGW project,  
9 but that also should be studied for your  
10 consideration. I want to thank you.

11           MS. LILLER: Thank you.

12           Richard McHugh.

13           MR. McHUGH: Richard McHugh,  
14 from Oakland. As I said earlier, I was  
15 totally unprepared and I was embarrassed  
16 because I thought I was basically the only  
17 one, but listening to what everybody has  
18 said, I was totally in the dark until this  
19 afternoon. I read yesterday's Inquirer and  
20 found the article. I just happened to find  
21 the paper laying around. That is how I  
22 found out about this meeting.

23 Last Tuesday I was at our town  
24 meeting and nothing was mentioned, at all,

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1 on this project. So as far as I know,  
2 Oakland is totally unaware of this. Either  
3 that or they're hiding it from us for some  
4 reason. To me that is very scary, that a  
5 project with such a major impact on our  
6 community, and there is such a total lack  
7 of communication and outgoing  
8 communication, I don't know quite how to  
9 state it -- listening to what I heard from  
10 people in very high, important positions  
11 that are unaware of this situation. To me  
12 that is scarier than the idea of the  
13 project, that we don't even know about it.  
14 We are the ones that are to be impacted.  
15 That is not right. It's like my life and  
16 my quality of life has not even been  
17 considered. There should be more. I'm  
18 going to make my town aware of it. I will  
19 be contacting them tomorrow because this is  
20 very important. Thank you.

21 MS. LILLER: I thank everyone  
22 for coming. Again, know that they will be  
23 here until nine, and if you decide that you  
24 want to speak, I'll make sure that the room

1 is quiet and you will be able to be heard.

2 Thank you.

3 I will also remind you that the  
4 other way is to take a comment form home  
5 and if you decide that you do have  
6 something that you want to write, on the  
7 comment form is Sue McDonald's address.  
8 You can mail it to her. You can e-mail it  
9 to her or you can go to the web site and  
10 submit it that way. Thank you for coming  
11 out.

12 SPEAKER: I have a question on  
13 this form.

14 Can they be copied?

15 MS. LILLER: Yes. The forms can  
16 be copied. Remember, December 1st is the  
17 deadline. Thank you.

18 (Whereupon, the hearing was  
19 concluded at 9:00 p.m.)

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I HEREBY CERTIFY that the proceedings and evidence are contained fully and accurately in the stenographic notes taken by me upon the foregoing matter on Tuesday, November 16, 2004 and this matter is a correct transcript of same.

---

FRANCIS A. FARRELL  
Certified Court  
Reporter and Notary Public.

(The foregoing certification of this transcript does not apply to any reproduction of the same by any means, unless under the direct control and/or supervision of the certifying reporter.)

Comment Number	Comment	Response
150.1	<p>[Janice Hauser] A noise monitor study conducted in January of 2003 measured the impact of aircraft operations, which were then 44 percent and 52 percent under the current annual average operational levels. Since that time, the usage of Runway 17-35 has increased to the extent that we believe that the existing noise study is no longer an accurate indicator of the potential impact of ambient noise levels in West Deptford Township.</p>	<p>The commentator 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. While the monitored operations were lower than the Annual Average Delay (AAD), the noise analysis is based on the INM model and the input accurately reflected the AAD for the base year.</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, 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>
150.2	<p>[Janice Hauser] While the Draft Environmental Impact Statement did not project any significant increases in average noise levels based on FAA tests and procedures for cumulative noise exposure, it did show an increase of 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>	<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>

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150.3	[Janice Hauser] The Draft Environmental Impact Statement joint 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 whether or not approvals for extension of Runway 17-35 are granted.	<p>There are no nighttime use "restrictions" on Runway 17-35 but voluntary noise abatement procedures. 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 and may be altered based on operational safety criteria conditions (weather/wind, visibility, volume of traffic, delays, pilot discretion, construction, etc.). The Part 150 Study further describes the nature of the night time runway use plan.</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 pursuant to Airport Noise and Capacity Act (ANCA) and FAR part 161.</p>
150.4	[Janice Hauser] I question whether the extension of Runway 17-35 is the most effective response given that an increase in arrivals and suspensions is more 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 would lead to an increase of arrival suspension. Is it really prudent to invest millions of dollars in the extension of Runway 17-35 when the benefit of that project, mainly decrease in flight delays, is likely to be significantly less effective due to an increase in arrival aircraft suspension associated with tanker and container ships?	The ship notification procedure currently in place is efficiently allowing air traffic controllers to assign aircraft to other runways when a ship is passing. Current experience and future projections indicate that ship notification would be needed on average at most four times a day. The closures are expected to occur approximately four times per day, lasting about 15 minutes, based on current experience. This has been taken into account in the delay model, and still produced delay reduction.
150.5	[Janice Hauser] I'm afraid that the expansion of Runway 17-35 could put the public at greater risk of a disastrous collision between a passenger aircraft and a large tanker or container ship.	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.
150.6	[Janice Hauser] I question whether this is a sound expenditure of public funds. It is my understanding that Runway 17-35 is a visual flight rules and runway. These rules limit the usage of this runway to weather conditions that provide good visibility.	As described in Chapter 2, Runway 17 is a precision instrument runway and Runway 35 is a non-precision instrument runway. Runway 17-35 can be used in poor weather conditions.
150.7	[Janice Hauser] Millions of public dollars being spent on the expansion of Runway 17-35 would be better spent expanding other existing runways. For instance, Runway 8-26 is currently controlled by a precision radar monitor, which makes landings relatively unaffected by visibility conditions. Therefore, an expansion of Runway 8-26 may be a safer and more efficient use of public funds.	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.
150.8	[Janice Hauser] 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.	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.
150.9	[Joe Rhyner] I don't think the document has provided enough data to make conclusions. The basis for the noise study was 2003. It supposedly included cumulative effects. We weren't landing regional jets on this runway until 2000 or so. To me that isn't a cumulative affect.	The commentator is correct in his statement that the basis for the noise study is 2003. The base year noise impacts were adjusted to reflect actual use of Runway 17-35. Cumulative effects were addressed in the noise analysis, which takes into account noise conditions resulting from past activities. The Summary Section of the Noise Technical Report (Appendix A.1 of the DEIS) acknowledges that the contours for the 2003 Existing Conditions in the current study were smaller than the 2001 contours in the FAR Part 150 Noise Compatibility Study.



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150.10	[Joe Rhyner] Some of the data that you actually prepared percentage wise are the regional jets would increase 29 percent, and that is, obviously, going to affect your noise, but the data in table 3-10 shows the regional jets will increase 73 percent on an average day. So things like that, it just doesn't make sense to me.	<p>Table 3-10 in Appendix A.1 of the DEIS presents numbers of operations rather than percentages, and it focuses only on the activity north and south of Runway 17-35. The related reference to an increase of 29 percent in the number of regional jets is because of the wording in the DEIS text on page 3-26. The second bullet on that page could have more clearly stated that:</p> <p>To the south, the Alternative 1 contours expand along the extended centerline of Runway 17-35 due to an increase of 29 percentage points in the use of Runway 35 for landing by regional jets and an increase of 14 percentage points in the use of 35 for landing by small narrow-body jets when compared to the No-Action Alternative.</p> <p>Similarly, the fourth bullet on the same page could have more clearly stated that:</p> <p>To the north, the Alternative 1 contours expand along the extended centerline of Runway 17-35 due to a 4 percentage point increase in the use of Runway 17 for landing by regional jets and an increase of 5 percentage points in the use of 17 for landing by small narrow-body jets, compared to the No-Action Alternative. In addition, the contours expand to the north and northwest because of an increase of 45 percentage points in the use of Runway 35 for departure by regional jets and an increase of 5 percentage points in the use of 35 for departure by small narrow-bodies, offset by a decrease of 12 percentage points in the use of the runway for takeoff by corporate jets, thereby limiting the amount of expansion in the DNL contours to the north.</p>
150.11	[Joe Rhyner] The model grid I found -- I thought was to large (200 acres average noise) when I have planes flying over my house. Somebody 1,500 feet away will have a lot less noise than I do. A model averages those numbers into one point in one grid square, and 3,000 feet is not a fine enough grid.	Noise exposures were calculated at specific points to identify noise changes at sensitive receptors such as schools and for specific population centroids. In addition, noise exposure values computed at the 3,000 foot grid spacing are intended to supplement calculations at specific cultural resources and at specific population centroids closer in towards the airport. At this spacing, the noise levels do not change dramatically from one point to the next.
150.12	[Joe Rhyner] We still don't know what the preferred alternative is here, so we can't say go forward, no, don't go forward.	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.
150.13	[Joe Rhyner] The time savings of a minute in -- 1.4 minutes in 2007 or 6 minutes in 2015 when I got to wait an hour, hour, hour and a half to get my baggage and 45 minutes to get back to my car, things like that, those 6 minutes don't mean anything to me. So I urge that the airport doesn't spend millions of taxpayer dollars for 1.4 minutes or 6 minutes per person.	The FAA has noted and considered your comment. The project is intended to reduce delay in the short term and is critical because PHL is a pacing airport, i.e., one of the airports that contribute to delays throughout the national airport system. The other delays that the commentor mentioned are non-airfield delays. The reported delay benefit is an annual average over all flights. Flights may be delayed substantially more - up to several hours. The Runway 17-35 Extension Project will reduce the average delay, not 1.4 minutes on each flight.
150.14	[Tom Horsey] The amount of traffic that is going to increase by both alternatives, whether it be one or two, seems to be a little more significant than we're led to believe.	Future Operations at PHL, for the No-Action Alternative and either build alternatives, are projected to increase to 528,400 annual operations in 2007, as described in Section 4.2.

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150.15	[Tom Horsey] Even though the decibels out on the noise grids that you had outside are small, being in the medical industry I know that even small decibel increases are significant. So that even if they rise just a little bit, to us on the ground, so to speak, it's quite a bit.	Increases in noise of 3 dB are barely perceptible to the human ear, and do not result in medical damage to hearing. 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 percent of the population. 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.
150.16	[Tom Horsey] By either alternative, even though the percentages out there on utilization are small by both increases and in both runways, I think that utilization figure is based on larger numbers in the future. And we're looking, from what I understand from West Deptford Township's research, that is significantly more than what was in the report.	The runway utilizations used in the noise modeling for this EIS are based on outputs from a complex simulation model (TAAM) used to estimate delays and other operational factors that are integral to any airport planning project. Though runway utilizations may change in the future as the mix of traffic, weather, and other air traffic control parameters change over time, the FAA stands behind the forecast utilizations reported in this EIS.
150.17	[Richard McHugh] As my taxes skyrocket, my property value is going down.	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.
150.18	[Richard McHugh] There must be a better alternative to redirect the traffic,...maybe, a few less planes put in the air...maybe schedule regshifting, something other than adding more to the airport to eliminate congestion.	As described in Chapter 3, a number of alternatives, including demand management alternatives, were considered and analyzed for the Project. These alternatives were eliminated because they would not achieve the project's purpose and need.
150.19	[Len Daws] I guess, for the record, the township committee is opposed to expansion of the runway. We feel as though there are, actually, better alternatives to the ones being proposed.	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.
150.20	[Len Daws] One of the requests that I would like to make of this committee and the FAA is to reconsider and reevaluate their noise model to reflect the 2004 radar data. The data model that you currently have, the one in the hallway, reflects the 2003 data model. I think one of the gentleman had indicated that there has been a slight change in the traffic pattern, more importantly the usage of certain approaches to the runway.	<p>The actual number of forecasted future operations are reported in Tables 3-4 through 3-9 of the Noise Technical Appendix A.1. This EIS was initiated early in 2004 and uses radar and other data for the most recent full calendar year preceding that date as the basis for many existing assumptions regarding fleet mix, numbers of nighttime operations, runway use, flight track locations, and track use. The 2003 data were then 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 to departures to southerly destinations as they leave the Philadelphia area. These operational inputs serve as the basis for the 2003 Existing scenario reported in this EIS. Modeled flight tracks reflecting this activity are shown in Figures 4.2-2 and 4.2-3 of the DEIS, and while they do not portray every unique operation that occurs in the vicinity of the airport, they do represent the vast majority of aircraft and the areas over which those aircraft fly.</p> <p>With regard to changes in operations since the start of this EIS process, traffic levels have continued to grow through 2004 and may have been noticed by residents of some communities; however, the increase in operations is still within the range of the forecast for 2007 against which the proposed Build Alternatives are being evaluated.</p>

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150.21	[Len Daws] In other words, the air traffic that is arriving to this runway is not following the corridor that is documented under the diagrams that you have in the hallway. The aircraft may be 90 to 110 degree bearing changes within a three-mile radius to the airport, which results in a dramatic noise elevation as a result of thrusting of engines and the dramatic shift in the bearing of the aircraft as they try to sight align themselves to this particular runway.	The noise analysis used up-to-date flight tracks for analysis for future conditions, and modeled the predicted future runway use for the specific types of aircraft expected to use Runway 17-35. As Figure 4.2-2 shows arrivals do make turns within three miles of the Airport.
150.22	[Len Daws] I would like to actually see the FAA and committee actually document the standard operating procedures between the bridge and the air traffic control tower, in terms of how this information, in terms of approaching vessels, is actually communicated, itself, and made itself known on the water that it's approaching the corridor. It's my understanding that there are four periods a day or ten periods a day that the aircraft tower will be suspending the approaching aircraft arriving on this runway. What would be interesting to know is, what is the standard operating procedure here, what are standard channels for communication that occur between the tower itself and, actually, someone on board the bridge.	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. 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.
150.23	[Steve Drummond] The attention should really be drawn to, as Janice pointed out, a third runway parallel to the Delaware River.	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.
150.24	[Steve Drummond] I would like to see 17-35 close down entirely, but as Janice had said, if it can be restricted as much as possible to daytime only, that would be appreciated.	Runway 17-35 is vital to the operation of the Philadelphia International Airport, and will not be closed. 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.
150.25	[Judy Shillingsford] I wish that you would consider the fact that the quality of life for the people that live here and try to come up with a solution that will benefit everyone.	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.

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150.26	[Nancy Miller] I would like for you to consider, perhaps, addressing the airlines, having them depeak their flights, which is what Chicago O'Hare did. As a result, their delays are no way near as long as they used to be.	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.
150.27	[Nancy Miller] How come the FAA and the City of Philadelphia has allowed Southwest to come in? Last year they had 200 flights.	As discussed in Section 3.3.1, governmental authorities have little control over the airlines' routing and scheduling. Under deregulation (1978), domestic airlines can establish and drop routes, start or end service at any airport. In addition, any airport that has received FAA funding (including PHL) must be available without discrimination to all users. 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.
150.28	[William Redner] We need a new noise study. Since May, it has changed greatly. So really the noise studies that have been done are not accurate in how it found the noise that we have over our community at this time.	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.
150.29	[William Redner] If you extend Runway 35 to the south without the displaced threshold, you're going to have a lot of stoppages like we are right now with ships. This operation that they had set up is not working well at all.	The ship notification procedure currently in place is efficiently allowing air traffic controllers to assign aircraft to other runways when a ship is passing. Current experience and future projections indicate that ship notification would be needed on average at most four times a day. The closures are expected to occur approximately four times per day, lasting about 15 minutes, based on current experience. This has been taken into account in the delay model, and still produced delay reduction.
150.30	[William Redner] Money would be much better spent on Runway 26. We have the PRN already in place. We can land Runway 26 and Runway 27 left and depart 27 right in bad weather.	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.

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150.31	[William Redner] Think of our quality of living. Think of the air pollution. Think of all the other problems, the chances of having, like the lady before said, a plane hitting a ship because there is a mistake with the communications. These are all major things to consider before you just go and build at the airport.	<p>Safety is the FAA's highest priority. The Joint U.S. Coast Guard and FAA Advisory issued 30 September 2004 establishes procedures and requirements for the Airport's Marine Radio Operator and Airport Operations Duty Officer, and for mariners and operators of vessels greater than 125 feet air draft. The Marine Radio Operator, stationed in the airport ramp control tower, is responsible for monitoring and tracking inbound and outbound vessel information, and for providing the Airport Operations Duty Officer with vessel transit times and information. Mariners with an air draft greater than 125 feet are required to notify the airport's MRO 30 minutes before entering the aircraft approach zone. The Airport Operations Duty Officer notifies the FAA/ATC Tower, then once notified, the runway is then opened or closed.</p> <p>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. Property values and quality of life depend on many factors. This Project will not have significant impact on noise, environmental impacts or quality of life. We believe it is highly unlikely that any property values will decrease, however, the FAA has noted your comment.</p>
150.32	[William Redner] Also, I would like to know, are these meetings published anywhere? I'm sure there are other people that might have attended this meeting. I happen to have gone into the library and saw it in the library. How is this information getting out to the public about a major concern that they may not even know about?	<p>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.</p>
150.33	[John Gaub] I think communication of this issue has certainly been a problem. I do agree that this place might have been filled, if the information had gotten out a little bit more to some of the rest of the people.	<p>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.</p>

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150.34	[John Gaub] The hours of operation have not been documented anywhere for this expansion.	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. If the proposed project is constructed, this voluntary noise abatement procedure is expected to remain in place. 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.
150.35	[John Gaub] Patterns have been changed, something has drastically changed, but that as it stands now, I can't even imagine, as far as I'm concerned, its unacceptable now, how an expansion would be a bigger nightmare for us.	Recently, particularly since the entry of Southwest Airlines at Philadelphia, more regional jets and narrow-body jets have been landing on Runway 35 when weather conditions permit. The FAA has noted and considered your comment.
150.36	[Bob Gould] You go and put on a public hearing with no times. I live close by, and I had to walk around the building to get in the door. There is no signs directing people how to get into the place. There is no nothing inside.	Meeting times were in all meeting notices distributed by the FAA.
150.37	[Bob Gould] During the summer, you have had two emergencies because you were flying illegally, too low and no one knew about it; no one was told about it. These issues need to be addressed.	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. Past emergency incidents caused by illegal pilot operations or other reasons would not be addressed in an EIS, but would be addressed through legal or enforcement channels. The vast majority of pilots comply with the regulations. FAA does not expect pilots to fly illegally.
150.38	[Raymond Stanaitis] None the people from that meeting from the [New Jersey] Department of Transportation knew anything about the airport deal.	Coordination was conducted with the appropriate and required New Jersey state agencies, which included the New Jersey State Historic Preservation Office and the New Jersey Department of Environmental Protection.
150.39	[Raymond Stanaitis] Once that is completed there is a probability of changing the angle of the main runway to extend it. When they change that angle, it's going to bring even more traffic over New Jersey. It's going to bring it right over Bellmawr, right over. Then there is the Delaware River Port Authority that wants to bring a rail line up, follow 55 to 42 and 42 into Camden, and that's a noise level -- reconstructed air space.	The Proposed Runway 17-35 Extension Project is limited to extending the runway in its current alignment and does not include any changes in the alignment of other runways at the airport.
150.40	[Raymond Stanaitis] The realignment should be considered, not a future project, I think it should be considered part of the project.	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. Realignment of existing runways are not short-term undertakings and are being investigated for the Capacity Enhancement Program (CEP), which is a long-term project.
150.41	[James Cromely] I think what should be considered or added to your proposal here is that the PGW is proposing this type of project, that you included this in your EIS because they have to be studied, in terms of the safety aspect, in case something catastrophic does happen. I did not realize that there was this interaction between the airport and the ship traffic.	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.

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## November 16, 2004 Public Hearing Transcript

Comment Number	Comment	Response
150.42	[Richard McHugh] Oakland is totally unaware of this. Either that or they're hiding it from us for some reason. To me that is very scary, that a project with such a major impact on our community, and there is such a total lack of communication and outgoing communication.	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.
150.43	[Richard McHugh] It's like my life and my quality of life has not even been considered. There should be more.	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.

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PHILADELPHIA INTERNATIONAL AIRPORT  
RUNWAY 17-35 EXTENSION PROJECT EIS

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10 Wednesday, November 17, 2004

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PUBLIC HEARING, held at the

16 Brandywine High School, 1400 Foulk Road, Wilmington

17 Delaware, commencing at 7:00 p.m., on the above

18 date, before Ronald DeShields, Shorthand Reporter

19 and Notary Public.

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CLASS ACT REPORTING AGENCY

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New Jersey 08054

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PANEL:

- Jim Byers
- Sue McDonald
- Wayne Heibeck
- Andrew Brooks

PUBLIC COMMENTS:

- Charles Landry
- Amy Pollick
- Bill McGlinchey
- Stephen Donato
- Barbara Fisher
- Ed Judge
- Amy Hobbs
- Wally Kremer
- Beverly Boonett
- John Kearney
- Bill Thompson

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MS. LILLER: Hello everyone. If you could please find a seat and we will begin the hearing. I would encourage you to come a bit closer if you would, because it's a big auditorium, just to make sure you can hear.

17-35-PublicHearingTranscript\_111704.txt  
7 I think you can hear, a little cozier. Thank  
8 you.

9 Welcome everyone to the public  
10 hearing on the Draft Environmental Impact  
11 Statement. My name is Suzanne Liller, and  
12 I'll be your facilitator for this evening.  
13 I'll talk in a bit about our protocol of how  
14 we'll carry out the meeting this evening, but  
15 first I'd like to introduce the folks up here  
16 at the podium, the front table.

17 And I'll start with Wayne Heibeck on  
18 the end, and he is manager of the Harrisburg  
19 Airport's District Office for the FAA.

20 And then Sue McDonald, next to him,  
21 is our hearing officer for this hearing. And  
22 she's an environmental protection specialist,  
23 and she's the FAA Project Manager for this  
24 project.

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1 The next person is Andrew Brooks,  
2 and he's Deputy Project Manager for this  
3 project for the FAA.

4 And then we have Jim Byers, and he's  
5 an Environmental Protection Specialist with  
6 the FAA headquarters.

7 I would now like to turn this  
8 portion over to our hearing officer, Sue  
9 McDonald, and she'll read a statement.

10 MS. McDONALD: Thank you very much.

17-35-PublicHearingTranscript\_111704.txt  
Thank you for coming.

This is a public hearing on the Draft Environmental Impact Statement for the Philadelphia International Airport Runway 17-35 Extension Project. The Federal Aviation Administration is the lead federal agency for this project. The Notice of Intent to prepare the Environmental Impact Statement for this project was published in the Federal Register on August 1st, 2003. The Notice of Availability for the draft Environmental Impact Statement for this project was published in the Federal Register on October 15th, 2004.

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The purpose of this project is to reduce airport delay at the Philadelphia International Airport in the short-term. At this hearing we will be taking testimony in the Draft Environmental Impact Statement. The FAA encourages all the interested parties to provide comments concerning the content and scope of the DIS. Your comments may be oral testimony, they may be written, you may E-mail to me. But we must have your comments no later than December 1st, 2004.

MS. LILLER: Thank you, Sue.

I'd like to direct you to the screen up here. There's a couple format points that

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I'd like to make.

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We asked you at the front table if you wanted to speak this evening and to have you sign in, so I do have a list of a few folks that would like to speak. There are no questions, because this is a hearing. It's a public hearing. Questions happened from 5:00 to 7:00, and now these folks in the front are here to listen to you and to your testimony, your oral testimony, about the study.

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I'll be calling speakers in the order that they signed up, and elected officials will be called upon first.

We'll have a time limit. There aren't that many speakers, and so I'm thinking we'll have eight minutes per speaker. And Jennifer rings the bell when you have -- she'll ring the bell at seven minutes so you'll know you have another minute before the time. But, again, because we have not too many people signed up I think we can be a little flexible on the time limit.

All comments are being recorded by Ron, who is our stenographer here, and he will tell me if he needs somebody to repeat something or somebody to slow down, because all these oral comments, the testimonies,

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19 becomes part of the public record, and he's  
20 recording every word. So it's important to  
21 get every word.

22 And comment forms, as Sue already  
23 mentioned, are available on the table. And  
24 that's one way you can submit a written

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1 comment. You can take it home with you and  
2 still fill out your comment and either mail  
3 it to Sue or you can E-mail it. Or, again,  
4 go to the web site and submit it. And you  
5 can submit more than one comment as well.  
6 And the deadline is December 1st, so just as  
7 long as you get it in by then, then you  
8 should be fine.

9 As far as the facilities here, maybe  
10 some of you know, but the exits, this goes  
11 right outside. The exits are also where you  
12 came in, and here. And then the restrooms,  
13 take a left, and then another left and you'll  
14 find the restrooms.

15 The only other protocol piece is,  
16 when you come up to the microphone, if you  
17 would just say your name slowly and clearly.  
18 I'll be reading it, but Ron likes to hear it  
19 twice to make sure that he gets it right.

20 All right. So I will begin by  
21 reading first from the elected officials  
22 list. And I'll tell you that all these four

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23 people want to be recognized, but they are  
24 not going to be speaking tonight, but they

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1 want you to know that they came.

2 And Patrick McGrory is the first  
3 person. Patrick is here, and he represents  
4 Representative Mike Castle's office. And  
5 then Senator Charlie Copeland is here. And  
6 also Edward Jhmid, who represents Congressman  
7 Jim Gerlach. He's over here on the right.  
8 Edward, thank you.

9 And then also we have Carrie --  
10 Carrie who represents, here she is, Office of  
11 Senator Carper.

12 So, they wanted you to know that  
13 they are attending.

14 So now for the people -- are there  
15 any other elected officials that we should  
16 identify or representatives that might not  
17 have signed in? Okay.

18 Then I'll start with the public  
19 list. And I have Charles Landry, who is  
20 signed up to speak first.

21 Charles. And, again, if you could  
22 say your name.

23 MR. LANDRY: Yes. Charles Landry;  
24 L-a-n-d-r-y.

1 MS. LILLER: Thank you.

2 MR. LANDRY: And you'll have to  
3 forgive me. I'm hoarse tonight. I'm  
4 fighting off a cold.

5 MS. LILLER: You're forgiven.

6 MR. LANDRY: I'll try to make it  
7 through this letter.

8 Tonight I'm going to read from a  
9 letter that has been prepared on behalf of  
10 the Executive Board of CCOBH. We are writing  
11 on behalf of our 140 Civic Association  
12 members representing 83,000 residents of  
13 Brandywine Hundred, New Castle County,  
14 Delaware.

15 We oppose your study because it has  
16 seriously underestimated the impact of the  
17 PHL Runway 17-35 Project on our quality of  
18 life here in Northern Delaware. You base  
19 your conclusion that any noise below the 65  
20 decibel limit used by the federal government  
21 has no impact on tens of thousands of  
22 citizens living under the approach path of  
23 Runway 9 Right at PHL, and that lengthening  
24 Runway 17-35 will have no impact on Delaware.

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1 Both conclusions we believe are incorrect.

2 According to the FAA, the reason for  
3 using 65 decibels as the acceptable limit for  
Page 8

4 aircraft noise is that noise beyond that  
5 level causes people to become, quote, highly  
6 annoyed. And this is from a study that was  
7 done in 1978. The references on the FAA web  
8 site.

9 The Aviation Safety Noise Abatement  
10 Act of 1979 required that the Department of  
11 Transportation, including the FAA, adopt a  
12 single method to measure the impact of noise  
13 on populations. The day/night sound level  
14 method was selected because it was believed  
15 that it produced the best measure of average  
16 noise impact on the population over time.  
17 Using this method the FAA assumes that noise  
18 levels below 65 decibels have no adverse  
19 impact on effected populations at all. Such  
20 an assumption defies logic, and the study  
21 cited above makes no such assumption.

22 The ability of people to endure  
23 noise without harm can depend on several  
24 things not taken into consideration by the

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1 FAA. For example, schools can be diversely  
2 affected by any repetitious noise that makes  
3 communications more difficult. Even when  
4 noise is not loud enough to drown out  
5 conversation, any sort of regular disruption  
6 will have an adverse impact.

7 Age and health can easily affect  
Page 9



8 people's ability to tolerate noise at levels  
9 well below 65 decibels, and the FAA's failure  
10 to consider increasingly annoying noise  
11 levels below that level brings into question  
12 the basic methodology used to assert that  
13 Delaware would not be affected by noise from  
14 changing aircraft patterns. The proposed  
15 changes on Runway 17-35 will change the  
16 pattern of aircraft over Brandywine Hundred.  
17 Smaller regional jets and turbo props not  
18 only produce less noise, but also require  
19 more space behind larger jets. Thereby,  
20 decreasing noise impact on the ground.

21 When these aircraft are diverted to  
22 Runway 17-35 there may be an initial  
23 reduction in the number of -- total number of  
24 aircraft flying overhead, but that advantage

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1 will be offset by denser heavy jet traffic  
2 during peak operating hours. If, as  
3 anticipated, traffic at PHL increases in the  
4 future the result will be more heavy jets  
5 overhead, spaced closer together for longer  
6 periods of time. Noise levels in Brandywine  
7 Hundred will increase, and the adverse impact  
8 on our communities will be intensified.

9 Hundreds of homes in Brandywine  
10 Hundred are already in noise impacted areas  
11 caused by traffic on I-495. Your study did

12 not address the impact of aircraft noise on  
13 these areas, and on nearby areas just outside  
14 the 65 decibel zones. It considered neither  
15 the current impact of combined ground and  
16 aircraft noise, nor the potential impact that  
17 increased aircraft traffic might have when  
18 combined with existing ground noise. This is  
19 a major oversight that leaves our most noise  
20 effected neighbors at risk of even more  
21 serious harm.

22 This study remains incomplete and  
23 inaccurate until the combined impact of  
24 current and projected aircraft and ground

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1 noise in these areas, and indeed on all of  
2 Brandywine Hundred, is measured and included  
3 in your findings.

4 CCOBH is keenly aware that PHL is a  
5 critical element in the economic health of  
6 the Philadelphia and Wilmington region.

7 We remind you, however, that another  
8 critical element of economic health is the  
9 ability of businesses to attract highly  
10 skilled employees to desirable communities  
11 un-affected by serious noise and pollution.

12 We urge you to re-examine your  
13 findings and to study and include the very  
14 real harm this project will cause to Northern  
15 Delaware.

16 Thank you.  
17 MS. LILLER: Charles, thank you.  
18 Would you have a copy of that that  
19 we can --  
20 MR. LANDRY: This is for you.  
21 MS. LILLER: Right. Thanks a lot.  
22 Okay. The next name on my list is  
23 Amy Pollock.  
24 MS. POLLOCK: Hi. My name is Amy

14

1 Pollock. I live in the historic village of  
2 Ardencroft. I worked for approximately eight  
3 years to get all three Ardens listed on the  
4 National Register of Historic Places. That  
5 listing is as a traditional cultural property  
6 or district, which means we're not listed for  
7 our houses, we're listed for the fact that we  
8 have ongoing life outside of our homes.

9 We have multiple theaters in the  
10 town that are all outdoors. We have multiple  
11 arts events, concert events. We have a  
12 heavily wooded community with foot paths, we  
13 don't have sidewalks and street lights. We  
14 have people that do things in the woods and  
15 that walk the paths to be with their  
16 neighbors and to have communication.

17 It's extremely difficult to carry on  
18 any of this part of our livelihood, which has  
19 been continued since 1900 through the

20 founding of each of the additional villages  
21 to date. And that is why we are listed.

22 I think that the impact that this  
23 air traffic is having on us is not being  
24 properly or fully recognized. I'm not

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1 getting feedback from people that indicates  
2 there's a complete understanding of a  
3 cultural listing versus a building listing.

4 I'd also like to comment that at one  
5 point we were told we only get 20 to 30  
6 percent of the Philadelphia Airport air  
7 traffic. I have made myself a non-scientific  
8 counting of planes, and I've marked off days;  
9 morning, noon, and night, when I'm hearing  
10 air traffic. When it's interrupting me and  
11 I'm aware of it. And there's less than 15  
12 days through the entire year that I have not  
13 written down at least twice or three times  
14 that I'm hearing air traffic during the day.

15 The air traffic is starting earlier  
16 in the morning, it is going later in the  
17 night. I'm waking up at one and two o'clock  
18 in the morning and hearing the planes.

19 Planes have flown so low over my  
20 home that they have actually rattled my  
21 windows. I was outside picking up the mail  
22 on October 21st, and a plane flew so low  
23 overhead that it truly caught my attention

24 and made the hair on the back of my neck

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1 stand up. I immediately called Mike Jeck at  
2 the Philadelphia Noise Office. He did the  
3 research - it took him a few days to call me  
4 back to confirm - that that plane was over my  
5 house at 2200 feet.

6 We've been repeatedly told that the  
7 planes over us at the Voine Intercept are to  
8 be at 3,000 feet or better. Obviously, 2200  
9 feet is not at 3,000 feet or better. The  
10 planes are getting lower. They're coming in  
11 more quickly and more on top of each other.  
12 They're less than a minute apart many times.  
13 And I'm told that the Keely Intercept is  
14 between Voine and Philadelphia, and that that  
15 has an 1800 foot marker, where Voine has the  
16 3,000 foot marker.

17 Obviously, I've also been informed  
18 that the planes have to -- can approach the  
19 1800 foot marker as opposed to waiting until  
20 they get there, which means they're lowering  
21 themselves before they get to Keely. So  
22 they're lower over our heads.

23 I'm also concerned about the noise  
24 board that's out front there. It said that

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1 it's computed DNLs in Delaware, and it listed  
2 the localities of Arden, Ardencroft, and  
3 Arden Town. And the gentleman explained to  
4 me that that is computer modeling. There was  
5 no recording of noise done in any of the  
6 three Ardens. I'm curious as to how you can  
7 make a comparison to something that you don't  
8 have to begin with.

9           You've made recordings in  
10 Lancashire, and I apologize I don't remember  
11 the other community, those aren't listed on  
12 your noise board out there. You have the  
13 balance of New Castle County; Bel font and  
14 Wilmi ngton, and I don't know where you posted  
15 moni tors in Bel font or Wilmi ngton, but you  
16 di d not post moni tors in any of the three  
17 Ardens to make a comparison. And I have  
18 di ffi cul ty understanding a computer-generated  
19 DNL when there's no comparison to start  
20 wi th.

21           I would request that the runway  
22 ai rport -- the extension of this 17-35 runway  
23 be reconsidered, because the ai rport is  
24 al ready ha vi ng an extremely adverse impact

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1 over Northern New Castle County. Especially  
2 over the Ardens, because of our historic and  
3 cul tural li fe-styl es. I don't want to see

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4 any increased air traffic. The air traffic  
5 wasn't here 10 years ago when I moved in, it  
6 didn't exist. Not like it does today -- it  
7 did exist, but not at this level. Something  
8 needs to be done to bring back the quality of  
9 life that has been taken from the residents  
10 in this community.

11 MS. LILLER: Thank you, Amy.

12 The next name I have is Bill  
13 McGlin -- I'm not pronouncing it right.  
14 McGlinchey, Chair of the Philadelphia Airport  
15 Action Group.

16 And if you would please correct me.

17 MR. McGLINCHEY: I've spent a  
18 lifetime clearing it up, don't worry about  
19 it.

20 Hi. I'm Bill McGlinchey, Chair of  
21 the Philadelphia Airport Quality of Life  
22 Action Group.

23 While I recognize that the review  
24 and comment period for this EIS meets the

19

1 minimum legal requirement, I would like to  
2 request an extension for the review and  
3 comment period for this EIS so that community  
4 groups such as ours have the time to discuss  
5 and digest all of the information which has  
6 been presented and formulate an appropriate  
7 response as needed.

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Thank you.

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MS. LILLER: Okay. Thank you,

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Bill.

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So, I have come to the end of my

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list of people that have signed up to speak

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this evening, and so what I do with that is I

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turn it back over to Sue, and as the hearing

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officer -- but, if there are other people --

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so, let me tell you what we'll do is just

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have you sign up. And so it sounds like

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there's two other people that would like to

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sign up.

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Sir, did you want to sign up as

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well? Do I see another hand? No. Okay.

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Just to let you know that we will be

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here until nine o'clock, and so people might

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still come in. Or if you change your mind, I

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mean, folks that want to leave after everyone

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has spoken can leave, but if you want to stay

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the panel will be up here until 9:00. And

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I'll turn it back to Sue for some words after

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Stephen speaks.

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Okay, Stephen.

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MR. DONATO: Hi. My name is Stephen

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Donato. I'm new -- not new to the area, but

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I just moved down here last year from

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Delaware County. And, you know, when I first

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moved in I was really surprised by the -- the



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12 aircraft activity. And, you know, the first  
13 six months that I was there, you know, never  
14 being exposed to it it was just shocking.  
15 And -- well anyway, what I'm trying to say is  
16 that I think something needs to be done, and  
17 I think as -- I think from everyone here they  
18 just feel like that people aren't listening  
19 to what we're trying to say. And it's that  
20 -- you know, we understand the airport's  
21 important. We understand as a region we need  
22 to -- we need the airport and -- but the  
23 thing is we're paying a great cost.  
24 And all that I'm saying is that I

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1 think there's other means that the FAA has  
2 not considered, through technology and  
3 reaching out and working with community  
4 groups that know the region, you know,  
5 possibly could help with routing and, you  
6 know, work together as far as an equitable  
7 solution for everybody. Because what's going  
8 on is, you know, we're impacted here, and  
9 then basically we say, Well, as a community  
10 we need to compete for -- to keep our housing  
11 prices up. So then I guess the obvious  
12 solution is to run aircraft over another  
13 community so that basically their quality of  
14 life and their residences, property values go  
15 down as well.

16 So, I guess we're all on sort of an  
17 even keel of living I guess with the standard  
18 that is sub-par. And I think that's what we  
19 need to address.

20 So, that's all that I'm saying is I  
21 just hope that, you know, we can come to some  
22 kind of equitable solution. I just don't  
23 know what else to say, because I think it's  
24 all been said. You know, we're not happy

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1 about it and, you know, you keep coming back  
2 here and the air traffic just keeps  
3 increasing. And I think I -- you know, I  
4 just hope we can do something about it.

5 Thank you.

6 MS. LILLER: Thank you, Stephen.

7 Ma'am, would you like to speak?

8 I'll just ask you to sign up. We need to get  
9 everybody's name.

10 Okay. This is Barbara Fisher.

11 MS. FISHER: Barbara Fisher, right.

12 And I'm from Lancashire. I've been  
13 to all of these meetings. The first meeting  
14 that we had here this auditorium was filled.  
15 Now I've been on all the lists, I did not  
16 receive any notification of this meeting.  
17 The only reason I knew it was held was I read  
18 about it in the Philadelphia Inquirer a month  
19 ago.

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20 There was a tiny thing in the News  
21 Journal yesterday that most people would have  
22 missed if they hadn't been looking for it.  
23 There was nothing in The Brandywine  
24 News. I'm sure there are many people that

23

1 would have liked to come to this meeting that  
2 know nothing about it.

3 I feel that the Philadelphia  
4 International Airport and the FAA is only  
5 jumping through the hoops so that they can do  
6 what they want to do. And they're not taking  
7 into account the way people feel about this.  
8 The amount of traffic that the -- that is  
9 coming into Philadelphia now expanded  
10 astronomically about five years ago. Those  
11 are not people coming into Philadelphia.  
12 That is because Philadelphia is now being  
13 used as a hub. And this is the basic  
14 problem, it is a facility that is being used  
15 beyond its capacity. And it is not serving  
16 just Philadelphia.

17 And this is an issue that needs to  
18 be confronted. Because you are destroying  
19 the lives of all the people that live in this  
20 area. Property values, quality of life,  
21 health, anything you want to mention, is  
22 being ruined by this airport and the fact  
23 that its being used improperly.

MS. LILLER: Thank you, Barbara.

1 Yes, sir. Come and sign up.

2 MR. McNAMARA: Thank you.

3 MS. LILLER: Richard McNamara.

4 MR. McNAMARA: Yes, good evening.

5 My name is Richard McNamara, and I  
6 would just like to follow-up Mrs. Fisher's  
7 comments with a brief statement.

8 I live in Northshire, and I didn't  
9 know about the meeting until a neighbor of  
10 mine, Steve Donato, called me at six o'clock  
11 tonight to ask if I can make it. I have  
12 attended three other meetings in the past.

13 The problem which we face, I've  
14 lived in Northshire for 11 years. And the  
15 last year the stacking of airliners over our  
16 houses has at least tripled. It starts early  
17 in the morning, it goes to late at night, and  
18 it's continuous. This is without your  
19 expansion.

20 So, before you do any expansions I  
21 suggest that you study the routing and the  
22 way you're having these airplanes stacked  
23 over residential areas, especially in New  
24 Castle County. It's a terrible problem, and

1 I hope -- very disappointed in the turnout  
2 here, but I understand why, nobody knew about  
3 it.

4 And I just hope you understand that  
5 this is a very serious problem. I've  
6 experienced it over 11 years, and in the last  
7 year it's increased where it's becoming an  
8 intolerable situation.

9 Thank you for your time.

10 MS. LILLER: Thank you for speaking,  
11 Richard.

12 I saw another hand. Yes.

13 This is Ed Judge.

14 MR. JUDGE: My, my name is Ed  
15 Judge. I -- been living in this general  
16 vicinity for about almost 10 years. Nine, 10  
17 years. I lived in Concordville for about  
18 eight and a half years, and I just recently  
19 moved to Brandywine -- Brandywood  
20 development. And within those eight years,  
21 over the past two years, I've seen an extreme  
22 amount of more air traffic.

23 I lived -- the back of my house when  
24 I lived in Chadds -- in Concordville was

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1 facing south. And I could actually watch the  
2 planes come around, bank over like the DuPont  
3 area, and bank and then cut over and over  
4 this area.

5                   Now, I'm exactly five minutes from  
6 where I used to live. Now, I could barely  
7 see the planes -- like I could see them, but  
8 I couldn't read any writing on them or  
9 anything on them now. Now when they fly  
10 over my house in Brandywood, I mean, I could  
11 tell you there goes a Fed EX, UPS, Frontier.  
12 And the noise from them. I'm sitting in my  
13 basement one night on the computer and I  
14 could actually hear the planes rumbling -  
15 this was like eleven, twelve o'clock at night  
16 - rumbling over my house.

17                   And the next thing I heard was my  
18 daughter wake up. It's just -- how people  
19 can't foresee -- well, how this noise affects  
20 the quality of life. For example, you know,  
21 flying over our house waking us up two  
22 o'clock in the morning. Can I go outside and  
23 cut my grass two o'clock in the morning? No,  
24 they'd come arrest me.

27

1                   There's construction -- I used to do  
2 construction. Our yard was within a  
3 community in West Philly. Well, we couldn't  
4 start-up our trucks until seven o'clock in  
5 the morning because we would make people up.  
6 Now, skies you have all the planes -- there's  
7 no regulation for the skies. It's not  
8 considered a highway. So, basically, you

9 people could just fly whatever height you  
10 feel like is right, and affect the quality of  
11 life for everybody below you.

12 Yes, it's needed for the economy and  
13 so forth. Well, there's other avenues that  
14 people can take. There's more technology out  
15 there. There's updated technology. I just  
16 don't understand, you know, I've been to  
17 about a dozen of these meetings, and it's --  
18 here and in Delco, Delaware County, and it  
19 seems like it's the same dog and pony show.

20 Well, it's not really going to  
21 affect you that much, but we're going to  
22 increase so we can bring more airlines in.  
23 But they're supposed to be flying this height  
24 but they're not. And then they do the noise

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1 study in Lancashire for the DNL. Well, the  
2 DNL is over I guess a year or something like  
3 that -- well it's -- it could be two weeks, I  
4 could be playing with my daughter in the  
5 yard, she can't hear me yell from me to you,  
6 where you're sitting, which is about 10 feet,  
7 to talk to my daughter. I mean that's  
8 just -- I just don't understand why, you  
9 know, everybody just can't work together and  
10 get this resolved.

11 You guys just, you know, basically  
12 just sit down and say this is the way it's

13 going to be and that's it. Now, I mean, I'm  
14 friends with Steve, and I've been friends  
15 with him for a long time and, you know, he's  
16 -- all this stuff is just -- I don't know, I  
17 just don't understand it.

18 Thank you.

19 MS. LILLER: Thank you, Ed, for  
20 speaking.

21 Do we have another speaker?

22 MR. HOBBS: I have a question.

23 MS. LILLER: Andy, could you just  
24 say your name.

29

1 MR. HOBBS: What?

2 MS. LILLER: Can you just say your  
3 name for the --

4 MR. HOBBS: Hobbs.

5 MS. LILLER: Hobbs. Andy Hobbs.

6 MR. HOBBS: And I'm finally meeting  
7 Steve, who's done a lot of work. Good to see  
8 you.

9 But at any rate, what I'm going to  
10 say to you is this, I am told that planes  
11 only come over my house when there's an east  
12 wind, which is about a third of the year. So  
13 I mean, I'm allowed to sleep for two-thirds  
14 of the year, and I'm awake for the other  
15 third. But the fact is, you don't -- you  
16 have such a narrow flight pattern. These



17 planes, one after the other every minute,  
18 bingo, from 5:30 in the morning until 12:30  
19 at night. And you wait until 11:30 to send  
20 the loudest planes of all, which are those  
21 big cargo planes. And I can hear those  
22 things miles away. You wake my children up,  
23 my grandchildren. It really -- this is  
24 unbearable. And I live in an historic area

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1 on the Kennett Pike, where George Washington  
2 fought his way to Brandywine, right.

3 And you guys are taking it away from  
4 us. This is no joke. This is an historic  
5 area that you're destroying. And once you  
6 destroy an area the word gets out and nobody  
7 wants to live there. And this is a serious  
8 matter. Everybody in this room -- and I'm  
9 just sorry that -- we ought to double the  
10 number here. There should be thousands here,  
11 because I've heard complaints from  
12 everybody. And this is a serious matter and  
13 you must think about it.

14 We cannot increase the traffic. In  
15 fact, if anything, we've got to decrease this  
16 traffic. And we've got to send it up the  
17 Delaware River, which we talked about so many  
18 times. I've been to these meetings for five  
19 years, and the Delaware River was one of the  
20 answers. But where has that gone. It

21 evaporated.

22 But what you're doing is destroying  
23 our lives here. And I want to tell you, and  
24 I think we've got to fight in Washington,

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1 we've got to fight everywhere. People have  
2 got to get mad. And the madder we get, then  
3 we're going to get a group together and go to  
4 Washington and prove this. Because we're not  
5 going to let this happen.

6 And I'm going to warn you right now,  
7 we're not going to let it happen. And that's  
8 all I have to say.

9 MS. LILLER: Thank you, Andy.

10 Yes, ma'am. Would you like to speak  
11 again, please.

12 MS. FISHER: Yes, I just want to say  
13 one thing.

14 MS. LILLER: You need to come up and  
15 sign up and speak, because it's a hearing and  
16 this is the way --

17 MS. FISHER: It's about airplanes in  
18 general.

19 MS. LILLER: That's fine. I'll  
20 write your name down. If you just speak to  
21 the mike.

22 Barbara Fisher.

23 MS. FISHER: The other night my  
24 husband was watching the news, and after the

1 noise was over the Simpsons came on. And I saw  
2 and behold they were doing a show about  
3 airplane noise. And airplanes -- the  
4 Simpson's house was right next to an  
5 airport. And it showed the house rattling  
6 and the kids screaming. And the one shot is  
7 the airplane crashes through the side of the  
8 house and the pilot says, Oh, I'm sorry.  
9 Backs it up and flies away.

10 What this tells you is if the  
11 Simpson's do a show, we have a national  
12 problem with airplane noise. And the  
13 solution is not to just be increasing traffic  
14 and increasing traffic into these airports.  
15 I don't know what the answer is. Maybe  
16 it's -- instead of spending tax dollars on  
17 airports, it's to spend tax dollars on  
18 hi-speed rail traffic.

19 The average trip, according to an  
20 article in the paper, is 300 miles. A  
21 railroad can be competitive with an airplane  
22 for 300 miles. You need airplanes to go  
23 across the country, you don't need them to go  
24 60 miles or 300 miles. And it's certainly a

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1 national problem that we have to confront.

2 MS. LILLER: Thank you, Barbara.

3 Amy, you'd like on speak again

4 MS. POLLOCK: P-o-l-l-o-c-k.

5 MS. LILLER: All right.

6 MS. POLLOCK: Amy Pollock again.

7 I made a couple more notes about  
8 other things that I wanted to comment to.

9 I was told that years ago the  
10 Philadelphia Airport did use an  
11 over-the-water approach, and we've been told  
12 recently that that's not an option. I would  
13 like to request that that option be more  
14 thoroughly investigated and reconsidered. If  
15 it existed in the past it should be able to  
16 exist in the current.

17 Orange County, California, because  
18 of historic recognition, has a steep descent  
19 or final drop into their airport that is  
20 steeper than most other places in the country  
21 as I understand, in honor of recognizing the  
22 impact over an historic area out -- like out  
23 there. I would like to request that that  
24 also be more thoroughly investigated for this

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1 airport.

2 I was told that planes essentially  
3 are making a left when they're about nine  
4 miles out from the airport. I need more

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5 information on that. But if they can be nine  
6 miles away and be making a turn to lineup for  
7 their final approach, if that's accurate,  
8 then that means they don't always have to be  
9 over our heads, and that water approach is  
10 that much more viable.

11 You've talked about this 17-35  
12 Runway Extension as being utilized to improve  
13 the delay situation that is apparently so  
14 awful at the Philadelphia Airport. Part of  
15 the concern that the residents of this area  
16 have is that you'll extend the 17-35 Runway,  
17 you'll take some planes off of 9-R and 9-L,  
18 and put them on 17-35. But you've already  
19 found out that 9-R and 9-L can handle a  
20 certain number of planes, which in our  
21 estimation means that you'll be otherwise  
22 increasing the traffic then on 9-R and 9-L  
23 because you've now relocated some of what was  
24 there, so you can pick that level back up.

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1 There's a phrase called the  
2 Southwest Effect that has been used  
3 repeatedly when the Southwest Airlines have  
4 gone into the various airports around the  
5 country, and we have indeed seen that effect  
6 here in Philadelphia in the dramatic increase  
7 of air flight over our heads in this area. I  
8 think Southwest came in initially with 14

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9 flights, and they're now over 40 I believe.

10 That's a big impact in and of itself.

11 So, with all the planes that  
12 Southwest is bringing in, and all the price  
13 competition that the other airlines are  
14 bringing in against Southwest, air traffic  
15 overall is increasing. And maybe instead of  
16 increasing your runway capacity, what you  
17 ought to do is consider your airport terminal  
18 capacity, and limit the flights instead of  
19 just looking to make the money hand over  
20 fist, and stick people in  
21 shoulder-to-shoulder instead of giving them  
22 some room to move around.

23 Maybe the airport should be just a  
24 little less -- a little less busy, and,

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1 therefore, a little more efficient instead of  
2 being as efficient as they can be, as busy as  
3 they can be.

4 Thank you.

5 MS. LILLER: Thank you, Amy.

6 Then what I'll do is turn this back  
7 now to our Hearing Officer, Sue McDonald.

8 MS. McDONALD: Okay. Once again,  
9 thank you very much for coming out and for  
10 those who spoke.

11 We will remain here until nine  
12 o'clock --

13 MS. LILLER: Can I ask you to sign

14 in.

15 MR. KREMER: Sure.

16 MS. LILLER: Sorry. I didn't see

17 that you wanted to speak.

18 MR. KREMER: Wally Kremer. I made  
19 the suggestion two or three meetings, one of  
20 the things that you normally do when you have  
21 a -- data like you have, which gives us  
22 statistical distribution of the noise level  
23 of these airplanes, a reasonable management  
24 principle is to look at statistically the

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1 ones that are making most of the noise. You  
2 follow-up and you find out why, and you work  
3 on those people to drop that noise level.

4 When I've raised this issue at two  
5 or three meetings the answers I get, no one  
6 is in charge of the airplane. The FAA is  
7 not, the airport is not. Nobody is concerned  
8 about doing such a reasonable management  
9 principle.

10 If you did that, if you've got the  
11 average at 45 or 40, why would anybody be at  
12 70? There's data that they're at 70. Now,  
13 there can be, because of situations, a pilot  
14 has to fly their plane to do it safely, and  
15 safety comes first. But a reasonable  
16 approach is follow-up on that. And if Joe

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has done a three times in the last month, it  
18 seems to me somebody needs to talk to Joe.

19 The other thing that's happening at  
20 the Philadelphia Airport, I sat next to a  
21 pilot and a man in management at one of the  
22 airlines on a flight, and it was a two-hour  
23 delay. And he went through all the things  
24 that were being done by the various union

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1 folks and so forth that were delaying that  
2 flight.

3 So, I don't know how this efficiency  
4 of what's happening there has got to the  
5 delay, but I know that was a two-hour delay.  
6 And this gentleman was very knowledgeable.  
7 So, the airlines have obviously now  
8 contracting a lot of labor issues going on.  
9 People have made the point, and it's correct,  
10 when the presentation was made was based off  
11 a computer model. The data was never used to  
12 work back and explain how come that model was  
13 appropriate for the data.

14 In today's world it seems to me the  
15 FAA could setup points to continue to take  
16 noise, be able to work that back to what  
17 flight it is, and be able to work back in a  
18 management principle, and work back to make  
19 the noise level lower. Where you actually  
20 fly the planes obviously makes a lot of



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21 import, and the river route - and I flew a  
22 lot of river routes coming in here, around  
23 the world, can be done.

24 Now, the other issue that's kind of

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1 out there, and some places you've done that  
2 is to take a site that's more remote from the  
3 city, and build a new airport. And that gets  
4 mixed reviews in terms of is it a good idea  
5 or isn't it a good idea. But that certainly  
6 seems to me as something to be thinking about  
7 instead of continually expanding Philadelphia  
8 Airport.

9 Thank you.

10 MS. LILLER: Thank you, Wally.

11 Ma'am, would you like to speak?

12 MS. BOONETT: My name is Beverly  
13 Boonett. I'm from the Ardens Historic  
14 District.

15 My point is that the expansion of  
16 17-35, as I read it, is to allow regional  
17 jets to use that extended air -- landing.  
18 And I believe that when that happens, when --  
19 then the other perpendicular runway, there  
20 you go, will be able to handle more planes.  
21 But those will be the older planes which  
22 create more noise and air pollution over  
23 Brandywine Hundred.

24 The Ardens Historic District is a

1 consulting party to this process. We wish to  
2 invoke Section 106 of the 1996 National  
3 Historic Protection Act that states that  
4 federal money cannot be spent to adversely  
5 impact the patrimony of the United States.  
6 This -- and it means that you must -- the FAA  
7 must consider all alternatives to the adverse  
8 impact upon the recognized historic  
9 district.

10 And I also want to say that I see an  
11 option that I believe would have potential in  
12 a long run, very long run, to solve some of  
13 these issues. I have read, been informed,  
14 that about 30 to 35 percent of the people  
15 coming in and out of the airport, the  
16 passengers, are from within a 300 mile  
17 radius. They are the ones may be served by  
18 the regional jets. But what I would like to  
19 suggest is that just as California has done a  
20 study showing that money is better invested  
21 in improving rail service than building more  
22 runways or building more highways. In this  
23 case, money would be better invested in  
24 improving the existing Amtrak service on the

2 miles north and south, and out to  
3 Harrisburg -- Harrisburg and Pittsburgh as  
4 well.

5 I would ask that the FAA think out  
6 of the box, go into the larger concerns of  
7 the Transportation Department of the United  
8 States, and consider spending this money on  
9 train service which has a far greater benefit  
10 to the society and culture of the United  
11 States.

12 I've lived -- I've had the great  
13 opportunity to live around the world in many  
14 locations which do have rail service, and I  
15 find that a broader spectrum of the community  
16 is served by good, frequent, less-expensive  
17 rail service. And I would ask that you look  
18 beyond just the FAA and think of the greater  
19 solutions that are available other than more  
20 concrete and more runways to solve this  
21 problem.

22 Thank you.

23 MS. LILLER: Thank you, Beverly.

24 Let's just check and make sure if

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1 there's anybody else that wants to sign up.

2 This is John Kearney.

3 MR. KEARNEY: Hi. My name is John  
4 Kearney, and I'm the Executive Director of an  
5 environmental group here in Delaware called

6 Environmentalist for Truth. And I also just  
7 learned about this meeting this morning on  
8 the radio.

9 So, the first thing that I want to  
10 do is request more time, an extension of the  
11 comment period. Most of us in the room are  
12 just seeing lots of this data for the first  
13 time today. December 1st, you know, that  
14 gives us what, 15 or so days. 30 days or a  
15 45 day period I think is reasonable. And we  
16 should have that amount of time to, you know,  
17 evaluate this data and be able to provide our  
18 comments to it. Requesting that extension  
19 first off the bat.

20 I also would like -- I'm just going  
21 to make a few notations that came to my mind  
22 from quickly skimming this, but I would like  
23 to reserve the right to provide further  
24 comments, written comments, sometime in the

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1 near future. Just a quick precursory  
2 evaluation of this.

3 Two things stood out to me, and I  
4 just want to quote here from it. It says: No  
5 properties listed or eligible for listing on  
6 the National Register of Historic Places  
7 would be impaired by either of the proposed  
8 project alternatives in such a way that would  
9 interfere with their designation of the

10 property. Therefore, the proposed project  
11 would not result in the -- and this is in  
12 quotes, use of a Section 4F property. And  
13 there's no need to prepare a Section 4F  
14 evaluation of prudent or feasible  
15 alternatives to such use.

16 I think that that statement is  
17 insulting. I really do. And that clearly a  
18 4F evaluation is needed here. And the reason  
19 why is clear, it's been alluded to by two  
20 other speakers. You know, we have a very  
21 unique location, it's the Ardens and, you  
22 know, you have three areas listed as, you  
23 know, on the Register of Historic Places, and  
24 the reason why they're listed is unique. So,

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1 therefore, the evaluation needs to be unique.  
2 And that has not been done, it has not taken  
3 place. The evaluation that was done -- is  
4 grossly inadequate.

5 You know, you have not evaluated  
6 enough information to determine if there's  
7 been a significant adverse impact on this  
8 area. You know, the area is listed as being  
9 culturally unique. It's listed on this  
10 Historic Register because of its outdoor  
11 activities. Like we heard, you know, you  
12 have -- I've been there. I go to their  
13 annual festivals every year. And, you know,

14 they have outdoor theaters. They have  
15 outdoor events that take place. And it's for  
16 that very reason why this area is listed on  
17 the National Historic Register.

18 And for you to say that that is not  
19 being impacted, based upon the information  
20 that you evaluated, which appears to be some  
21 modeling that you've done, some computer  
22 modeling, you know, I don't think that that's  
23 a significant evaluation. More information  
24 need to be done. There should be actual

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1 recording of noise levels taking place in  
2 these areas. There should be a 4F evaluation  
3 done because of the unique nature of this  
4 location.

5 The second point that I wanted to  
6 evaluate is the air quality. For the last  
7 four years I was a Director of the Clean Air  
8 Council here in Delaware, so I'd like to  
9 think I know a little bit about air quality.

10 In the report it indicates that  
11 because of increased efficiency that will  
12 result out of this new extension that there  
13 would not be a significant effect -- an  
14 adverse effect on air quality, and that,  
15 therefore, a conformity determination does  
16 not need to be done. But also as what we  
17 heard tonight, it seems like -- one thing

18 that stuck out to me is we're hearing reports  
19 from the people that live in these areas that  
20 the planes are coming in at lower levels more  
21 frequently than what is possibly officially  
22 being reported. So my question that I would  
23 like answered is, when you did your  
24 evaluation of the air impact, what was --

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1 what evaluations were done to determine the  
2 adverse effect of the increased air traffic  
3 would have at the various levels.

4 You know, did you take a  
5 determination of X amount of planes at 3,000  
6 feet versus 2,000 feet. And what effect that  
7 more planes coming in at a lower level would  
8 have on air quality. Was that done? And if  
9 it wasn't done, would that affect your  
10 determination that there was no need for a  
11 conformity determination.

12 Again, because of my claim is that  
13 because of there appears to be more planes  
14 coming in lower than probably what you  
15 evaluated, that the potential from increasing  
16 this number, that potential for an adverse  
17 effect on the air quality may outweigh the  
18 benefits that you list, which is the  
19 increased efficiency backlog of planes having  
20 to wait, et cetera.

21 So, my question is -- again, I'll

22 repeat it quickly and then I'll sit down, but  
23 what I'm thinking is, more planes coming in  
24 at lower levels, which appears to be taking

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1 place, could have an -- outweigh the benefits  
2 that you foresaw from having less traffic, et  
3 cetera.

4 Thank you.

5 MS. LILLER: Thank you, John.

6 You need to pronounce your last  
7 name.

8 MR. THOMPSON: Bill Thompson from  
9 Wynnewood. I'd just like to make a few  
10 comments.

11 The first is that if the altitude  
12 regulations and guidelines aren't being  
13 followed right now, if you increase the air  
14 traffic I'm afraid to think of what's going  
15 to happen to these communities. So if you  
16 can't enforce current guidelines, what's  
17 going to happen later.

18 One personal experience that's  
19 repeated several times, usually cut my grass  
20 on a Saturday, and for some reason that seems  
21 to be a period where some of the four engine  
22 jets fly overhead, and I can routinely hear  
23 the airplanes coming in over my house over  
24 the noise that my lawn mower makes. And my



1           lawn mower is not quiet.

2                       I'd also like to see a study on --  
3           that analyzes the altitude data over Northern  
4           New Castle County, which targets the rate of  
5           descent of these airplanes. The rate of  
6           descent from the Brandywine Gate to the one  
7           that's previous -- whatever the other signal  
8           marker is before this. I suspect that the  
9           planes are coming in as flat, no rate of  
10          descent from the previous gate to this one.  
11          And I think that that means that you could  
12          obviously raise the altitude that the planes  
13          are coming in at over our communities.

14                     I think we're kind of caught in a  
15          mind-set now where we're thinking of ways to  
16          increase the air traffic. And I guess you  
17          just don't us, we don't want increased air  
18          traffic, we want to reduce it.

19                     And just one note on the historic  
20          communities, we need to protect them. But  
21          regardless of if there's an historic  
22          community in this area, the citizens here  
23          have just put up with enough. And the fact  
24          that there are historic communities, that

1           adds to our case. But just because -- the

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2 citizens are here and if they're not part of  
3 an historic community you should still be  
4 listening to us.

5 So, in conclusion, I'd like to just  
6 say that I think that with the increase in  
7 air traffic, which is going to cause the  
8 increase in pollution, noise, and a decrease  
9 in the quality of our lives and our property  
10 values, all for the profit of the  
11 Philadelphia Airport, I don't think we should  
12 stand for it.

13 MS. LILLER: Thank you, Bill.

14 Is there anybody else?

15 Does anybody else want to speak?

16 And, again, we'll be here until 9:00, so if  
17 you change your mind. Okay.

18 Turn it back to Sue.

19 MS. McDONALD: Okay. Thank you,  
20 again.

21 As Suzanne said, we will remain here  
22 until 9:00. If you do not care to speak but  
23 would still like to offer a comment, please  
24 fill out a form, or E-mail me. Again,

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1 December 1st, 2004 is the comment deadline  
2 period.

3 We will be continuing this hearing  
4 tomorrow night in the Eastwick Community.  
5 Just as tonight, we'll 5:00 to 7:00 display

6 17-35-PublicHearingTranscript\_111704.txt  
board, and then from 7:00 to 9:00 be taking  
7 testimony.

8 I'd like to thank you again for  
9 coming out this evening.

10 MS. LILLER: Thank you, everyone.

11 \* \* \* \*

12 (Whereupon, the hearing  
13 concluded at 9:00 p.m.)

14 \* \* \* \*

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2 C E R T I F I C A T E  
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4  
5 I hereby certify that the testimony and  
6 the proceedings in the foregoing matter are  
7 contained fully and accurately in the  
8 stenographic notes taken by me, and that the  
9 copy is a true and accurate transcript of the

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same.

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Ronald DeShields, Notary Public

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Comment Number	Comment	Response
151.1	<p>[Charles Landry] The Aviation Safety Noise Abatement Act of 1979 required that the Department of Transportation, including the FAA, 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 the population over time. Using this method the FAA assumes that noise levels below 65 decibels have no adverse impact on effected populations at all. Such an assumption defies logic, and the study cited above makes no such assumption.</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, 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>

Comment Number	Comment	Response
151.2	<p>[Charles Landry] The ability of people to endure noise without harm can depend on several things not taken into consideration by the FAA. For example, schools can be diversely affected by any repetitious noise that makes communications more difficult. Even when noise is not loud enough to drown out conversation, any sort of regular disruption will have an adverse impact. Age and health can easily affect people's ability to tolerate noise at levels well below 65 decibels, and the FAA's failure to consider increasingly annoying noise levels below that level brings into question the basic methodology used to assert that Delaware would not be affected by noise from changing aircraft patterns. The proposed changes on Runway 17-35 will change the pattern of aircraft over Brandywine Hundred. Smaller regional jets and turbo props not only produce less noise, but also require more space behind larger jets. Thereby, decreasing noise impact on the ground.</p>	<p>Noise can awaken people from sleep and several studies have examined the relationship between aircraft sound level and awakening. [e.g. 1) Federal Interagency Committee on Aircraft Noise (FICAN), Effects of Aviation Noise on Awakenings from Sleep, dated June 1997; 2) Passchier-Vermeer, et al, "Sleep disturbance and aircraft noise exposure, Exposure-effect relationships," Division of Public Health, The Netherlands, TNO report 2002.027, 30 June 2002; 3) Basner, M., et al, "Effects of Nocturnal Aircraft Noise," Volume 1, Executive Summary, German Aerospace Center, Institute of Aerospace Medicine, Cologne, Germany, July 2004; 4) J.B. Ollerhead et al, Report of a Field Study of Aircraft Noise and Sleep Disturbance, London: Department of Safety, Environment and Engineering, 1992; 5) S. Fidel et al, Noise-induced Sleep Disturbance in Residential Settings, Report AL/OE-TR-1994-0131, Occupational &amp; Environmental Health Division, Armstrong Laboratory, Wright Patterson Air Force Base, Ohio, 1994; 6) S. Fidel et al, "Field study of noise-induced sleep disturbance," Journal of the Acoustical Society of America, 98 (2), Pt. 1, August 1995; 7) S. Fidel et al, "Effects on sleep disturbance of changes in aircraft noise near three airports," Journal of the Acoustical Society of America, 107 (5), Pt. 1, May 2000.] These studies were conducted in people's homes and were able to identify the percent of awakenings that would occur in a population as a function of the sound level in the sleeping room. In general less than 10 percent awaken for Sound Exposure Levels (SEL) less than 80 dBA (about 70 dBA maximum) in the bedroom. Assuming that houses provide a minimum of 15 dB outdoor-to-indoor reduction of sound levels, then maximums outdoors of 85 dB should not awaken more than 10 percent of the population. Levels this loud from a departing aircraft such as a 737-500 should occur at no more than about a half mile from the runway end.</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). Values are computed at each of 35 measurement locations analyzed in this EIS for each study alternative and each study year, and also at 567 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, 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>
151.3	<p>[Charles Landry] When these aircraft are diverted to Runway 17-35 there may be an initial reduction in the number of -- 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 on our communities will be intensified.</p>	<p>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.</p>

Comment Number	Comment	Response
151.4	<p>(Charles Landry) Hundreds of homes in Brandywine Hundred are already 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 the 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 effected 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 in these areas, and indeed on all of Brandywine Hundred, is measured and included in your findings.</p>	<p>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.</p>
151.5	<p>[Charles Landry] 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 un-affected by serious noise and pollution. We urge you to re-examine your findings and to study and include the very real harm this project will cause to Northern Delaware.</p>	<p>As Section 4.2 of this EIS demonstrates, the proposed project would not increase noise in Northern Delaware, and would decrease regional air pollution. The proposed airport improvements will not affect the ability of regional businesses to attract employees, and would enhance the efficiency of airport operations.</p>
151.6	<p>[Amy Pollock] At one point we were told we only get 20 to 30 percent of the Philadelphia Airport air traffic. I have made myself a non-scientific counting of planes, and I've marked off days; morning, noon, and night, when I'm hearing air traffic. When it's interrupting me and I'm aware of it. And there's less than 15 days through the entire year that I have not written down at least twice or three times that I'm hearing air traffic during the day.</p>	<p>The commentator is likely experiencing 20-30 percent of daily traffic but may have misunderstood to believe that the traffic occurs on 20-30 percent of days in a year.</p>
151.7	<p>[Amy Pollock] We've been repeatedly told that the planes over us at the [Brandywine] Intercept [BWINE] are to be at 3,000 feet or better. Obviously, 2,200 feet is not at 3,000 feet or better. The planes are getting lower. They're coming in more quickly and more on top of each other. They're less than a minute apart many times. And I'm told that the Keely Intercept is between BWINE and Philadelphia, and that that has an 1,800 foot marker, where Voine has the 3,000 foot marker. Obviously, I've also been informed that the planes have to -- can approach the 1,800 foot marker as opposed to waiting until they get there, which means they're lowering themselves before they get to Keely. So they're lower over our heads.</p>	<p>It is true that air traffic controllers keep most landing traffic over Brandywine Intercept (BWINE) at 3,000 feet or higher as they descend to land to the east on Runway 9R under one of several published instrument approach procedures. However, the ILS approach to Runway 9L includes another intersection, QWEST, which is in close proximity to BWINE but only requires that aircraft be at or above 2,100 feet as they begin their descent to land on Runway 9L. In addition, some aircraft may be making visual approaches to 9R or 9L flying at altitudes less than 3,000 feet in the vicinity of BWINE. In any case, there are several legitimate explanations as to why an aircraft might be below 3,000 feet in the commentator's neighborhood.</p> <p>That said, the proposed project alternatives evaluated in this EIS have no bearing on flight paths or altitudes off the ends of Runways 9L-27R or 9R-27L. If anything, the noise exposure in these areas west and east of the main parallels is expected to decrease slightly under either of the two Build Alternatives, due to the slight diversion of traffic off of the parallels and onto the extended crosswind Runway 17-35. These changes in exposure are illustrated in Figures 4.2-6 through 4.2-9 of this EIS and out to further distances in Figures 4.2-14 through 4.2-17.</p>

Comment Number	Comment	Response
151.8	[Amy Pollock] I'm also concerned about the noise board that's out front there. It said that it's computed DNLs in Delaware, and it listed the localities of Arden, Ardencroft, and Arden Town. And the gentleman explained to me that that is computer modeling. There was no recording of noise done in any of the three Ardens. I'm curious as to how you can make a comparison to something that you don't have to begin with.	As described in Section 4.2 of this EIS, although noise measurements are not required as part of an environmental process, noise measurement data were evaluated to provide an understanding of the existing noise environment at selected sites deemed representative of noise-sensitive land use in the study area. While noise measurements were not conducted in any of the three localities noted in the comment, noise measurements were conducted at two representative sites in Delaware as identified in Section 4.2, Noise, of this EIS. The noise measurement results for the two sites (LT-4 and ST-9) were previously summarized in the Noise Technical Report (Appendix A.1 of the DEIS). Summaries of various INM-computed noise metrics at the two measurement sites in Delaware are provided in Section 4.2, Noise, of this EIS.  The primary means of describing the noise effects that result from the alternatives studied in this EIS is not based on measurements, but on INM-computed levels. These are reported in detail in Chapter 4.2 and the technical appendix to the DEIS.
151.9	[Amy Pollock] I would request that the runway airport -- the extension of this 17-35 runway be reconsidered, because the airport is already having an extremely adverse impact over Northern New Castle County. Especially over the Ardens, because of our historic and cultural life-styles.	As stated in Section 4.9, the Proposed Project would not have an adverse effect on historic and cultural resources, and would not increase noise over the Ardens.
151.10	[Amy Pollock] Something needs to be done to bring back the quality of life that has been taken from the residents in this community.	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.
151.11	[Stephen Donato] ...I think there's other means that the FAA has not considered, through technology and reaching out and working with community groups that know the region, you know, possibly could help with routing and, you know, work together as far as an equitable solution for everybody.	Public outreach, including community inputs on scoping, is 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. FAA considered the use of technology (Alternative E1) and eliminated this alternative because it would not achieve the project's purpose and need of reducing delay in the short term.
151.12	[Barbara Fisher] ...I did not receive any notification of this meeting.	You have been added to the mailing list.
151.13	[Barbara Fisher] Property values, quality of life, health, anything you want to mention, is being ruined by this airport and the fact that its being used improperly.	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.
151.14	[Richard McNamara] ...suggest that you study the routing and the way you're having these airplanes stacked over residential areas, especially in New Castle County.	The extension of Runway 17-35 would not change the airspace configuration or the approach/departure patterns for Runway 9L/27R or 9R/27L. As Figures 4.2-2 and 4.2-3 in this EIS show, flight tracks for aircraft arriving or departing on Runway 17-35 do not pass over New Castle County. The FAA is currently undertaking an airspace redesign, and is preparing a DEIS.
151.15	[Barbara Fisher] Maybe it's -- instead of spending tax dollars on airports, it's to spend tax dollars on hi-speed rail traffic. The average trip, according to an article in the paper, is 300 miles. A railroad can be competitive with an airplane for 300 miles.	As described in Chapter 3, a number of alternatives, including high-speed rail, 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.
151.16	[Amy Pollock] I was told that years ago the Philadelphia Airport did use an over-the-water approach, and we've been told recently that that's not an option. I would like to request that that option be more thoroughly investigated and reconsidered.	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 this runway, as it is perpendicular to the Delaware River.



Comment Number	Comment	Response
151.17	[Amy Pollock] Orange County, California, because of historic recognition, has a steep descent or final drop into their airport that is steeper than most other places in the country as I understand, in honor of recognizing the impact over an historic area out -- like out there. I would like to request that that also be more thoroughly investigated for this airport.	There is no justification for mitigation of this nature in this EIS. Such measures are normally evaluated through an FAR Part 150 Noise Compatibility Study. The Airport has such a plan and it will be updated in the next few years. Orange County did have an arrival procedure that was discontinued due 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 unless the Airport Sponsor initiated a FAR Part 161 Study. However, there are no significant impacts that would warrant implementing such a procedure.
151.18	[Amy Pollock] I was told that planes essentially are making a left when they're about nine miles out from the airport. I need more information on that.	The extension of Runway 17-35 would not change the airspace configuration or the approach/departure patterns for Runway 9L/27R or 9R/27L. As Figures 4.2-2 and 4.2-3 in this EIS show, flight tracks for aircraft arriving or departing on Runway 17-35 do not pass over New Castle County.
151.19	[Amy Pollock] ...you'll take some planes off of 9-R and 9-L, and put them on 17-35. But you've already found out that 9-R and 9-L can handle a certain number of planes, which in our estimation means that you'll be otherwise increasing the traffic then on 9-R and 9-L because you've now relocated some of what was there, so you can pick that level back up.	The purpose of the project is to reduce delays for current and future forecast traffic, rather than enhance capacity for current and forecast traffic. The near-term benefit of lengthening Runway 17-35 is that it will reduce delay by allowing the shifting of some traffic from 9L and 9R onto the extended 17-35.
151.20	[Amy Pollock] ...instead of increasing your runway capacity, what you ought to do is consider your airport terminal capacity, and limit the flights...	Section 3.3 evaluates demand management policies, including slots, voluntary de-peaking, and voluntary flight reduction to reduce delay. The airport is a benefit to the public as much as the highways in the U.S. are. As discussed in Section 3.3.1, governmental authorities have relatively little control over the airlines' routing, scheduling, and operations.
151.21	[Wally Kremer] I made the suggestion two or three meetings, one of the things that you normally do when you have a -- data like you have, which gives us statistical distribution of the noise level of these airplanes, a reasonable management principle is to look at statistically the ones that are making most of the noise. You follow-up and you find out why, and you work on those people to drop that noise level. When I've raised this issue at two or three meetings the answers I get, no one is in charge of the airplane. The FAA is not, the airport is not. Nobody is concerned about doing such a reasonable management principle. If you did that, if you've got the average at 45 or 40, why would anybody be at 70? There's data that they're at 70. Now, there can be, because of situations, a pilot has to fly their plane to do it safely, and safety comes first. But a reasonable approach is follow-up on that. And if Joe has done a three times in the last month, it seems to me somebody needs to talk to Joe.	Noise impacts from aircraft is measured using the DNL, the average day-night level, which measures cumulative noise impacts of all aircraft. Appendix A.1 of the DEIS provides definitions of the noise metric. Noise from single aircraft are measured using the SEL or Lmax as described in Section 4.2. As the EIS shows, individual aircraft can cause noise levels that are substantially higher than the DNL. All jet aircraft using the Airport comply with Stage 3 noise criteria.
151.22	[Wally Kremer] ...things [are] being done by the various union folks and so forth that were delaying that flight. So, I don't know how this efficiency of what's happening there has got to the delay...	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.
151.23	[Wally Kremer] ...FAA could setup points to continue to take noise, be able to work that back to what flight it is, and be able to work back in a management principle, and work back to make the noise level lower. Where you actually fly the planes obviously makes a lot of import, and the river route - and I flew a lot of river routes coming in here, around the world, can be done.	Existing voluntary noise abatement procedures for departures off Runways 27L and 27R will remain in place. While pilots using these runways follow the Delaware River to the extent compatible with safety and weather conditions, neither runway 9L/27R nor 9R/27L is aligned with the river. Aircraft must approach a runway for landing aligned with the centerline of the runway.

Comment Number	Comment	Response
151.24	[Wally Kremer] ...take a site that's more remote from the city, and build a new airport.	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.
151.25	[Beverly Barnett] The Ardens Historic District is a consulting party to this process. We wish to invoke Section 106 of the 1996 National Historic Protection Act that states that federal money cannot be spent to adversely impact the patrimony of the United States. This -- and it means that you must -- the FAA must consider all alternatives to the adverse impact upon the recognized historic district.	As described in Chapter 3, the Ardens are not located within the Area of Potential Effect (APE) for the Runway 17-35 Extension Project and are not consulting parties to the Section 106 process for this project. 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. FAA's Section 106 process was followed, and the PA SHPO agreed with the findings.
151.26	[Beverly Barnett] But what I would like to suggest is that just as California has done a study showing that money is better invested in improving rail service than building more runways or building more highways. In this case, money would be better invested in improving the existing Amtrak service on the east coast of the United States for the 300 miles north and south, and out to Harrisburg -- Harrisburg and Pittsburgh as well.	As described in Chapter 3, a number of alternatives, including high-speed rail, 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. The California Study referred to by the commentator is not applicable to this project.
151.27	[John Kearney] ...clearly a 4F evaluation is needed here. And the reason why is clear, it's been alluded to by two other speakers. You know, we have a very unique location, it's the Ardens and, you know, you have three areas listed as, you know, on the Register of Historic Places, and the reason why they're listed is unique. So, therefore, the evaluation needs to be unique. And that has not been done, it has not taken place. The evaluation that was done -- is grossly inadequate. You know, you have not evaluated enough information to determine if there's been a significant adverse impact on this area.	No increases in noise are proposed over Arden. Section 4(f) Resources have been evaluated in accordance with FAA Order 1050.1E Policies and Procedures, as documented in Section 4.8 of this EIS. The evaluation concludes that the Proposed Project would not result in the "use" of a Section 4(f) property, and there is no need to prepare a Section 4(f) Evaluation of prudent and feasible alternatives to such use.
151.28	[John Kearney] There should be actual recording of noise levels taking place in these areas.	As described in Section 4.2, Noise, of this EIS, although noise measurements are not required as part of an environmental process, noise measurement data were evaluated to provide an understanding of the existing noise environment at selected sites deemed representative of noise-sensitive land use in the study area. The noise measurement data available for evaluation included data that were obtained from the Airport's permanent NOMS for 2003, as well as data that were obtained from a temporary noise monitoring program performed during the latter half of January 2004. In effect, these two sources of measurement data are the recorded sound levels during the respective measurement periods. It should be noted that audio recordings were not performed.
151.29	[John Kearney] There should be a 4F evaluation done because of the unique nature of this location.	Section 4(f) Resources have been evaluated in accordance with FAA Order 1050.1E Policies and Procedures, as documented in Section 4.8 of this EIS. The evaluation concludes that the Proposed Project would not result in the "use" of a Section 4(f) property, and there is no need to prepare a Section 4(f) Evaluation of prudent and feasible alternatives to such use.

Comment Number	Comment	Response
151.30	[John Kearney] ...when you did your evaluation of the air impact, what was -- what evaluations were done to determine the adverse effect of the increased air traffic would have at the various levels.	The Air Quality analysis uses EDMS, the FAA required air quality model to evaluate aviation-related emissions associated with PHL. EDMS is designed to assess the air quality impacts of airport emission sources, particularly aviation sources, which consist of aircraft, auxiliary power units, and ground support equipment. EDMS also provides the capability to model other airport emission sources that are not aviation-specific, such as ground access vehicles and stationary sources. EDMS includes emissions and dispersion calculations, the latest aircraft engine emission factors from the International Civil Aviation Organization (ICAO) Engine Exhaust Emissions Data Bank, vehicle emission factors from the Environmental Protection Agency's (EPA) MOBILE6.2, and EPA-validated dispersion algorithms in the AERMOD model. EDMS considers aircraft in four operation modes of the landing and take-off cycle, including approach, taxi/idle, takeoff, and climbout. For the approach and climbout portions of the LTO cycle when the aircraft is in the air, emissions are accounted for up to 3,600 ft. Above that height it is considered no longer possible to specifically attribute emissions to an individual aircraft due to atmospheric mixing and dispersion.
151.31	[John Kearney] ...did you take a determination of X amount of planes at 3,000 feet versus 2,000 feet. And what effect that more planes coming in at a lower level would have on air quality. Was that done? And if it wasn't done, would that affect your determination that there was no need for a conformity determination.	For the approach and climbout portions of the LTO cycle when the aircraft is in the air, emissions are accounted for up to 3,600 ft. Above that height it is considered no longer possible to specifically attribute emissions to an individual aircraft due to atmospheric mixing and dispersion. The Conformity determination was based on total Project-related cumulative emissions changes, and those results would not change based on the altitude that aircraft would be flying.
151.32	[John Kearney] ...that potential for an adverse effect on the air quality may outweigh the benefits that you list, which is the increased efficiency backlog of planes having to wait...	The total number of aircraft flights (operations) will not change due to the Proposed Project. The goal of the Project is to reduce aircraft delay, which in turn will reduce aircraft idling at the gates or queuing on the taxiways. The DEIS demonstrated that compared to the No-Action Alternative, either proposed 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).
151.33	[Bill Thompson] I'd also like to see a study on -- that analyzes the altitude data over Northern New Castle County, which targets the rate of descent of these airplanes. The rate of descent from the Brandywine Gate to the one that's previous -- whatever the other signal marker is before this.	The INM uses flight tracks and altitudes, among other information to calculate the DNL. The INM inputs are available on request. The extension of Runway 17-35 would not change the airspace configuration or the approach/departure patterns for Runway 9L/27R or 9R/27L. As Figures 4.2-2 and 4.2-3 in this EIS show, flight tracks for aircraft arriving or departing on Runway 17-35 do not pass over New Castle County. The FAA is currently undertaking an airspace redesign, and is preparing a DEIS.
151.34	[Bill Thompson]...I think that with the increase in air traffic, which is going to cause the increase in pollution, noise, and a decrease in the quality of our lives and our property values, all for the profit of the Philadelphia Airport, I don't think we should stand for it.	The FAA has noted and considered your comment.

2 RUNWAY 17-35 EXTENSION PROJECT  
3 ENVIRONMENTAL STATEMENT PUBLIC HEARING

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Thursday, November 18, 2004

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Commencing at 7:00 p.m.

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HELD AT: The Meadows

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7703 Lindberg Boulevard

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Philadelphia, Pennsylvania

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REPORTED BY: Francis A. Farrell

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Professional Reporter

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1 IN ATTENDANCE:

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Susan McDonald, FAA

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Wayne Heibeck, FAA

4 Andrew Brooks, FAA  
5 Jim Beyers, FAA  
6 Susanna Liller, Facilitator  
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1 MS. LILLER: I would like to  
2 welcome you all to the this public hearing  
3 on the Draft Environmental Impact  
4 Statement. My name is Susanna Liller, and  
5 I will be your facilitator for this  
6 evening. I'm going to talk, in a bit,  
7 about the protocol for this evening, but

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8 first I want to introduce the folks that  
9 are up here at the front of the room. I'll  
10 start with Wayne Heibeck. Wayne's the  
11 manager of the Harrisburg airport district  
12 office for the Federal Aviation  
13 Administration.

14 Next to him is our hearing  
15 officer, Sue McDonald, and she's an  
16 environmental protection specialist, and  
17 she's the FAA project manager for the  
18 project.

19 Then we have Andrew Brooks.  
20 He's the deputy project manager from the  
21 FAA.

22 And then Jim Beyers. Jim is an  
23 environmental protection specialist at  
24 headquarters for the FAA.

4

1 There is another gentleman here  
2 that I would like to introduce, and his  
3 name is David Berk. He's up here in the  
4 front. David is with the Pennsylvania  
5 Department of Environmental Protection, and  
6 he's a member of the agency streamlining  
7 team.

8 Let me just go over the protocol  
9 for this evening. We have a couple of  
10 ground rules, and I think a lot of you  
11 heard this when you came in. I'm just

12 17-35-PublicHearingTranscript\_111804.txt  
13 going to repeat it again to make sure we're  
14 all on the same page.

15 If you wish to speak, there was  
16 a list where you could sign up to speak.  
17 Actually, I have the list up here, but if  
18 you haven't signed up and you decide that  
19 you do want to speak, then just go back to  
20 the table and sign up and they will bring  
21 that list up to me. There won't be any  
22 questions, at all, during this hearing  
23 because what we will be doing is listening  
24 to you and hearing what you have to say and  
taking your testimony.

5

1 Speakers will be called in the  
2 order that they signed up. I'm going to  
3 call elected officials first. A time limit  
4 will be established. We looked at the list  
5 of people that want to speak, and we're  
6 setting a time limit of five minutes.  
7 Jennifer is going to be keeping the time up  
8 here, and we're going to rely on Jennifer  
9 to ring that bell when it is four minutes  
10 and you know that you have one minute left.  
11 Then she will ring it again when your time  
12 is up for five minutes.

13 All comments are being recorded  
14 by our stenographer. Our stenographer is  
15 Frank Farrell. What he has asked is that

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16 people say their names when they come to  
17 the mike. It's very important that he gets  
18 your name. I would also ask for you to  
19 spell you're last name, because sometimes  
20 we can't read it correctly and then we will  
21 make sure that we get it right.

22 Comment forms are also available  
23 at the table, so there are different ways  
24 that you're going to be able to submit your

6

1 testimony. In a minute I'm going to ask  
2 Sue to explain a little more -- our hearing  
3 officer, to explain a little more about  
4 this, but let me just continue through this  
5 protocol.

6 As far as the sequence, what I  
7 will do is just call people down the list  
8 and I'll call a couple of people ahead so  
9 that you know where you are on the list and  
10 you can be preparing.

11 I think the last thing that I  
12 need to say is that you know the exit is  
13 here (indicating) and there is also an exit  
14 behind me. If you need to use the  
15 restrooms, you just go down this corridor  
16 behind here (indicating) and then you take  
17 another left and you will find them. So  
18 with that, I would like to introduce our  
19 hearing officer, Sue McDonald.



17-35-PublicHearingTranscript\_111804.txt  
20 MS. McDONALD: Thank you very  
21 much. Good evening and thank you all for  
22 attending. This is a public hearing on the  
23 Draft Environmental Impact Statement for  
24 the Philadelphia International Airport

7

1 Runway 17-35 Extension Project. The  
2 Federal Aviation Administration is the lead  
3 federal agency for this project. The  
4 Notice of Intent to prepare the Draft  
5 Environmental Impact Statement for this  
6 project was published in the Federal  
7 Register on August 1st of 2004. The Notice  
8 of Availability for the Draft Environment  
9 Impact Statement for this project was  
10 published in the Federal Register on  
11 October 15, 2004.

12 The purpose of this project is  
13 to reduce aircraft delays at the  
14 Philadelphia International Airport, in the  
15 short term. At this hearing, we will be  
16 taking testimony on the Draft Environmental  
17 Impact Statement. The FAA encourages all  
18 interested parties to provide comments  
19 concerning the scope and content of the  
20 Draft Environmental Impact Statement. Your  
21 comments may be oral, they may be written  
22 or they may be provided by E-mail.  
23 However, all comments must be received no

1 MS. LILLER: Thank you.

2 As you know, we will call on the  
3 elected officials that have signed up that  
4 want to speak. The first person that I  
5 have on the list is Mayor Slay. Again, if  
6 everyone would say their name and spell  
7 their last name so we can make sure Frank  
8 has it.

9 MAYOR SLAY: Good evening. My  
10 name is Mayor F. Raymond Slay, Upper Darby  
11 Township, Delaware County, and I have a  
12 resolution that I would read into the  
13 record.

14 This is a resolution, number  
15 3404, a resolution of Upper Darby Township,  
16 Delaware County, Pennsylvania opposing the  
17 extension of runway 17-35 at the  
18 Philadelphia International Airport.

19 Whereas, on November the 18th,  
20 2004 and three other dates, the Federal  
21 Aviation Administration, FAA, will hold  
22 public hearings to discuss the proposed  
23 extension of runway 17-35 at the  
24 Philadelphia International Airport from

1 5,459 to 7,000 feet. And whereas the  
2 extension of this will allow regional jets  
3 to take off and land on runway 17-35, and  
4 whereas the regional jets will be handling  
5 heavier loads of fuel than aircraft that  
6 currently take off and land on runway  
7 17-35. And whereas the traffic on runway  
8 17-35 is anticipated to increase if the FAA  
9 permits the extension. Whereas if the FAA  
10 permits the extension, the regional jet  
11 flight pattern will carry them over  
12 Highland and Island Park Elementary Schools  
13 of Upper Darby Township and will be in  
14 total proximity of several schools within  
15 the township. Whereas this Council is  
16 concerned that the regional jets and other  
17 traffic that results from the extension of  
18 runway 17-35 will increase stress and noise  
19 level within the township, cause vibration  
20 to structures in the vicinity of take offs  
21 of the runway, an increase of a possibility  
22 of the hazardous materials carried on the  
23 aircrafts over the township that could  
24 cause an increase and other safety issues

10

1 that will significantly impact the health,  
2 safety and welfare of township residents,  
3 business people and visitors.

4 Therefore it is resolved that,  
Page 8

5 one, the township opposes the proposed  
6 extension of runway 17-35, and, two, the  
7 mayor and the administration are hereby  
8 empowered to take all steps necessary to  
9 ensure that the township's opposition to  
10 the extension of the runway 17-35 is  
11 expressed to the FAA at the public hearing  
12 on November the 18th, 2004, resolved this  
13 17th day of November 2004, Upper Darby  
14 Township.

15 Do you want this copy?

16 MS. LILLER: I would like to  
17 thank you.

18 The next person wanted to be  
19 recognized, but will not be speaking this  
20 evening, and that is Mayor Mosely.

21 Mayor Mosely, where are you?

22 Okay. She's being represented.

23 Bob Prevedi is representing  
24 Counsel person Verna here, and he wanted to

11

1 speak. If you would spell your last name.

2 MR. PREVEDI: Sure. It's  
3 P-R-E-V-E-D-I. I'm the Director of  
4 Communications for City Council President,  
5 Anna Verna. She also represents the 2nd  
6 District.

7 There are two main concerns that  
8 the council president has at this point for

9 the expansion project that we have not  
10 gotten adequate answers for.

11 Number one is the rerouting of  
12 the traffic onto Bartram Avenue, rerouting  
13 Route 291 onto Bartram Avenue. I have sent  
14 a couple of E-mails and sat in a couple of  
15 these meetings and was promised answers on  
16 it and have not gotten those answers. I  
17 was looking to find out what options were  
18 looked at besides using Bartram Avenue and  
19 there are other alternatives to moving  
20 Route 291 to the other side of 95.

21 The community does not want to  
22 have any more pollution pushed towards  
23 their community and by rerouting Route 291  
24 to the other side of 95, you accomplish

12

1 that, and I don't think that is what the  
2 community wants. We would like to have  
3 some answers on what the options are. I  
4 understand that there was a brief meeting  
5 with the Streets Department, which our  
6 office was not made aware of. We would  
7 like to know what follow-up has come from  
8 that.

9 The other thing that I'm  
10 concerned about is one of the participants  
11 here, Maggie Powell, at a previous meeting,  
12 asked if she could be made aware of what

13 locations were chosen for the noise study,  
14 the noise analysis, wherever you use the  
15 meters. She had wanted to just, kind of,  
16 concur with the locations to make sure -- I  
17 even remember, at the meeting, she offered  
18 up her porch. Again, there has been no  
19 response to what locations were chosen.  
20 The community, I think, is trying very hard  
21 to work with the airport to try to get this  
22 done, but the noise and the pollution and  
23 the traffic are two important issues to the  
24 community. We would certainly like to see

13

1 your response to those main issues. We  
2 have not gotten them as of yet. Thank you.

3 MS. LILLER: Thank you. Next  
4 we're going to go to the public sign up  
5 sheet. The first person that we will call  
6 is Joe Warren from Eastwick. Just so you  
7 know the next person will be Marcia  
8 Brunelli and then Camille Amato.

9 Joe Warren, that would be  
10 W-A-R-R-E-N?

11 MR. WARREN: That's correct.

12 Philadelphia is one of the most  
13 severely environmentally challenged areas  
14 in this entire country. This airport  
15 expansion will clearly jeopardize us for  
16 years. This airport expansion will further

17       jeopardize us for years to come, so what  
18       was this hearing about? None of the  
19       information that has been presented thus  
20       far improves our present situation. It  
21       appears that will be exacerbated no matter  
22       which alternative you have chosen by the  
23       decision. So what has been offered to us  
24       who choose to remain in this area? This

14

1       question does not require an answer. No  
2       offer can be made on our physical health  
3       and mental well being. One thing that  
4       should be investigated, in our opinion, and  
5       in the collective wisdom, is the cause of  
6       the damage already done to the environment,  
7       no matter what the cause that you can  
8       blame. Some consideration should be given  
9       to provide area property owners for sound  
10       proofing, and noise barriers should be  
11       installed between Bartram Avenue and  
12       residential areas and be considered for  
13       properties in their affected area. This  
14       request is requested no matter what your  
15       maps may show. Your maps may show that  
16       some areas will get more noise in other  
17       areas than in Eastwick. We don't think  
18       that makes sense. We think Eastwick,  
19       nearest to the airport, will be the most  
20       affected.

21 MS. LILLER: Thank you.  
22 The next person is Marcia  
23 Brunelli and then Camille Amato and then  
24 Scott Maitz.

15

1 MS. BRUNELLI: Marcia Brunelli,  
2 I'm from Upper Darby Township, Delaware  
3 County.

4 As resident of the Upper Darby  
5 Township and as an active member of the  
6 coalition of the community against runway  
7 17-35 I'm opposed to the runway 17-35  
8 extension project. I disagree with the  
9 Draft Impact Environmental Impact Statement  
10 that finds no significant impact on our  
11 surrounding communities.

12 Large aircraft will be flying  
13 over our township at lower altitudes and  
14 with greater frequency. This project, the  
15 route stretches over our schools, our local  
16 hospitals and highly populated residential  
17 areas in Upper Darby. At the beginning of  
18 this week, you have heard testimonies from  
19 school officials in the Upper Darby School  
20 District, who echoed those concerns. Can  
21 you imagine if you're a student in school  
22 and trying to take a math test with the  
23 sound of overhead aircraft? Our schools  
24 are not air conditioned and need to have



1 the windows open in classrooms in warmer  
2 weather. The noise will register at five  
3 or more decibels. This will be a severe  
4 impediment to learning and teaching.

5 Home is where people go to find  
6 peace and comfort and where families settle  
7 down to spend quality time. This would be  
8 interrupted by airplanes flying over their  
9 homes. The quality of life, as we know it,  
10 will decline, resulting from runway 17-35  
11 and other property enhancement problems.

12 Last night I was awakened from  
13 an airplane flying overhead. The windows  
14 were closed, and it was very loud. The  
15 general risk from increased aircraft cannot  
16 be understated. Under the extension  
17 project Upper Darby Township and the  
18 surrounding communities will be subjected  
19 to air pollution from smoke and ground  
20 level ozone. Exposure to air components  
21 from jet fuel will increase the risk for  
22 cancer and increase asthma and other  
23 pulmonary diseases. Exposure to jet  
24 aircraft noise can elevate blood pressure

17-35-PublicHearingTranscript\_111804.txt  
1 levels, and it's documented in the  
2 Indianapolis Star that jet noises along  
3 with other loud noises have been proven to  
4 lead to hearing loss.

5 Flying aircraft over heavily  
6 populated areas, such as Upper Darby, will  
7 present a significant safety risk for our  
8 townships. The risk is intensified because  
9 of the increased number of aircraft and  
10 because runway 17-35 routes extend right  
11 over our public and parochial schools and  
12 our local hospital. One accident will be  
13 catastrophic. One accident is too many.  
14 One accident can injure and kill many  
15 people.

16 Our township was not included in  
17 flight drills and our township will need to  
18 have specialized training in order to  
19 respond to aircraft. There should be a  
20 thorough study done assessing the total  
21 fiscal impact on Delaware County. The  
22 property enhancement program will cost,  
23 approximately, two billion dollars and will  
24 end up being a Band Aid approach for a long

18

1 range problem. There may be other  
2 alternatives that you need to be  
3 discussing.

4 According to my understanding,

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5 one alternative that there may be is one  
6 proposal that proposes to move an already  
7 existing runway over 500 feet and have  
8 parallel take offs over the river. This  
9 would eliminate flying over Delaware County  
10 and jobs and businesses would not be  
11 affected. This option is certainly worth  
12 investigating.

13 In summary, the Federal Aviation  
14 Administration has conducted an  
15 environmental study that is lacking. The  
16 Federal Aviation Administration failed to  
17 include communities such as Havertown,  
18 Montgomery and Upper Darby Townships in  
19 their review. Contrary to EIS statement,  
20 there will be a significant impact on  
21 surrounding communities as a result of the  
22 runway 17-35 project. There will be an  
23 adverse effect in our social environment  
24 disrupting our established community that

19

1 includes your schools, community hospitals  
2 and our residents' dwellings within the  
3 densely populated metropolitan areas of  
4 Upper Darby Township.

5 During the Federal Aviation  
6 Administration's public session at Upper  
7 Darby High School, there was a concern to  
8 preserve the red belly turtle. All life

17-35-PublicHearingTranscript\_111804.txt  
9 forms are important. Steps need to be  
10 taken to preserve the humans that will be  
11 affected by any enhancement program,  
12 including runway 17-35. Thank you.

13 MS. LILLER: Thank you, Marcia.  
14 Camille Amato is next, and then  
15 it will be Scott Maits and Robert Marmon.

16 MS. AMATO: Camille Amato, Upper  
17 Darby, Pennsylvania, A-M-A-T-0. This is an  
18 E-mail, and I'm only reading the E-mail as  
19 it was written to President Bush at the  
20 White House on November 8th.

21 The subject is U.S. Citizens  
22 object. FAA projects without our  
23 representation. Subject one is Kelly  
24 Colvin's meeting of 11/5/04 with seven

20

1 Delaware County area activists regarding  
2 objections to the runway 17-35 expansion  
3 project, Philadelphia International  
4 Airport.

5 Subject two is a hand out from  
6 Ms. Kelly Colvin, Delaware County, Media,  
7 Pennsylvania minutes of council public  
8 hearing, August 18, '03, regarding  
9 Philadelphia International Airport capacity  
10 enhancement program.

11 "Dear Government Officials and  
12 all Activists. This e-mail is written with

13 17-35-PublicHearingTranscript\_111804.txt  
14 information obtained at an Upper Darby  
15 Township County meeting, at a meeting with  
16 activists and a conference with U.S.  
17 Representative Curt Weldon's District  
18 Director, Kelly Colvin on 11/5/04. Reading  
19 the Delaware County, Media, PA Minutes of  
20 Counsel Public Hearing, August 18, '03  
21 regarding Philadelphia International  
22 Airport and the capacity enhancement  
23 program. I conclude the following.

24 There is little communication or  
courtesy given the Delaware County,

21

1 Pennsylvania authorities and citizens  
2 regarding the above subject matter by  
3 federal government employees, FAA. This  
4 was emphasized by Mr. Weldon on August 18,  
5 '03 and by our Lead Local activists on  
6 November 5, '04. The grave concerns stated  
7 by the local activists is the need for an  
8 extension of time by the FAA to communicate  
9 with Delaware County residents, preferably  
10 at our town meetings. The local activists  
11 state also the need for a full, hard copy  
12 of the Environmental Impact Statement. The  
13 environmental impact was a chief concern of  
14 most activists visits at the meeting of  
15 11/5/04.

16 After I read the public hearing

17 17-35-PublicHearingTranscript\_111804.txt  
minutes of August 18, '03, I have personal  
18 statements to make separate from the above  
19 meetings. As I understand the minutes,  
20 they were talking about billions in  
21 dollars, monies spent and apparently monies  
22 part of the bottom line for spending on  
23 three new projects. Cascading down, these  
24 monies will be obtained from all U.S.

22

1 citizens from our 50 states at the federal  
2 taxation level. The minutes mentioned two  
3 obsolete projects of the Philadelphia  
4 International Airport, millions spent and  
5 projects obsolete right after opening.

6 What galls me the most is if the  
7 FAA has their way, these projects would  
8 evict healthy tax revenue producing  
9 companies to produce one or two obsolete  
10 runways for bankrupt airlines.

11 I warn Governor Rendell, Mayor  
12 Street, Delaware County Council and all of  
13 Pennsylvania, if you evict any healthy  
14 company to produce the effects above, you  
15 will never get any CEO to invest in  
16 Pennsylvania again. You will be a dead  
17 state.

18 This e-mail was sent  
19 individually to federal, state and local  
20 officials, due to address errors

17-35-PublicHearingTranscript\_111804.txt  
avoidance."

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24

I also wish to extend an excerpt  
from Jesus Christ's abolition site. "The  
excerpt from Jesus Christ's 11/5/2004

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message to all nations. Today, my brothers  
and sisters I am dispatching Saint 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 blessings  
of the United Hearts of Jesus Christ and  
his blessed mother, Mary and Maranatha  
Springs, Elyria, Ohio. End Abortion, we  
will so be blessed."

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Further, on November 16th, I  
attended a CDC meeting, which is the Center  
for Disease Control at Jefferson Hospital  
on a conference for international  
terrorism, which was presented by U.S. and  
Israeli speakers. It was awesome to hear  
as a layperson and ex -- and retired LPN.  
I extend to all the communities of the

1 United States and this community their  
2 first arrivers, the emergency technicians,  
3 the doctors, the nurses on any natural or  
4 terrorist disaster, I applaud them. It's  
5 awesome to hear what is going on in the  
6 United States of America and abroad to  
7 protect human life. I hope that we never  
8 have a terrorist attack again, and the  
9 natural disaster efforts by our people I  
10 extend the blessings of the United Hearts.  
11 Thank you.

12 MS. LILLER: Thank you, Camille.  
13 Scott Maits is next and after  
14 Scott will be Robert Marmon and then Maggie  
15 Powell.

16 MR. MAITS: I'm Scott Maits,  
17 M-A-I-T-S. I am a former resident of West  
18 Philadelphia, currently in Haverford,  
19 Delaware County, but working as a planner  
20 using transportation as one of my tool box  
21 kits to revitalize parts of Philadelphia  
22 and the region. I'm also a transportation  
23 activist. I'm an elected board member of  
24 this region, not representing anyone from

1 outside the region, but an elected board



2 member of the Delaware Valley Association  
3 of Rail Passengers. I do have a statement,  
4 a general statement of my own. We are  
5 probably going to be formulating a formal  
6 statement in the future, either for this or  
7 the next round of expansion plans.

8 I don't know if everyone is  
9 aware of this, but less than 20 feet from  
10 that back wall there is a high speed train  
11 line, and it's going by right now. If you  
12 can imagine an airplane flying by 20 feet  
13 away, you would know what that would sound  
14 like. This is the thing that I'm talking  
15 about and I have been at the other  
16 hearings. We need to build more lines like  
17 the high speed airport line. We need to do  
18 it in the future to mitigate the need, the  
19 absolute need for expanding the airport  
20 much further. Now the decisions for this  
21 particular runway were made 50 years ago.  
22 Basically, we set ourselves on course in  
23 the '50s and these are the inevitable  
24 consequences. I'm actually glad that

26

1 people are riding in airplanes than driving  
2 cars and building multi deck super highways  
3 and the like. We need to be thinking  
4 beyond today's hearing. I want to put a  
5 challenge up to the same people that are

6 going to be making the decisions that when  
7 we come to the next round of the airport  
8 expansion, that we think about this one.  
9 What can we do; what the real alternatives  
10 for building second airports or building  
11 diagonal runways that are going to go  
12 across even more populated areas where the  
13 entire areas like Eastwick get very dense?  
14 We need to look at those things.

15 I believe in the next 50 years  
16 that there are realistic alternatives. I  
17 know there are. I am involved in bringing  
18 a lot of them. It's going to take  
19 cooperation. It's going to take people  
20 extending the airport, the trains that come  
21 into 30th Street that may come from up  
22 state Pennsylvania, whether they're current  
23 trains or new ones such as the Schuylkill  
24 Valley Metro or lines to Allentown to come

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1 and end at the airport. We know that the  
2 Harrisburg Airport, after a big fight, is  
3 going to be on the train line to  
4 Philadelphia and to Harrisburg. It's going  
5 to be a 110-mile an hour train in sections,  
6 and it's going to connect directly from  
7 Harrisburg to the airport and also to  
8 Philadelphia. Do we need to really -- if  
9 we build a connection from 30th Street to

10 the airport here, do we really need to have  
11 regional jets flying down over these  
12 neighborhoods, to Philadelphia, to feed the  
13 national jet system or could we have people  
14 riding that train that runs, maybe, every  
15 two hours, it could run more often, and  
16 safe in fuel? There is no issue whether  
17 people are gaining weight on a train that  
18 you have to add more fuel to the locomotive  
19 as there is with an airplane. These are  
20 the type of thoughts that we need to go  
21 into. We really need to look at high speed  
22 for the cross state system. We need to  
23 improve the Amtrak Northeast corridor, even  
24 consider bringing it down to the airport,

28

1 which used to be the original way between  
2 Chester and Philadelphia. It's used to be  
3 right on that airport line. We need to  
4 look at these things in the future.

5 I do believe that this expansion  
6 that is being considered today is  
7 inevitable. It was something that started  
8 a long time ago. I'm asking to please, as  
9 we do this, consider what the future may  
10 bring for all of us, because the impact  
11 will just get greater and greater and there  
12 has got to be alternatives. When you do  
13 notice a train going by -- this building

14 was built very close to the track --  
15 consider what an airplane would sound like.  
16 Consider a super highway over there.

17 MS. LILLER: Thank you.

18 The next person is Robert  
19 Marmon. After Robert will be Maggie Powell  
20 and then Frank Maller.

21 MR. MARMON: I will try get this  
22 into five minutes but I will give a written  
23 copy of it to the stenographer.

24 My name is Robert A. Marmon,

29

1 M-A-R-M-O-N.

2 The stated reason by the  
3 Philadelphia Airport Authority for this  
4 project is that they allege that this  
5 project is the only way to quickly reduce  
6 aircraft waiting times at the airport owned  
7 by the City of Philadelphia. That is  
8 right, Philadelphia itself owns the  
9 airport. This project is not being  
10 pushed -- this project is being pushed by  
11 the City of Philadelphia, not the FAA, not  
12 the U.S. Government, but Philadelphia. You  
13 will see why that is an important  
14 consideration in understanding what is  
15 being proposed.

16 I will outline, in my testimony,  
17 why this project cannot be justified, is

18 ill conceived and, in fact, dangerous. I  
19 have demonstrated three things in my  
20 testimony. Number one, both of the  
21 premises used by Philadelphia to justify  
22 this project are contrived and fatally  
23 flawed and that the Authority knows this to  
24 be true.

30

1 Two, the project actually  
2 represents a clear and present danger to  
3 all of those who live under the new flight  
4 paths and to the traveling public as well.  
5 More over, and worse, that this  
6 multimillion dollar windfall for the  
7 politically connected may actually increase  
8 delays at Philadelphia, but at best will  
9 have little impact on the problem it is  
10 purported to address. More about this and  
11 local politics at the conclusion.

12 Number three, Philadelphia is  
13 pursuing this ill conceived project knowing  
14 full well that almost all of the adverse  
15 impact will be dumped on the residential  
16 suburbs that have never been exposed to the  
17 outrageous noise of low flying commercial  
18 jet aircraft and also knowing that their  
19 consultant's conclusions about noise and  
20 its true impact is laughable except for  
21 the people that will have to endure.

22 Point one, both of the premises  
23 being used by Philadelphia to justify this  
24 project are fatally flawed. We have been

31

1 told the average waiting time, and I  
2 emphasize the word "average." It's  
3 critical to understand. The average  
4 waiting time for flights out of the airport  
5 is about ten minutes per flight based on  
6 current schedules. This is a critical  
7 point. The delay calculation is based on  
8 current schedules. They have computed that  
9 this costs the airlines about a  
10 hundred million dollars per year. That is  
11 it costs the stockholders of these large,  
12 publicly traded corporations one hundred  
13 million dollars in before tax profits.  
14 Although, we have asked to see the actual  
15 distribution of these delay numbers, and  
16 they have not been produced. Based on  
17 statistics available elsewhere and in  
18 particular those from a busy airport like  
19 O'Hare, Chicago, what actually is happening  
20 is that almost 95 percent of the  
21 non-weather related delay numbers, going  
22 into this average calculation upon which  
23 this entire project is premised, actually  
24 occur between 7:00 a.m. and 10:00 a.m. and

1 to a lesser degree between 4:30 p.m. and  
2 7:00 p.m. when each airline packs their  
3 schedule for competitive reasons of their  
4 own. In other words, what we have here is  
5 really a self-inflicted wound whose massive  
6 medical bills will be paid not by  
7 Philadelphia, but rather by the homeowners  
8 and taxpayers under the new flight paths,  
9 but there is more.

10 The delay calculation is based  
11 on published schedules. That is, schedules  
12 published by the airlines themselves. Now  
13 this is really bizarre. If the airline's  
14 schedule actually reflected the true time  
15 required, there would be no delay to fix.  
16 In fact, in Amtrak schedules, when their  
17 trains require stops at busier stations,  
18 the schedule reflects the additional time  
19 required at those stops. All I can say on  
20 this point is, it is a good thing for the  
21 homeowners along the flight paths that the  
22 airlines, for competitive reasons, didn't  
23 arbitrarily reduce their scheduled times by  
24 ten minutes. If they did, the geniuses

1 pushing this project would be complaining

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2 to us about the 20 minute delay at

3 Philadelphia and the bulldozers would  
4 already have been at work. There is more.

5 At a public hearing in New  
6 Jersey, we asked the airport why don't you  
7 just force the airlines to reduce their  
8 peak load departure slots voluntarily or  
9 allocate them?

10 Said Philadelphia, and I quote,  
11 "That can't be done. Since deregulation,  
12 airlines can do what they want about their  
13 departures." There is nothing that can be  
14 done about this self-inflicted wound. One  
15 week later that statement was shown for  
16 just what it was.

17 The O'Hare Airport management  
18 asked the FAA to help solve a similar  
19 problem in Chicago, and that is exactly  
20 what the FAA did. It ordered the airlines  
21 to adjust their schedules to solve the peak  
22 hour loading problems. They did not order  
23 the O'Hare management to build a new runway  
24 and route their flights over residential

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1 areas. That is happening here because that  
2 is what Philadelphia wants, period.

3 The second premise on which this  
4 project is based was one completely made up  
5 by Philadelphia and made a key criteria to



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6 be used by it's so called consultants on  
7 the project. This criteria is blatantly  
8 outrageous and arbitrary because the only  
9 possible project that could meet its  
10 requirements is exactly the one that we're  
11 looking at.

12 They told their consultants to  
13 find a project that might help the problem  
14 no later than 2007. There is nothing magic  
15 about 2007. That is what the people  
16 letting the consulting contracts made up  
17 and gave to the their consultants to bid  
18 on. A quick look at the geometry of the  
19 airport would tell you that given the  
20 unbelievably short time frame, the only  
21 thing that might help would be something to  
22 do with runway 17-35 and here we are; big  
23 surprise, but made up of false premises by  
24 Philadelphia.

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1 The real solution for  
2 Philadelphia has always been a third major  
3 east to west runway together with a  
4 reconfiguration that would allow  
5 simultaneous operations on the current  
6 parallel runways. That project, the true  
7 solution, the solution that would not  
8 expose densely populated residential areas  
9 on both sides --

10 MS. LILLER: Let me interrupt  
11 you for a minute. Why don't you take three  
12 more minutes.

13 MR. MARMON: That solution that  
14 would not expose densely populated  
15 residential areas on both sides of the  
16 river to low flying commercial jet aircraft  
17 in their take off and landing phases. It  
18 could not possibly be accomplished by  
19 Philadelphia's made up, hurry up, 2007  
20 date. And now Philadelphia claims to be  
21 relying on the honest recommendations and  
22 opinions of their consultants. The best  
23 opinions that Philadelphia's money could  
24 buy.

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1 Two, amazingly, even if what  
2 Philadelphia were claiming were true, this  
3 proposal represents a clear and present  
4 danger to all those who will be living, for  
5 the first time, under the flight paths of  
6 low flying commercial jet traffic and to  
7 the traveling public as well.  
8 Notwithstanding any of this, the project  
9 could actually increase delays that it is  
10 supposed to alleviate.

11 First, every pilot will tell you  
12 that the most dangerous portions of any  
13 flight are the take off and landing phases.

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14 Now, brought to us by the courtesy of the  
15 Philadelphia Airport Authority, if this  
16 project happens, we would have those two  
17 critical phases from bigger, more powerful  
18 commercial aircraft routed over densely  
19 populated residential areas here and in New  
20 Jersey, areas never before exposed to these  
21 dangers. Just ask the people in Queens, in  
22 Long Island, off the departure end of a JFK  
23 runway about it. That community is still  
24 mourning its losses.

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1 Should our residential  
2 communities be exposed in this way for a  
3 project that can't be justified? I think  
4 not.

5 Next, look at the geometry of  
6 the proposal. What do you notice? How  
7 does it compare to other airports?

8 First of all, the most violent  
9 and dangerous wingtip vortices, the  
10 turbulence created by the aircraft, occurs  
11 on the ground just after take off or just  
12 before landing. This is one of the reasons  
13 that at every significant airport, right  
14 down to the size of Trenton and  
15 Philadelphia Northeast, when runway center  
16 lines intersect, that intersection is  
17 always placed as far away as possible from

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18 runway thresholds as possible or their  
19 thresholds are placed so far apart as to  
20 present no danger to each other during  
21 simultaneous operations. So look at what  
22 we have here at Philadelphia International,  
23 a disaster waiting to happen. We have  
24 arrival and departure thresholds for

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1 intersecting runways virtually on top of  
2 each other. Who are we kidding here?  
3 We were promised simulations  
4 showing impact of wind direction around the  
5 compass roses during high volume operations,  
6 operations that must comply with all FAA  
7 wake turbulence separations for the size  
8 and mix contemplated here at Philadelphia.  
9 Remember, the theory is, the heavy jets  
10 will use the main runways while the smaller  
11 commercial jets, more susceptible to  
12 upsets, will be using intersecting runways  
13 after their trips from or departure to our  
14 residential neighborhoods. There is a good  
15 reason that we haven't seen the simulation.  
16 This project won't fix the problem in the  
17 first place, if there were a real problem  
18 to fix. I only have a few more pages.

19 MS. LILLER: Maybe you can just  
20 summarize it in a couple of sentences.

21 MR. MARMON: Actually, the last

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22 arrow in the quiver, the last arrow in this  
23 sad story produces the most unkind cut of  
24 all. The best opinions money would buy

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1 tells us that the noise increase is legally  
2 permissible when viewed under federal noise  
3 guidelines. In fact, few, if any, homes  
4 will qualify for remediation. That is  
5 government subsidized noise dampening  
6 guidelines. The reason for that conclusion  
7 is that this project uses a measure of  
8 noise that is actually scoffed at in  
9 California. They're using an aggregate  
10 noise. That is the same thing as if they  
11 took the residents along the flight path  
12 and put them in a hanger at Philadelphia  
13 Airport and had a well maintained jet  
14 engine in operation only to expose the  
15 people to that noise for 20 or 30 seconds  
16 and let them out.

17 MS. LILLER: I think we have  
18 Maggie waiting behind you. Go ahead.

19 MR. MARMON: They are going to  
20 calculate the average, and that's the word  
21 again, decibel increase that you have been  
22 exposed to, and here's the way they do it.

23 They take every minute in a 365  
24 day year, that includes minutes in the

1           nights, weekends and holidays, summer, all  
2           the time, and that huge total of numbers  
3           becomes the denominator. The decibels of  
4           the noise that you hear multiplied by the  
5           few seconds that you experience them  
6           becomes the numerator. You have a very,  
7           very big denominator and a very small  
8           numerator. So the result of that  
9           calculation is a very small average  
10          increase. Under federal guidelines unless  
11          that average exceeds, about, 65 decibels  
12          day in and day out, you haven't been  
13          damaged. Let me put this in the starkest  
14          relief.

15                         Let's assume you've never been  
16          exposed to commercial jet noise at all.  
17          Let's say Philadelphia has a soundproof  
18          hangar with a well maintained  
19          state-of-the-art jet engine in operation.  
20          Let's say they walk you into that hangar  
21          for only 30 seconds, 20 times a day, and  
22          you are told that is what you're going to  
23          do five or six days a week every week for a  
24          while, and that the frequency of your

1           visits to that hangar might increase a  
2           little over time. Then they tell you that

3 on average, your life has not changed very  
4 much. Then they show you the federal  
5 guideline that agrees that your life hasn't  
6 changed that very much. The fraction of  
7 time that you have been exposed to these  
8 noises has gone from zero only to a very,  
9 very small increase over a year, at least  
10 that's the way they calculate your  
11 discomfort.

12 Under federal guidelines unless  
13 you are exposed to 65 decibels, a chain  
14 saw, 24 hours a day, 365 days a year, you  
15 haven't been legally damaged, even though  
16 your ears may be ringing 20 times or so a  
17 day and you had to resist temptation to  
18 duck.

19 In California, they scoffed at  
20 that calculation and it's foregone  
21 conclusion. They look at what really  
22 matters. The real impact of each session  
23 you are now exposed to that noise in that  
24 hangar, it's called SENL. It stands for

1 Single Event Noise Level. They focus on  
2 the change in that number. They know that  
3 is the number real people care about, the  
4 quality of life of real people. 20 brand  
5 new low flying commercial jets, where none  
6 existed before, would be an extreme hurdle

7 to climb over in California.  
8 Unfortunately, we don't live there. We  
9 live here.

10 It seems our politicians don't  
11 care as much about us as the ones in  
12 California care about their citizens. Not  
13 only will this project permanently affect  
14 the peace and quite enjoyment of our people  
15 under the new flight paths by introducing  
16 low flying commercial jet traffic to new  
17 neighborhoods, but, also, Philadelphia's  
18 own conclusions note that this type of  
19 commercial jet noise pollution has only one  
20 impact on the value of the home and real  
21 estate it affects, and that impacts to  
22 lower values for every homeowner and  
23 taxpayer affected. So to solve this made  
24 up problem, Philadelphia is, in effect,

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1 transferring the decreased value of our  
2 homes and our peace and quiet to increase  
3 the value for the shareholders of a few  
4 large publicly traded corporations to solve  
5 a problem they created. Unbelievable and  
6 unfair.

7 However, there may be one more  
8 disturbing reason why Philadelphia is  
9 pushing this unjustified project so hard.  
10 As you know, the FBI is investigating key



11 Philadelphia political officials in a  
12 widely reported pay-to-play scandal. This  
13 is the apparent awarding of lucrative  
14 contracts with the City to only those  
15 persons and companies who have made  
16 sufficient political contributions to those  
17 in power. Much of the scandal revolves  
18 around how taxpayers of Philadelphia have  
19 been adversely affected by the spending of  
20 scarce local resources.

21 However, if Philadelphia is  
22 successful in ramming this ill conceived  
23 project through, a large part of the funds  
24 they will have control over and be able to

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1 disbursed to their pay-to-play friends,  
2 will be those contributed by the federal  
3 government. What would be better for  
4 Philadelphia's incumbent politicians,  
5 millions of dollars of OPM, that's other  
6 people's money, to spend on an  
7 unjustifiable project that benefits their  
8 friends and will forever penalize and  
9 threaten residential neighbors on both  
10 sides of the Delaware River. In fact, so  
11 confident are the Philadelphians pushing  
12 this project that we have learned that  
13 contractors have already been spoken to and  
14 may have already been selected. So I guess

15 we all have been wasting our time here.

16 If this is the best example of  
17 our government agencies and their  
18 consultants at work, it's a disgrace. This  
19 entire affair has given new meaning to the  
20 word "sophistry." You guys from  
21 Philadelphia and your so-called honest  
22 consultants, if you don't know what the  
23 word "sophistry" means, look it up. You  
24 have been great at it.

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1 MS. LILLER: Thank you.

2 Maggie Powell and then Frank  
3 Muller and then Stephen Donato.

4 MS. POWELL: Good evening. That  
5 is a tough act to follow. My name is  
6 Maggie Powell. I am the director of the  
7 Eastwick Project Area Committee Community  
8 Organization.

9 I'm here to speak about  
10 something that everyone in this room is  
11 doing right now. We're inhaling and  
12 exhaling. We all have that in common. I'm  
13 here to talk about homeland security in the  
14 airport.

15 The airport has done nothing to  
16 notify the community of any chemical  
17 spills. You see them on TV all the time  
18 checking luggage and checking the

19 passengers. I think over 50 percent of the  
20 airplanes at the airport are cargo planes,  
21 meaning they carry chemicals and other  
22 things. Therefore, I'm talking about the  
23 homeland security for our community. There  
24 is no system in place now in case of

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1 anthrax or any other chemical getting loose  
2 at the airport. We're so very close to the  
3 airport that we can hear them warming up  
4 their engines in the summertime. When our  
5 windows are open, we can hear them. I  
6 don't want to be in bed, asleep, and taking  
7 in toxic fumes because there is no alarm  
8 system in place.

9 I don't know if you're aware of  
10 a thing called "Shelter in Place." We're  
11 doing that out here along with Sunoco. We  
12 have sirens placed strategically throughout  
13 our community. We are educating our  
14 residents on what the sirens will mean when  
15 they go off. They will mean shelter in  
16 place. We're training them on how to get  
17 kits for one room for their home; how to  
18 make that room air tight. But nobody has  
19 ever said anything about the airport.

20 I have a smoke and fire alarm  
21 system in my home. I have a radon  
22 detection unit in my home. All of these

23 thing are in my home to make me safe, but I  
24 could walk out the door and take a couple

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1 of gasps of air and drop dead. There are  
2 chemicals out there that are that strong.

3 More and more longer runways,  
4 more traffic, more possibility of  
5 accidents. I say to you that the airplanes  
6 are still flying low. They are now  
7 interfering with my Direct TV. When they  
8 fly over for two or three seconds, I lose  
9 my picture. That has just started  
10 happening in the last three months. I'm  
11 saying supposed there is a chemical spill  
12 on one of those planes that are flying  
13 backed up.

14 I speak for the entire Eastwick  
15 community and others surrounding  
16 communities who inhale and exhale as we do.  
17 I thank you.

18 MS. LILLER: Thank you.

19 Frank Mallee and then Stephen  
20 Donato and then Catherine Celley.

21 MR. MALLEE: Thank you. Frank  
22 Mallee, M-A-L-L-E-E. I'm planning chairman  
23 of a little town called Norwood in Delaware  
24 County. We have been approached in -- we

1 haven't been very close to the airport in  
2 this whole expansion program. Planes fly  
3 over us for years and years and never have  
4 we had a chance to come and express our  
5 feelings to the FAA.

6 I'm here tonight to say that  
7 Norwood -- all we're judging is the plan  
8 for 17-35. All these other problems we're  
9 not interested in. When we looked and  
10 reviewed the plans for the expansion of  
11 this runway and the fact that it will  
12 impact the delay times that all aircraft  
13 are now experiencing, like this gentleman  
14 said, needless to say I have flown from the  
15 airport in the last couple of years and  
16 always have I been delayed. Maybe he  
17 hasn't, but I have.

18 We are for the expansion, as it  
19 is established right now, for alternate  
20 number one. Mainly, because it will not  
21 mean any relocation or condemnation of any  
22 of our homes. There will be no loss of  
23 revenue from the UPS facility or the  
24 commercial parking lots or other commercial

1 buildings in the area, including the  
2 Emerson Track. This mainly impacts us

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3 because the Interboro School District, who  
4 we are a member of, and our tax base as  
5 well, we believe that we can maintain the  
6 status quo with this expansion, and we are  
7 for the expansion of 17-35. Thank you.

8 MS. LILLER: Thank you, Frank.  
9 Stephen Donato is next and then  
10 Catherine Celley and then Laura Reddick.

11 MR. DONATO: My name is Stephen  
12 Donato. I'm a resident of New Castle  
13 County, Delaware. I testified last night.  
14 I was e-mailed a document last night, an  
15 article from North Jersey where they sued  
16 the FAA for withholding documents. I was  
17 forwarded a document that, basically, I  
18 understand that US Air had some access to  
19 some air space modeling. I would like to  
20 have access to that information because  
21 where I am at we're heavily impacted by the  
22 airport. I would like to see how 17-35  
23 impacts my area.

24 As far as the parallel runway,

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1 everyone talks about how that is such a  
2 great thing because it's over the Delaware  
3 River, well, they're not, because when the  
4 planes that are flying inbound with an east  
5 wind they come over my community, which is  
6 about 18 miles out. In the daytime, they

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7 can routinely push 500 jets over our  
8 community. They come in straight over  
9 Chester, over residential areas. What  
10 we're looking for is a true technology that  
11 would support that. I think, regardless of  
12 what some other people in this room think,  
13 that is, it's a good idea, I think it's  
14 bad. I think that from what I understand,  
15 from some of the research that I have done,  
16 this expansion could bring anywhere between  
17 50 and 80,000 additional flights into the  
18 region and keep the same delay. It's a  
19 game of numbers. That is really what we're  
20 upset about. So I would like to also see  
21 the revised capacity enhancement  
22 benchmarks. I believe they did this for  
23 O'Hare and they revised the benchmarks for  
24 the 55 airports. I think it was done in

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1 the past couple months. I would like to  
2 see that. I would also like to see any of  
3 the modeling regarding 17-35. Thank you.

4 MS. LILLER: That you, Stephen.  
5 Catherine Celley and then Laura  
6 Reddick will be next and then LaVern  
7 Vaughn.

8 MS. CELLEY: I just came earlier  
9 to look at the things that were set up here  
10 and I have an idea now. I wrote a few

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11 things. I will give you some things. I  
12 think it seems that an alternative might be  
13 the best choice, if the Army Corp of  
14 Engineers can allow an extension of the  
15 short runway, 8-26, that runs parallel to  
16 the river, that would be the best  
17 alternative.

18 To me, nothing will decrease the  
19 airplanes circling above the airport  
20 thereby increasing sound and chances for  
21 accidents. I think one alleviates this  
22 point and would not cost as much as we  
23 found alternative two would cost. This  
24 also seems to not affect 291 or Bartram

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1 Avenue, alternative one. Alternative two  
2 does get rid of 291.

3 Alternative two would increase  
4 sound decibel levels for three hospitals,  
5 three high schools, numerous churches  
6 elementary schools, businesses and homes.  
7 Until quieter engines can be created, I  
8 believe alternative one, which extends over  
9 towards the river will be better.

10 Preferably, however, I believe  
11 runway 8-26 should be extended into the  
12 Army Corp of Engineer's area. It seems  
13 that's the least invasive of populated  
14 areas that may be paid for by the increased



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16 traffic, if it comes to that. That is all  
17 I have.

18 MS. LILLER: Catherine, thank  
19 you.

20 Laura Reddick and after her is  
21 LaVern Vaughn and Theresa Tobin.

22 MS. REDDICK: My name is Laura  
23 Reddick, R-E-D-D-I-C-K. I'm a resident and  
24 I don't have a prepared or typed statement.  
I'm just here to say that I am totally

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1 against the runway 17-35 project. I live  
2 directly around the airport off of Bartram  
3 Avenue. In the past three months, I've  
4 noticed that there has been an increase in  
5 flying over our property. The noise is so  
6 loud that many times I'm awakened out of my  
7 sleep at 3:00 in the morning. I think the  
8 world is coming to an end. I don't know  
9 what is going on. I think that it's an  
10 earthquake shattering.

11 I'm concerned about our  
12 properties with damages. I'm concerned  
13 about the quality of air. I'm concerned  
14 about the possibility of accidents. There  
15 are a lot of issues that I'm concerned  
16 about with this project.

17 Another thing that I'm concerned  
18 about and the members of my community have

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19 expressed, is that we were really not aware  
20 of what this project was all about. I  
21 found out about this project -- I heard  
22 about the expansion, not knowing that the  
23 runway was going directly over our property  
24 and this was a close call. I read it in

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1 some newspaper just this week. Then I went  
2 onto the web site and I downloaded all of  
3 the information.

4 As a resident I felt that  
5 information should have been mailed to us.  
6 The statements that were given to us  
7 tonight should have been mailed to each of  
8 the residents throughout the community so  
9 that we could review this information.

10 If you live in the community,  
11 you would know what I'm talking about.  
12 When you're over at the mall and a airplane  
13 is coming in to land and you can see the  
14 pilot's head, you can see the name of their  
15 airline, you can see the airplane coming  
16 down, you think it's going to hit your car.  
17 That is how close it is.

18 Our properties are very, very  
19 close and this runway, with the departure  
20 and landing, the airplanes will be coming  
21 directly over our properties. I don't want  
22 to see an airplane coming over my property

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23 like this. This is what I see. This is  
24 how chose the airplane is coming over our

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1 properties. We oppose this development.  
2 It looks like, from what I have read, and I  
3 just did a crash course in reading over the  
4 past two days, and I'm getting more  
5 information as I'm here today, this is  
6 probably a done deal. But as a homeowner,  
7 I feel that we should be compensated money  
8 for it damaging our homes. It's not fair  
9 to affect the quality of our life. I have  
10 been living in this community for 20 years.  
11 I had no idea that something like this --  
12 that I would have to be faced with  
13 something like this. I don't want to see  
14 an airplane crash into one of our homes  
15 because of this expansion.

16 MS. LILLER: Thank you.

17 LaVern Vaughn.

18 MS. VAUGHN: My name is LaVern  
19 Vaughn, V-A-U-G-H-N. I'm a resident of  
20 Eastwick. I'm a new resident. I have only  
21 been here, approximatly, three years. I  
22 oppose the runway expansion. The lady  
23 prior to me, I have to confirm or agree  
24 with everything that she was saying. I now

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1 live in the flight patterns. I have jets  
2 flying over my home at all hours of the day  
3 and at night. At times it makes the alarms  
4 go off on my automobile, which means it  
5 must be flying pretty low. It also affects  
6 the television and radio in my home also.  
7 So the quality of life for me and my family  
8 has been affected. I am very happy that I  
9 have made my residence here in Eastwick,  
10 but I'm not happy with the choice of the  
11 Federal Aviation Administration and the  
12 City of Philadelphia with the expansion.

13 MS. LILLER: Thank you, LaVern.

14 Theresa Tobin. After Theresa  
15 will be Robert Montgomery.

16 MS. TOBIN: I didn't have  
17 anything prepared, but I have been a  
18 resident for 35 years. The noise level has  
19 increase greatly. It has affected myself  
20 both physically and mentally. I have had  
21 to cope with the noise, and I am forced to  
22 accept this runway 17-35. To me it seems  
23 like a done deal. Everything that the man  
24 said, that talked real long, is right.

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1 Everything he said, I agree with. That is  
2 all I have to say that I don't think we  
3 should be forced to accept something. Like

4 LaVern said, she lives around the corner  
5 from me, we hear these jets all the time  
6 and it does affect us physically and  
7 mentally. I have been going to a doctor  
8 for my nerves and this is going to make  
9 them worse.

10 MS. LILLER: Thank you, Theresa.

11 Next is Robert Montgomery and  
12 after Robert is Teneda Hines.

13 Robert.

14 MR. MONTGOMERY: I didn't have  
15 anything prepared. My name is Robert  
16 Montgomery. I'm an resident of West  
17 Deptford Township in New Jersey. I was  
18 unable to make the meeting there a couple  
19 of days ago, so I thought I'd come to this  
20 one.

21 I would like you to look at page  
22 six. I would like to know where that  
23 statement came from and anywhere in the EIS  
24 on how it came to that conclusion.

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1 There is also, looking at the  
2 map provided on, it's figure S-1 of the  
3 EIS, it shows that is, there, a Sunoco  
4 terminal pier that is within 2000 feet of  
5 the proposed runway extension. If that --  
6 something were to happen where the plane  
7 would not go into the runway correctly or

8 something else, all those tanks carrying  
9 oil or fuel or whatever they would be  
10 carrying, could create a large  
11 environmental disaster for this entire  
12 area. That is all I have to say.

13 MS. LILLER: Thank you, Robert.

14 Teneda Hines.

15 MS. HINES: My name is Teneda  
16 Hines; H-I-N-E-S is the last name. I have  
17 been a resident for 34 years. I am very  
18 concerned because I also work in the  
19 community at an elementary school that is  
20 currently experiencing, and has been  
21 experiencing over the last six months, low  
22 planes where we can actually see the people  
23 in the plane, the actual physical shapes.

24 I work with special ed children

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1 who begin to scream and cry because of the  
2 noise and disturbance that the airplanes  
3 are having. Also, in my home, we're  
4 getting cracks. We're having disturbances  
5 to the TV. We're having the same thing  
6 with our alarm system where it gets set off  
7 because the planes are so low. We're  
8 awakened at night, two or three in the  
9 morning because of the planes. I'm opposed  
10 to runway 17-35.

11 MS. LILLER: Thank you, Teneda.

12 I have reached the end of my  
13 list for people who have signed up, and I'm  
14 wondering if somebody, perhaps, have  
15 changed their mind and have decided that  
16 they would like to speak. If so, you can  
17 come up and sign up right now.

18 This is Paul Johnson.

19 MR. JOHNSON: Good evening  
20 everyone. My name is Paul K. Johnson. I'm  
21 a democratic committee person for Division  
22 40 and Ward 48. Basically, the boundaries  
23 are west of 84th Street, north of Bartram  
24 Avenue and south of Lindbergh Boulevard,

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1 basically the last division in the city.

2 Personally, I support the  
3 expansion of the runway for economic  
4 reasons. I also understand it's  
5 inevitable. It's going to happen. I  
6 understand that. I understand that airline  
7 traffic is increasing, but I do have to  
8 represent my neighbors and my residents and  
9 voice these concerns.

10 Most of my neighbors and  
11 residents are concerned about increased  
12 traffic, specifically, on Bartram Avenue as  
13 well as 84th Street. 84th Street is a  
14 major road that leads into Delaware County  
15 to Hook Road. We have a lot of truck

16 traffic with the parcel deliveries that  
17 goes back and forth between the airport and  
18 the parcel places.

19 Also we're concerned with the  
20 expansion, the traffic noise that would be  
21 on -- not just on Bartram Avenue, but on  
22 86th Street. We have a huge apartment  
23 complex called Korman Suites, which is on  
24 84th Street, as well as some residences

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1 near 84th Street and Crane. We have had a  
2 problem with drag racing and we have a  
3 problem with the trucks. We're concerned  
4 that more traffic is going to lead to more  
5 noise.

6 Our area has a lot of senior  
7 citizens, which are home during the day.  
8 This noise is going to be a big concern to  
9 them.

10 Most of my residents have talked  
11 to me and requested that if one of the  
12 alternatives go through that we request a  
13 mitigation sound wall on the northbound  
14 side of Bartram Avenue, if Bartram Avenue  
15 does become State Route 291.

16 Most of our residents have also  
17 voiced concerns that the airport is in the  
18 City of Philadelphia and we feel as though  
19 we're being not recognized because in



20 Delaware County and Essington they are  
21 getting sound reduction and sound barriers  
22 and remedies in those areas. This is our  
23 area. This airport is our airport. This  
24 is the Philadelphia International Airport.

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1 We feel as though we're being discriminated  
2 against in Philadelphia. So why isn't the  
3 airport supporting us? Why isn't this  
4 airport helping us out? This community has  
5 been here long before I got here, and these  
6 people deserve to have these remedies.  
7 This airport is a profit making machine,  
8 not just for the City, but for the airlines  
9 as well. We feel as though that we should  
10 be compensated. Thank you.

11 MS. LILLER: Thank you, Paul.  
12 Carolyn Mosley.

13 MS. MOSELEY: Good evening. My  
14 name is Carolyn Mosley, and I am a  
15 resident. I feel I have to express my  
16 concern about the noise level. When I  
17 watch my television, I hear the pilot's  
18 voice. These things happen, but you can  
19 also -- I'm asking for your sensitivity to  
20 the environmental issues that impact us.  
21 I'm probably not the only person in this  
22 room and certainly not in the community  
23 that have problems and life threatening

24 problems. One thing we don't need is

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1 something to add onto the environmental  
2 issues that impact our health. We ask for  
3 your sensitivity to mitigate those  
4 conditions. Thank you.

5 MS. LILLER: Thank you.

6 Is there anybody else that would  
7 like to sign up to speak?

8 MS. LEACH: Good evening. My  
9 name is Raquel Leach. I'm a resident. I  
10 have to concur, when the planes already fly  
11 too low, you can see the planes fly right  
12 over the shops and you can see the landing  
13 gear. You can see the windows really  
14 clear. Back on 82nd and Lindbergh the  
15 planes sound so close to your home and you  
16 think they're going to crash into your  
17 property. The cars already think it's a  
18 country road. There are too many  
19 accidents. We have too many accidents of  
20 cars driving too fast. There are traffic  
21 lights there, but cars don't respect them.  
22 These are all things that should be  
23 considered and how it's going to affect the  
24 residents. Thank you.

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1 MS. LILLER: Thank you, Raquel.

2 MS. ROSSI: Joanne Rossi. I  
3 would like to paint the shutters on my  
4 house, which is on Front Street in  
5 Essington. Before I can do those shutters,  
6 I'm going to have to power wash them  
7 several times to get the debris and grime  
8 from the airport exhaust off the front of  
9 my house.

10 The first year that I lived in  
11 this house I had new chairs on my porch.  
12 When I tried to use the chairs again, I  
13 tried to scrub the grime from the airplane  
14 exhaust off them and couldn't get it off,  
15 so I threw the chairs out.

16 I recently flew out of the  
17 Philadelphia Airport. The pilot came on  
18 and said that we're in the queue waiting to  
19 take off. It's probably going to be about  
20 19 minutes before we can take off. Well,  
21 it was about 19 minutes. I didn't see  
22 myself or anyone else on the airplane being  
23 upset by the fact that it was going to take  
24 19 minutes. The interesting thing is,

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1 after we got in the air, he told us that we  
2 were going to arrive early at our  
3 destination.

4 If the plan is to correct  
5 waiting times of 20 minutes, why just not  
6 add those minutes onto the expected time  
7 that the plane is going to fly and that  
8 would clear everything up. Thank you.

9 MS. LILLER: Let me tell you  
10 that I'm going to turn this over to our  
11 hearing officer in one moment, but we are  
12 going to stay here until 9:00. So if  
13 somebody does decide that they do want to  
14 speak, all you have to do is let me know  
15 and I'll sign you in and set you up at the  
16 microphone.

17 Sue, if you would like to go  
18 ahead.

19 MS. McDONALD: Once again I  
20 thank everyone for attending and the ones  
21 who spoke. We will remain here to take  
22 testimony until nine after that, at 9:00,  
23 the hearing will be closed. However, we  
24 will continue to take comments up until

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1 December 1, 2004 either by e-mail or  
2 written comment sheets set up in the rear  
3 if you need them. Again, if you would like  
4 to give testimony, we will be here until  
5 nine, and if not, we will continue to take  
6 comments by E-mail or by writing up until  
7 December 1, 2004, thank you.

8 MS. LILLER: I would also like  
9 to tell you that we have these lovely  
10 refreshments here provided by Ground  
11 kitchens. It's for you folks, and please  
12 help yourself before you go. Thank you.

13 This is Paul Johnson, Democratic  
14 Committeeperson.

15 MR. JOHNSON: I just want to  
16 make an additional comment about the  
17 economic impact of this runway expansion.

18 There has been concerns in the  
19 city especially when there is multimillion  
20 or multibillion dollar economic projects  
21 that the community is not involved,  
22 specifically for the economic benefit of  
23 jobs and employment. I would hope that the  
24 FAA and the City of Philadelphia tries to

152.66

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1 implement an apprenticeship program  
2 specifically for some of the residents in  
3 our community that may not have the skills  
4 for the construction that is going to be  
5 involved in this project, to train them so  
6 they can have these jobs for construction  
7 and possibly lead to further employment  
8 after the closing of this project.

9 Also, I would like to say that I  
10 believe, with additional funds from the  
11 flights, that there would be additional

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13 jobs at the airport and to seriously  
14 consider giving those additional jobs to  
15 people in our community.

16 MS. LILLER: Thank you.

17 MS. McDONALD: This concludes  
18 the public hearing of the Philadelphia  
19 International Airport Runway 17-35  
20 Extension Project Draft Environmental Impact  
21 Statement.

22 (Whereupon, the hearing was  
23 concluded at 9:00 p.m.)  
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### CERTIFICATION

I HEREBY CERTIFY that the proceedings and evidence  
are contained fully and accurately in the  
stenographic notes taken by me upon the foregoing  
matter on Thursday, November 18, 2004 and this  
matter is a correct transcript of same.

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FRANCIS A. FARRELL  
Certified Court  
Reporter and Commissioner  
of Deeds.

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Letter 152

November 18, 2004 Public Hearing Transcript

Comment Number	Comment	Response
152.1	[Mayor F. Raymond Slay] Council is concerned that the regional jets and other traffic that results from the extension of Runway 17-35 will increase stress and noise level within the township, cause vibration to structures in the vicinity of take offs of the runway...	<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." Aircraft noise exposure levels in Upper Darby Township are expected to fall within the 45 to 60 dB DNL range for each of the Build alternatives in each future forecast year.</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>
152.2	[Mayor F. Raymond Slay] ...an increase of a possibility of the hazardous materials carried on the aircrafts over the township that could cause an increase and other safety issues that will significantly impact the health, safety and welfare of township residents, business people and visitors.	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.
152.3	[Mayor F. Raymond Slay] ... the township opposes the proposed extension of Runway 17-35...	The FAA has noted and considered your comment.
152.4	[Bob Previdi] ...what options were looked at besides using Bartram Avenue and there are other alternatives to moving Route 291 to the other side of [I-]95.	Designating Bartram Avenue as SR 291 was the only alternative that was evaluated. There are no other options available that provide local access.
152.5	[Bob Previdi] The community does not want to have any more pollution pushed towards their community and by rerouting Route 291 to the other side of [I-] 95, you accomplish that...	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 Tables 4.5-10 and 4.5-11 of this EIS and DEIS Appendices E and H of the Air Quality Technical Report).
152.6	[Bob Previdi] I understand that there was a brief meeting with the Streets Department, which our office was not made aware of. We would like to know what follow-up has come from that.	The Department of the Interior and the City of Philadelphia has met several times with the City Streets Department. Mr. Previdi was informed and attended a meeting after the November public hearing. Issues raised have been addressed and the City Streets Department has concurred with the proposed mitigation for the Project.
152.7	[Bob Previdi] The other thing that I'm concerned about is one of the participants here, Maggie Powell, at a previous meeting, asked if she could be made aware of what locations were chosen for the noise study, the noise analysis, wherever you use the meters. She had wanted to just, kind of, concur with the locations to make sure -- I even remember, at the meeting, she offered up her porch. Again, there has been no response to what locations were chosen.	Measurements for the Runway 17-35 EIS were completed approximately one year ago and no additional monitoring is anticipated for this project. Locations of measurement sites are summarized in Tables 2-7, 2-8, and 2-9 and are plotted on Figure 2-6, all of which appear in the Noise Technical Report which is reproduced in its entirety as Appendix A.1 of the DEIS.
152.8	[Joe Warren] One thing that should be investigated, in our opinion, and in the collective wisdom, is the cause of the damage already done to the environment, no matter what the cause that you can blame.	As stated in Section 4.18, the cumulative impact analysis for the Proposed Project considers past actions and therefore takes into account the condition of the existing environment.



Comment Number	Comment	Response
152.9	[Joe Warren] Some consideration should be given to provide area property owners for sound proofing, and noise barriers should be installed between Bartram Avenue and residential areas and be considered for properties in their affected area.	<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>The increased traffic on Bartram Avenue is not anticipated to result in additional noise, due to the high levels of existing and projected future noise from traffic using Bartram Avenue, I-95, and the SEPTA rail operations. There are no residences directly adjacent to Bartram Avenue that would benefit from installing a sound barrier. In any event, the projected increase in surface traffic volumes would not be sufficient to warrant the installation of sound barriers based on FHWA noise criteria for highways.</p>
152.10	[Joe Warren] Your maps may show that some areas will get more noise in other areas than in Eastwick. We don't think that makes sense. We think Eastwick, nearest to the airport, will be the most affected.	It is correct that, in general, residents of Eastwick will be more affected by the two Build Alternatives than any other populated area surrounding the airport. Though noise exposure levels to the south of Runway 17-35 in New Jersey appear to increase more than in Eastwick under Build Alternative 1 (see Figures 4.2-6 and 4.2-7, for example), the underlying land use in that area is primarily industrial and no people live within the 65 or even the 60 DNL contours, so the effect on residents of West Deptford Township and Paulsboro Borough is not as great as to the north. Build Alternative 2 clearly affects Eastwick to the greatest extent (see Figures 4.2-8 and 4.2-9).
152.11	[Marcia Brunelli] Large aircraft will be flying over our township at lower altitudes and with greater frequency. This project, the route stretches over our schools, our local hospitals and highly populated residential areas in Upper Darby. ... Our schools are not air conditioned and need to have the windows open in classrooms in warmer weather. The noise will register at five or more decibels. This will be a severe impediment to learning and teaching.	<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>
152.12	[Marcia Brunelli] The quality of life, as we know it, will decline, resulting from Runway 17-35 and other property enhancement problems.	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.
152.13	[Marcia Brunelli] Under the extension project Upper Darby Township and the surrounding communities will be subjected to air pollution from smoke and ground level ozone. Exposure to air components from jet fuel will increase the risk for cancer and 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 a strict mandate to achieve compliance with the ozone ambient air quality standards. The DEIS demonstrated that compared to the No-Action Alternative, either alternative of the Proposed Project will reduce air pollution emissions, including emissions of Hazardous Air Pollutants, 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 the DEIS and Appendix H of the Air Quality Technical Report).

Comment Number	Comment	Response
152.14	[Marcia Brunelli] Exposure to jet aircraft noise can elevate blood pressure levels, and it's 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>
152.15	[Marcia Brunelli] Flying aircraft over heavily populated areas, such as Upper Darby, will present a significant safety risk for our townships. The risk is intensified because of the increased number of aircraft and because Runway 17-35 routes extend right over our public and [parochial] schools and our local hospital.	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.
152.16	[Marcia Brunelli] ...our township will need to have specialized training in order to respond to aircraft. There should be a thorough study done assessing the total fiscal impact on Delaware County.	Section 4.4 assesses the economic impact of the Proposed Project on surrounding communities, including those in Delaware County. The Proposed Project will not have any impacts on Delaware County. There will be no property acquisitions, no change in employment and no changes in access. A fiscal study is, therefore, not warranted.
152.17	[Marcia Brunelli] The property enhancement program will cost, approximately, two billion dollars and will end up being a Band Aid approach for a long range problem. There may be other alternatives that you need to be discussing.	The Runway 17-35 Extension Project is estimated to cost approximately \$36 million and not \$2 billion. Chapter 3 of the EIS provides a thorough evaluation of alternatives.
152.18	[Marcia Brunelli] ...one alternative that there may be is one proposal that 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 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.
152.19	[Marcia Brunelli] The Federal Aviation Administration failed to include communities such as Havertown, Montgomery and Upper Darby Townships in their review.	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. As shown on Figure 4.3-3, Havertown, Montgomery and Upper Darby Townships are included in the Study Area for the Proposed Project.
152.20	[Marcia Brunelli] There will be an adverse effect in our social environment disrupting our established community that includes your schools, community hospitals and our residents' dwellings within the densely populated metropolitan areas 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.

Letter 152

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Comment Number	Comment	Response
152.21	[Scott Maits] We need to build more lines like the high speed airport line. We need to do it in the future to mitigate the need, the absolute need for expanding the airport much further.	As described in Chapter 3, a number of alternatives, including high-speed rail, 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.
152.22	[Scott Maits] ...when we come to the next round of the airport expansion, that we think about this one. What can we do; what the real alternatives for building second airports or building diagonal runways that are going to go across even more populated areas where the entire areas like Eastwick get very dense? We need to look at those things.	The FAA has noted and considered your comment. These issues will be addressed in the Capacity Enhancement Program (CEP). 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.
152.23	[Scott Maits] We really need to look at high speed for the cross state system. We need to improve the Amtrak Northeast corridor, even consider bringing it down to the airport, which used to be the original way between Chester and Philadelphia. It's used to be right on that airport line.	As described in Chapter 3, a number of alternatives, including high-speed rail, 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.
152.24	[Robert Marmon] ...both of the premises used by Philadelphia to justify this project are contrived and fatally flawed and that the Authority knows this to be true.	This project is justified by the significant current and forecasted delays experienced by PHL and the fact that PHL is a pacing airport where delays at PHL contribute to delays across the national airport system.
152.25	[Robert Marmon] ...the project actually represents a clear and present danger to all of those who live under the new flight paths and to the traveling public as well.	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.
152.26	[Robert Marmon] ...this multimillion dollar windfall for the politically connected may actually increase delays at Philadelphia, but at best will have little impact on the problem it is purported to address.	The project, as described in Chapter 3, is expected to reduce average delay per operation at PHL.
152.27	[Robert Marmon] Philadelphia is pursuing this ill conceived project knowing full well that almost all of the adverse impact will be dumped on the residential suburbs that have never been exposed to the outrageous noise of low flying commercial jet aircraft and also knowing that their consultant's conclusions about noise and it's true impact is laughable except for the people that will have to endure.	<p>The alternatives under consideration for the Runway 17-35 Extension Project are expected to have minimal effects on aircraft flight paths, particularly at moderate to large distances from the Airport, as noted in Section 3.2.5 of the Noise Technical Report (Appendix A.1 of the DEIS). Because the proposed project is expected to have minimal effects on aircraft flight paths, any communities that currently experience aircraft operations on a regular basis are likely to experience aircraft operations on a regular basis in the future. The proposed project is not expected to route aircraft operations over communities that have never been exposed to aircraft operations on a regular basis.</p> <p>The purpose of the project is to reduce current and projected airfield delays at PHL as soon as feasible. The potential noise impact associated with this 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 has opted to prepare a separate EIS for each project because 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. These EISs are being prepared concurrently.</p> <p>The conclusions of the noise analysis and the impact assessment were based on FAA-approved methods, models, and procedures.</p>

Comment Number	Comment	Response
152.28	[Robert Marmon] ...we have asked to see the actual distribution of these delay numbers, and they have not been produced.	<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. 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.</p> <p>The commentor 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.</p>
152.29	[Robert Marmon] Based on statistics available elsewhere and in particular those from a busy airport like O'Hare, Chicago, what actually is happening is that almost 95 percent of the non-weather related delay numbers, going into this average calculation upon which this entire project is premised, actually occur between 7:00 a.m. and 10:00 a.m. and to a lesser degree between 4:30 p.m. and 7:00 p.m. when each airline packs their schedule for competitive reasons of their own.	The project is intended to reduce delay in the short term and is critical because PHL is a pacing airport, i.e., one of the airports that contribute to delays throughout the national airport system. As noted in Chapter 2, the airlines, not the FAA or the Sponsor, are responsible for schedules.
152.30	[Robert Marmon] The delay calculation is based on published schedules. That is, schedules published by the airlines themselves. Now this is really bizarre. If the airline's schedule actually reflected the true time required, there would be no delay to fix.	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.
152.31	[Robert Marmon] why don't you just force the airlines to reduce their peak load departure slots voluntarily or allocate them?	As discussed in Section 3.3.1, governmental authorities have little control over the airlines' routing and scheduling. Under deregulation (1978), domestic airlines can establish and drop routes, start or end service at any airport. In addition, any airport that has received FAA funding (including PHL) must be available without discrimination to all users.
152.32	[Robert Marmon] The O'Hare Airport management asked the FAA to help solve a similar problem in Chicago, and that is exactly what the FAA did. It ordered the airlines to adjust their schedules to solve the peak hour loading problems. They did not order the O'Hare management to build a new runway and route their flights over residential areas.	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 152

November 18, 2004 Public Hearing Transcript

Comment Number	Comment	Response
152.33	[Robert Marmon] The second premise on which this project is based was one completely made up by Philadelphia and made a key criteria to be used by it's so called consultants on the project. This criteria is blatantly outrageous and arbitrary because the only possible project that could meet its requirements is exactly the one that we're looking at. They told their consultants to find a project that might help the problem no later than 2007. There is nothing magic about 2007.	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.
152.34	[Robert Marmon] The real solution for Philadelphia has always been a third major east to west runway together with a reconfiguration that would allow simultaneous operations on the current parallel runways.	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.
152.35	[Robert Marmon] this proposal represents a clear and present danger to all those who will be living, for the first time, under the flight paths of low flying commercial jet traffic and to the traveling public as well.	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.  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.
152.36	[Robert Marmon] the project could actually increase delays that it is supposed to alleviate.	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. This analysis 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.
152.37	[Robert Marmon] the most dangerous portions of any flight are the take off and landing phases. Now, brought to us by the courtesy of the Philadelphia Airport Authority, if this project happens, we would have those two critical phases from bigger, more powerful commercial aircraft routed over densely populated residential areas here and in New Jersey, areas never before exposed to these dangers.	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.
152.38	[Robert Marmon] the most violent and dangerous wingtip vortices, the turbulence created by the aircraft, occurs on the ground just after take off or just before landing. This is one of the reasons that at every significant airport, right down to the size of Trenton and Philadelphia Northeast, when runway center lines intersect, that intersection is always placed as far away as possible from runway thresholds as possible or their thresholds are placed so far apart as to...present no danger to each other during simultaneous operations. So look at what we have here at Philadelphia International, a disaster waiting to happen. We have arrival and departure thresholds for intersecting runways virtually on top of each other.	The intersection of Runways 17-35 and Runway 9L-27R is an existing condition and is not a result of the proposed project. The Runway 35 Extension will not intersect with Runway 27L as a result of this project. Safety is the FAA's highest priority and the Agency will ensure that the design of the Runway 17-35 Extension properly protects public safety. The Preferred Alternative will meet all FAA safety standards and design criteria. Since the proposed action is an extension of an existing runway, none of the alternatives evaluated in the Draft EIS results in change in the flight tracks at PHL and no new areas are exposed to overflights.

Comment Number	Comment	Response
152.39	[Robert Marmon] We were promised simulations showing impact of wind direction around the compass [rose] during high volume operations, operations that must comply with all FAA wake turbulence separations for the size and mix contemplated here at Philadelphia. ... This project won't fix the problem in the first place, if there were a real problem to fix.	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.
152.40	[Robert Marmon] ...this project uses a measure of noise that is actually scoffed at in California. They're using an aggregate noise.	<p>The noise metric used is not "aggregate noise". Following the procedures in FAA Order 1050.1E and as detailed in Section 4.2, Noise, of this EIS, this study included the preparation of Day-Night Average Sound Level (DNL) noise exposure contours and the evaluation of supplemental noise metrics, such as the Night DNL (NDNL), 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). The DNL is the FAA's approved method of noise measurements, based on a 1992 Federal Interagency Committee on Noise (FICON) Study.</p> <p>The commentator's reference to a measure of noise used in California is believed to be a reference to the Community Noise Equivalent Level, or CNEL. The CNEL is a noise exposure metric that is similar to the DNL, except that in addition to the 10-dB nighttime penalty applied to noise events that occur between 10:00 PM and 7:00 AM, the CNEL includes an additional 5-dB penalty for noise events that occur during the evening hours between 7:00 PM and 10:00 PM. The CNEL noise metric was not computed for this study.</p>
152.41	[Robert Marmon] In California, they scoffed at that calculation and it's foregone conclusion. They look at what really matters. The real impact of each session you are now exposed to that noise in that hangar, it's called SENL. It stands for Single Event Noise Level. They focus on the change in that number.	<p>The commentator makes reference to a measure of noise used in California. It is believed that the commentator may be referring to one of two possible noise metrics; either the Community Noise Equivalent Level (CNEL), or the Sound Exposure Level (SEL).</p> <p>The CNEL is a noise exposure metric used in California that is similar to the DNL, except that in addition to the 10-dB nighttime penalty applied to noise events that occur between 10:00 PM and 7:00 AM, the CNEL includes an additional 5-dB penalty for noise events that occur during the evening hours between 7:00 PM and 10:00 PM. The CNEL noise metric was not computed for this study.</p> <p>Following the procedures in FAA Order 1050.1E and as detailed in Section 4.2, Noise, of this EIS, this study included the preparation of Day-Night Average Sound Level (DNL) noise exposure contours and the evaluation of supplemental noise metrics, such as the Night DNL (NDNL), 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). The SEL is a time-integrated metric (i.e., continuously summed over a time period) which quantifies the total energy in the A-weighted sound level measured during a transient noise event. SEL accounts for both the duration and the loudness of a noise event.</p>
152.42	[Robert Marmon] this type of commercial jet noise pollution has only one impact on the value of the home and real estate it affects, and that impacts to lower values for every homeowner and taxpayer affected.	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.
152.43	[Robert Marmon] ...contractors have already been spoken to and may have already been selected.	The FAA is responsible for deciding the Preferred Alternative and any final design action taken by the City of Philadelphia before the Record of Decision is signed would be premature. The City had selected a contractor or engineering design firm, this would not affect the FAA's decision process and the City would proceed at its own risk.

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November 18, 2004 Public Hearing Transcript

Comment Number	Comment	Response
152.44	[Maggie Powell] There is no system in place now in case of anthrax or any other chemical getting loose at the airport. We're so very close to the airport that we can hear them warming up their engines in the summertime. When our windows are open, we can hear them. I don't want to be in bed, asleep, and taking in toxic fumes because there is no alarm system in place.	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. This project would have no influence on the likelihood of chemical spills or leakage and therefore this issue would not be addressed in an EIS. The Air Quality analysis conducted for the Runway 17-35 Extension is documented in Section 4.15 of this EIS and in DEIS Appendix A-2. This analysis was reviewed and approved by the U.S. Environmental Protection Agency and the Pennsylvania Department of Environmental Protection. The analysis shows no increase in toxic fumes as a result of the Runway Extension.
152.45	[Frank Mallee] We are for the expansion, as it is established right now, for alternate number one. Mainly, because it will not mean any relocation or condemnation of any of our homes. There will be no loss of revenue from the UPS facility or the commercial parking lots or other commercial buildings in the area, including the Emerson Track. This mainly impacts us because the Interboro School District, who we are a member of, and our tax base as well, we believe that we can maintain the status quo with this expansion, and we are for the expansion of 17-35.	The FAA has noted and considered your comment.
152.46	[Stephen Donato] I understand that US Air had some access to some air space modeling. I would like to have access to that information because where I am at we're heavily impacted by the airport.	The commentor may be confusing the Airspace Redesign EIS with this Project. The delay modeling (TAAM) for the Runway 17-35 Extension Project was conducted by the Airport as part of the Master Plan Update, and was validated by the FAA. No parties outside of the FAA, the Airport, and their consultants have had access to the airport modeling for this EIS.
152.47	[Stephen Donato] this expansion could bring anywhere between 50 and 80,000 additional flights into the region and keep the same delay.	The forecast documented in Chapter 3 of the EIS demonstrates that there would be no increase in aircraft operations with either Alternative 1 or Alternative 2 when compared to the No-Action Alternative. A small percent of the operations (8.5 percent) would shift from the primary runways to Runway 17-35 if Alternative 1, the Preferred Alternative, were constructed. This equates to approximately 45,000 operations per year (123 per day). Both alternatives would reduce delay and would therefore meet the project's purpose.
152.48	[Stephen Donato] I would like to also see the revised capacity enhancement benchmarks. I believe they did this for O'Hare and they revised the benchmarks for the 55 airports. I think it was done in the past couple months. I would like to see that. I would also like to see any of the modeling regarding 17-35.	The purpose of the project is to reduce delays, not to enhance capacity for current and forecast traffic. The project and analysis is based on the premise that operations would not increase as a result of the project. The near-term benefit of lengthening Runway 17-35 is that it will reduce delay by allowing the shifting of some traffic from 9L and 9R onto the extended 17-35. The Capacity Enhancement Program (CEP) will evaluate capacity needs of the Airport.
152.49	[Catherine Celley] I think it seems that an alternative might be the best choice, if the Army Corp of Engineers can allow an extension of the short runway, 8-26, that runs parallel to the river, that would be the best 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. 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.
152.50	[Catherine Celley] I believe Runway 8-26 should be extended into the Army Corp of Engineer's area.	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.

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Comment Number	Comment	Response
152.51	[Laura Reddick] I am totally against the Runway 17-35 project.	The FAA has noted and considered your comment.
152.52	[Laura Reddick] I'm concerned about our properties with damages. I'm concerned about the quality of air. I'm concerned about the possibility of accidents.	Safety is the FAA's highest priority. Property values and quality of life depend on many factors. One factor is the environment. This Project will not have significant impact on air quality, noise or quality of life. We believe it is highly unlikely that any property values will decrease, however the FAA has noted your comment.
152.53	[Laura Reddick] Another thing that I'm concerned about and the members of my community have expressed, is that we were really not aware of what this project was all about.	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.
152.54	[Laura Reddick] as a homeowner, I feel that we should be compensated money for it damaging our homes.	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.
152.55	[Lavern Vaughn] I oppose the runway expansion.	The FAA has noted and considered your comment.
152.56	[Lavern Vaughn] I have jets flying over my home at all hours of the day and at night. At times it makes the alarms go off on my automobile, which means it must be flying pretty low. It also affects the television and radio in my home also. So the quality of life for me and my family has been affected.	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.
152.57	[Robert Montgomery] ...a Sunoco terminal pier that is within 2000 feet of the proposed runway extension. If that --something were to happen where the plane would not go into the runway correctly or something else, all those tanks carrying oil or fuel or whatever they would be carrying, could create a large environmental disaster for this entire area.	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.
152.58	[Teneda Hines] I am very concerned because I also work in the community at an elementary school that is currently experiencing, and has been experiencing over the last six months, low planes where we can actually see the people in the plane, the actual physical shapes. I work with special ed children who begin to scream and cry because of the noise and disturbance that the airplanes are having.	The FAA has noted and considered your comment.
152.59	[Teneda Hines] I'm opposed to Runway 17-35.	The FAA has noted and considered your comment.
152.60	[Paul K. Johnson] I support the expansion of the runway for economic reasons.	The FAA has noted and considered your comment.
152.61	[Paul K. Johnson] Most of my neighbors and residents are concerned about increased traffic, specifically, on Bartram Avenue as well as 84th Street.	There is no increase in traffic volume projected along 84th Street as a result of this project. Increased volume along Bartram Avenue can be accommodated and levels of service in the 2015 Build condition are acceptable and in some cases better than existing conditions.



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November 18, 2004 Public Hearing Transcript

Comment Number	Comment	Response
152.62	[Paul K. Johnson] ...we're concerned with the expansion, the traffic noise that would be on -- not just on Bartram Avenue, but on 86th Street. ... We're concerned that more traffic is going to lead to more noise.	The increased traffic on Bartram Avenue is not anticipated to result in additional noise, due to the high levels of existing and projected future noise from traffic using Bartram Avenue, I-95, and the SEPTA rail operations. There are no residences directly adjacent to Bartram Avenue that would benefit from installing a sound barrier. In any event, the projected increase in traffic volumes would not be sufficient to warrant the installation of sound barriers based on FHWA noise criteria for highways.
152.63	[Paul K. Johnson] Most of my residents have talked to me and requested that if one of the alternatives go through that we request a mitigation sound wall on the northbound side of Bartram Avenue, if Bartram Avenue does become State Route 291. Most of our residents have also voiced concerns that the airport is in the City of Philadelphia and we feel as though we're being not recognized because in Delaware County and Essington they are getting sound reduction and sound barriers and remedies in those areas.	The increased traffic on Bartram Avenue is not anticipated to result in additional noise, due to the high levels of existing and projected future noise from traffic using Bartram Avenue, I-95, and the SEPTA rail operations. There are no residences directly adjacent to Bartram Avenue that would benefit from installing a sound barrier. In any event, the projected increase in traffic volumes would not be sufficient to warrant the installation of sound barriers based on FHWA noise criteria for highways.
152.64	[Carolyn Mosely] I feel I have to express my concern about the noise level. When I watch my television, I hear the pilot's voice.	There is the potential that the aircraft radio frequency the pilot is using was slightly off and bled into the frequency of the TV channel the commentator was watching.
152.65	[Joanne Rossi] If the plan is to correct waiting times of 20 minutes, why just not add those minutes onto the expected time that the plane is going to fly and that would clear everything up.	Delays at PHL cannot simply be reduced by changing flight schedules. 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. The causes of delay must be directly addressed.
152.66	[Paul Johnson] I would hope that the FAA and the City of Philadelphia tries to implement an apprenticeship program specifically for some of the residents in our community that may not have the skills for the construction that is going to be involved in this project, to train them so they can have these jobs for construction and possibly lead to further employment after the closing of this project.	The FAA has noted and considered your comment.
152.67	[Paul Johnson] I would like to say that I believe, with additional funds from the flights, that there would be additional jobs at the airport and to seriously consider giving those additional jobs to people in our community.	The FAA has noted and considered your comment.

**Philadelphia International Airport  
Runway 17-35 Extension Project  
DEIS Comments Submitted via Web Site**

ID	Name	Title	Affiliation	Email	Comment	Comment Date
1				zengelman@comcast.net	I am a resident currently in the flight path of the turbo prop plans in Montgomery township. I need to know if there will be any increase in noise and traffic over my house and what input I can give to ensure there is no disruption to my family. Please advise me as to what the process is for deciding on whether there will be a runway extension for 17-35 and how I can influence those decisions.	10/11/2004
2	Spenser, Rit			diane1arm@yahoo.com	I wish to contest this project due to the risk (airplanes flying below 3,000 feet) over my home in Chester County and the noise pollution it creates during all hours of the day.	10/12/2004
3				allyjwalk@comcast.net	I live alongside the Delaware River in Claymont. Neighborhoods along the Delaware River are presently coping with the constant noise of traffic on I-495. We cannot speak in normal conversational tones, or enjoy our patios, or open our windows at night because the roar of traffic disturbs sleep. To those who want airplanes to fly over the Delaware River I say that one problem isn't solved by creating another problem for others who are already coping with more than their share of noise. Thank you for listening. Allyce J. Walker	10/14/2004
4				mild@attglobal.net	I can't find a map anywhere on the web site showing where the new runway extension would be located and how it would alter Route 291. Is there one?	10/14/2004
5	Redner, William	Air Traffic Controller	FAA	therednersare@comcast.net	I am an Air Traffic Controller at PHL and I live in West Deptford on the Runway 35 final. I have lived here for over 20 years. I have been an Air Traffic Controller at PHL for 22 years. I am having trouble understanding what additional capacity the extension of Runway 35 to the south will bring. The capacity problems we have at PHL occur when we have IFR weather conditions, not when it is VFR. The only time we can use Runway 35 is during VFR conditions. We can't run an instrument approach to Runway 35 due to the ships in the river. In fact, we can't use Runway 35 in VFR conditions when large ships go up and down the river. If the runway is extended further south, this will compound the problem causing even smaller ships to be a problem, stopping arrivals to runway 35. Another problem the extension of Runway 35 to the south will cause is the sequencing of the Runway 27R and 35 arrivals. It is a difficult task as it is now but the extension will make it more difficult causing more go-arounds and actually decreasing capacity. What you need to look at is what is causing the capacity problems? Runway configuration is definitely a big part of it but scheduling is an equally big part. US Air itself schedules more flights than our capacity several hours each day. This HUB system, it has become evident, is not cost effective and most HUB airlines are or are going bankrupt. I believe the Southwest type of scheduling will be the way of the future making our current capacity problems a non-issue. What are you going to get for the extension of Runway 35 to the south? Not much, if anything, in capacity and a lot of upset people south of the airport. Although I don't want to give the problem to another town, the extension of Runway 35 to the north makes a lot more sense. We use to be able to land Runway 27R and 17 simultaneously (land and hold short) but we lost that operation several years ago. That was our highest capacity operation. We also currently have Converging ILS to Runway 9R and 17 that we often use. The problem that operation causes is the slowing down of departures. If you extended Runway 35 to the north you could end the runway prior to Runway 9L/27R and you could land Runway 17 and depart Runway 9L at the same time	10/16/2004

ID	Name	Title	Affiliation	Email	Comment	Comment Date
					or land Runway 27R and 17 at the same time again, greatly increasing capacity. The extension of Runway 35 to the south makes very little sense and no economic sense. William Redner 856-468-0372	
6	Entrekin, Lauren			gulch21@hotmail.com	To whom it may concern: I am writing to express my opposition to the Runway 17-35 project at the Philadelphia Airport. My home is located in Upper Darby, due north of the airport, and directly in the path of planes taking off from Runway 17-35 northbound. Thus far, my family has experienced no problem with airport-related noise at home. An increase in runway length, and the increased capacity for larger planes, would surely generate a significant noise disturbance. I have visited a friend's house in West Deptford, NJ, and seen first-hand how air traffic overhead generates loud noisy and shakes the windows of the house. An air traffic change of the magnitude of the Runway 17-35 project would bring this disturbance to my home, and therefore, I am protesting. Even though I am a frequent traveler at Philadelphia airport, I strongly believe that airport travellers should accept a short delay rather than allow the airport to decrease the quality of life for nearby residents. Sincerely, Lauren Entrekin Upper Darby, PA	10/27/2004
7				rengelman@ironmountain.com	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	11/9/2004

ID	Name	Title	Affiliation	Email	Comment	Comment Date
					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 PresidentComac, Inc. andIron Mountain Latin America, Ltd. An Iron Mountain Company 1000 Campus Drive Collegeville, PA 19426 email: ross.engelman@ironmountain.com Cell: 1.610.283.2325 Phone: 1.610.831.2304 Fax: 1.610.831.2394	
8				rhynerj@juno.com	<p>Comments on the Draft Environmental Impact Statement for the Runway 17-35 Extension Project. Joseph Rhyner, PE 1138 Parliament Way, Thorofare, NJ 1. Page 1-4 section 1.3.1 Public Scoping Meeting. General comment: The FAA did not do enough for this public scoping meeting to invite people from the effected communities, especially West Deptford Twp. There was no mass mailing to township residents, there was no concerted effort by the FAA to reach out to community members. The FAA may have tried to use mass media but did not stress the effects of this proposed project in order to have the best possible community involvement. 2. The Public information meetings held in April of 2004 were a attempt by the FAA and the City of Philadelphia to mislead the communities around the airport as to the exact nature and scope of the project. This is evidenced by the fact that None of the Township officials in attendance or the County officials thought there was any planned changes that would result in an increase in the number of flights over Gloucester county. It took me several weeks of persuasion to get them to realize that the public info session had nothing to do with expanding the runway. 3. Chapter 2 Purpose and Need. Key Points Paragraph 4: Last sentence: "This congestion of the primary runway complex contributes to delays." This is not a quantified statement. How much of the current and projected delays are because of the congestion on the runways? How much is due to weather, how much is due to airfield configuration, how much is due to the configuration of the terminals. 4. Section 2.1.2 8th paragraph. Whys is there a time limit of 15 minutes for not using the runway when a ship is in the channel? Is transit time that long, has data on this timing been collected or is this an assumed time? 5. Section 2.2.1 Aircraft Fleet Mix; This paragraph and the associated table are making false comparisons. It is using a percentage of total flights to compare narrow body planes and turbo props but then it compares the number of regional jets against only regional jets to show an increased need by using a large percentage. The numbers should be compared consistently. Either use percentage of total fleet or compare each of the aircraft types to the numbers for that aircraft type.. Otherwise the inconsistency makes the comparison flawed. 6. Section 2.2.1 Runway Length Requirements for Regional Jet and Narrow body Aircraft; Again inconsistent comparisons by comparing percentages of aircraft vs. themselves and vs. total fleet. Be consistent. 7. Section 2.2.1 Runway Length Requirements for Regional Jet and Narrow body Aircraft, Second paragraph; There is no quantification of the amount of the delay cause by regional jets needing to use the larger runways. See comment # 3 above. 8. Section 2.2.1 Delay first paragraph, last sentence; In my work I count on travel delays and plan for it by bringing work. The vast majority of the people I work with also take the same approach. The vast majority of the people I see at the airport who are business travelers also seem to be working or doing productive things. The majority of the people I have spoke to about this have all stated the same thing to me. The delay of 10 minutes now and 20 minutes in the future does not account for lost work time, in the scheme of spending several hours trying to get through security, baggage claim, ground transportation, it is nothing. The FAA and the Airport cannot use businesses for lost revenue. 9. Section 2.2.2 Forecast Aircraft Fleet Mix; second paragraph; Upon what data is the forecast developed? How have the numbers been created? 10. Chapter 2, There is no information on the change of the operations of Scheduled flight carriers from the old model of Hub and Spoke to Serial operations which may create a reduction of flights in and out of the airport at high volume times. There is also no information about the latest change to USAIRWAYS scheduling to reduce the delays in the document anywhere. 11. Section 3.3 Candidate Alternatives and Screening; Why was not the idea moving all cargo operation such as UPS, FEDEX and DHL to the Northeast Airport considered or even mentioned? Maybe they could shift their operations there, provide jobs in the Northeast, if given enough</p>	11/15/2004

ID	Name	Title	Affiliation	Email	Comment	Comment Date
					<p>incentive to move.12. Chapter 3. Alternative A2.1 Commercial Services Airports: A comment on some of the reasoning for the elimination of this alternative. The second to last paragraph states that Southwest and Frontier Airlines have chosen to use PHL instead of PNE or Trenton. Sine they moved in knowing the situation of delays then they should not be considered in the scenario. They are a contributing factor in the delays because they are increasing flights. If PHL is so bad with delays then they would not have made the business decision to move into PHL.13. Chapter 3. Alternative B1 Automobile Travel. End of Second paragraph makes a bold assumption about reasons for why people fly vs. drive. Has a statistical survey been done to prove this claim or it is opinion? In my office where much of our travel is to the northeast. People have started driving more to save time because of delays due to increased security. If a survey has not been completed, then please note the fact that this is opinion rather than researched fact. If it has been researched, show the research. 14. Chapter 3. Alternative C1, Administrative Approaches (slots); Reason 2 of the reason for elimination is that it "Requires resolution of complex Federal Policy issues and a rulemaking by the FAA" This document is being prepared by a contractor working for the FAA, Therefore it is an FAA document. The FAA can make rules for themselves, the FAA should make a rule and maintain the Option. It is not like the FAA is asking the EPA to make a rule. 15. Chapter 3. Alternative C1, Administrative Approaches (slots); Reason 3 "It is not possible to implement in the short term." If the FAA had not been blind in eliminating this option at the start of the process then the rule making could be underway at this moment and could be complete by the time it needed to be implemented. Rules can be made quickly if there is enough incentive. Rules are easier to do than building a runway or getting public agreement with this project.16. Chapter 3. Alternative C2 Voluntary De-Peaking and Flight Reduction. The second reason for eliminating this option states in part " it is not severely congested to the point when FAA would interfere with airline deregulation..." If the delay is not that severe then why do anything at all, why increase the flights over my house, my neighborhood, my town, and not have the airline do something? If the delay is not too severe to the airlines operating then the airport should not care. 17. Chapter 3. Alternative C2 Voluntary De-Peaking and Flight Reduction. The third reason for not maintaining this option states in part..." It is unlikely the Secretary will use his authority to seek voluntary de-peaking..." Has the Secretary of Transportation been asked? Which secretary of Transportation? Why wouldn't the Secretary do this since precedence has been set by doing it at O'hare?18. Section 3.3.4 Category D: On-Airport Infrastructure, Alternative D2 was eliminated because it requires "significant airfield and/or terminal modifications, and therefore cannot be implemented in the short term." Two entire terminals (F and A west) were built in a short time frame, Less than three years I believe. How can the terminal end modifications or removals take longer than extending a runway. Again if this work was started at the beginning of the process then it could be well along it way to being completed. Most of the delays I face are waiting to get into a gate or for traffic to move out of the terminal so my aircraft can get into the terminal. 19. Section 3.3.4 Category E Alternative E1 Technology. Why has a technology study not been done at PHL to see what could help with the situation like at SFO? With the tech center at Pomona a short drive away I would think that technology for the FAA would be readily available for testing at PHL. 20. Section 4.2.2 Affected environment. This section talks about historical data that was used such as FAA radar data etc. How has this data been validated? I have experienced known problems with the radar tack data. In June of 2004 I called the airport Noise office to complain about large aircraft flying over my house or adjacent to my property at certain times of day I specifically noted times and type of aircraft right over my front lawn. One particular incident included two 737-400 and one Airbus 319 less than 1000 feet, in the span of 15 minutes with other aircraft following similar paths. When I provided this info to Mike Jeck, the Noise officer, he checked the radar data and found no aircraft over my property. The closest he found was 1.25 miles away and at 3000ft. The next was 1.5 miles and 2500 ft and the other was 2 miles away. Therefore I believe this data is flawed in such a manner as to be unreliable. Please provide me with the details as to how the data used for telling which aircraft were flying where and when was validated as this data is used for all aspects of the studies.21. Section 4.2.2 Affected Environment. Population Database, The Census data for 200 was used and assumed not to change. In West Deptford Twp there has been a large increase in building in the last four years with a senior housing complex being built directly adjacent to flight path of runway 17-35. The assumption that population centers have not changed is false and the</p>	

ID	Name	Title	Affiliation	Email	Comment	Comment Date
					<p>data needs to be re-analyzed.22. Page 4-20 Alternative 1 Second bullet. This bullet describes how the contours have increased because of a 29 percent increase in regional jet arrivals and a 14 percent change in the arrivals of small narrow body jets. However reading the noise analysis write-up and using the projected daily average numbers from table 3-10 of the noise technical report, the percentages shown here are patently wrong. The actual projected increase in arrivals of regional jets is 74 percent more (149.6 vs 81) and the increase in small narrow body jets is at least 933 percent more (31 vs 0). Since right now they say there are zero arrivals of small narrow body jets, I used a figure of three per day the minimum of which I personally have observed and compared it to the projected 31 arrivals per day to get the 933% projected daily average increase. Again this is a blatant attempt of the FAA and the contractor to misuse statistics and mislead the public in its presentation. More comments to follow about this in the review of the Noise Technical report.23. Page 4-23, paragraph 7, There is a significant impact on south jersey from the noise. The contours shown do not incorporate the Locations of the River Winds community which may very well be within the New 65 dB contour over south jersey. The so called undeveloped area is actually developed. This needs to be reviewed for accuracy. 24. Table 4.2-20 There is only one location near the actual flight path of the jets landing on runway 35. LT-5 This site was not monitored for a long time in 2004 to determine what impact the additional flights of larger jets will have on the DNL. Also the site does not appear to be in a direct line with the flight path or directly under most of the aircraft. 25. Section 4.2.4 Mitigation, Last paragraph. " The FAA notes that the Sponsor has committed to update its 2003 Part 150 Study... and would evaluate expanding the noise attenuation program to the Eastwick neighborhood at that time" What is the "Sponsor" going to do about West Deptford Township people who experience the large increase in noise?26. Section 4.3.4 Environmental Consequences; This section speaks about increase in noise levels over recreational land use areas, but nowhere does it speak to the River Winds Athletic fields, or Community Park. This area is definitely within the 65 dB contour area yet the FAA and the Sponsor have chosen to ignore it. Please address this area.27. Section 4.4 Social Impacts, Induces Socio Economic Impacts and Secondary Impacts. This is the section that should contain some discussion of the loss of property values associated with living in the flight path of an expanded runway. The perception that this is impossible to do was given at the public meeting however there is a method that could be employed. Compare the cost of a similar size house in a similar setting except for being under a flight path. This would be a simplistic yet effect way to compare the potential loss of property values. Living under a flight path that is occasionally used is not too bad. I have lived in my house for 14 years now and have not though about moving until the last year because of the increase in numbers of flights and increase in noise levels. Now the FAA and the Sponsor want to increase the average daily flights by 73% that means basically any time that I go outside I will have aircraft overhead. This would be noticeable to anyone and would detract for the enjoyment of my outdoor living. This detracts from property value and there is a minimal effort that the FAA could do to compare that loss. 28. Section 4.5 Air quality; This chapter mainly speaks to PADEP rules and air quality standards, and only addresses idle time, wait time, and run up for takeoff. It has not addressed the increase in number of flights over New Jersey nor the added pollution to New Jersey's Air. It also does not address New Jersey's Air quality regulations, which are stricter that Pennsylvania. There has been no quantification of the increase, or decrease, of air pollution deposited by the Aircraft flying over New Jersey and in particular West Deptford Twp.29. Page 4-54 Conformity with PA SIP. Has there been any comparison to the New Jersey SIP, since the over flights will have an effect on New Jersey Air quality?30. Page 4-58 Emission of Criteria Pollutants in 2003. The assumption that PM10 emissions are zero is a major falsehood. Any combustion of jet fuel, which is very similar in composition to diesel fuel, will have a PM10 associated with it. Just because the FAA does not have data does not excuse this use of bad assumptions. There is a Tech center in Pomona, there are jet engine test cells all over America, there are gas turbine power plants, this data could be generated fairly easily by either the FAA or the EPA. 31. Page 4-59 Table 4.5-4 Maximum Estimated Ambient Pollutant Concentrations. Again there is a huge amount of assumption to say that there is no PM emissions from aircraft. With the Number of flights and the number of different engines, there has to be PM emissions and they are most likely significant to the environment. The FAA and/or the EPA should collect more information in order to use accurate data for making decisions that will impact thousands of people in the</p>	

ID	Name	Title	Affiliation	Email	Comment	Comment Date
					<p>area adjacent to the airport.32. Page 4-60 Emissions of HAP Second paragraph, why was not data from Gloucester County used in this comparison of data? Gloucester County abuts the airport. 33. Page 4-64 and page 4-68 and page 4-70 Ambient Concentrations; First bullet states “ All of the modeled maximum concentrations for NO2, CO, SO2 and PM10 are below NAAQS” The last one may be because of the assumption of an emission rate of 0 ppm of PM10 for aircraft. 34. Page 4-67 both VOC and NOx emissions were said to decrease in part because of the decrease in the size of the economy parking lot however in the description of the project the parking spaces will be moved to the former area of sr-291. So the Total parking area may even increase not decrease having a net increase in these emissions. 35. Page 4-67 Both VOC and NOx emissions are said to decrease due to reduced idling time, however the most reduction in wait time is only 2 minutes. What time number has been used to determine the reduction in emissions. This information has not been provided. 36. Page 4-70, Indirect and Secondary Impacts; Second paragraph. Please provide the data that proves that Aircraft emissions are “negligible” in comparison to the remainder of the area. In West Deptford there are not many large sources of air emissions. However the flights of thousands of aircraft per day in a significant source of air pollution. Adding more flights and aircraft can only mean more pollution.37. Section 4.5.4 General Conformity Analysis. This analysis compares the previous section’s information to a tons per year threshold for significance. The problem with the comparison is that the previous data only accounted for Idling and taxiing emissions. It did not include the most emissions producing portion of aircraft operations, Take off and Landing, as well as flights over a specific area. These emissions may very well be significant, however the data has not been collected or presented to enable that determination. Therefore the FAA should collect and compare the information to see if indeed this would cause an exceedance of the tons per year threshold. Any argument that vehicles are not considered is bunk because the emissions from taxiing and idling are considered. 38. Section 4.5.4 General Conformity Analysis. Page 4-73, First paragraph This paragraph only compares the amount of emissions to the Pennsylvania portion of the Non Attainment area. Since all of the flights arriving on Runway 35 and those taking off from runway 17 will fly over New Jersey why haven’t the emissions from those flights been compared to the New Jersey Portion?39. Section 4.5.5 Mitigation; Since the previous sections were not complete the assumption that there was no significant impact from aircraft operations is not ready to be determined and therefore discussions of no mitigation are not appropriate at this time.40. Section 4.5.6 Please provide copies of the letters from the regulatory agencies in the EIS to show that all items have been satisfied.41. Section 4.6.4 Children’s Environmental Health and Safety Risk. Section 4.5 did not fully disclose the air quality impacts of the flights over New Jersey or Pennsylvania therefore the statement that no disproportionate health or safety impacts to children would result has not been fully investigated or proven.42. Section 4.7 Water Quality, page 4-79 Study Area third paragraph. Please define what an SSA is. It is not in the Acronym list. 43. Section 4.7 page 4-80 Drainage Area 3- Outfall 003, Please define SEPD and provide a map of the area. 44. Section 4.7 page 4-81 Surface Water Quality- Local Study Area fourth paragraph. Airport operations have a reasonable potential to discharge VOCs into the waterways, from Deicing operations and fueling operations. Therefore the statement of the last sentence of this paragraph is false. 45. Section 4.7 page 4-83 Regional Groundwater Flow, last sentence, the lower aquifer flow to the east-northeast is in the direction of NJ and can be considered as part of the SSA. Therefore the area does in fact contribute to the SSA.46. Section 4.7 Deicing Operations page 4-86 first paragraph. Please describe the inspection process of the water in the impoundment area. Is it only a visual inspection, or is the water sampled for pollutants prior to being released? If it is only a visual inspection what properties are checked for? Can the inspector tell if the water is contaminated with deicing fluids readily by sight? Is there an inspection check sheet that is maintained?47. Section 4.7 Hydrologic Impacts page 4-89 second column, first paragraph begins with the words “Without mitigation”... What mitigation is planned to avoid the increase in erosion and suspension of materials? Because the first paragraph in the first column of page 4-90 state that there are no significant impacts to water quality however nowhere does it say in the description how the erosion and suspension of materials will be dealt with. Same comment for alternative 2 on page 4-9048. Page 4-91 first paragraph discusses the approach of aerating the spent deicing fluid prior to discharging it to the Delaware River. While this may be acceptable why not recycle the glycol/water mix and save money?49.</p>	

ID	Name	Title	Affiliation	Email	Comment	Comment Date
					<p>Page 4-93 Sediment and erosion control. This section only discusses the approaches that will be used to reduce and eliminate erosion during construction activities. There is no discussion about what to do about the increase in erosion cause by large pavements areas and increased flow rates of the runoff. 50. Page 4-99 second paragraph state that Little Tinicum Island is not designated for public recreation, however, the island does receive many visitors in the summer boating season and should be considered as a public recreation area. 51. Table 4.8-2 DNL levels should not be used for this comparison. Recreation areas are generally used during the day and the review should reflect this information.52. Section 4.12.2 Existing Wetlands and Waterways-Project area, CMC-4, the last sentence in the first paragraph discusses a sewage odor noted at this site, and that the site is downstream from CMC-3 where a septic waste dumping site from the winter of 2003-2004. Was any further investigation of the site performed? There may be an illicit connection from the airport site to a storm drain,which is illegally dumping sewage to the stream. If the smell lingered more than several day after the dumping event. The dates of the event and the dates of the investigation would be helpful to determine if this is an isolated case or something more serious to the water quality of the stream.53. Section 4.12.3 Direct impacts. Page 4-144 Alternative 1 states that any macro invertebrate activity would be lost. The goal of the clean water act is to improve waterways. If the project cannot be done without improving water quality then it should not be undertaken. Any further loss of water quality is unacceptable. 54. Section 4.12.3 Last paragraph of the section on page 4-146, Change the word may to will in the last sentence of the paragraph. "The increase in impervious areas... will increase runoff... and also will increase pollutant and toxicant load..."55. Section 4.12.4 Mitigation, last paragraph uses the word could to describe that mitigation could be done. The question is what will be done? A determination that there are no negative impacts cannot fully be understood without knowing what the mitigation measures are.56. Section 4.14.2 Surface transportation, affected environment. Page 4-159 first paragraph, for this proposed project, LOS -D or better is considered to be acceptable. How was this determination made? Was it determined prior to doing the survey or after doing the survey? Who made the determination?57. Section 4.15.2 Affected Environment, please provide a description of the known releases and what the contaminants of concern are at each of the sites.58. Section 4.15.2 Existing and Former Underground ad Above ground storage tanks. Last sentence. Just because a tank has not had a reported release does not mean that it hasn't happened. These tanks should be investigated in accordance with PADEP rules and should have been removed or upgrade prior to the December 1998 deadline.59. Section 4.15.3 Unknown Status USTS. These tanks should have been remove or upgrade by December 1998, in accordance with federal law. Is the Airport in violation of this requirement and what is being done to correct the situation?60. Section 4.15.4 Mitigation: Fill Sampling page 4-178, Any sampling of Fill material should include PCB and Dioxin sampling since these contaminant may reasonably be expected to be in fill from unknown sources. 61. Section 4.15.4 Mitigation Contaminated Groundwater management. Since POTWs do not normally treat for industrial contaminants, what pretreatment of the groundwater will occur prior to discharge to the POTW? 62. Section 4.18 Cumulative Impacts FAA order 1050.1e states "if the proposed action causes the cumulative impacts of these non-project actions to exceed and applicable significant threshold, then the proposed action would be the one causing the significant impact." The past action of allowing regional and larger jets to land on runway 35 was not analyzed for noise impacts on the surrounding area. That change in conjunction with the extension of the runway will have a total increase of DNL level that may be considered significant. Since the before and after are not available at this time the cumulative effects cannot be compared. Please compare the DNL from a time period prior to having regional jets and other jet aircraft use the runway 35 for landing and compare it to the expected noise from both alternatives.Noise Technical Report1. Section 2.2.1 FAA's Integrated Noise Model page 2-6 First paragraph discusses historical flight track data used to run this model. As commented above, How has this data been validated? I have experienced known problems with the radar tack data. In June of 2004 I called the airport Noise office to complain about large aircraft flying over my house or adjacent to my property at certain times of day I specifically noted times and type of aircraft right over my front lawn. This included two 737 400 and one Airbus 319 less than 1000 feet, in the span of 15 minutes with other aircraft following similar paths. . When I provided this info to Mike Jeck, the Noise officer he checked the radar data and found no aircraft over my</p>	



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					<p>property. The closest he found was 1.25 miles away and at 3000ft. The next was 1.5 miles and 2500 ft and the other was 2 miles away. Therefore I believe this data is flawed in such a manner as to be unreliable. Please provide me with the details as to how the data used for telling which aircraft were flying where and when was validated as this data is used for all aspects of the studies.2. Section 2.2.2 page 2.7 first full paragraph. The Model information was based upon radar tracks. Again please describe in full how this data was validated to be used. 3. Page 2-9 Last paragraph. This paragraph describes how narrow body flights were increased on runway 17-35 in 2004 yet the rest of the paragraph states that the model used th3e flight tracks from the 2003 year to be modeled. Since the Narrow body jets are louder and fly lower on landing onto runway 35 shouldn't the most recent data have been used for the model?4. Page 2-21 Measured DNL for January 2004, First sentence states that the Model was not calibrated or adjusted to the measure noise levels. I work with several different types of environmental models notable, groundwater contamination and surface water flow models. Every model I have ever seen has had to be calibrated to match actual real life conditions for it to be acceptable to the regulatory community and the public. If this model is not calibrated then how can the public or regulators be sure that the model is indeed accurate? The acoustics in this area are different from other areas so to say that the model works here as well as other areas may not be entirely true. More work should be done to be sure that the model is showing actual conditions.5. Page 2-21 Measured DNL for Jaunary 2004. First bullet. The noise measurements from a two week period in January of 2004 do not show the long term trend of noise from larger jets that have been landing on runway 35 with increasing frequency. The long term average number of aircraft should be compared to a long term average of aircraft, not to a two week period. Also it is not the average noise that is bothersome it is the increased frequency of large noise pockets that is bothersome.6. Page 2-24, Table 2-9, ST-22 site at River Winds Community Center. How is this site not considered to be applicable to the project. Aircraft landing on runway 35 or taking off from runway 17 pass within ½ a mile from the center. Please calculate the DNL at the site since it is an important part of the West Deptford community.7. Page 2-27 Meteorological Conditions during the Measurement period. These conditions do not indicate wind speed or direction during the time of the measurements. These are important factors in the landing pattern of aircraft. If the wind happened to be out of the south predominantly then this short term measurement of Noise would have been biased because the aircraft would not have been traveling as much over West Deptford as if the wind was coming out of the north. However since this information has not been presented, the public, nor the regulators can take this into account.8. Section 3.2.6 Runway use. Page 3-12 This paragraph state that the use of runway 17-35 would go up from 55,3111 aircraft to 103,270. Pleas explain how doubling the number of flight events thereby doubling the time that a certain noise level is attained does not raise the average noise level more than 1 dB. Since the math of the model is not provided in the document, these calculations cannot be checked. 9. Table 3.10 Breakdown or Runway 17-35 Operations for 2007 Average Annual Day. Besides the fact that this is an average, how can you have a tenth of an operation per day? This data should be rounded to the nearest whole number. 10. Table 3.10. Where is the data for comparison for either 2003 or 2004? The numbers presented here are only estimates for 2007. 11. Section 3.2.10 Grid Point Analysis page 3-20. This analysis did not take into account new developments that have been in the planning stages prior to 2000 and have been built since 2000. Field work could have been done to estimate the number of effected communities, and to survey the population. Therefore the analysis of the number of people effected is inaccurate at best.12. Section 3.3 page 3-21 first full paragraph states that only non-residential land use would be effected on the south side of the area. This is inaccurate for the reasons stated above.13. Figure 3-3. This figure shows the lines that the FAA calls significant for noise exposue at 60-75 dB. However there is criteria that ,muat be addressed if areas outside of these contours experience a 3-5dB change. How are the public or regulators to compare these levels if the contours are not shown?14. Page 3-22 describes table 3-12 as the prediction of population exposed to larger noise levels. However as stated above the analysis of number of effected people is erroneous due to the fact that new communities have not been considered.15. Page 3-25 fist paragraph. This paragraph describe the concern of the FAA and the sponsor about including one person at Ft. Mifflin even though no one lives there, however the neither the FAA nor the Sponsor has enough concern about its neighbors in south jersey to correctly identify</p>	

ID	Name	Title	Affiliation	Email	Comment	Comment Date
					<p>whether or not there are actually people living there. 16. Page 3-26 Second Bullet. This statement that "To the south... due to a 29 percent increase in arrivals for regional jets and a 14 percent increase in arrivals for small narrow body jets" However, the date provided in table 3-10 shows that the average daily increase in arrivals to runway 35 from the south will be 82.61% more for regional jets and 933% more for narrow body jets. For the narrow Body calculation I used the average of 3 narrow body jet landings on runway 35 instead of the 0 figure provided. If the noise model uses percentages as inputs then the noise model may be wrong since the data provided does not support the text shown. Please reconcile the math prior to inserting it into text. 17. Page 3-33 Second bullet, again the percentages provided I the text do not match the data provided in the tables. The regional increase in projected to be 70 percent not the 28 percent given in the text and the narrow body jets increase is going to be 355 percent not 16 as given in the text. Please reconcile the numbers. 18. Page 3-37 Second Bullet: The expected increase in departures to the south increase by over 100%, even though the number of flights increasing in departures is small the percentage is not. Again there is inconsistency in the analytical approach the FAA is taking, using percentages where it is convenient and actual numbers when it is not. 19. Section 3.3.3 Other indicators of Changed Cumulative Noise Exposure. Page 3-39. Last paragraph states that the grid size used for the modeling effort is a uniform grid spacing of 3000 ft. This is equivalent to over 206 acres per grid square, roughly the size of a golf course or two hundred football fields. Noise is a localized event for the most part. It is very noisy directly under an aircraft and less noisy the further to the side you get. Most numerical models that use finite element or finite difference use tighter grid spacing in areas of higher concern. The Model should be run with tighter grid spacing over the backbone flight paths and runways. This would give a more detailed look at the effects of the backbone flight paths and would better predict where noise is a problem. Without a tighter grid spacing what the FAA is doing is in effect diluting the noise from an event over 206 acres. This assumption is made because there is no other discussion of the mathematics of the model, the grid spacing, and how the numbers are calculated 20. Section 3.3.3 page 3-40, Changed Noise Exposure Within the 65 dB contour. First bullet states that the only area to the south that would have an increase in the noise exposure would be an undeveloped area. This is not true there is development with people living in the area. And as stated in the previous comment, the noise model dilutes the sound over 206 acres so that the true increase in noise is not known. Further analysis is needed. 21. Page 3-46 Changed Noise Exposure between the DNL 45 and 60 dB contours. The contours for the 45 to 60 are not shown. Color-coded squares that are 206 acres is not enough detail to know if an area will experience more noise than can be considered significant. Again the model should be run with a finer grid in order to show a truer representation of reality. 22. Section 3.3.4 First paragraph, Editorial note: Gloucester county is in New Jersey Not Pennsylvania. 23. Section 3.4.3 INM Computed Nighttime DNL, Lmax, and TA at specific points. Page 3-57 While these items may be of interest to the FAA, one item is of interest to me is a worst-case single day cumulative noise exposure. By this I mean, what is the worse possible noise exposure I will have over the term of a day when the aircraft are landing to the north onto runway 35 on a constant basis. Much like the majority of the time. Aircraft fly over my house or in close proximity and I have not seen any analysis to show what exactly I am being exposed to on a daily basis. The average DNL means little to me since there is not much nighttime flights however, during the day I have counted upwards of 21 aircraft over my property in a forty minute span. This happens so often during a normal day that I can almost set my watch by the times. The worst part is it happens at times when I would like to be outside enjoying my deck and garden but with the noise it is becoming unbearable. The long-term average is not what bothers me it is the short-term day to day hours of noise from aircraft. 24. Table 3-24 does not indicate noise data from flights of narrow body jets landing and taking off from runway 17-35 since the data was from 2003 and not 2004. 25. Section 3.6 Cumulative Noise Impacts. Page 3-67, The FAA has not prepared any environmental documentation of the effects of landing regional Jets and Narrow Body jets on Runway 17-35. This documentation should have been prepared to compare the noise exposures prior to approving this action. This action has created a "new standard" by which the future actions are being considered. The cumulative effect of landing large numbers of Jets along with the Turbo Props most likely has had a significant noise effect, More than 5 dB, but the data has not been prepared and can only be inferred. 26. Appendix A pg A-8 Day Night Average Sound Level, DNL the requirement to use this metric</p>	

ID	Name	Title	Affiliation	Email	Comment	Comment Date
					was developed over thirty years ago when there were less people and less flights around to disturb them. Has any newer work been done to develop a better measure as to what people find disturbing when it comes to noise?27. Appendix A, pg A-9, the description of the DNL should have the mathematical equation used so people can see that it indeed includes the number of flights.28. Appendix A, Figure A-6, page A-10 shows that 8 miles from touchdown at a major airport and 3.5 miles from takeoff at a small airport have a noise level of 62-63dB. The results of the noise model do not appear to match these numbers.29. Appendix C, The numbers presented here are only percentages. No actual numbers of aircraft are given. This data does not assist in the comparison of existing to predicted flights and flight paths.30. Nowhere in either the Noise technical report or in the EIS was data provided about the noise levels of any of the aircraft at the flying levels. The equation for the DNL includes a summation of the noise from aircraft per event. I would like to have this data to see what the calculated noise level at my house would be so I can compare it to the large grid cell given in the report. 31. The only place where the time of flight delays is discussed is in the first part of the EIS. However nowhere in the EIS or the Noise study does it say what the time reduction would be if either of the alternatives are picked.32. The Executive Summary states that the best improvement that will be gained for alternative 1 is 1.4 minutes in 2007 and 6.5 minutes in 2015 and Alternative 2 give improvements of .2 minutes in 2007 and 4.1 minutes in 2015. These improvements in times are not worth the Millions of taxpayer dollars to be spent on this project the cost to benefit ration is too high. Neither of the alternatives will alleviate the situation and in fact will exacerbate the noise problems in West Deptford. I urge the FAA to reject both alternatives and focus on the CEP to gain real time savings.33. Reviewing the Correspondence provided in Appendix D, Only the NJ SHPO was contacted. No other regulatory agency was contacted in NJ. How can the FAA plan on sending more pollution into NJ air space for the benefit of the City of Philadelphia without having contact with the NJDEP?	
9				emmmreed@rcn.com	I live in ridley park because it is a close knit and quiet community as are the surrounding communities. The amount of people this would affect is atronomical. Why ruin peoples lives to benefit an industry such as airlines. I believe that a few modifications with the present system would be adequate. If it ain't broke, don't fix it.	11/16/2004
10	Sentivan, Heidi			sentivan@vsba.com	My comments are in regards to the Runway 17-35 Extension Project. I reviewed the powerpoint document from the September Upper Darby Public Meeting. I was not aware that there was another meeting at Ridley High School until today. Since I did not attend this meeting, I wanted to comment on this proposal. I am particularly concerned with Alternate #2 which will raise the noise level in my community. Currently during certain weather conditions the planes fly quite low over my house and are very loud. Under these conditions it is difficult to carry on a conversation outside. My concern is that with the expansion of 17-35 runway the noise of the planes will become constant and not just under certain weather conditions making it difficult to spend time outside.	11/16/2004
11	Hayburn, Thomas			t.hayburn@att.net	I live in the Riverwinds development in West Deptford Township.in Glouster County, NJ. I am totally against the proposed extension of runway 17-35 since I live directly in the path of the increased traffic and noise that will result if this project is completed. As it is now the noise can be excessive. What factual gurantee can you give that this will not be happen. Why not divert the commuter and smaller air craft to Philadelphia's Northeast airport ?	11/17/2004
12	Massa, Kathy			kathy1956@hotmail.com	It is a Saturday morning 6:45 and so far I have heard overhead at least 9 planes since I woke up at 6:00. Traffic patterns change with the weather and today it is raining in Ridley Park. My doors and windows are closed since it is November but I do not have central air to block noise during the Summer months. I also am a homemaker so I do not leave my home everyday. Residents are not fully aware of the noise and frequency the air planes make daily. So maybe we can't compete	11/20/2004

ID	Name	Title	Affiliation	Email	Comment	Comment Date
					with cities with larger or more airports, is that bad? The noise is one thing, I don't want to even think about the pollution. I guess I need to think about leaving my home of 25 yrs . What do you think?	
13	Swavely, Marie			rere125@msn.com	As a long time resident of Lester, Please keep me updated on this. I am very concerned. Thank you. Marie Swavely	11/20/2004
14	Bathurst, Doug			debathurst@aol.com	I would like to voice my opposition to the project increasing Airplane Traffic over West Deptford and Paulsboro, NJ. It will have a negative affect on property values. Further my community will not get any additional benefit for the lower quality of life. If Philadelphia and Pennsylvania wants a better Airport then they will have to accept all that comes with it. Not pawn it off on New Jersey.	11/23/2004
15	Mattison, Priscilla			smattison@aol.com	1) I would urge the absolute strongest protections for the red bellied turtle. 2) With regard to noise, the reference in the EIS to "minor increases" in some areas is not terribly helpful. To those of us who live within earshot of overflying planes, no increase in noise is likely to be "minor". Specifically, it's my understanding that the changed traffic pattern may result in more air traffic over the Schuylkill River. I would strongly disfavor that. My property on Hidden River Road in Penn Valley backs onto the 76 Expressway, parallel to the river, and our neighborhood already contends with frequent overflying news helicopters. Any additional air traffic overhead would be most unwelcome.	11/24/2004
16	Connor, Anne			Anbrec@cs.com	Please reconsider the Runway 17-35 extension project for the following reasons: 1. The noise study predates changes to the flight pattern, quantity and type of aircraft that occurred in 2004. Additional traffic and noise that would result from the extension will severely impact the quality of life in West Deptford, NJ. 2. Wait to see how the announced plans of US Airways to de-peak its schedule affects flight delay times. Logical thought would say this would greatly reduce propagation delays with aircraft departures spread out. 3. Do not waste taxpayer money with interim solutions. We have lived with the problem and with untried solutions such as de-peaking ready to be enacted. I request that the time, money and energy budgeted for 17-35 extension be used to fix the long-term PHL airport problem. 4. It appeared from listening to the public hearing that the 17-35 traffic suspension impact due to Delaware River ship traffic was underestimated in the study. If suspensions increase up to a dozen per day due to increased ship and air traffic, this will cancel out much of the delay reduction the extension is expected to generate. Sincerely, Anne and Bill Connor 1110 Parliament Way Thorofare (West Deptford, NJ 08086-2200)	11/28/2004
17	Raven, Kit	homeowner	Swarthmore	kitraven@comcast.net	I have been a resident of Swarthmore for about 15 years and my husband, for over 20 years, as a professor at Swarthmore College. We recognize the need to shorten delays at Philadelphia airport. We are concerned that the proposed PHL changes will adversely affect many residents. Specifically, we are very concerned about the proposed changes to the flight plans so that planes will depart and arrive over homes, rather than over the Delaware River, as they do now. We are worried that the noise will be substantially louder. The flight paths over the Delaware are a good choice since no one lives on the river and (noisy) industry is what's located on the banks. Delaware County, however, has long been inhabited by a wide variety of communities, who don't want their tranquility disrupted many times per hour, throughout the day and evening, by planes flying low overhead. We have towns ranging from impoverished to solid working and middle class to upper middle class. In addition to the usual K-12 schools, we have a number of colleges, a university, and trade schools, all of which function better without frequent	11/28/2004

ID	Name	Title	Affiliation	Email	Comment	Comment Date
					overhead noise. We are very much concerned that our quality of life will substantially deteriorate and that real estate prices will then accordingly fall. We have a number of historic structures, from farmhouses to government buildings. Thriving, not noise beleaguered, communities are necessary to preserve them. We would like to see a reduction in delays at PHL. We also would like a carefully considered plan. We want time for local committees to review plans, discuss them in the towns, and then provide input. For the sake of economy and for minimizing inconvenience during construction, we want a plan well analyzed and understood before it is actually constructed. Thank you for considering these comments. Kit Raven	
18				rcody939@comcast.net	Stop the maddness! Stop the lies! Stop the runway extension! If you don't think that extending the runway to increase the number of flights will not effect the quality of life, environment in Sounthern New Jersey communities I invite you to spend a night in my house to here the airplane traffic in the early morning hours. Talk to the home owners in Delaware County, Pa.	11/29/2004
19				jkurpis@comcast.net	Ms. 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)	11/29/2004
20	Clark, Brian			brian.clark@temple.edu	The use of the average DNL figure for assessment of the impact of aircraft noise is inappropriate and deceptive. For example, the results for Swarthmore, PA indicate only modest increases in noise, from 44.2 to 46-47.7 dB, depending on which alternative is chosen. Thus, I might be lulled into a sense of comfort that the proposed runway extension might not have much impact on my quality of life. However, the real effect of aircraft flights on my quality of life results not from any average noise level, but from single events. On days when the cloud cover is low, and more flights takeoff on Runway 35, I am routinely awakened at ~5:30 am by aircraft ascending over me. It is extremely annoying. By comparing the current and projected % of takeoffs on Runway 35 to the current and projected numbers of annual flight operations, I realize that the NUMBER of takeoffs on Runway 35 is projected to increase to 333% to 391% of current takeoffs, depending on whether Alternative 1 or 2 is chosen. If the proportion of flights taking off from Runway 35 that turn left to headings of ~300 degrees remains constant, I anticipate that the number of extremely noisy aircraft passing overhead in Swarthmore will increase by a similar amount. This increase in frequency of sleep-ending takeoffs is unacceptable, and the situation will only be worsened by a change in the fleet composition to include more Boeing 737's using the 17-35 runway. I strenuously object to the use of average DNL noise levels in the draft EIS. I urge the FAA to revise the noise analysis in a way that heavily weights the noise disturbance due to single events.	11/29/2004
21	Dariano Sr, Matthew			mdarianosr@comcast.net	We have lived in WestDeptford almost 40 yrs. The noise from the planes can at times be very disturbing. We live near the river. More air traffic would make unbearable plus I believe it would greatly effect our property values. My wife and I are against it.	11/30/2004
22				johnhaigis@rcn.com	As one of the stewards of several historic sites which are adversely affected by the assault of	11/30/2004

ID	Name	Title	Affiliation	Email	Comment	Comment Date
					increased air traffic I respectfully submit: A) There has been an inadequate EIS comment period for a document released in lte October, especially when I understand FAA has refused to release the Integrated Noise Model files for publuc review B) Congressman Weldon and others have requested an extention of the review period C) other alternatives have not been adequately considered d) precipitious action leads to mistakes such as \$221 million spent for runway 8/26 which is virtually unusable due to changes in the industry e) a great deal of money is proposed to be spent for a minor reduction in delay and f) the people of Delaware County need protection from the arial assault of commercial jets. An expansion of 17/35 at this time is unwise, unnecessary, wasteful, and not in the best interest of the general public.Thank youJohn Haigis1006 Main StreetDarby, PA 19023(610) 583-0788	
23				JPatrickCPA@comcast.net	I live in West Deptford, NJ and have attended the FAA informational meetings and have extensively reviewed the Draft Environmental Impact Study. I have seen a noticeable increase in air traffic over my neighborhood that is totally unacceptable. I think it is deplorable that the FAA would infringe on West Deptford residents like this for a short term "solution" to the airport's inefficiency. The alternative choices are poor. Taxpayer's money would be better spent creating a third runway parallel to Runways 9L-27R and 9R27L. Even better, expanding RW 8-26 would make more sense. These two ideas would have less impact personally and environmentally than disrupting the lives of thousands of people in West Deptford and surrounding communities.The noise has increased significantly and has diminished our quality of life. Our family cannot speak to one another out in the yard without being drowned out by the bigger, lower-flying jets. I am very concerned about the additional pollution my little 1-year-old daughter will have to breathe. Please do the right thing and reconsider your alternatives so our lives won't be so disrupted. Thank you.Jim Patrick	11/30/2004
24				Jimopus18@aol.com	Data provided to the public are insufficient to permit inferring how baneful the effects from peak noise levels would be; mere statement of a year-round average decibel level is woefully inadequate. I already suffer from noisy overflights during very early morning hours; the proposed expansions would likely worsen the situation. Until more is known and made available to the public, I believe that the no-change model is the most responsible one. Sincerely yours, James L. Marshall, acoustical consultant	11/30/2004
25	Celley, Catherine	committee person 8-2 Ridley		artplus01@rcn.com	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	11/30/2004

ID	Name	Title	Affiliation	Email	Comment	Comment Date
					<p>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.</p>	
26	Celley, Kate			catmajo@yahoo.com	<p>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</p>	11/30/2004

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					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.	
27	Kako, Edward			ekako1@swarthore.edu	I write to you as someone who lives in Lansdowne, Delaware County, and works in Swarthmore, Delaware County. Like many others, I am very concerned about the FAA's proposal to extend Runway 17-35 at Philadelphia International Airport.I appreciate that the airport needs to grow, and that such growth is essential to the well-being of our regional economy. However, I do not believe such growth should come at the expense of the quality of life of people living near the airport. By the FAA's own admission, extending 17-35 would bring rather small benefits, hardly worth the cost to the airport's neighbors.Therefore, I urge the FAA to abandon its plans to extend 17-35 and put its time and money instead into other measures that will help to reduce delays and expand capacity. It is a fact that the airport will have to undergo a more dramatic expansion within the next decade or so. I believe that everyone concerned would be better served if the FAA moved forward on these larger-scale expansion plans -- in particular, the parallel plan that would place a new runway in a filled-in portion of the Delaware River, thereby keeping the bulk of air traffic over the river and away from residential areas.If, however, the FAA feels it must go ahead with an extension of 17-35, I would urge the Agency to opt for Alternative 1, which would have a decidedly smaller impact on air traffic over Delaware County.Thank you for your time and consideration in this vital matter.Sincerely,Edward Kako230 W. Albemarle Ave.Lansdowne, PA 19050	11/30/2004
28	Drexel, Meredith			mdrexel03@netscape.net	To whom it may concern:Having recently purchased a home, currently being constructed within the Township of West Deptford, New Jersey, we would like to strongly voice our opposition to this Extension Project. Along with many of our future neighbors, we are alarmed, disappointed, and feel a certain sense of animosity towards this project. The intended extension will void many of our reasons for having chosen to reside within this community. The peaceful, and scenic atmosphere that drew us to the area had already been somewhat blemished by the current flight pattern... why would we (or any of the other residents,) concede to increase any factor that would contribute to an already disturbing 'neighbor'? PHL is obviously a necessity, and we are quite aware of the commerce/revenue that it generates. I can appreciate that fact. However, I cannot appreciate or understand how a disturbance of this capacity could be allowed. It will undoubtedly infringe upon the lifestyles of the people who have come to live in harmony with the airport. We are quite certain that all of our neighbors, as well as many other residents of the surrounding area feel the same, and if prompted, will do whatever it takes to prevent this project from being approved. We would be glad to speak with anyone who has questions regarding our feelings, and position on this matter. Thank you in advance for your concern, understanding, and compassion.Meredith Drexel & Christopher Worth,future residents of 638 Worcester Dr., located within the development of The Grande at Kings Woods, West Deptford, New Jersey	11/30/2004
29				wawpack66@aol.com	Dear Ms. McDonald:As a 6+ year West Deptford Township resident, I am writing to voice my opposition to the 17-35 runway project. In our time in the township, my wife and I have noticed a distinct increase in the frequency and associated noise of the aircraft passing over our home on the way to the airport. It is, in our view, certain that the project, as proposed, will serve only to	11/30/2004



ID	Name	Title	Affiliation	Email	Comment	Comment Date
					increase the noise, air pollution and danger to which we are subjected from aircraft passing overhead. Several news articles have mentioned alternative runway plans which would have considerably less impact on the surrounding, populated areas. We would suggest that these alternatives be more closely examined before approving the current plan. Any alternative that would lessen local impact would have to be an improvement. I was also surprised to learn that air traffic at the airport has to be delayed when an oil tanker passes by. Does that mean that, had the tanker currently leaking in the river been a mile or so closer to the airport, all air traffic would have been stopped since Friday???? That would be a transportation nightmare. Since the proposed extension will be closer to the water, I must presume that even more air traffic will have to be stopped for oil tankers passing the airport. This also seems to be a recipe for disaster. Please ensure that all possible alternatives are fully explored before subjecting our community to this needless intrusion. Thank you for your time. Bill Walsh	
30				d_chant@yahoo.com	I live in West Deptford, NJ and I have seen a noticeable increase in air traffic over my neighborhood. The noise from the air traffic has diminished our quality of life. Our family cannot speak to one another out in the yard without being drowned out by the bigger, lower-flying jets. I have attended the FAA informational meetings and have extensively reviewed the Draft Environmental Impact Study. I believe that the taxpayer's money would be better spent creating a third runway parallel to Runways 9L-27R and 9R27L. The best plan would be to expand RW 8-26. These two solutions would be better for the environment and for the thousands of people affected in West Deptford and the surrounding communities. I am especially concerned for the health and safety of my 1-year old daughter and the many children in my neighborhood that are affected by the noise and pollution from the extra air traffic. I hope that you will reconsider your alternatives so we can live in a healthier and less disruptive community. Thank you. Dawn Patrick	11/30/2004
31				stuhltrager@earthlink.net	The draft Environmental Impact Statement ("EIS") for the Runway 17-35 Extension Project ("Extension Project") is deficient for three reasons. First, the EIS fails to adequately assess the noise and pollution impacts of the proposed operation of Runway 35. The EIS projects that expansion of Runway 35 will result in a "large increase" in departures from Runway 35. In addition, the type of aircraft that will utilize the lengthened runway – narrowbody jets such as the Boeing 737 – are noisier and produce more air pollution than the turboprop aircraft that are the runway's current predominant users. The noise and air pollution resulting from the increased use and aircraft size will impact communities that have never been subject to such stressors. In addition, there is inadequate information to evaluate how the FAA determined that the noise resulting from expansion and use of Runway 35 will have only a "minimal impact" on communities in Delaware County. The FAA does not have any monitoring data from points in the Glenolden/Homes/Folsom area. The FAA must implement monitoring in this area before issuing a final EIS. Moreover, the FAA inappropriately looks at a 24-hour average when determining impact, but it does not evaluate the substantial short-term impact of the noise and pollution from departing flights. Having experienced first-hand the noise from narrowbody aircraft departing from Runway 35, I can attest that the impact is not "minimal." Second, the EIS utterly fails to address any homeland security aspects of the proposed Extension Project. The Department of Homeland Security has identified the terrorist use of Man-Portable Air Defense Systems against airliners as a primary threat to homeland security. Yet, the EIS does not examine the increased risk	12/1/2004

ID	Name	Title	Affiliation	Email	Comment	Comment Date
					to both the larger airliners that will depart from the extended Runway 35 and to the communities under their flight path. The final EIS must examine this potential threat and identify an adequate solution. Finally, the EIS is inadequate because it does not include a "cost-benefit" analysis of the Expansion Project. Perhaps this oversight is intentional because the anticipated \$36 million pricetag of runway expansion would not substantiate the minimal 7.5 minutes of avoided delay in 2015 even under the FAA's rosiest scenario (Alternative 1). \$4.8 million spent per minute saved is not worth it, especially considering the enormous impact on the communities of Delaware County. James M. Stuhltrager, Esq. Holmes, Pennsylvaniastuhltrager@earthlink.net	
32				deadcoyotetunes@aol.com	ms.mcdonald, i live on the end of rw17 at kphl. why the extension of 17 appears to be a nseeacary evil, why was rw26 built in the first place. kphl has very little ga traffic....and now more money for rw17. extending 17 is a bandaid, it will not slove the problems at hand kphl needs another 11000ft runway so dont spend money on 17 unless your planning on a major project to extend it another 4000ft or its time for a better idea....the noise here during the day and evening awful with the small commuter aircraft they start landing the larger jets on 17 i for one will file a lawsuit...enough is enough! thank you william r smith 7900 lindbergh blvd. #4412 philadelphia, pa. 19153 215-365-6991	12/5/2004
33	Loges, Laura	Mrs.		laura11@snip.net	I am very upset over the proposal to expand the runway. I reside in Weathervane Farms, Mount Royal NJ. When I built my home in this community 3 years ago, I was attracted to the quiet way of life. But I have noticed in the past years an increase in the amount of air traffic, as well as louder noise levels. Planes are now flying lower. Sitting in my back yard, it is difficult NOT to be disturbed by it. I understand there is an alternative route over Mantua Creek. I urge the commission to consider this, for the sake of our neighborhood and surrounding communities. Many of my neighbors moved here from Philadelphia to get away from the hectic life of the city, the traffic and the noise. And now they are faced with this? We have a wide variety of people in our community of Weathervane Farms - retired folks looking for a quiet place to reside, and those with babies and young children. An increase in noise level from air traffic will greatly affect their lives. We pay enough taxes, we deserve to have the community we bought in to. We hope that you will listen to our voices of despair, as many of us are upset over this, and reconsider the proposed plan. I thank you for the opportunity to voice my concern, Mrs. L Loges	12/6/2004

Comment Number	Comment	Response
153.1	[Rit Spenser] I wish to contest this project due to the risk (airplanes flying below 3,000 feet) over my home in Chester County and the noise pollution it creates during all hours of the day.	The FAA has noted and considered your comment.
153.2	[William Redner] What you need to look at is what is causing the capacity problems. Runway configuration is definitely a big part of it but scheduling is an equally big part. US Air itself schedules more flights than our capacity several hours each day.	The various causes for delay at PHL were examined for this EIS. Section 3.3 evaluates demand management policies, including slots, voluntary de-peaking, voluntary flight reduction, and market based approaches to reduce delay. Scheduling does play a part in the causes of delay. However, as discussed in Section 3.3.1, governmental authorities have little control over the airlines' routing and scheduling.
153.3	[William Redner] If you extended Runway 35 to the north you could end the runway prior to Runway 9L/27R and you could land Runway 17 and depart Runway 9L at the same time or land Runway 27R and 17 at the same time again, greatly increasing capacity. The extension of Runway 35 to the south makes very little sense and no economic sense.	The proposed project (Alternative 1) extends Runway 17-35 to the north as far as is practicable. The elevated I-95 is an obstruction which prevents any further extension to the north. While the proposed configuration does not allow simultaneous operations on Runway 17-35 and 9L/27R, the delay modeling shows clearly that Alternative 1 would reduce delays at the Philadelphia International Airport and meets the project purpose.
153.4	[Lauren Entrekkin] I strongly believe that airport travelers should accept a short delay rather than allow the airport to decrease the quality of life for nearby residents.	The FAA has noted and considered your comment.
153.5	[Ross Engelman] 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. 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.
153.6	[Ross Engelman] What will the following noise and distance parameters be for planes as follows based on your extensive modeling at a distance of 12 miles, 10 miles, 8 miles, 6 miles, and/or 4 miles down the center line from #17 runway over Pennsylvania: 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.	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. Computations assume the aircraft is on a 3-degree approach to the runway and crosses the runway threshold 50 feet in the air. Altitudes of aircraft on departure from Runway 17 or Runway 35 under either of the proposed 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.  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 above are only on the order of a few tenths of a decibel -- a slight increase in sound level if the aircraft is lower over the ground as a result of one of the Build Alternatives, a slight decrease in level if the aircraft is higher over the ground, as is the case for an approach to Runway 35 under Build Alternative 2. Changes of that magnitude, up or down, are not likely to be discerned on an event-by-event basis.
153.7	[Ross Engelman] 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?	No. There is no justification for mitigation of this nature in this EIS. Such measures are normally evaluated through an FAR Part 150 Noise Compatibility Study. The Airport has such a plan and it will be updated in the next few years. Orange County did have an arrival procedure that was discontinued due 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.

Comment Number	Comment	Response
153.8	[Ross Engelman] What are the expected number of flights per day on average if the runway is extended based on your extensive modeling (at a distance from #17 runway over Pennsylvania; 12 miles, 10 miles, 8 miles, 6 miles, and 4 miles) for takeoffs w/in 1 mile of the center line at the above distances 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 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>
153.9	[Ross Engelman] 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.
153.10	[Ross Engelman] 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 of 12 miles, 10 miles, 8 miles, 6 miles, and/or 4 miles from #17 runway over Pennsylvania: Alt 1 or 2 with more traffic on takeoffs at above distances and Alt 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).
153.11	[Ross Engelman] What regulations or controls are there preventing aircraft from discharging fuel or water during takeoff and landings at the various altitudes? 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>Aircraft are prohibited by federal regulations from discharging fuel or water over land. The proposed Runway 17-35 Extension Project would not create new risks of fuel or water being discharged from aircraft. Because the Runway 17-35 Extension project would not change flight tracks or increase flights, there are no new risks from aircraft.</p> <p>The Federal Aviation Administration (FAA) has the jurisdiction to make the decision on how to proceed on this project. Federal, state, and local officials, as well as other members of the public, were offered the opportunity to participate in the decision-making process for this project by attending public meetings, participating in the public hearings, and by submitting comments on the Draft Environmental Impact Statement during the specified comment period.</p>
153.12	[emmmreed@rcn.com] I believe that a few modifications with the present system would be adequate.	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.

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Comments via Web Site

Comment Number	Comment	Response
153.13	[Heidi Sentivan] I am particularly concerned with Alternative #2 which will raise the noise level in my community.	The FAA has noted and considered your comment. The FAA has selected Alternative 1 as the Preferred Alternative.
153.14	[Heidi Sentivan] My concern is that with the expansion of [Runway] 17-35 the noise of the planes will become constant and not just under certain weather conditions making it difficult to spend time outside.	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.
153.15	[Thomas Hayburn] I am totally against the proposed extension of Runway 17-35 since I live directly in the path of the increased traffic and noise that will result if this project is completed. As it is now the noise can be excessive. What factual guarantee can you give that this will not be happen.	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. As shown in Figures 4.2-14 and 4.2-16, Alternative 1 would have a greater negative effect on aircraft noise exposure in in both 2007 and 2015, than would Alternative 2.
153.16	[Thomas Hayburn] Why not divert the commuter and smaller air craft to Philadelphia's Northeast airport ?	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.
153.17	[Doug Bathurst] I would like to voice my opposition to the project increasing Airplane Traffic over West Deptford and Paulsboro, NJ. It will have a negative affect on 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.
153.18	[Doug Bathurst] Further my community will not get any additional benefit for the lower 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.
153.19	[Priscilla Mattison] I would urge the absolute strongest protections for the red bellied turtle.	Measures to avoid and minimize impacts to protect the state-listed red-bellied turtle and its habitat have been considered and are located in Sections 4.11 and 4.12 of this EIS. Additional coordination with the appropriate agencies will continue during the EIS process and continue into the permitting process.
153.20	[Priscilla Mattison] With regard to noise, the reference in the EIS to "minor increases" in some areas is not terribly helpful. To those of us who live within earshot of overflying planes, no increase in noise is likely to be "minor". Specifically, it's my understanding that the changed traffic pattern may result in more air traffic over the Schuylkill River. I would strongly disfavor that.	The Proposed Project will not increase air traffic over the Schuylkill River. As shown in Figures 4.2-2 and 4.2-3, the river is not on the flight path for Runway 17-35.
153.21	[Anne Connor] The noise study predates changes to the flight pattern, quantity and type of aircraft that occurred in 2004.	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.
153.22	[Anne Connor] Wait to see how the announced plans of US Airways to de-peak its schedule affects flight delay times. Logical thought would say this would greatly reduce propagation delays with aircraft departures spread out.	While US Airways has indicated that it would voluntarily change flight schedules to reduce delays, this has not yet been demonstrated to be effective. It is likely that, as occurred at O'Hare following voluntary de-peaking by the major carriers, other air carriers would take advantage of less congested conditions and increase their flight schedules. Additionally, US Airways has recently increased their service at PHL.

Comment Number	Comment	Response
153.23	[Anne Connor] I request that the time, money and energy budgeted for 17-35 extension be used to fix the long-term PHL airport problem.	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. An EIS is currently being prepared for the CEP.
153.24	[Anne Connor] It appeared from listening to the public hearing that the 17-35 traffic suspension impact due to Delaware River ship traffic was underestimated in the study.	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.
153.25	[Kit Raven] Specifically, we are very concerned about the proposed changes to the flight plans so that planes will depart and arrive over homes, rather than over the Delaware River, as they do now.	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.
153.26	[Kit Raven] We are worried that the noise will be substantially louder.	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.
153.27	[Kit Raven] We are very much concerned that our quality of life will substantially deteriorate...	Section 4.5 demonstrates that the Proposed Project would produce a reduction in emissions and an improvement in ambient air quality. Section 4.4 demonstrates that the Proposed Project would not have an adverse economic impact on surrounding communities. 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 property values or quality of life.
153.28	[Kit Raven] ....and that real estate prices will then accordingly fall.	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.
153.29	[Kit Raven] We have a number of historic structures, from farmhouses to government buildings. Thriving, not noise beleaguered, communities are necessary to preserve them.	The Proposed Project will not affect economic vitality of surrounding communities and, therefore, will not affect the ability of these communities to protect historic resources.
153.30	[rcody939@comcast] ...extending the runway to increase the number of flights will effect the quality of life, environment in [Southern] New Jersey communities...	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.
153.31	[Joseph Kurpis] Our property values 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. Is it unlikely that there would be an impact on property values.

Comment Number	Comment	Response
153.32	<p>[Brian Clark] The use of the average DNL figure for assessment of the impact of aircraft noise is inappropriate and deceptive. For example, the results for Swarthmore, PA indicate only modest increases in noise, from 44.2 to 46-47.7 dB, depending on which alternative is chosen. Thus, I might be lulled into a sense of comfort that the proposed runway extension might not have much impact on my quality of life. However, the real effect of aircraft flights on my quality of life results not from any average noise level, but from single events.</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>
153.33	<p>[Brian Clark] By comparing the current and projected % of takeoffs on Runway 35 to the current and projected numbers of annual flight operations, I realize that the NUMBER of takeoffs on Runway 35 is projected to increase to 333% to 391% of current takeoffs, depending on whether Alternative 1 or 2 is chosen. If the proportion of flights taking off from Runway 35 that turn left to headings of ~300 degrees remains constant, I anticipate that the number of extremely noisy aircraft passing overhead in Swarthmore will increase by a similar amount. This increase in frequency of sleep-ending takeoffs is unacceptable, and the situation will only be worsened by a change in the fleet composition to include more Boeing 737's using the 17-35 runway.</p>	<p>Though operations will clearly increase over Swarthmore, the commentor has overemphasized the amount of the increase by failing to acknowledge that a significant portion of the change is projected to occur even under the No-Action Alternative. A more correct comparison is that in 2007, takeoffs will increase 115 percent to 135 percent over the No-Action Alternative, depending on which of the Build Alternatives is implemented. In 2015, takeoffs will increase 134 percent to 183 percent over the No-Action Alternative, again depending on which Build Alternative is implemented. Alternative 2 is higher in each case; however, Alternative 1 has been selected as the Preferred Alternative.</p>
153.34	<p>[Brian Clark] I strenuously object to the use of average DNL noise levels in the draft EIS. I urge the FAA to revise the noise analysis in a way that heavily weights the noise disturbance due to single events.</p>	<p>The FAA uses DNL values as well as a variety of supplemental noise metrics to fully assess differences between the study alternatives.</p>
153.35	<p>[Matthew Dariano, Sr.] More air traffic would make unbearable plus I believe it would greatly effect our property values.</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. Is it unlikely that there would be an impact on property values.</p>
153.36	<p>[John Haigis] ...other alternatives have not been adequately considered...</p>	<p>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.</p>
153.37	<p>[John Haigis] ...the people of Delaware County need protection from the aerial assault of commercial jets. An expansion of 17/35 at this time is unwise, unnecessary, wasteful, and not in the best interest of the general public.</p>	<p>The FAA has noted and considered your comment.</p>
153.38	<p>[Jim Patrick] Taxpayer's money would be better spent creating a third runway parallel to Runways 9L-27R and 9R27L. Even better, expanding RW 8-26 would make more sense.</p>	<p>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 both the extension of Runway 8-26 and construction of a third runway parallel to 9L-27R and 9R-27L.</p>

Comment Number	Comment	Response
153.39	[Jim Patrick] The noise has increased significantly and has diminished our quality of life. Our family cannot speak to one another out in the yard without being drowned out by the bigger, lower-flying jets.	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.
153.40	[Jim Patrick] I am very concerned about the additional pollution my little 1-year-old daughter will have to breathe.	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).
153.41	[James Marshall] Data provided to the public are insufficient to permit inferring how baneful the effects from peak noise levels would be; mere statement of a year-round average decibel level is woefully inadequate.	<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 (L<sub>max</sub> 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>
153.42	[James Marshall] I already suffer from noisy overflights during very early morning hours; the proposed expansions would likely worsen the situation.	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.
153.43	[James Marshall] ...I believe that the no-change model is the most responsible one.	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. The No-Action Alternative would not reduce delay at PHL and would result in approximately 19 minutes of delay per operation by 2010. In addition, the No-Action Alternative would have higher emissions of air pollutants.
153.44	[Edward Kako] By the FAA's own admission, extending 17-35 would bring rather small benefits, hardly worth the cost to the airport's neighbors. Therefore, I urge the FAA to abandon its plans to extend 17-35 and put its time and money instead into other measures that will help to reduce delays and expand capacity. It is a fact that the airport will have to undergo a more dramatic expansion within the next decade or so. I believe that everyone concerned would be better served if the FAA moved forward on these larger-scale expansion plans -- in particular, the parallel plan that would place a new runway in a filled-in portion of the Delaware River, thereby keeping the bulk of air traffic over the river and away from residential areas.	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. This 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 exploring methods to address delays.



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Comments via Web Site

Comment Number	Comment	Response
153.45	[Edward Kako] If, however, the FAA feels it must go ahead with an extension of 17-35, I would urge the Agency to opt for Alternative 1, which would have a decidedly smaller impact on air traffic over Delaware County.	The FAA has selected Alternative 1 as its preferred alternative.
153.46	[Meredith Drexel] Having recently purchased a home, currently being constructed within the Township of West Deptford, New Jersey, we would like to strongly voice our opposition to this Extension Project. It will undoubtedly infringe upon the lifestyles of the people who have come to live in harmony with the airport.	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.
153.47	[Bill Walsh] ...I am writing to voice my opposition to the 17-35 runway project.	The FAA has noted and considered your comment.
153.48	[Bill Walsh] Several news articles have mentioned alternative runway plans which would have considerably less impact on the surrounding, populated areas. We would suggest that these alternatives be more closely examined before approving the current plan. Any alternative that would lessen local impact would have to be an improvement.	The alternative runway plans that the commentor is mentioning might refer to the parallel and diagonal plans that are among 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. The Runway 17-35 Extension Project is aimed at reducing delay in the short term and is independent of the CEP.
153.49	[Bill Walsh] Does that mean that, had the tanker currently leaking in the river been a mile or so closer to the airport, all air traffic would have been stopped since Friday???? That would be a transportation nightmare. Since the proposed extension will be closer to the water, I must presume that even more air traffic will have to be stopped for oil tankers passing the airport.	If a ship were disabled in the channel on centerline with Runway 17-35, and if the height of that ship posed a hazard to aircraft operations, use of the runway would be temporarily discontinued.
153.50	[Dawn Patrick] I believe that the taxpayer's money would be better spent creating a third runway parallel to Runways 9L-27R and 9R27L. The best plan would be to expand RW 8-26. These two solutions would be better for the environment and for the thousands of people affected in West Deptford and the surrounding communities.	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 both the extension of Runway 8-26 and construction of a third runway parallel to 9L-27R and 9R-27L.
153.51	[Dawn Patrick] I am especially considered for the health and safety of my 1-year old daughter and the many children in my neighborhood that are affected by the noise and pollution from the extra air traffic.	The Proposed Project will not increase aircraft operations. The 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 Tables 4.5-7 and 4.5-12 of this EIS, and DEIS Appendix H of the Air Quality Technical Report).
153.52	[James Stuhltrager] ...the EIS fails to adequately assess the noise and pollution impacts of the proposed operation of Runway 35. The EIS projects that expansion of Runway 35 will result in a large increase in departures from Runway 35. In addition, the type of aircraft that will utilize the lengthened runway, including narrowbody jets such as the Boeing 737, are noisier and produce more air pollution than the turboprop aircraft that are the runway's current predominant users. The noise and air pollution resulting from the increased use and aircraft size will impact communities that have never been subject to such stressors.	The operational changes cited in the comment are included in the modeling of the noise and air quality analyses conducted as part of this EIS. The fact that the projected changes in noise are not as large as the commentor appears to anticipate is because various tradeoffs occur that help keep the noise from increasing as much as it might otherwise. For example, operations will continue to grow whether or not one of the Build Alternatives is implemented; Runways 9L-27R and 9R-27L will continue to handle the large majority of the traffic; aircraft on Runway 17-35 will begin their takeoff from the extended pavement and be slightly higher over the communities than they are now; landings will utilize displaced thresholds; and some aircraft types will shift off of 17-35 while others are shifted onto it. It is the sum of these factors that is reflected in the analyses of the various study alternatives.

Comment Number	Comment	Response
153.53	[James Stuhltrager] ...there is inadequate information to evaluate how the FAA determined that the noise resulting from expansion and use of Runway 35 will have only a minimal impact on communities in Delaware County.	The methods and procedures used to assess the potential noise impact of the Proposed Action are well-documented in both this EIS and the DEIS Appendix A.1 Noise Technical Report.
153.54	[James Stuhltrager] The FAA does not have any monitoring data from points in the Glenolden/Homes/Folsom area. The FAA must implement monitoring in this area before issuing a final EIS.	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.
153.55	[James Stuhltrager] ...the FAA inappropriately looks at a 24-hour average when determining impact, but it does not evaluate the substantial short-term impact of the noise and pollution from departing flights.	<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>
153.56	[James Stuhltrager] ...the EIS utterly fails to address any homeland security aspects of the proposed Extension Project. The Department of Homeland Security has identified the terrorist use of Man-Portable Air Defense Systems against airliners as primary threat to homeland security. Yet, the EIS does not examine the increased risk to both the larger airliners that will depart from the extended Runway 35 and to the communities under their flight path. The final EIS must examine this potential threat and identify an adequate solution.	The extension of Runway 17-35 does not change the number or type of aircraft that use PHL nor will it require any change in Homeland Security procedures.
153.57	[James Stuhltrager] ...the EIS is inadequate because it does not include a "cost-benefit" analysis of the Expansion Project.	NEPA documents are not required to present a cost-benefit analysis. FAA will consider the cost-benefit ratio in its decision on funding the proposed project, but this is not part of the analysis of environmental effects required by NEPA.
153.58	[William Smith] [E]xtending [17-35] is a band aid, it will not [solve] the problems at hand[.] [PHL] needs another 11,000 ft runway so [don't] spend money on [17-35] unless [you're] planning on a major project to extend it another 4,000ft or its time for a better idea....the noise here during the day and evening [is] awful with the small commuter aircraft they start landing the larger jets on [17-35][.] [!] for one will file a lawsuit...enough is enough!	The purpose of the project is to reduce delay at PHL in the short term. The No-Action Alternative would not reduce delay at PHL and would result in approximately 19 minutes of delay per operation by 2010. The FAA considers an airport with average delay in excess of 5 minutes to be congested. 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. CEP may include a parallel runway.



# Attachments to DEIS Responses to Comments

**Attachment #1: Responds to Comment # 19.4 [68.196]****2003 Existing Condition Ground Times \* by Aircraft Type**

Aircraft ID	Aircraft	Arrivals			Departures		
		Operations	Total Time	Average	Operations	Total Time	Average
717	717-200	14	1:35:48	0:06:51	14	4:01:26	0:17:15
727	727 Series	7	0:39:01	0:05:34	6	1:00:18	0:10:03
747	747 Series	1	0:03:59	0:03:59	0	0:00:00	
757	757 Series	40	3:11:13	0:04:47	26	8:48:59	0:20:21
767	767 Series	10	0:50:08	0:05:01	13	4:30:48	0:20:50
777	777-200	1	0:03:55	0:03:55	1	0:12:24	0:12:24
737200/300	737-200/300 Series	62	5:03:46	0:04:54	61	19:46:44	0:19:27
737400/500	737-400/500 Series	41	3:39:46	0:05:22	41	12:04:33	0:17:40
737700/800	737-700/800 Series	10	1:17:51	0:07:47	11	3:07:15	0:17:01
A300	A300 Series	2	0:08:57	0:04:28	2	0:19:42	0:09:51
A319/320/321	A319/320/321 Series	94	8:03:39	0:05:09	87	29:04:01	0:20:03
A330/340	A330/340 Series	7	0:39:01	0:05:34	9	4:13:33	0:28:10
BJ	Various Business Jets	65	7:04:14	0:06:32	78	12:41:23	0:09:46
CRJ	Canadair RJ	48	6:52:53	0:08:36	44	13:03:04	0:17:48
DC10	DC10 Series	0	0:00:00		2	0:40:27	0:20:14
DC8	DC8	6	0:29:29	0:04:55	0	0:00:00	
DC9	DC9 Series	12	1:38:39	0:08:13	12	3:20:34	0:16:43
DRJ	Dornier RJ	8	0:48:08	0:06:01	8	1:38:02	0:12:15
ERJ3	Embraer 135 Series	10	1:13:18	0:07:20	7	1:39:14	0:14:11
ERJ4	Embraer 145 Series	28	2:34:08	0:05:30	28	9:37:19	0:20:37
F100	F100	4	0:16:12	0:04:03	4	1:44:38	0:26:10
GA MEL	GA Multi-engine Prop	12	1:03:06	0:05:16	6	0:57:37	0:09:36
GA SEL	GA Single-engine Prop	2	0:13:17	0:06:38	1	0:08:52	0:08:52
MD11	MD11 Series	0			0		
MD80	MD80 Series	14	1:13:50	0:05:16	15	4:05:25	0:16:22
TP	Turbo Props	148	13:28:57	0:05:28	147	30:03:17	0:12:16
Total		646	62:13:16	0:05:47	623	166:49:37	0:16:04

\*Times given in hours:minutes:seconds (0:00:00).

Annual Weighted Average Taxi/Idle Time for the 2003 Existing Conditions:

- 1) Average Arrivals Times = 5 minutes, 47 seconds = 5.78 minutes
- 2) Average Departures Time = 16 minutes, 4 seconds = 16.07 minutes
- 3) Overall Airport-wide Average Time = 5.78 + 16.07 = 21.85 minutes

**Attachment #2: Responds to Comment #58.1 [96.415]; #93.2 [78.301]; #91.2 [25.34];  
and, #153.6 [161.807]**

**Altitude (in feet)**

<b>Distance from Current Runway End</b>	<b>No-Action Alternative</b>	<b>Alternative 1</b>	<b>Alternative 2</b>
Runway 17:			
8 miles	2,275	34' lower	34' lower
4 miles	1,168	34' lower	34' lower
2 miles	614	34' lower	34' lower
Runway 35:			
8 miles	2,275	21' lower	55' higher
4 miles	1,168	21' lower	55' higher
2 miles	614	21' lower	55' higher

**Attachment #3: Responds to Comment #119.1 [126.660]**

The potential noises impact of the alternatives under consideration for the Proposed Project 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, and further stipulates that the FAA-approved models, such as INM, must be used to evaluate aviation noise impacts. Various input data are required to accurately model existing and future aircraft noise exposure levels in the study area using the INM. Such input data include:

- aircraft noise and performance data;
- runway orientations;
- runway lengths;
- runway end elevations;
- start-of-takeoff-roll points on each runway;
- landing touchdown points on each runway;
- runway threshold crossing heights;
- runway approach slopes;
- annual average temperature, pressure, relative humidity;
- number of aircraft operations;
- aircraft fleet mix;
- day-night split of operations;
- runway utilization; and
- flight track geometry and utilization.

## Attachment #3: Responds to Comment #119.1 [126.660] (Con'd)

## 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
MEDIA BORO	45.2	45.7	45.5	46.1	-0.2	0.3	47.4	-0.3	0.0

## Attachment #3: Responds to Comment #119.1 [126.660] (Con'd)

## 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...							
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

## Attachment #3: Responds to Comment #119.1 [126.660] (Con'd)

## 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...		Average					
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
LOGAN TWP	45.7	60.8	50.6	49.6	-0.2	-0.2	50.9	-0.1	-0.2



## Attachment #3: Responds to Comment #119.1 [126.660] (Con'd)

## 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...							
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
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

**Attachment #3: Responds to Comment #119.1 [126.660] (Con'd)****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...							
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