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Comments to the Federal Aviation Administration and the city of Chicago regarding the Preliminary Draft Purpose and Need and the Airport Layout Plan by Jack Saporito.

The following comments by ARECO are in addition to those submitted April 19, 2003 on our behalf by Mr. Ross Ruthenberg, an independent researcher.

The city of Chicago's plan for the expansion of O'Hare Airport regarding its Airport Layout Plan (full expansion plan) are flawed and segmented and a full Environmental Impact Statement is needed because of the devastating impacts that this unwise plan will have on the public and communities located even many miles from the airport. All effects (impacts) need to be fully and adequately eradicated to protect the health, safety and welfare of millions of people that live and work in those affected communities, as well as the passenger:

1. Commercial jet aviation is the least sustainable form of transportation.
2. The plan does not provide a sufficient environmental buffer from both noise and air pollution (including trigger effects) to adequately protect the health and welfare of millions of people and especially, children and seniors. An environmental buffer of a minimum of 25 miles is therefore needed.
3. The project does not provide the terminal, landside and support facilities needed. While many of those projects have been segmented and/or are in the construction phase or completed, many are still not feasible (e.g., World Gateway Program).
4. The plan will also increase safety problems by the planned layout, as recently indicated by Craig Burzych, President of the National Air Traffic Controllers Association at O'Hare¹. Safety is also compromised by the significant saturation of airspace.
5. The plan will not produced the planned outcome regarding Chicago's forecasts of at least 1.6 million landings and take-offs. Even the City's own contractor's studies (Ricondo and Associates assessment) show that the airport would have considerable delays and safety problems at around 1.1 million landings and take-offs. Bad weather delays and safety problems will be drastically exacerbated above 1.1 million landings and take-offs.
6. The modeling that was done to arrive at the projections of efficiency, capacity and delay reduction are likely not representative of actual conditions. The infusion of an additional 700,000 operations at O'Hare would overwhelm the Air Traffic Control system. Also where do the flights come from and where are they going to go?

¹ Daily Herald, *Not quite cleared for takeoff*, Feb. 16, 2003. See also, Mr. Burzych's letter to the editor.

7. The taxi patterns that are mentioned for ground traffic are lengthy and will add to ground delays. When ground delays are factored in, the average delay will increase. We are doubtful that the modeling for O'Hare expansion provided a credible assessment of ground delay.
8. We do not believe that Runways 14/32 will be closed in the future configurations. We believe that there will always be a demand for those runways and that there will be a significant reduction in capacity and efficiency if they were closed.
 - San Francisco originally said that they would close Runway 28L when they got their runways in the Bay approved, however; they now say that they may use it for departures. If they can use it for departures, they can use it for arrivals; hence, no change. We would expect the same to occur at O'Hare.
9. We believe that the close of two fully operational runways, which will be kept in satisfactory condition throughout the project time frame is a waste of resources. The closure would result in lost capacity and efficiency. We would expect the plan to change as the closure date nears.
10. The additional runways aligned as suggested may provide the ability to launch an untold number of aircraft, however; the rest of the air traffic control system will not be able to accept them. Also the system cannot provide the steady stream of arrivals to reach the maximum capacity of the airport. In other words, the claims are not representative of what the system can accommodate.
11. While this plan is touted to reduce bad weather delays by 95%. We have a hard time seeing any runway improvements that can make that type of improvement. Did you model capacity? If so, did you model the terminal airspace? Did you terminate the test flight as soon as airborne? Did you factor in the delays encountered in entering the national airspace system? Did you use SIMMOD? What is the baseline used? Has it been validated? Has the real time air traffic data been "played" against those baseline parameters? Please provide all data mentioned above.
12. Where are the arrival traffic patterns located in a total east-west configuration? Address where the departure traffic will fly and the number and types of aircraft.
13. What is the multiplier that is used to determine the contribution of O'Hare to the local economy? Many of the dollars generated by the airport remain at the airport or never reach the Chicago economy and are transferred immediately out of state. An actual dollar figure might be quite a bit lower.
14. The use of Gary Airport for large amounts of activity may not be efficient.
15. The plan and expansion is a huge waste of precious resources and the taxpayer and passenger's money. The economic situation that the airlines find themselves in, caused in part because of over-capacity (too many flights), is causing them to rethink their whole business strategy. United's proposals for their bankruptcy restructure should give some food for thought.
16. The projections of efficiency and capacity and delay reduction are in our opinion, grossly overstated and demand is overly optimistic.
17. Expansion of O'Hare and Chicago's plan is a waste of time, money and, a significant liability to the health, safety and welfare of millions of people who are directly affected by the airport and aircraft operations and, a hazard to the safety of the passengers. There are better options.
18. **Government reports show "Not to expand O'Hare"**. It will not provide for transportation needs and nor the decrease in delays needed or claimed (including peak periods and all weather delays that is also indicated in Chicago's own contractor findings, Ricondo and Associates).