

New York/New Jersey/Philadelphia Metropolitan Area Airspace Redesign Project

SCOPING REPORT

Environmental Impact Statement March 2002

Federal Aviation Administration *Eastern Region*



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1.0 SUMMARY OF SCOPING AND SCOPING COMMENTS

In accordance with the National Environmental Policy Act (NEPA) and regulations set forth by the Council on Environmental Quality (CEQ), the Federal Aviation Administration (FAA) implemented a scoping process that encourages and facilitates public involvement early in the airspace redesign process. Individuals and agencies were invited to express their views and concerns in regard to proposed airspace redesign by either submitting written comments to the FAA or by participating in scoping meetings that were held in various locations throughout the study area.

The objectives of the scoping process and associated public meetings are:

- To provide a description of the proposed action to interested parties and participants of the Environmental Impact Statement (EIS) process;
- To provide an early and open process to determine the scope of issues to be addressed in the EIS;
- To identify potentially significant issues or impacts related to the proposed action that should be analyzed in the EIS;
- To identify any coordination efforts associated with the proposed action that are outside Federal requirements; and
- To identify and eliminate from detailed study those issues that are not deemed significant to the study.

All comments collected during the scoping process will be documented and studied during the development of the Draft EIS document that will be publicly available for comment.

The formal scoping period for the Airspace Redesign Project was January 22 through June 29, 2001. The scoping process consisted of 28 public meetings and three agency meetings held in various locations throughout the five-state study area. The following sections will discuss the background, meeting locations, meeting logistics and comments received during the scoping process.

1.1 BACKGROUND

On January 22, 2001, the FAA Eastern Region published a Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS) in the Federal Register. The NOI stated that the EIS would assess the potential environmental impacts resulting from the proposed modifications to air traffic routings in the metropolitan New York/New Jersey and Philadelphia area. This area includes Newark International Airport, John F. Kennedy (JFK) International Airport, LaGuardia Airport, and Philadelphia International Airport, as well as several regional and general aviation-use airports. The NOI provided readers a standard mail and electronic mail address to submit scoping comments. The

NOI also included an announcement of the FAA's intentions to conduct public scoping meetings; a web site address and toll free number was provided to obtain schedule, meeting locations, and other pertinent scoping information. The NOI was published on January 18, 2001, in the following newspapers: *New York Daily News, Newsday, The Advocate* (CT), *The Journal News* (NY), *Newark Star Ledger, Philadelphia Daily News, El Diario* (Spanish) and *The Village Voice* (NY).

In addition, the NOI announced that three meetings would be held for Federal, state and local agencies in Manhattan, NY, Philadelphia, PA and Trenton, NJ. The Federal, state and local agencies with offices or regulatory interests [faal]in the study area were sent letters identifying the agency meeting locations and times and requesting comments for the scoping process.

1.2 SCOPING MEETING LOCATIONS AND PARTICIPATION

Twenty-eight public scoping meetings were held throughout the Airspace Redesign Project's five-state study area. In addition to the website and the toll free number, a newsletter that listed the meeting dates and locations was sent to approximately 2000 individuals, including agencies and public officials, and names of people who had attended pre-scoping meetings in 1999-2000. Each meeting was also publicized in a variety of advertisement media including major and local newspapers, radio, and cable TV. The dates and locations of the scoping meetings are listed in **Table 1.0**, as well as the numbers of comments received.

Each scoping meeting began at 7:00 pm and ended at 9:00 pm. Attendees were encouraged to register at a registration table set up at the entrance to the meeting rooms. Following the registration, at 7:15 pm, the FAA Airspace Redesign Project Manager provided an introduction and slide show presentation of the Airspace Redesign Project. At 7:30 pm, the meeting attendees were directed to an open forum display room, which contained Airspace Redesign, environmental, and computer modeling displays and stations. FAA representatives were available in the display room to discuss the specific concerns or questions of attendees one-on-one. At 8:30 pm, the attendees returned to the presentation room for a group question and answer session. A four-person panel facilitated the question and answer session. The panel included an FAA airspace redesign professional; an FAA environmental professional; a noise modeling engineer; and a NEPA/environmental impact process professional.

Throughout the duration of the scoping meetings, a court recorder was available to record individual comments and an area was set up to allow the public to write down comments.

Appendix A contains maps that depict the general residential locations of participants who attended scoping meetings.

Table 1.0: Scoping Meeting Summary

	Location	Date	Number of Attendees	Number of Oral Comments	Number of Written Comments
1	Danbury, CT	7-Feb	7	0	2
2	Kingston, NY	8-Feb	33	1	4
3	White Plains, NY	12-Feb	20	4	3
4	Stamford, CT	13-Feb	17	8	1
5	New Rochelle, NY	14-Feb	1	0	0
6	Newark, NJ	6-Mar	7	0	1
7	Carteret, NJ	7-Mar	11	1	1
8	Edison, NJ	8-Mar	13	3	4
9	Clifton, NJ	12-Mar	4	0	3
10	Hasbrouck Hts, NJ	13-Mar	53	5	11
11	Park Slope, Brooklyn, NY	14-Mar	18	3	2
12	Springfield, NJ	20-Mar	59	12	14
13	Somerville, NJ	21-Mar	18	3	3
14	Parsippany, NJ	26-Mar	105	9	31
15	Jersey City, NJ	27-Mar	4	0	0
16	Tottenville/Staten Isl., NY	28-Mar	7	0	0
17	Uniondale, NY	3-Apr	20	4	1
18	Lawrence, NY	4-Apr	90	13	17
19	Elmhurst/Queens, NY	5-Apr	33	5	1
20	NW Staten Isl., NY	24-Apr	25	2	4
21	Manhattan, NY	25-Apr	14	5	2
22	Bronx, NY	26-Apr	3	0	0
23	Glen Mills, PA	14-May	38	9	8
24	Toms River, NJ	15-May	19	3	5
25	Tinton Falls, NJ	16-May	63	8	27
26	Talleyville, DE	22-May	248	27	72
27	Philadelphia, PA	23-May	8	2	2
28	Trenton, NJ	24-May	93	11	30
	TOTAL		1031	138	249

1.3 SCOPING COMMENTS

Agencies, public officials and the public were asked to send in comments via postal mail or electronic mail or to provide comments during scoping meetings during the time period of January 22, 2001 through June 29, 2001. At the scoping meetings, a total of 387 comments, 138 oral and 249 written, were received. Other comments were mailed separately. Comments were received from the public, from public officials and from Federal, state and local agencies.

Each comment received was entered into the FAA project database. Once entered into the database, each comment was reviewed and assigned one or more specific general category keywords. It is important to understand that some comments could contain several issues and therefore be assigned several keywords, while others might only address one issue and thus be assigned one keyword. Individual keywords were developed based on comments received from the public during the scoping process. This categorization process provided a means to group similar issues together based on comment content. An environmental team then queried each keyword in the database, reviewed and analyzed each comment received and summarized their findings in the sections that follow. All comments received will guide the FAA in its development of the analyses to be conducted in the EIS.

1.4 PUBLIC COMMENTS BY GENERAL CATEGORY

There were 901 comments received from the public. As can be seen from **Table 1.0**, 387 of those comments were received during the scoping meetings. The others were received via mail or e-mail. Figure **1.0** shows the breakdown of the specific issues that resulted from the comments received. As stated above, each comment could contain several issues and would be broken down based on each keyword assigned.

For each keyword that follows, after the issues are summarized, a paragraph entitled "EIS Analysis" provides an indication of how the FAA will be considering the concerns in the EIS analyses.

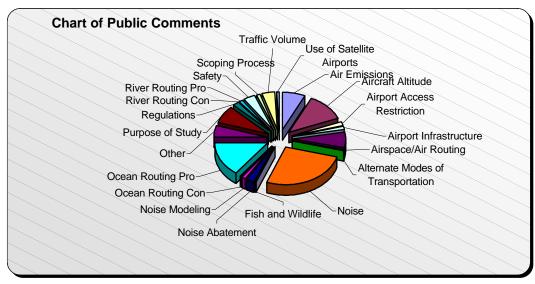


Figure 1.0: Public Comment Summary

Aircraft Altitude

About one third of all comments received during the scoping process concerned aircraft altitudes in the study area. The majority of these comments recommended moving aircraft to higher altitudes both in the arrival and departure phases of flight.

This concern was not only limited to residents living close to airports; it was also shared by residents as far away as 30-40 miles west of Newark airport in New Jersey, as well as residents in the Catskills mountains area, approximately 60-70 miles north of New York City. For example, the following organizations expressed a concern about the altitudes of air traffic in the Ulster County, New York, area: Ulsterites Fight Overflight, Inc., Palisades Interstate Park Commission and the Catskill Center for Conservation and Development.

A large number of comments from residents of northern New Jersey recommended raising the altitudes of all metro traffic to reduce the layering of aircraft. Some residents requested a return to the pre-Expanded East Coast Plan routings and altitudes. New York residents in and around Brooklyn and the LaGuardia/JFK airport areas also expressed concern over the aircraft altitudes currently being used.

Some residents expressed a concern that aircraft approaching Teterboro Airport's Runway 19 are too low while flying over Hackensack Hospital; other Teterboro area residents would like the FAA to try to keep Newark traffic at a higher altitude longer so that Teterboro departures can climb out over the East Rutherford area.

Some residents also observed_[faa2] that smaller local airport traffic is held _[faa3]at a specific altitude to make room for the metro traffic flow, which residents believe adds to low altitude-induced noise impact.

A large number of comments were received during meetings held in the vicinity of Philadelphia International Airport. Residents living west of that airport would like to see aircraft arriving to Runway 9 restricted to higher altitudes than those currently flown and would also like to see aircraft fly a steeper glide slope on approach to Runway 9.

The main point expressed by the public in all of the meetings is to keep arriving planes at higher altitudes longer and get departing planes to higher altitudes faster. This issue is considered noteworthy due to the widespread regional nature of the input by the public during the scoping process.

EIS Analysis: As a part of the alternatives development, the airspace redesign team will consider ways to raise aircraft altitudes for both arrivals and departures throughout the study area. These considerations will be included in the Alternatives and Environmental Consequences chapters of the EIS.

Air Emissions

Many of the scoping comments listed air emissions from aircraft as a concern that should be addressed during the Airspace Redesign Project and EIS development. The majority of the comments concerning air emissions were generated from the following areas: northern New Jersey (including areas west of Newark airport and along the northern New Jersey shoreline), areas surrounding JFK airport in New York and areas surrounding both Wilmington (DE) and Philadelphia airports.

The health effects on humans resulting from exposure to aircraft emissions were the primary concerns addressed throughout the study area; asthma and cancer were listed as the major health concerns that the public would like to see analyzed in greater detail. A secondary concern dealt with dirt films and residue deposits on external house furniture and siding that residents associate with aircraft emissions. These concerns were reported mostly from residents living close to major airports in the study area. Some of the mitigating suggestions included limits on the volume of air traffic, pushing for tighter regulations of aircraft engine emission restrictions and redirecting air traffic over less populated areas.

EIS Analysis: It is neither within the FAA's regulatory authority nor expertise to carry out a health-effects type study of air quality in the study area for this EIS. However, the required air quality analysis will be done.

Airport Access Restrictions

The majority of comments in this general category propose the implementation of nighttime curfews for the major airports in the study area. Most correspondence focused on Teterboro airport with respect to limiting both numbers and types of aircraft

(i.e., all large commercial, cargo, or corporate jet operations. There were requests for restrictions on Stage 2 aircraft that have been fitted with "Hush-Kits."

One person expressed that if hubbing is required, hubs should be in areas that are free of congestion and not in the midst of the most densely congested airspace in the world.

EIS Analysis: The EIS will describe the purpose and need for the Airspace Redesign Project. It will also provide a discussion of the alternatives to be examined in detail in the study as well as those eliminated from further study.

Airport Infrastructure

Expansion of airports was the main concern within the "airport infrastructure" keyword category. The majority of the comments were from Pennington and Ewing, NJ and Newton and Yardley, PA. The comments were against the expansion of the Trenton-Mercer Airport. Commentors were concerned about the increase in noise and air pollution that may occur if commercial air traffic increases at this airport. Other airports that commentors do not want expanded are: Solberg Airport, NJ, Teterboro Airport, NJ, and Philadelphia International Airport, PA.

Some commentors suggested the building of additional runways at existing airports. In particular, it was suggested that adding an additional north-south runway at the Philadelphia International Airport would help alleviate some of the noise pollution for the residents of the Brandywine area west of the airport.

EIS Analysis: Generally, airport infrastructure issues are the prerogative of the airport operators. However, any projected changes will be discussed in the Environmental Consequences chapter of the EIS.

Airspace/Air Routing:

Several suggestions regarding airspace or air routings are included in this section. Some were made by pilots, while other were observations made by members of the public regarding overflights of certain communities.

A summary of some pilots' comments follows:

Private pilots requested more direct routings, especially in the New York area.
 Some existing routes takes pilots over long routes that add significantly to their flying time and expenses. Depending on winds, some of these longer routes may make it necessary to stop en route for additional fuel. Some private pilots found long over water portions of routes undesirable.

- Typical route clearances should be published and available to Flight Service Stations and all air traffic control facilities so they could be issued as "canned" clearances.
- Route characteristics should be specified--altitude, airspeed, aircraft type, climb/descent profile.
- Air traffic control communications should be minimized by eliminating multi-step climbs and descents, avoiding multiple handoffs (traffic through several approach and departure controls), and limiting in-flight amendments.
- Current routings should be revised to keep aircraft higher and descend them faster.
- One glider pilot requested that the FAA provide consideration for glider pilots in the area of Wurtsboro Airport, NY. He suggested that a modest routing change could improve conditions for a number of gliders in the area.
- Aircraft arrivals and departures at Newark International Airport should use waterways, industrial, and vacant lands where possible rather than departing over heavily populated residential areas at low altitude. Eliminating the need to cross Newark arrival paths would also be beneficial.

The following suggestions were made regarding general aviation. The general sentiment of these comments was to make sure general aviation is properly recognized in the study area and to factor general aviation into the redesign.

- Recommend higher altitude climbouts for general aviation airports. For example, a current problem for Allaire airport (BLM) is that westbound jet traffic is held low for 50 to 100 miles before climb-to-cruise is permitted, which wastes fuel. Any Instrument Flight Rule (IFR) traffic from BLM north or northeast bound receives routings, which route the traffic far west of the metro area.
- Provide reasonable corridors through the airspace for Visual Flight Rule (VFR) traffic. For instance, the Hudson River corridor is excellent, but narrow and low considering the amount of traffic that has to use it. More corridors are needed to serve the general aviation VFR community.
- Cross from the New Jersey shore to Long Island with reasonable, safe altitudes.
- Develop a better north-south VFR corridor under or through (6000-10,000 feet) the class B airspace with a minimum 1500-foot ceiling over New York Bay.
- Recommend that New York Center should be the single controlling air traffic agency of all of the airspace in the New York metropolitan area.
- Recommend no expansion of the current Class B airspace.

The following suggestions were made regarding several of the concepts proposed during scoping (ocean routing concept; four-cornerpost concept; etc.):

• Implement tracks over geography where there is little residential development and little probability of complaint, using ocean routing or any other geography that has little residential development.

- Develop maps to show population densities and areas of complaint. Attempts should be made to use areas such as ocean routings, bays, rivers, railroad rights-ofway and major highways, and other buffers such as industrial development and natural vegetative barriers.
- Use modern new aircraft and new technology procedures with the four-cornerpost concept, to "keep them hot and keep them high." Bring approaching aircraft high into limited places at the top of the box and require steep descent paths, gradually using the arteries identified by the process. Likewise, departures should use maximum performance climbs along similar corridors.
- If the four-cornerpost concept is selected, use it with steep corridors for commercial traffic and identify other areas and paths for other aircraft to transit the area.
- Airports and airlines should eliminate climb and power reductions required for noise abatement.

The following suggestions were made regarding northern New Jersey traffic flows:

- Some citizens residing in northern New Jersey suggested either moving aircraft completely out of this area of the state or moving as much flow as possible over industrial, water or less populated areas. The majority of these commentors live within 25 miles of Newark International Airport in northern New Jersey.
- Specific areas mentioned for rerouting included: the meadowlands area, industrial areas along the Hudson River and over the Hudson River. While the majority of the comments concerned jet aircraft, there was some concern regarding helicopters.
- Some people also recommended dispersion as a possible solution or rerouting of aircraft based on time of day.
- In addition, one person recommended using the Solberg Mitigation Proposal as defined in the Expanded East Coast Plan EIS. (The Solberg Mitigation proposal was implemented in the 1990's as a result of the Expanded East Coast Plan EIS.)

The following suggestions were made regarding airport-specific terminal area traffic flows (i.e., the area within about a five to ten mile radius of each airport):

- Rerouting of traffic flows in the vicinity of specific airports was identified as a
 major issue during the public scoping process. One of the airports identified was
 Philadelphia International Airport. The majority of comments received came from
 participants who lived 20 miles or less from the Philadelphia airport area, primarily
 west of the airport. Specific recommendations from that Philadelphia area included:
 - Varying the approach paths based on specific days of the week.
 - Moving the approach paths over less densely populated areas.
 - Moving approach paths away from the Brandywine area and the northern Wilmington areas in Delaware.
 - Using more approach fixes into the airport.
 - Using dispersion techniques.

• A large number of residents living close to JFK International Airport, NY, made the following comment, which is also included in the Noise Abatement section. Residents of the South Ozone Park area believe they would benefit if the FAA would direct all aircraft using the Canarsie Approach to JFK to remain south of the strobe lead-in lights along North Conduit Avenue. They assume this would help reduce the noise problem for those residents who believe that planes stray north over Aqueduct Racetrack and fly over their residential community. By keeping south of the lights, the aircraft would approach JFK over vacant land and the noise would not impact residential areas.

General recommendations for other area airports (Westchester County Airport in White Plains, NY, Trenton Mercer Airport, NJ, Teterboro, NJ, and Morristown, NJ) included:

- Moving routes over industrial areas.
- Moving routes over the I-95 corridor or other highways.
- Dispersing traffic--either takeoffs or landings.
- Moving traffic away from the HAARP intersection in the vicinity of Westchester County Airport, NY.
- Rerouting Instrument Landing System (ILS) 19 approach path into Teterboro.

EIS Analysis: Piloting concerns will be considered by the airspace redesign team as they develop the airspace alternatives. These issues will be discussed in the Alternatives chapter of the EIS. Air traffic influences on noise-sensitive sites also will be considered in the airspace team's development of alternatives as well as in the modeling of aircraft for noise impact analysis. The results of the analyses will be discussed in both the Alternatives chapter and in the Environmental Consequences chapter of the EIS.

Alternate Modes of Transportation

Some commentors recommended the use of high-speed rail. Others stated the opinion that any airspace design done in isolation of other forms of transportation would be simplistic and inaccurate at best. Also high-speed rail transportation was suggested from New York City to JFK as a way to cut down on the flights in and out of LaGuardia.

EIS Analysis: Alternate modes of transportation will be discussed in the Alternatives chapter of the EIS.

Fish and Wildlife

Three comments were received on fish and wildlife. They are as follows:

- Somerset, NJ: concern that the migratory flight path of the Canada geese is not affected by noise, air pollution or by fuel being dispensed improperly due to an emergency.
- Florham Park, NJ: concern that the Morristown Airport may be cutting down trees as well as destroying birds, deer and other living things.
- Wilmington, DE: concern that noise pollution from low flying planes may negatively impact over 100 species of birds as well as other animals that migrate or live in the Brandywine Creek State Park.

<u>EIS Analysis</u>: The concern regarding tree cutting is outside the scope of this project, and would normally be handled by the local airport management. Regarding the Airspace Redesign Project, the FAA will be consulting with the U.S. Fish and Wildlife Service, along with state agencies, regarding potential fish and wildlife impacts from the project. The results of this consultation will be described in the Environmental Consequences chapter of the EIS.

Noise Abatement/Terminal Routing

Suggestions under this topic can be grouped into 2 primary groups: (1) terminal area (within 5-10 mile radius of control tower) air traffic procedures or routing restrictions; and (2) noise abatement measures such as land acquisition, sound proofing, or enginequieting technologies.

Several commentors recommended dispersion of terminal traffic, both arrivals and departures, as goals that the airspace project designers should address. There was a recommendation that FAA use population density maps to aid in the development of new routing structures. Recommendations for traffic departing out of the LaGuardia and Philadelphia areas included eliminating the limitations on full throttle takeoffs in order to reach higher altitudes in shorter distances.

The following is a brief summary of suggestions made by the public for changes to noise abatement terminal flight procedures at specific airports or unique noise-sensitive areas:

Morristown Airport: Investigate implementing Runway 23 noise abatement procedures that have been under consideration by the Morristown Airport Operations Manger, and supported by Quieter Environment Through Sound Thinking (QUEST), a non-profit organization made up of local citizens surrounding the airport. This procedure would route aircraft departing off Runway 23 over less populated areas south of the airport.

Newark International Airport: A recommendation was made that Newark Runway 4 departures should take an immediate right turn and proceed down the Hudson River, over the Verrazano Bridge and then continue with the proposed ocean routing concept.

JFK International Airport:

- The Inwood Civic Association recommended turning Runway 13 traffic at JFK to an immediate 180 heading.
- South Ozone Park recommended that on the approaches to JFK Runways 13L/R, the FAA should ensure that aircraft remain south of the Shore Parkway and strobe leadin lights to avoid drifting over the Aqueduct Raceway and residential areas.

Philadelphia International Airport: A suggestion was made to modify current noise abatement takeoff procedures to restrict departing aircraft from turning on course off of the Delaware River. It also recommended requiring an altitude higher than 3,000 feet before turning on course.

Noise-Sensitive Areas: Finally, several unique noise-sensitive areas were identified by the public during scoping. The public comments recommend either minimizing or reducing air traffic over these areas. The following is the list that was identified as of particular interest to the public:

- Fire Island National Seashore, NY
- Great Swamp National Wildlife Refuge, NJ
- Morristown National Historic Park, NJ
- Jockey Hollow National Park, Morris County, NJ
- Catskill Park, including movement of the TALCO intersection to the east over the Hudson River, NY
- Fairmount Historic District, Pottersville, NJ
- Minnewaska State Park Preserve and other protected areas of the Shawangunk Ridge, spanning Ulster, Orange, and Sullivan Counties of New York State.
- Historic districts in the towns of Ardencroft, DE and Lower Makefield, PA--both districts listed on the National Register of Historic Places.

Regarding noise abatement measures such as land acquisition, sound proofing, or engine-quieting technologies, in general, several commentors recommended charging special fees to airline passengers, in the form of passenger facility fees, and the airlines to produce revenue that can be directly used on noise abatement solutions. Further recommendations included using more FAA-administered Airport Improvement Program (AIP) and Port Authority of New York and New Jersey funds towards noise abatement, including home sound proofing and land acquisitions. Lastly, interest was also expressed in development of new technologies to reduce noise levels at the source (i.e., engine-noise reductions).

EIS Analysis: The FAA will evaluate the appropriateness of modifications to air traffic operations in the terminal environment as well as to existing noise abatement procedures at specific airports. These issues will be discussed in the Alternatives and Environmental Consequences chapters of the EIS.

Noise Modeling

Noise modeling comments centered on the FAA-approved noise metric that is used to describe aviation related noise impacts. The FAA uses the cumulative metric of daynight average sound level (DNL or L_{dn}) as the standard metric in evaluating aviation noise impacts. Several comments suggested including additional single event metrics such as: maximum sound level (L_{max}); sound exposure level (SEL); and time above threshold (TA), expressed in minutes. The concern was expressed that more emphasis should be placed on single events and not on averaging event levels. There was also a recommendation to lower the 65 DNL threshold of significant impact down to 55 DNL. The use of both the "A" and "C" weighting factors was also recommended.

The suggestion was made that the FAA should provide a better explanation of noise metrics, because these metrics, including the decibel level, dB, don't generally mean anything to the average person who is trying to understand noise impacts. One suggestion recommended that noise be described in terms of relative loudness to known sources or against the current environment when comparing alternatives. Comments suggested using terms like "1.5 times as loud as the current levels" as an example of a relative noise metric.

Issues raised regarding the Noise Impact Routing System (NIRS) model, which is the accepted noise model for regional FAA studies included: the lack of validation of the NIRS model; NIRS should factor in background noise levels into its calculations; and NIRS predictions should be based on annoyance levels that in turn would be derived from background noise levels. Some members of the public believe that lower background noise levels along with associated small changes may result in greater annoyance when they occur in relatively quiet rural settings, as opposed to urban environments with higher background noise levels.

Finally, supplemental noise measurements were recommended to verify the model predictions.

<u>EIS Analysis</u>: The FAA will be using the NIRS model and the DNL metric as the basis of its analysis and decisions on the impacts of noise in the overall study area. Other metrics, such as single event metrics, may possibly be used. However, if used, the metrics other than the DNL will be presented for information only. A noise measurement analysis will be conducted. Noise measurements will be provided for information only. These issues will be discussed in the noise section of the Environmental Consequences chapter of the EIS.

Noise Pollution

The majority of all comments received during scoping indicated that noise pollution was a concern. It was not only considered the primary issue because of the large

number of people who commented, but also because of the vast geographic area that was represented by the persons who provided the comments. Noise generated by jet aircraft represented the majority of the concerns, although people living in areas in and around Manhattan expressed concern over helicopter-generated noise. The majority of the remainder of the keywords used to summarize the scoping comments is also directly or indirectly related to noise reduction. They provide additional details describing the public's recommendations on how to reduce noise in the project area. Figure 1.0 graphically depicts the significance of noise impacts to the public.

<u>EIS Analysis</u>: A comprehensive analysis of the Airspace Redesign Project's aircraft noise impacts will be conducted and noise will be discussed in the Environmental Consequences chapter of the EIS.

Ocean Routing—Con (Opposed)

The majority of the comments against ocean routing for Newark International Airport were from the Monmouth County area. This area already has JFK International Airport traffic overhead and the commentors were concerned that the additional Newark air traffic will add to their already existing air and noise pollution.

A resident of Carteret, NJ, commented that ocean routing would move more noise and air traffic congestion over someone else's home by providing noise relief for the western part of Middlesex County, Somerset County, Union County, Warren County and Morris County, while the eastern part of Middlesex, Monmouth, Ocean counties along with the southern part of New Jersey and the western part of Staten Island would get the full force and burden of the air traffic associated with this concept.

EIS Analysis: Ocean routing is one of the alternatives whose impacts will be evaluated as part of the Airspace Redesign Project. It will be discussed in the Alternatives and Environmental Consequences chapters of the EIS.

Ocean Routing—Pro (In Favor)[faa4]

Many public comments received were in favor of the ocean routing concept. Several were a general call to route air traffic over the ocean and/or water whenever possible. However the vast majority of the comments are in support of the specific ocean routing concept that New Jersey Citizens for Environmental Research (NJCER), New Jersey Citizens Against Aircraft Noise (NJCAAN), and many northern New Jersey residents have been advocating as a meaningful way to provide permanent noise relief to the residents of northern New Jersey. This routing concept generally puts the departures from Newark and JFK over the Atlantic Ocean before they are turned back over the New Jersey shoreline further south.

Many of the comments in favor of ocean routing also suggested the use of user fees to be assessed to the airlines and/or the passengers to help defray the additional expenses that ocean routing may cause to the airlines.

EIS Analysis: Ocean routing is one of the alternatives whose impacts will be evaluated as part of the Airspace Redesign Project. It will be discussed in the Alternatives and Environmental Consequences chapters of the EIS.

Purpose of Study

Many scoping comments from New Jersey addressed the issue of the purpose of the Airspace Redesign Project. These residents feel that the primary goal of the Redesign Project should be noise reduction.

The Counsel for NJCER stated that the FAA promoted the redesign of the New York/New Jersey airspace as the only avenue that could achieve meaningful and long-term noise impacts suffered by hundreds of New Jersey residents since the adoption of the Expanded East Coast Plan in 1987. Thus, his organization believes that a third objective of the Airspace Redesign must be to seek to reduce the current noise impacts on residential communities and minimize future impacts as a result of the projected increase in operations.

The Counsel for NJCAAN, requested on behalf of NJCAAN, that the FAA state explicitly that a major purpose of the Airspace Redesign Project is to configure the airspace in an environmentally sensitive manner and reduce noise from aircraft.

Additional comments on the purpose of study were received from the South Ozone Park and Howard Beach areas of New York. These residents are impacted by JFK flight traffic. These residents requested that mitigating the negative impacts of noise and other pollutants on communities surrounding the airport should be the primary focus and easing flight delays the secondary goal of the Airspace Redesign Project.

<u>EIS Analysis</u>: The EIS will provide a thorough discussion of the purpose and need for the proposed Airspace Redesign Project. It will also include a comprehensive noise analysis of any potential route/altitude changes, using the FAA's Noise Impact Routing System (NIRS), which is the standard noise model for analyzing airspace changes over a wide geographic area containing multiple airports.

Regulations

The comments concerning regulations focused on effecting noise reduction at the source (i.e., engines). Commentors suggested putting more emphasis on development of newer, less polluting, quieter engines, including working with NASA's Aeronautical Research Division. Some comments recommended mandating that all aircraft meet

quieter Stage 4 requirements, especially those aircraft operating out of the major airports in the study area. In addition to moving to Stage 4 regulations, residents located close to Teterboro Airport also recommended banning all Stage 2 aircraft regardless of overall gross weight. It was also recommended that Stage 2 aircraft fitted with a "Hush Kit" be phased out of operation.

Returning to pre-"Aviation Investment and Reform Act for the 21st Century" (AIR-21) operational limits at LaGuardia, as well as giving the Federal government more control over airport traffic counts in the metro region was also recommended. There were also comments suggesting the use of regulations to provide incentives for airlines to use quieter aircraft. These would include the following: preferred routing, preferred takeoff and landing slots, fewer night time restrictions and reduced landing fees.

<u>EIS Analysis</u>: It should be noted that the International Civil Aviation Organization (ICAO) recently issued new Stage 4 aircraft recommendations for newly certified manufactured aircraft. ICAO made no recommendations regarding phase out of Stage 3 or Stage 2-Hush-kitted aircraft. The United States government supports the ICAO's new Stage 4 recommendations. Currently the U.S. has no plans to phase out Stage 3 or Stage 2-Hush-kitted aircraft. While these issues are generally handled on a national and even international level, the extent to which they may be implemented for this project will be discussed in the Alternatives chapter of the EIS.

River Routing—Con (Opposed)

A comment from Wilmington, DE, was concerned about the environmental impacts to the Delaware watershed from airspace redesign. The comment suggested that careful studies be done on the impact of over water routing to the water and natural resources, as well as the impact on the air quality standards for ozone and other polluting emissions.

<u>EIS Analysis</u>: The FAA will explore whether or not the Delaware River routing concept can become a viable alternative. The Alternatives chapter of the EIS will explain the reasons for its inclusion or elimination as an alternative.

River Routing—Pro (In Favor)

Many comments from areas west of Philadelphia International Airport, including Wilmington, DE, and the Brandywine areas of DE and PA suggested having air traffic fly over the Delaware River on approach to the Philadelphia International Airport. The commentors believed that they would be safer if aircraft were using the river approach rather than flying over residential areas and it would lessen the noise impact specifically to the Brandywine area west of Philadelphia International Airport.

<u>EIS Analysis</u>: The FAA will explore whether or not the Delaware River routing concept can be used under certain conditions. The Alternatives chapter of the EIS will explain the reasons for its inclusion or elimination as an alternative.

Area Navigation (RNAV)/New Technology

Commentors suggested that [faa6] advanced area navigation (RNAV) technologies, such as global positioning system (GPS) or flight management system (FMS), be used to spread out arriving and departing aircraft in both the New York/New Jersey and Philadelphia areas. The premise was not to concentrate traffic on a particular route, but to build more routes to spread traffic over a larger area. Recommendations were also made to develop and use more FMS waypoints as part of the airspace redesign.

EIS Analysis: The airspace redesign team will be examining ways to use new technologies as part of alternatives development. The resolution of the issue will be discussed in the Alternatives chapter of the EIS.

Safety

Safety of persons and residences on the ground from air traffic was a concern expressed throughout the five-state study area. The comments were very consistent from state to state. Safety concerns included:

- Current increases in air traffic volume.
- Potential future increases in air traffic volume.
- Low altitudes of aircraft over heavily populated areas.

Many comments recommended that aircraft be routed over a body of water and fly at higher altitudes. New Jersey residents suggested that ocean routing, using higher altitudes from Newark International Airport, would make the ground area safer from a potential catastrophic event. In Delaware, the suggestion was made to bring the planes into Philadelphia International Airport at higher altitudes and over unpopulated areas such as the Delaware River.

One commentor was concerned about the safety of Teterboro Airport. This commentor, who believes that the runway is too short for corporate and commercial jets, is afraid that if these jets abort a landing or takeoff they would crash in a heavily populated area. The commentor suggested moving passenger and freight jet traffic from Teterboro Airport to Newark, JFK or LaGuardia.

<u>EIS Analysis</u>: Safety is the FAA's number one priority. It will remain the FAA airspace redesign team's highest priority in its development of airspace redesign alternatives, which will be discussed in the Alternatives chapter of the EIS. However, the FAA, through the EIS process, will also conduct a thorough evaluation of the

airspace redesign's effects on the people and the environment in the study area. The FAA's EIS will consider over 20 categories of environmental impacts, including, among others, the following: noise, air quality, land use considerations, historic properties, park/recreational lands and wildlife refuges.

Scoping Process

Comments concerning the scoping process itself suggested that more explanation of the layout of the meeting was needed. It was also suggested that the display presentations be given to large groups because some people had problems hearing presenters. Some commentors also expressed that the displays did not show enough detail and information on the noise problem for their specific locations. Concerns were noted that the information presented on the alternatives did not allow the public to clearly understand the alternatives enough to make comments, and, therefore, the impression was that the scoping phase of the project is premature. The notification process of the meetings was also questioned.

Other comments were received that complemented the scoping process, particularly the direct one-on-one sessions with FAA representatives.

EIS Analysis: The scoping phase of the EIS is complete. All comments have been thoroughly analyzed by the FAA and will assist in the development of the EIS. This Scoping Summary Report is available to the public on the FAA website (http://www.faa.gov/programs/airspace.htm).

Traffic Volume

General comments concerning air traffic volumes included:

- There are too many flights for the designated airspace;
- Redesign to further increase air traffic is unacceptable;
- Reduce air traffic volume to pre-1987 levels;
- Reduce traffic to pre-AIR-21 levels;
- Only fly aircraft at 98% or greater passenger capacity;
- Traffic volume increases will create further delays (example: recent increase in LaGuardia flights and resultant delays);
- Reduce traffic volumes by using rail as an alternate for short distance trips;
- Moderate the number of flights scheduled at peak hours and in bad weather;
- Limit corporate and private aircraft operations.

Some specific geographic-area concerns cited were:

- If British Airport Authority (BAA) takes over operations of the New York airports, they may add a significant number of additional flights, many of which may be added in the early morning and late night hours.
- It was claimed that flights had increased substantially over the V-157 airway, such as over the HAARP intersection, and as such it was requested that volume of aircraft flying on this path either be reduced or dispersed.
- Reduce flights over Katonah-Bedford area in New York and redirect over other airspace. Redirect East-West cargo flights as well as single engine aircraft.

EIS Analysis: The FAA will be designing the airspace to accommodate current and future needs. This will be discussed in detail in the Purpose/Need and Alternatives chapters of the EIS.

Use of Satellite Airports

Comments were made concerning the use of satellite airports. One comment from Trenton, NJ, and one from Staten Island, NY, suggested moving some of the air traffic from the major airports to the Atlantic City Airport due to the reduced population density and close proximity to the Atlantic Ocean, both of which favor reducing noise impacts. A comment from Wilmington, DE, suggested moving the cargo flights from the Philadelphia International Airport to a coastal airport. One comment from Long Valley, NJ, suggested using the Lakehurst Naval Air Station for freight operations.

Comments from Valley Stream and Woodmere, NY, suggested the use of Calverton Airport to alleviate the congestion at JFK. It was also suggested that private planes be diverted from JFK and sent to Farmingdale Airport.

A large majority of the comments on the use of satellite airports suggested the building of another airport in less congested areas to alleviate the heavy burden on existing airports. One such area suggested was the north shore of Long Island. Another comment suggested building a Regional Airport located near the Spencer/Candor area south of Ithaca, NY. Commentors also recommended the use of high-speed rail to link satellite airports with the major cities.

EIS Analysis: The EIS will describe the purpose and need for the Airspace Redesign Project. It will also discuss the alternatives to be examined in detail in the study as well as those eliminated from further study. Alternative modes of transportation, changes in airport use, and other alternatives will be evaluated to determine the extent that they may be able to meet the purposes and needs of the project. Building airports, such as one suggested for the Spencer/Candor area of NY is outside the study area and beyond the scope of the FAA's mission in this Airspace Redesign Project. All these factors will be discussed in detail in the Purpose/Need and Alternatives chapters of the EIS.

1.5 PUBLIC OFFICIALS COMMENTS BY GENERAL CATEGORY

There were 107 comments received from Federal, state and local elected or appointed public officials. These comments were analyzed for specific issues and assigned appropriate keywords similar to the general public comments. An explanation of how the FAA will be using the comments in its preparation of the EIS has been provided under each keyword in the "EIS Analysis" portion of Section 1.4, above, and, therefore, will not be repeated under the keywords below, which are the same.

Chart of Elected Officials Comments Use of Satellite Airports Traffic Volume Air Emissions Scoping Process-Aircraft Altitude Safety Airport Access Regulations Restriction Purpose of Study Airport Infrastructure Airspace/Air Routing Other Alternate Modes of Transportation Ocean Routing Pro-Ocean Routing Con Noise Modeling-Noise Abatement

Figure 2.0 shows the breakdown of the comments by keyword.

Figure 2.0: Elected Officials Summary

Aircraft Altitude

Fifty-two officials commented on aircraft using higher altitudes while enroute or during arrival and takeoff. Aircraft climbing higher faster would help mitigate noise effects for communities close to airports. It was suggested that minimum altitudes for flight paths should be based on noise levels of individual aircraft. Low altitude flying raised concerns of safety, increased noise and air pollution. Officials from Manhattan requested that helicopters fly at least 2000 feet or higher, and that other aircraft fly even higher. Higher altitudes were requested for aircraft over the Catskills as well.

The Town of Greenwich submitted recommendations from a company called Geospec Inc. Geospec is an aviation consultancy company that was commissioned by neighborhood associations in Greenwich, CT, and Westchester County, NY, to study aircraft impacting the area. Its recommendations included the following:

- Increase the altitude of LaGuardia arrivals via the Carmel VOR to 5,000 feet mean sea level (MSL) or above.
- Cancel the LaGuardia VORDME or GPS-E Instrument Approach Procedures.
- Revise the LaGuardia VORDME or GPS-G DP's to coincide with the LaGuardia LDA final approach course
- Implement the Westchester County Airport Runway 34 FMS Instrument Approach Procedure as soon as practicable. (Note this was accomplished by the issuance on January 25, 200l of the RNAV (GPS) Runway 34 Approach.)
- Modify the New York Class B airspace by raising the 3,000-foot MSL floor to 4,000 feet MSL between the LaGuardia 14 nautical mile ring and the LaGuardia 20 nautical mile ring, from the north shore of Long Island to the east shore of the Hudson River.

Air Emissions

Fifteen elected officials commented about aircraft emissions. A number of city officials adjoining Teterboro Airport commented about air pollution. Several mayors in towns located within 8 miles of JFK International Airport commented about low flying aircraft, soot deposits on automobiles and houses, and the heavy smell of jet fuel in the area. Community Board leaders from Manhattan also expressed concern about air pollution, noting that there was a high level of respiratory disease prevalent in the local population. Councilwoman Marlene Verrastro, Hasbrouck Heights, NJ, believed that fuel was being dumped from aircraft flying into Teterboro Airport.

Airport Access Restrictions

Seven officials suggested some sort of airport access restrictions. These included night curfews (from 11:00 pm to 7:00 am) at Newark and LaGuardia airports and opposition to lifting of any weight restrictions at Teterboro Airport (this would prevent the Boeing Business Jet from using that airport).

Airspace/Air Routing

U.S. Congressman Vito Fosella, 13th District, New York, recommended a straight-out departure takeoff pattern from Newark International Airport to help relieve the excessive noise from aircraft over Staten Island. He pointed out that a four-day test on the straight-out departure by the FAA in 1980 found that it:

- Provided a safer and more direct route for the aircraft;
- Decreased air traffic controller workload;
- Significantly increased fuel efficiency for a multi-million savings to airlines;
- Increased airspace for LaGuardia Airport;
- Reduced delays and saved thousands of hours of passenger and crew time, and;
- Had no increased noise impact on surrounding communities.

New York State Senator Marty Markowitz, 20th District, commented that he would like to see routes made to lessen the impacts of overflights in the communities around Prospect Park, including Park Slope, in Brooklyn, NY. These areas experience overflights when the LaGuardia Runways 4, 22 and 31 are in use.

Eric Nelson, Chair, Manhattan Community Board 7, requested that flights be routed away from the West Side residences and routed over the water or industrial areas. Assemblyman Scott Stringer, 67th District, New York State Assembly, requested that aircraft fly over commercial areas of New York City. New York State Senator Thomas Duane, 27th District, also requested that planes be directed to use other pathways over less densely populated areas rather than the West Side of Manhattan.

Mayor Robert Lewis, Village of Garden City, NY, requested that only predetermined safe approach routes be permitted and that such routes be developed with the input and approval of the Village residents, including the Village officials, affected by the takeoff and landing operations at the New York airports and Newark International Airport.

Other comments from elected officials requested that other options be looked at instead of the four-cornerpost concept. It was their opinion that this concept would spread additional noise throughout Central and Eastern New Jersey.

Alternate Modes of Transportation

U.S. Congressman Jerrold Nadler, 8th District, New York, and original co-sponsor of HR 2329, the High-Speed Rail Investment Act of 2001 introduced on June 27, 2001, noted that this bill would provide \$12 billion over the next 10 years to develop high-speed rail transportation in regional corridors. He felt that the use of airplanes for short distance trips could thus be mitigated by use of high-speed rail as an alternative. This alternate form of transport could reduce the number of aircraft flying in and out of the New York/New Jersey/Philadelphia airspace and ensure safer flights with fewer delays. Assemblyman Stringer, New York State Assembly and a representative of the Office of the Mayor of Middletown, NJ supported Congressman Nadler's views.

Noise Abatement

Mayor Susan Schlaff, Woodsburgh, NY, a village of approximately 900 residents, located 3 miles southeast of JFK claimed that pilots rarely followed a tower letter instructing pilots and tower personnel to follow noise abatement procedures in choosing runways from 11:00 pm to 7:00 am.

Noise Modeling

Forty-eight elected officials, all from the State of New Jersey, submitted comments concerning noise evaluation procedures and metrics. Many recommended that each of the alternatives proposed in the EIS should be evaluated using several noise metrics in addition to the accepted standard day-night average noise level (DNL) metric. The additional metrics suggested include: Equivalent Sound Level (L_{eq}); Maximum Sound Level (L_{max}); Time Above dBA Threshold (TA) (the number of minutes that sound is above a certain level of dBA), which is used as an indicator of speech interference; and Sound Exposure Level (SEL), used as an indicator of sleep disturbance. These metrics were suggested to provide a more detailed picture of the resulting aircraft noise so that all stakeholders may properly review each alternative.

Noise Pollution

There were 89 comments about noise. Aircraft noise was noted as affecting quality of life, mental and physical health, and community economic standards.

Commentors recommended the redesign include: making noise reduction a primary goal of the Airspace Redesign Project; using a variety of metrics in addition to the established DNL in the noise evaluation; using quieter aircraft; following noise abatement procedures; changing routes; flying at higher altitudes; reducing volume of aircraft; using ocean routing; and alternate forms of transportation.

There were suggestions that FAA should provide noise level information to the public in a comparative form as well as determine standards of measurement for health effects. It was noted that in Europe there was a move to limit noise level pollution by aircraft and it was suggested that the U.S. similarly recognize there is a problem and take action to minimize disruptive aircraft noise impacts on the population.

Ocean Routing—Con (Opposed)

Seven elected officials from the State of New Jersey opposed ocean routing as an alternative. Their objections included the following:

- Ocean routing will move the noise impacts from one part of the state to another;
- Noise and safety were concerns in the Raritan Bay and the Coastal counties of Monmouth, Middlesex, Ocean and Atlantic;
- Additional miles would be added to flights to the west;
- Ocean routing would result in increased flight times and fuel consumption.

Congressman Fosella (New York) criticized ocean routing as unsafe. Congressman Fosella claimed that the FAA rejected the over-the-ocean routing plan in 1995 after five years of study. He believed that the ocean routing proposal should be immediately removed from consideration without further study and that no additional time or money should be spent on it.

Ocean Routing—Pro (In Favor)

Of the 70 comments suggesting ocean routing as a means of alleviating aircraft noise, 67 were from officials in the State of New Jersey. All of these officials suggested that aircraft flying out of or into Newark International Airport use a route over the ocean while ascending or descending. Two comments from around Woodbridge suggested that ocean routing should steer well away from New Jersey's shore communities.

Congressman Nadler (New York) commented that ocean routing at LaGuardia could bring aircraft to a higher altitude benefiting Manhattan residents. New York State Senator Marty Markowitz recommended that aircraft fly over the waterways around New York City such as the Upper Bay or the Hudson River and thus reduce noise over land. Mayor Schlaff, Woodsburgh, NY, recommended more ocean routing of planes flying into JFK to possibly reduce noise in her community.

Other

Three officials objected to implementing the four-cornerpost concept on the basis that when a similar plan was implemented at Washington State's Seattle/Tacoma Airport, there were widespread noise complaints. One official supported the concept.

Assemblywoman Rose Heck, 38th Legislative District, New Jersey, suggested that the FAA be divided into two independent parts – one to address safety and well being of the public and the other to promote the airline industry. This person also wanted to know the status of air traffic control equipment and the workload of the controllers.

U.S. Congressman Rodney Frelinghuysen, 11th District, New Jersey, suggested that statistics of the number of incoming/outgoing flights of all the airports in the New York/New Jersey metro area should be included in the final analysis of the airspace redesign. Many of his constituents were concerned that FAA's "flights-per-day"

statistics do not reflect flights at smaller regional and municipal airports such as Morristown, NJ, Caldwell, NJ, Teterboro, NJ, Westchester County Airport, NY and others.

Mayor Schlaff, Woodsburgh, NY, suggested that the U.S. Environmental Protection Agency should be brought into the process to assess the situation.

Purpose of Study

Elected officials including Members of Congress, State Legislators from the States of New Jersey and New York, Assemblypersons, Mayors, and others requested that noise reduction should be one of the primary goals of the study. Assemblywoman Heck, New Jersey, suggested that noise reduction at Teterboro Airport should be considered as a primary objective.

Regulations

The Town of Greenwich Selectmen recommended that the FAA follow up on the independent consultant Geospec Inc.'s recommendations concerning changes to LaGuardia arrivals and departures.

Mayor Lewis, Village of Garden City, NY, recommended making regulations to accomplish the following:

- Prevent any pilot prerogative in landing approaches at LGA, JFK and Newark airports;
- Ensure all glide slope and marker beacons be installed and functioning at all times;
- Use only approach routes, directions and angles predetermined as safe and in compliance with noise abatement standards;
- Develop routes with input from local public and town/village authorities;
- Install the most current navigational technology in all commercial aircraft using the three airports.

Other suggestions for regulations included: regulating air traffic over New York City; keeping all aircraft, including helicopters, at the highest practical altitude; and initiating use of quieter aircraft, particularly during nighttime operations.

RNAV/New Technology

The supervisor from the Town of Woodstock, NY, suggested using new technologies to hush air carrier noise. The Park Slope liaison for New York State Senator Marty Markowitz recommended the use of RNAV systems to allow planes to stay at higher altitudes prior to landing.

Safety

Both Mayor Patricia Walsh, Township of Greenbrook, NJ, and Mayor Kate Sarles, Branchburg, NJ, noted that while safety should be addressed at Newark International Airport, increased aircraft noise impacting the quality of life of people in that neighborhood should not be ignored.

U.S. Congressman Frank Pallone, 6th District, New Jersey, stated that constituents in his district are concerned about aircraft noise and safety.

Councilwoman Verrastro, Hasbrouck Heights, NJ, opposes any increase in the size of aircraft at Teterboro Airport, brought up an accident in 1999 and expressed general concerns for safety at Teterboro.

U.S. Congressman Mike Ferguson, 7th District, New Jersey, noted that reducing congestion while improving safety was the paramount concern of the Airspace Redesign Project and would improve the quality of life of the people of New Jersey.

The Board of Chosen Freeholders of the County of Monmouth, NJ, concerned about ocean routing over Raritan Bay and the coast of Monmouth and Ocean Counties, noted that an earlier ocean routing proposal mentioned in the Expanded East Coast Plan had cited nine potential in-air conflicts throughout the State of New Jersey, three of which would be over or near Monmouth County. It was the Board's opinion that this would pose hazards to the residents and visitors of Monmouth County and, therefore, the Board strongly opposed the ocean routing concept.

Assemblywoman Heck, New Jersey, suggested that FAA be divided into two independent parts, one to address safety and well being of people and another to support the aircraft industry. She was also concerned about the path taken by planes on arrival to Teterboro Airport as they fly over Hackensack University Medical Center, which, in her opinion, put the hospital, its patients and staff at risk.

Mayor Lewis of Garden City, NY, a village located approximately 8 miles North of JFK and in the flight path of the approaches to Runways 22L and 22R, was concerned about low flying aircraft. He felt that aircraft descended at more than a three-degree glide slope, particularly during low visibility and crosswinds. He believed that controllers would release aircraft from using Instrument Flight Rules and advise them to fly manually. He expressed the following opinions regarding the condition when an aircraft is at low altitude with wheels down and low airspeed: (a) the pilot is more prone to visual disorientation; and (b) the aircraft is more vulnerable to wind shear, power loss, and most critically, a stall with no room for recovery. Concerned about this condition, Mayor Lewis suggested a number of regulations for landing practices, such as removing pilot prerogative in landing approaches to JFK, LaGuardia and Newark airports among others.

Congressman Fosella (New York) expressed concern about Newark's current takeoff procedures – where upon liftoff, aircraft turn 30 degrees left (190 degree heading), travel 2.3 nautical miles and then turn back to 220 degrees. It is his opinion that this "zigzagging" while trying to gain altitude was an unsafe maneuver. Congressman Fosella also wondered why the FAA would now study ocean routing as an alternative, when reports from previous years had claimed it as a potential hazard and documented failure. He recommended considering such concepts as fanning, straight out and left and right departures from Newark International Airport.

Scoping Process

The Chairman, Environmental Commission, Township of Randolph, requested that the FAA provide noise level information to the public in plain language. He felt that information provided at various meetings contained decibel (dB) data that was meaningless without a comparative explanation. He suggested that information about increases above a 65 dB average day/night noise level could have more clearly indicated that a 3 dB increase is equivalent to an approximate doubling of the noise level. Also, information about noise levels should have included examples of commonly recognized sources generating equivalent sound levels.

Traffic Volume

Four elected officials from the State of New Jersey noted that increased traffic volumes caused increases in noise levels. While some suggested reducing the number of aircraft flying in and out of the local airports, others suggested that a variety of routes be used to reduce noise impacts on particular sections of the communities living under the air routes.

Use of Satellite Airport

Assemblywoman Heck, New Jersey, suggested the use of Maguire Air Force Base as an alternate commercial airport to relieve congestion at Newark International Airport. Mayor Lewis, Garden City, NY, suggested transferring a significant number of flights from LaGuardia Airport to other regional airports.

1.6 FEDERAL, STATE, AND LOCAL AGENCY SCOPING MEETINGS COMMENTS

The FAA sent approximately 200 letters to Federal, state and local agencies with jurisdiction or special knowledge relative to the Airspace Redesign Project. These letters described the project and requested any pertinent comments from each agency. Also, the letters provided the date, time and location for the three agency scoping meetings that were held in Manhattan, NY, Philadelphia, PA, and Trenton, NJ. A total of seven agencies attended the agency scoping meetings and thirteen agencies sent in scoping comments. Their responses are summarized in **Table 2.0.**

Table 2.0: Agency Scoping Comments

Responding Agency	Comment	
Federal Government		
U.S. Fish & Wildlife Service	•	Enclosed a Pamphlet that lists the National Wildlife Refuges in the study area. Recommended measures to mitigate adverse impacts of the redesign on the terrestrial and aquatic ecosystems in the project area.
US Army Corps of Engineers	•	The redesign project will not have significant impacts to waters of US under jurisdiction of the Corps of Engineers.
Department of Navy	•	The redesign project will not have significant impacts on Department of Navy resources.
National Park Service, Fire Island National Seashore	•	Requested analysis of the impacts due to air traffic changes on Fire Island National Seashore including Pike High Dune Wilderness Area.
	•	Redesign should not impact adversely the breeding and nesting of endangered species
	•	Concerned with noise pollution on the visiting public. Requested a minimum of 2000-feet altitude restriction over park area.
State Government		
Donald T. DiFrancesco, State of New Jersey, Acting Governor	•	The FAA must consider noise relief on an equivalent weighting to operational efficiency and its commitment to such must be formalized as a stated purpose of the Redesign project. Commitment that the FAA study routing design concepts that offer an environmentally sound approach to permanent noise relief from aircraft noise, including ocean routing. The FAA give priority to the development of Stage 4 aircraft criteria and provide policy support to Congress to ensure the adoption of Stage 4 standards and compliance. Recognizing that this redesign is a regional effort, forethought must be given by the FAA to ensure coordination and cooperation
	•	across geographical boundaries and government entities before the final product is produced. Call upon FAA Administrator Jane F. Garvey and Transportation

Responding Agency	Comment			
	Secretary Norman Y. Mineta to do all within their power to expedite the redesign process.			
"Governors Group of Nine"	 Concerned with noise pollution over Monmouth County due to a traffic to and from JFK International Airport. 			
	 Against ocean routing as it would generate more noise over Monmouth County. 			
Connecticut, Dept. Of	Due to investigating complaints regarding increased traffic over			
Transportation, Bur. Of	the southern part of CT, CT DOT would like the opportunity to			
Aviation & Ports	provide their input during the preparation of the EIS, with specification to route locations and altitude designations.			
Connecticut Dept of	 Interested in impacts of noise pollution with changes in air 			
Environmental Protection	patterns and altitudes			
	 Identification of specific impact evaluation is limited due to undefined operational changes. 			
New Jersey Dept. of	Asked that the following considerations be included in the analysis:			
Transportation, Div. Of	Evaluate the impact of any major flight route changes on the			
Aeronautics	underlying general aviation airports and air traffic in the study area			
	 Evaluate impact of flight route changes on smaller air carrier 			
	airports in the region to ensure that those flights are not adversely			
	impacted and do not create additional noise on neighboring communities.			
	 Analyze noise impacts of displaced general aviation traffic. 			
	 Analyze the economic and time impacts on displaced general aviation traffic. 			
	 Consider implementing specific proposals for general aviation 			
	traffic to segregate them from the normally heavy air carrier aircraroutes.			
	• Ensure proper contact and coordination is made with the military			
	regarding operations in New Jersey, to insure that any adverse			
Now Youl State Dont of	impacts on the military operations are included in the analysis. Would like the following issues addressed:			
New York State Dept. of Environmental Conservation	Use lower pollution-emitting aircraft engines.			
Environmental Conservation	 Consider time-of-day landing fees, especially during ozone season. 			
	Convert group service equipment to either electrical or lower			
	emissions fuels, such as compressed natural gas and/or low sulfur			
	diesel, power systems.			
	 Increase use of passenger shuttle services for getting to and from the 			
	airports.			
	Introduce other measures to counteract and reduce overall			
	aircraft/airport emissions due to increased flights.			
Local Government				
Lawrence Public Schools	Changes to air route should reduce the disruptions that now exist			
	with noise pollution from large commercial aircraft over Lawrence			
	Public Schools and request more outreach to public schools.			

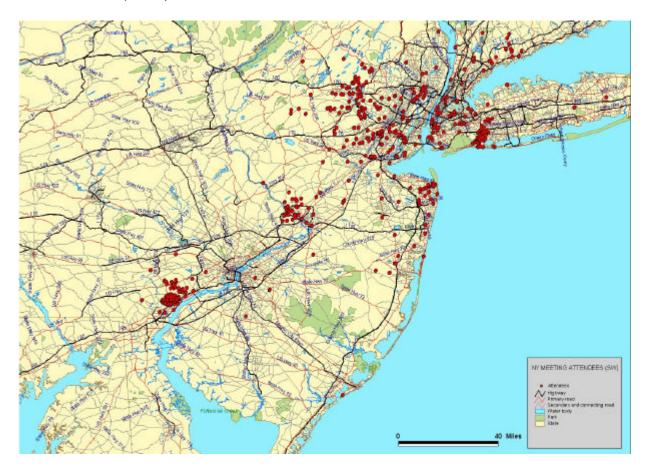
Responding Agency	Comment
Trenton Mercer Airport	 Request raising the altitude restriction that hampers Trenton takeoffs and impacts noise on local residents. Install an ILS for Runway 24 The airspace above Trenton is uncontrolled Class E airspace. To ensure safety of the airspace above, Mercer County requests reclassification of this airspace to controlled airspace.
Yonkers Planning Bureau	 Asks that Yonkers be treated equally with all the other communities within the region and Westchester County. DEIS needs to include local information about the current air traffic situation in order to evaluate the existing problems against the proposed alternatives. The city would like to assist in identifying the places where measurements should be taken so that the document is useful to their needs. The flight patterns should be spread across the region's geography by time-of-day and day-of-week in a way to minimize the impact upon any one community. Care needs to be taken when examining the impacts of the flight patterns that might be routed over southwest Yonkers due to it being an area of lower income and higher minority populations. Request training be held to learn how to identify aircraft and determine the altitude.

APPENDIX A



Northeast Scoping Meetings Attendees

APPENDIX A (Cont.)



Southeast Scoping Meeting Attendees