



The Alliance of Residents Concerning O'Hare, Inc.

A Grass-Roots Not-for-Profit Corporation

PO Box 1702 ○ Arlington Heights, IL 60006-1702 ○ Fax: 847/506-0202 ○ Tel: 847/506-0670

"To achieve a balance between public health and the economy"

Ms. Annette Davis, AGL-520
Great Lakes Region
Air Traffic Division
2300 East Devon
Des Plaines, IL 60018

George W. Bush, President
The White House
1600 Pennsylvania Avenue, NW
Washington DC 20500

The Honorable Peter Fitzgerald
U.S. Senator
555 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Richard Durbin,
United States Senate
364 Russell Senate Office Building
Washington, DC 20510

The Honorable Henry Hyde
U.S. Congressman
2110 Rayburn Building, HOB
Washington, DC 20515-1306

The Honorable Mark Kirk
U.S. Congressman
1531 Longworth Office Building
Washington, DC 20515

The Honorable George Ryan,
Governor of Illinois
(Hand delivered)

The Honorable Wendell Jones
State Senator
110 W. Northwest Highway
Palatine, IL 60067

The Honorable Christie Whitman,
Administrator
U.S. Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

The Honorable Norman Mineta, Secretary
Department of Transportation
400 Seventh Street, SW
Washington, DC 20530

The Honorable Jane Garvey, Administrator
Federal Aviation Administration
800 Independence Avenue, SW
Washington, DC 20591

The Honorable John Ascroft,
Attorney General
United States Department of Justice
950 Pennsylvania Avenue
Washington, DC 20530

Chairperson
Council on Environmental Quality
722 Jackson Place, NW
Washington, DC 20503

The Renee Cipriano, Director
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, IL 62794-9276

The Honorable Cecelia L. Hunziker,
Regional Administrator
FAA Great Lakes Region
2300 East Devon Avenue
Des Plaines, IL 60018

The Honorable Thomas Skinner,
Regional Administrator
US-EPA Region 5
77 West Jackson Blvd.
Chicago, IL 60604

Mr. Kenneth A. Westlake, Chief, B-19J
Environmental Planning and Evaluation
US-EPA Region 5
77 West Jackson Blvd.
Chicago, IL 60604

Proud Recipient: 1995 Environmental Merit Award, Arlington Heights - 1996, '99 Illinois State Senate Recognition
Protecting the Health and Safety of Millions of O'Hare Affected Citizens

The terrible events of September 11, 2001 require the Federal Aviation Administration ("FAA") to reconsider all of its procedures and plans that were pending before that date, in terms of adequacy of security and adequacy of safety. The thousands of gallons of highly inflammable jet fuel on planes, used as it was on September 11, 2001, requires the FAA to add additional margins of safety into all aspects of aviation, not less. Because CTAP's changes would bring great increases in the density of flights into the same, finite amount of airspace, over a densely populated urban area, it can only result in an ultimately less safe aviation system. Thus, the FAA must change its entire expansion plans for O'Hare, changing over to finally providing people in this country who wish to travel the safer, cleaner, more secure, more efficient transportation they deserve – a world-class, nation-wide network of high-speed rail and other alternatives. This FEIS is inadequate because it does not address the changes needed since September 11, 2001. Therefore, this EIS must restart to determine whether CTAP is even "needed" anymore.

This FEIS is also inadequate because it fails to disclose and address the many aspects of the adverse public health and environmental impacts from aviation and/ or CTAP. The purposes of such an environmental endeavor by the federal government is to accurately, honestly, and fully describe a federal project in its whole and its complete impact in an informative manner for the public and other federal and state agencies. This document does not accomplish that purpose.

FEIS page B-308, Areco's questions, Areco template, p. 2:

3d paragraph: increase in operations -- agency's response of D-16, claiming operations will not increase as a result of CTAP's creating many more "arrival routes" into O'Hare, is belied by common sense, the Chicago "Delay" Task Force's written document proving that one goal of this CTAP proposal is to "increase airspace capacity," by the agency's own alternatives dismissal section of the FEIS, Ch. 2, which is replete with admissions that increasing capacity is the factor they are seeking, as well as the agency's response in D-32, page B-423, in which it admits expansion plans at O'Hare: "[f]lights could be added in the early morning that could serve eastbound markets. There is also the opportunity to add flights in the late evening to serve markets to the west."

Increase in operations presenting serious threat to human health -- agency's response of H-2, or its "paragraphs highlight[ing] aspects of CTAP with respect of the common quality of life issues," is plainly not even an attempt to seriously and adequately address the health impacts of the proposed action. Agency's conclusion in its Ch. IV and Appendix H, that CTAP will reduce emissions and noise pollution, is clearly incorrect as it fails to take into account the potential huge increase in flights at O'Hare by creating many more "arrival routes." See evidence cited above.

4th paragraph: "Anything which changes airspace that will and/or might add capacity will have a ground level impact because it needs a slot. Thus, an Environmental Impact Study needs to be done for O'Hare on the ground also." -- The agency has not responded to this request.

5th paragraph: comprehensive, baseline health study -- agency's response of N-4 is inadequate because the agency has not even performed adequate baseline water, air, ground, and noise pollution assessments and disclosures as some of the components of an evaluation of health and environmental impacts. We request that the appropriate, realistic, current baseline study be done for these as well as for the projected increase in the airports' usage from the additional landings and take-offs which CTAP's many additional arrival routes would allow.

FEIS page B-309, Areco's questions, Areco template, p. 3:

3d paragraph: increase in operations -- agency's response of D-16 and D-4, claiming operations will not increase as a result of CTAP's creating many more arrival routes into O'Hare, is belied by common sense, the Chicago "Delay" Task Force's written document proving that one goal of this CTAP proposal is to "increase airspace capacity," as well as by the agency's own alternatives dismissal section of the FEIS, Ch. 2, which is replete with admissions that increasing capacity is the factor they are seeking. We request that this be answered.

FEIS page B-310, Areco's questions, Areco template, p. 4:

1st paragraph: negative health impact from increase in operations -- agency's response of N-4 is inadequate because the agency has not even performed adequate water, air, ground, and noise pollution assessments and disclosures as some of the components of an evaluation of health and environmental impacts. The agency has not stated whether CTAP changes would cause further deterioration of public health and the environment from aviation.

2nd paragraph: increase in operations -- agency's response of D-17 and D-4, claiming operations will not increase as a result of CTAP's creating many more arrival routes into O'Hare, is belied by common sense, the Chicago "Delay" Task Force's written document proving that one goal of this CTAP proposal is to "increase airspace capacity," as well as by the agency's own alternatives dismissal section of the FEIS, Ch. 2, which is replete with admissions that increasing capacity is the factor they are seeking. Agency's statement that "CTAP would not increase the arrival acceptance rate of the airport and would not increase O'Hare capacity" is unsupported by the evidence that clearly shows CTAP would greatly increase the ability for O'Hare to accept flights. Moreover, acceptance "rate" is not at issue, but acceptance "capacity" is at issue.

Comprehensive health study -- agency's response of H-1 is plainly not even an attempt to seriously and adequately address the health impacts of the proposed action. Agency's conclusion in its Ch. IV and Appendix H, that CTAP will reduce emissions and noise pollution,

is clearly incorrect as it fails to take into account the potential huge increase in flights at O'Hare by the creation of many more "arrival routes" under CTAP.

3rd paragraph: reasonable alternatives are no action or alternative mass transportation such as high speed rail -- agency's response of C-4, as does its Ch. II, constitutes an inadequate, irresponsible, close to non-existent examination of reasonable alternatives to O'Hare expansion and ever-increasing numbers of aircraft, which are filled with circular "reasoning" and unsupported, conclusory statements. Agency's response fails to assess the U.S. transportation system as a whole, fails to assess which forms of mass transportation are safest, most efficient, least toxic, least harmful in its adverse effects to life on earth, and most sustainable, fails to study the well-known, primary cause of "delays" at O'Hare and elsewhere -- the airline corporations' over-scheduling of flights (e.g., 62 flights scheduled in one 15-minute block of time for one O'Hare runway last spring, with one take-off needing around one minute), and fails to adequately examine other methods of reducing "congestion" and delays such as re-instating the High Density Rule, outlawing over-scheduling, and other demand management controls.

FEIS page B-311, Areco's questions, Areco template, p. 5:

1st paragraph: request for analysis of possible results from CTAP changes -- agency's response of D-18 does not answer the request for disclosure of impacts under varying forecasts, but does contain admissions which controvert the agency's "conclusion" that the proposal has no significant environmental impact: "For Chicago O'Hare, the largest airport within the study area, it also represents the highest annual activity forecast. Thus, the results of the analysis are the most conservative from an environmental perspective." Inherent in calling use of the highest traffic forecast the most "conservative" is that the agency admits that the more traffic there is, the more environmental impacts, not less as it claims elsewhere. And adding many more arrival routes into O'Hare with no caps on the number of possible flights that could use those arrival routes, means, by definition, more traffic, and more environmental impacts. "Because the addition of a low or mid-range forecast would underestimate the potential environmental impacts of the proposed project, a range of forecast growth would serve no purpose." The agency admits here that the proposal has potential, significant, environmental impacts, yet disclaims it elsewhere in the FEIS. Thus, the agency has profoundly impeached its credibility, and a new, full EIS must be undertaken by an objective set of researchers. Further, the agency refers to cumulative impact response of "Section 4.24," (p. 4-63) which claims that there are no cumulative impacts of the proposal because CTAP is not connected to other actions, yet this is belied by the 1999 ACE Plan and other documents. See Areco comments at B-326-33.

Paragraph I A, B: number of flights in last five years and currently, and number of predicted and/or possible new, additional flights as a result of CTAP changes -- agency does not address request for number of additional flights as a result of CTAP in its response of D-19.

Paragraphs IC - G: delay analysis for existing and predicted, additional flights, request to disclose all plans that will increase number of possible flights at O'Hare, request for quantification of safety of current operations and for safety of operations with additional flights should CTAP changes occur -- agency's response of D-20 only addresses delay analysis for existing flights and predicted growth in flights. It does not address any of the following: delay analysis for the additional flights which will result from CTAP changes, request to disclose all plans that will increase number of possible flights at O'Hare, request for quantification of safety of current operations and for safety of operations with additional flights should CTAP changes occur. These are valid requests within the scope of any EIS, and need to be answered by the agency.

Paragraph III: identify current level of all air, water, ground, and noise pollution now generated by O'Hare, on and off airport grounds -- in the agency's response of F-21 (G-4 and N-4), it incorrectly claims that "a comprehensive public health assessment or environmental inventory is not within the scope of the CTAP project or the intent of the NEPA process." We disagree. How can the agency evaluate whether any significant environmental impacts would result, as NEPA requires, if it does not know what the current levels of pollution are? Further, the agency's Ch. III and IV are ultimately inaccurate because they fail to take into account the potential huge increase in flights from the many additional arrival routes into O'Hare which CTAP would create. Furthermore, health studies are required since they are environmental effects under the NEPA, a statute that is designed to protect human health and environment.

FEIS pages B-311-12, Areco's questions, Areco template, p. 5-6:

Paragraph V: noise pollution will increase with more flights and with larger aircraft -- agency's response of F-22 and F-23 is inadequate. In F-22 it states "[t]he comment refers to phase-out of Stage 2 aircraft." This comment does not refer to Stage 2 aircraft, but to noise pollution, which will increase, by definition, with increases in flights. The agency's response fails to objectively address aviation noise pollution.

The agency grossly underestimates the number of people (500,000) exposed to airport and aircraft noise in the United States. Among its protections for the aviation industry, the FAA uses the unscientific (65DNL) measurement to describe noise. This number severely undercounts the number of people whose health and quality of life is harmed by aviation noise pollution. Moreover, just using the air industry's unscientific, quantitative evidence demonstrates that well over 600,000 people are affected by the noise from one airport alone, Chicago's International O'Hare Airport. 600,000 people affected by the airport only represents a limited amount of communities that monitor in the Chicagoland area. It is estimated that over 1.6 million people are located in the 65 DNL of Chicago's O'Hare Airport. Yet, the FAA claims that they have substantially reduced the airport noise problem to "only 500,000 people"

who are "significantly impacted," mostly near the very largest airports in Chicago, New York, and New Jersey.

Averaging hides the true impact of noise on individuals. In 1993 a World Health Organization (WHO) report entitled "Community Noise" reviewed the international scientific evidence and found that noise gave rise to a large number of health problems. These ranged from insomnia, stress and mental disorders to heart and blood circulation problems and cardiac diseases. Some of these health effects (e.g. increased sensitivity to noise and annoyance) start when people are exposed to noise of around 50dB(A). Other effects, such as hearing pain and hearing impairment, require much higher levels.

The WHO report cited evidence from specific studies indicating clear evidence of health damage. The report said that environments with "heavy noise" (67-75 dB(A)) were characterized by "cardiac diseases, doctors calls and purchase of medicine more frequently than in quiet environments". The report found that noise also affects mental functioning: it reduces task performance and productivity.

The FAA has unjustifiably accepted the 65 dBA DNL as the standard for determining "significant" noise impact. In reality, substantial impacts occur to millions of people well below the 65 decibel level. The 65 DNL standard is inadequate for many reasons. From a scientific perspective, the 65 decibel level standard is supposed to correlate to individuals being "highly annoyed" by the noise level. But this is subjective, not scientific. The annoyance level between individuals differs greatly, and it is not responsible, nor fair, to apply the same arbitrary "highly annoyed" standard to everyone. Substantial impact occurs well before people become highly annoyed. Research has shown that "high annoyance" occurs around 57 decibels, not 65 (Journal of the Acoustical Society of America, Dec. 1998). The EPA had earlier identified 55 dBA DNL as a more appropriate noise level. But the 55 dBA DNL value remains inadequate for reasons that have more to do with the metrics, or noise descriptors, than a particular value. The DNL refers to a "day-night level" average.

Averages, however, do not adequately account for the real impacts of aircraft noise on individuals. Averages understate "single events" and it is these single loud noises as the airplanes fly overhead that can disrupt sleep, and adversely impact people's well-being. Being awakened at 3 a.m. or 6 a.m. and not getting a full night's sleep can negatively affect the individual's activities throughout the day -- at work, traveling, and at home. On October 2, 2001, the European Court of Human Rights ruled that the rumble of jets violated Heathrow Airport area residents' human rights by robbing them of a good night's sleep. The European Court of Human Rights decision is available at: <http://www.echr.coe.int/Eng/Judgments.html>, Hudoc reference: REF00002765: case of Hatton and others v. U.K, application # 0036022/97 (filed May 6, 1997). People in the U.S. deserve the same protection from nighttime flights, and we strongly urge the FAA to institute a ban on all such flights. Aviation noise impacts on

wildlife has been observed as disruptions to feeding and mating patterns. Loud "single noise events" also intrude on conversations, one's right to quiet enjoyment of their home, television viewing, reading, thinking, and speaking on the telephone. These single events rob people of a decent quality of life and potentially could have lasting health effects. Many communities restrict single noise events to 55-65 cBA in residential areas. The World Health Organization recommends maximum outdoor daytime/evening noise impacts of 50-55 dB Laeq and 30 dB Laeq (with a minimum number of peaks at 45 dB Lmax) in bedrooms.

The WHO cites the potential impact and health hazards of low frequency noise in their 1995 and 1999 community noise documents. The 1995 document calls into question the validity of "A" weighting: "... both in the laboratory and in the field, evidence has accumulated that A-weighting predicts the loudness and annoyance of community noise rather poorly." Using dBA or the "A" weighting scale does not adequately account for low frequency noise. The "A" weighting discounts low frequency noise (50 Hertz and below) by 30 to 70 or more decibels, depending on the frequency. Like all large machines, aviation noise spectra are substantial ... down to invasive vibrotactile frequencies below 20 Hertz. A standard that measures low frequencies using the "C" weighting is necessary to reflect the impact of low frequency noise. In the 1995 WHO document, it was logically proposed that when the difference between dBC and dBA is 10 dB or more, a penalty of 5 dBA should be added to the Leq of less than 60 dBA, and a penalty of 3 dBA for an Leq of 60 dBA or more. An important advantage of incorporating C weighting into the new standards is that almost all sound level meters have this weighting as a standard feature, in addition to the use of A weighting.

We strongly urge the FAA to adopt and enforce the WHO's current noise standards and guidelines for harmful aviation noise, which are based on much more current science than the out-dated standards which the FAA cites in its responses.

FEIS page B-312, Areco's questions, Areco template, p. 6:

Paragraph V.B. (a-e): realistic projections of noise contour -- agency's response of F-19 is inadequate. See our response at FEIS pages B-311-12, Areco's questions, Areco template, p. 5-6: paragraph V. Most credible, non-aviation industry noise experts, organizations, academic, and medical sources world-wide disagree with the experts whom the agency cites. The experts cited by the agency lack credibility because of their conflicts of interest created by their promotion of airport expansion activities. Nevertheless, internal FAA and NASA documents even agree that 55 DNL or below is the point at which noise is "safe."

Paragraph V.C.: inaudible low and high frequency sound waves emitted from aircraft cause real and serious damage to human health and structures -- agency's response of F-23 is inadequate. See our response at FEIS pages B-311-12, Areco's questions, Areco template, p. 5-6: paragraph V and FEIS page B-312, Areco's questions, Areco template, p. 6: Paragraph V.B. (a-e).

Paragraph V.C. (1-2) and D.: disclose noise impacts on human health and physical structures under existing conditions -- agency's response of F-24 is inadequate. See our response at FEIS pages B-311-12, Areco's questions, Areco template, p. 5-6: paragraph V and FEIS page B-312, Areco's questions, Areco template, p. 6: Paragraph V.B. (a-e).

FEIS page B-313, Areco's questions, Areco template, p. 7:

Paragraph V.D.: noise and vibrations from airport and aircraft operations cause detrimental effects on human health and children's ability to learn -- agency's response of F-23 is inadequate. See our response at FEIS pages B-311-12, Areco's questions, Areco template, p. 5-6: paragraph V and FEIS page B-312, Areco's questions, Areco template, p. 6: Paragraph V.B. (a-e). See also studies regarding noise and children's health on AReCO website at www.areco.org.

Paragraph V.D.(1-2) and V.E.: name harmful effects to human health and related medical and lost productivity costs -- agency's response of F-24 is inadequate. See our response at FEIS pages B-311-12, AReCO's questions, AReCO template, p. 5-6: paragraph V and FEIS page B-312, AReCO's questions, AReCO template, p. 6: Paragraph V.B. (a-e).

Paragraph V.G.: identify sleep disturbances and related effects caused by airport and aircraft operations: agency's response of F-25 is inadequate. The DNL metric does not adequately take into account the effects of noise on people. See our response at FEIS pages B-311-12, AReCO's questions, AReCO template, p. 5-6: paragraph V and FEIS page B-312, AReCO's questions, AReCO template, p. 6: Paragraph V.B. (a-e).

Paragraph V.H.: what will be changes on human health impacts and property from aviation-caused noise pollution should CTAP changes go into effect -- agency's response of F-5 is inadequate as the agency did not disclose the possible changes. See also our response at FEIS pages B-311-12, AReCO's questions, AReCO template, p. 5-6: paragraph V and FEIS page B-312, AReCO's questions, AReCO template, p. 6: Paragraph V.B. (a-e).

Paragraph V.H. Note: do not use the INM noise model without independent validation of all model input, and compare/show available monitoring data -- agency's response of F-4 is inadequate. The INM has many technological problems that are well documented. Dr. Fidell, who performed the INM review, did not validate equipment or raw data. Thus, this response is not adequate.

FEIS pages B-313-14, AReCO's questions, AReCO template, p. 7-8:

Paragraph VI.A. - C.: disclose impacts of airport and aircraft operations on property values, home ownership tenure, local government revenue, and social service needs -- agency's response of F-27, F-26, and J-2 are inadequate and disingenuous. Contrary to the agency's contention, determining airport operation effects on the value of real estate is not difficult.

According to one of FAA's own publications, the effect of noise on prices was highest in moderately priced and expensive neighborhoods. For two moderately priced "paired" neighborhoods north of LAX, the study found "an average 18.6 percent higher property value in the quiet neighborhood, or 1.33 percent per dB of additional quiet." "The Effect of Airport Noise on Housing Values: A Summary Report," 1994, by Booz-Allen & Hamilton, Inc., for the FAA. According to another of the FAA's studies, a one-decibel change in cumulative noise levels up or down, results in a corresponding inverse change in property values of 1.5 percent. So, using the 65-decibel average limit as a baseline, houses in the 80 decibel average noise zone would lose 22.5 percent in value; houses in the 75-decibel zone would lose 15 percent. FAA, "Final Regulatory Evaluation: Metropolitan Washington Airports Policy," Oct. 1981, FAA-APO-81-12, Appendix C.

Regarding O'Hare, the well-documented study by Professor Frankel showed that a major reduction in the number of O'Hare flights would not hurt employment and business but would boost property values. See: "The Effects of Aircraft Noise and Airport Activity on Residential Property Values: A Survey Study," April 1988, Professor Marvin Frankel, Acting Director of Bureau of Economic and Business Research, University of Illinois, Champaign-Urbana. Professor Frankel states, "Notwithstanding the important role played by the airport in job generation, a substantial decline in its activity level (including the number of flight operations) should it occur, is estimated by both Realtors and appraisers to produce a comparatively small impact on business and employment in the surrounding communities. Moreover, such a decline in airport activity would, in the judgment of the respondents, tend to strengthen residential property values." One of the study's findings is that the value of single family homes is reduced 3 to 22% by O'Hare jet noise. (Now, some property values are reduced by as much as 33%.) It is basic, common sense. No one wants to live where there is ungodly noise. "O'Hare boosts the amount of homes for sale, but reduces demand for them."

In Appendix G, the agency cites a study regarding the effect of military aircraft noise on residential property values as proof that "airports have no effect or even a positive effect on property values." G-20. However, this cannot be compared to the effects of large commercial airports. Moreover, the agency's response fails to take into account the great number of additional flights which CTAP changes would allow for at O'Hare. These additional flights, by definition, will cause more aircraft noise in single "noise events," not less.

FEIS page B-314, AReCO's questions, AReCO template, p. 8:
Paragraph VI.D-E.: disclose impact of flight paths on residential property tax revenues, including a comparison of O'Hare-affected and non-O'Hare-affected residential property, including future projections of losses -- agency's response of F-26 is inadequate. See our response at FEIS pages B-313-14, AReCO's questions, AReCO template, p. 7-8: Paragraph VI.A. - C.

Paragraph V.I. F.: disclose social impacts (relationships) from airport and aircraft noise disrupting human communications and associated economic losses -- agency's response of F-28 is inadequate. See our response at FEIS pages B-311-12, AReCO's questions, AReCO template, p. 5-6: paragraph V and FEIS page B-312, AReCO's questions, AReCO template, p. 6: Paragraph V.B. (a-e).

Paragraph V.I. G.: identify/ quantify costs of decreasing quality of life and business viability -- agency's response of H-1 is inadequate because it fails to take into account any of the negative effects of aviation on health, safety, security, and welfare, nor the great number of additional flights which CTAP changes would allow for at O'Hare. These, by definition, will cause more harmful effects from aviation, not less. Further, agency states that "[m]ajor commercial airports within the CTAP study area are considered primary public facilities in their respective communities." We request that the agency disclose the basis or legal authority for this statement, specifically regarding O'Hare airport.

Paragraph VII. A - C: identify socioeconomic impacts of the proposal, including demographic impacts and impacts on community facilities services -- agency's response of J-2 is inadequate as it fails to take into account any of the negative effects on aviation on health, safety, security, and welfare, nor the great number of additional flights which CTAP changes would allow for at O'Hare. These, by definition, will cause more harmful effects from aviation, not less.

Paragraph VII. D.: identify and quantify effects of flight tracks, including demographic, economic, psychological, and additional community services factors -- agency's response of F-24 and F-27 is inadequate because it fails to disclose the negative effects on aviation on health, safety, security, and welfare, nor the great number of additional flights which CTAP changes would allow for at O'Hare. These, by definition, will cause more harmful effects from aviation, not less.

FEIS pages B-314-15, AReCO's questions, AReCO template, p. 8-9:

Paragraph VII. E. 1-8: identify/ quantify impacts of proposal on surrounding schools -- agency's response of F-24 and F-28 is inadequate because it fails to disclose the negative effects on aviation on health, safety, security, and welfare, nor the great number of additional flights which CTAP changes would allow for at O'Hare. These, by definition, will cause more harmful effects from aviation, not less.

FEIS page B-315, AReCO's questions, AReCO template, p. 9:

Paragraph VII. F.: identify/ quantify reduced local government revenues -- agency's response of J-2 is inadequate because it fails to disclose the negative effects on aviation on health, safety, security, and welfare, nor the great number of additional flights which CTAP changes would allow for at O'Hare. These, by definition, will cause more harmful effects from aviation, not less.

Paragraph VII. G.: list all land use changes: agency's response of G-4 is inadequate because it fails to disclose the requested information. Further, the agency's Ch. III and IV are ultimately inaccurate because they fail to take into account the potential huge increase in flights from the many additional arrival routes into O'Hare which CTAP would create.

Paragraph VII. H.: identify all historic structures in affected area, and solicit input from agencies and groups with interest in protecting those historic structures: agency's response of G-4 is inadequate because it fails to disclose the requested information. Further, the agency's Ch. III and IV are ultimately inaccurate because they fail to take into account the potential huge increase in flights from the many additional arrival routes into O'Hare which CTAP would create.

Paragraph VIII.: identify all past agreements affecting any community -- agency's response of N-5 is inadequate because it fails to disclose what changes in agreements are planned with CTAP proposal. In agency's F-18 response, it states that CTAP will decrease the "occurrence of delayed flights into the nighttime hours." So the agency has basically stated that CTAP will limit nighttime flights. We think this would be a great improvement. Please disclose how many flights will be allowed under CTAP's new nighttime flight cap, and cite that flight cap regulation. However, the agency also contradicted itself, impeaching its credibility, because these statements directly contradict those in its response in D-32, page B-423, in which it admits expansion plans at O'Hare: "[f]lights could be added in the early morning that could serve eastbound markets. There is also the opportunity to add flights in the late evening to serve markets to the west."

Paragraph IX.A.: identify the contaminated area and inventory all criteria, toxic, and hazardous air pollutants caused by O'Hare airport and aircraft operations -- agency's response of E-10 is inaccurate, incomplete, and disingenuous, because it fails to disclose the emissions from the great number of additional flights which CTAP changes would allow for at O'Hare. These, by definition, will cause more harmful effects from aviation, not less. The agency also failed to disclose the current, full inventory of all pollutants caused by O'Hare operations, including from vehicles and other support equipment used now and that predicted for the additional landings and take-offs which CTAP would allow. Further, it is ultimately wrong because the emission amounts used in the calculations for the emission inventory are based on only new engine emission data, instead of on estimates of the actual output of the engines which are in use. Further, the agency only disclosed only criteria air pollutants. We request that the agency disclose all toxic and other hazardous emissions for aircraft and the airports covered by the proposal. We also request that the agency provide AReCO with all the raw data and calculations which were used to arrive at the conclusions in Appendix I.

Paragraph IX.B.: identify/ quantify all associated mobile and stationary contributors to air pollution, on and off airport grounds -- agency's response of E-11 is inaccurate, incomplete, and inadequate for the reasons listed in our response to IX.A. In addition, the additional new landings and take-offs allowed by CTAP would have to be associated with additional ground-level emissions from the vehicles and other support equipment and sources of air pollutant emissions, which the agency has failed to disclose.

FEIS page B-316, AReCO's questions, AReCO template, p. 10:

Paragraph IX. C D.: average amount of fuel spent by aircraft in approach and departure procedures within 24 miles of the airport and anticipated changes, and average amount of fuel spent idling and taxiing for the last five years -- agency's response of E-12 is inadequate and incomplete because it did not respond to the request to disclose the average amount of fuel spent by aircraft in approach and departure procedures within 24 miles of the airport and anticipated changes. Further, we request that the agency disclose the data and calculations used to determine the "net fuel savings" which CTAP will create. Please also disclose the amount of fuel that will be spent by the great number of additional aircraft which can land at O'Hare due to CTAP's many additional arrival routes.

Paragraph IX.E-F.: identify total amount of emissions from all sources from O'Hare -- agency's response of E-10 is inaccurate, incomplete, and disingenuous. See our response to IX.A.

Paragraph IX.G.: identify and quantify all public health problems that will occur to the population? -- agency has not responded to this question.

Paragraph IX. H-I.: identify/quantify all environmental problems, and list fuel dumping dates and health effects and costs and expected changes -- agency's response of E-13 fails to answer any of these questions, is absurd, and is highly unprofessional.

Paragraph IX. J.: identify/quantify amounts of decomposing glycols and fuels, and health effects and other costs, and expected changes -- agency's response of E-14 is inadequate because it fails to answer any of these questions and fails to answer how the additional landings and take-offs allowed under CTAP would change these chemical interactions and associated costs.

Paragraph IX. K. -- address atmospheric effects of air pollutants on environment, and expected changes -- agency's response of E-14 is inadequate because it fails to answer any of these questions and fails to answer how the landings and take-offs allowed under CTAP would change these chemical interactions.

Paragraph IX. L: identify existing ground-level air emissions -- agency's response of E-15 is inaccurate, incomplete, and disingenuous, because it fails to disclose the emissions from the

great number of additional flights which CTAP changes would allow for at O'Hare. These, by definition, will cause more harmful effects from aviation, not less. The agency also failed to disclose the current, full inventory of all pollutants caused by O'Hare operations, including from vehicles and other support equipment used now and that predicted for the additional landings and take-offs which CTAP would allow. Further, it is ultimately wrong because the emission amounts used in the calculations for the emission inventory are based on only new engine emission data, instead of on estimates of the actual output of the engines which are in use. Further, the agency only disclosed only criteria air pollutants. We request that the agency disclose all toxic and other hazardous emissions for aircraft and the airports covered by the proposal. We also request that the agency provide AReCO with all the raw data and calculations which were used to arrive at the conclusions in Appendix I.

Paragraph IX. M.: inventory/quantify PAH's in jet exhaust and expected changes – agency's response of E-16 is inaccurate, incomplete, and disingenuous, because it fails to disclose the emissions from the great number of additional flights which CTAP changes would allow for at O'Hare. These, by definition, will cause more harmful effects from aviation, not less. Further, it is ultimately wrong because the emission amounts used in the calculations for the emission inventory are based on only new engine emission data, instead of on estimates of the actual output of the engines which are in use. We also request that the agency provide AReCO with all the raw data and calculations which were used to arrive at the conclusions in Appendix I.

FEIS page B-317, AReCO's questions, AReCO template, p. 11 :

Paragraph IX. N.: quantify particulates caused by all O'Hare operations and expected changes, and identify jet fuel A combustion components, health and environmental effects and costs, and expected changes – agency's response of E-17 is inaccurate, incomplete, and disingenuous, because it fails to disclose the amount of particulate matter in emissions from current operations, including from both air and ground-related actions, as well as from the great number of additional landings and take-offs which CTAP changes would allow for at O'Hare. These, by definition, will cause more harmful effects from aviation, not less. To assume PM emission factors are zero because "no data is available" is anti-scientific and absurd.

It is incorrect to state that no data regarding particulate emissions from aircraft exist: a 1993 study by U.S. EPA suggests that aircraft from Chicago Midway Airport release significant quantities of particulate matter, as well as other toxic compounds. EPA, "Estimation and Evaluation of Cancer Risks Attributable to Air pollution in Southwest Chicago: Final Summary Report," prepared by ViGYAN, Inc., Falls Church, VA, April 1993, p. 13. The grave health effects of particulate pollution are well-known and well-documented in the scientific literature. To publish such a blatantly callous statement in an EIS constitutes failure by the FAA to protect the health, safety, and welfare of the people, and is another serious betrayal of the trust which people place in the FAA.

Paragraph IX. O.: inventory and quantify effects of lead caused by O'Hare operations and expected changes – agency's response of E-18 is inadequate because it does not inventory or quantify the effects of lead emissions from O'Hare operations and the changes in those emissions caused by the great number of additional flights allowed by CTAP's many extra arrival routes.

Paragraph IX.P.: identify and quantify all associated ground congestion and impacts on local air quality by fossil fuel consumption – agency's response of E-11 is inadequate because it fails to disclose the local air quality impacts of fossil fuel consumption from current ground congestion, as well as from the great number of additional flights allowed by CTAP's many extra arrival routes.

Paragraph IX.Q: number of people who die each year as result of airport/aircraft operations and associated costs and expected changes – agency's response of F-24 is inadequate because it answers no part of these questions.

Paragraph IX. R.: identify effects on children's learning as result of air pollution and expected changes – agency's response of E-10 and H-1 is inadequate. See our response to FEIS page B-315, AReCO's questions, AReCO template, p. 9, Paragraph IX.A. The H-1 response fails to take into account any of the negative effects of current levels of flights on children's learning, nor of the great number of additional flights which CTAP changes would allow for at O'Hare.

FEIS page B-318, AReCO's questions, AReCO template, p. 12 :

Paragraph X. and XI. – list and quantify water quality and use issues – agency's response of G-4 is inadequate and non-responsive. The agency's Ch. III and IV are ultimately inaccurate because they fail to disclose the harmful effects from the current level of flights as well as the potential huge increase in flights from the many additional arrival routes into O'Hare which CTAP would create. The agency's statement that "[s]eldom do changes in air traffic procedures cause any basis for concern about water quality" is baseless. We have discovered, through our legal actions against airports, including O'Hare, that chemicals from airport operations cause water quality problems. Further, the agency itself states that the "project area" covers 7100 square miles of Lake Michigan. FEIS at 3.2.1. What the agency fails to disclose about this fact, however, is that Lake Michigan is the source of drinking water for over ten million people. The agency included no analysis of how air deposition of the persistent and/or bioaccumulative, toxic emissions from the thousands of jet planes that fly over Lake Michigan each day affect the quality of tens of millions of peoples' drinking water. We request that agency answer these water quality questions.

Paragraph XII.: identify all leaking underground fuel storage tanks – agency's response of G-4 is inadequate because it does not answer this question.

FEIS page B-319, AReCO's questions, AReCO template, p. 13:

Paragraph XIII.: ground quality, identify all toxic compounds and systems now in use – agency's response of G-4 is inadequate because it does not answer this question.

XIV.: surface transportation, number of vehicles in airport operations and expected changes? – agency's response of G-4 is inadequate because it does not answer this question.

XV.: airport-related pollution's effects on endangered species – agency's response of G-4 is inadequate because it fails to take into account any of the negative effects of current levels of flights on endangered species, nor of the great number of additional flights which CTAP changes would allow for at O'Hare.

XVI.: identify effects of pollution from O'Hare operations on Wild and Scenic Rivers and expected changes – agency's response of G-4 is inadequate because it fails to take into account any of the negative effects of current levels of flights on Wild and Scenic Rivers, nor of the great number of additional flights which CTAP changes would allow for at O'Hare.

XVII.: identify how floodplains will be affected – agency's response of G-4 is inadequate because it does not answer this question.

XVIII.: solid and hazardous waste treatment and disposal and expected changes – agency's response of G-4 is inadequate because it does not answer this question for the current operations, nor for the great increase in flights which CTAP could bring.

FEIS page B-320, AReCO's questions, AReCO template, p. 14:

XIX.: identify/quantify all related construction and its impacts – agency's response of G-4 is inadequate because it does not answer this question for the current operations, nor for the great increase in flights which CTAP could bring.

XX.: safety and related environmental consequences of breaches in safety and expected changes – agency's response of I-1 and I-6 are inadequate because it does not answer this question for the current operations, nor for the great increase in flights which CTAP could bring. I-1 contains circular reasoning regarding the unknown safety of the CTAP changes. The FAA cannot judge whether CTAP's great increase in arrival routes in O'Hare's Class B Airspace, which could in turn bring great increases in the number of flights, is safe, because no study has been done as to what constitutes a "safe" number of planes in that airspace at any given time, and whether safety requires a density limit to be set for O'Hare's airspace. Thus, the FAA must assess these issues and disclose its studies to the public before any CTAP theoretical changes are given effect.

The events of September 11 also require the FAA to reconsider all of its procedures and plans that were pending before that date, in terms of adequacy of security and adequacy of safety. The thousands of gallons of highly inflammable jet fuel, used as it was on September 11, requires the FAA to add additional margins of safety into all aspects of aviation, not less. Because CTAP's changes would bring great increases in the density of flights into the same, finite amount of airspace, over a densely populated urban area and high-profile targets, it can only result in an ultimately less safe aviation system.

Pursuant to response I-6, if it is true that the FAA does not keep records of occurrences when objects from aircraft fall to the ground, it needs to immediately begin keeping such records.

XXI.: atmospheric effects of O'Hare's pollution and expected increases – agency's response of E-11 inaccurate, incomplete, and inadequate for the reasons listed in our response at FEIS page B-315, AReCO's questions, AReCO template, p. 9, IX.A. In addition, the additional new landings and take-offs allowed by CTAP would have to be associated with additional ground-level emissions from the vehicles and other support equipment and sources of air pollutant emissions, which the agency has failed to disclose.

XXII.: quantify types of fuel used daily, components, health effects to workers, and expected changes – agency's response of E-12, E-19, and G-4 is inadequate and non-responsive to these questions and continues to deny the inescapable conclusion that CTAP will allow many more flights to fly in O'Hare airspace.

XXIII.: infrastructure and expected changes – agency's response of G-4 is non-responsive.

XXIV., 1st paragraph: harm to human health from aviation-related toxic chemicals – agency's response of E-19 and H-1 is inadequate. See our response to response to FEIS page B-315, AReCO's questions, AReCO template, p. 9, Paragraph IX.A. This response also fails to disclose the negative effects of aviation on health, safety, security, and welfare, nor the great number of additional flights which CTAP changes would allow for at O'Hare. These, by definition, will cause more harmful effects from aviation, not less.

FEIS page B-321, AReCO's questions, AReCO template, p. 15:

XXIV.A.: request for disclosure of area of toxic chemical impact to human health – agency's response of E-15 is non-responsive to this question.

B.: identify all known resulting diseases, on whom, changes, and costs – agency's response of E-10 and H-1 is non-responsive.

C.: risk analysis, morbidity and mortality rates caused by noise, air, water and ground pollution generated from airport – agency's response of E-19 and H-1 is non-responsive.

D.: disclose morbidity of airport workers from airport pollution – agency has not responded to this request.

E.: disclose emission inventory for all airport pollution – E-19 is non-responsive. See our response to FEIS page B-315, AReCO's questions, AReCO template, p. 9, IX.A. and B.

F.: validate all modeling – agency's response of E-19 is non-responsive.

G.: disclose dioxin emitted during operations, level of exposure, and expected changes – agency's response of E-19 is non-responsive.

FEIS page B-322, AReCO's questions, AReCO template, p. 16:

XXIV.H.: determine how the most sensitive will be affected by O'Hare's criteria, hazardous, and toxic pollutants – agency's response of E-19 is non-responsive.

I.: aircraft noise causes serious human health problems – agency's response of F-24 is contrary to the prevailing weight of the science on harmful effects of aircraft noise. See our response to FEIS pages B-311-12, AReCO's questions, AReCO template, p. 5-6, Paragraph V.

Disclose risk assessment for and level of exposure to aircraft noise and expected changes – agency's response of E-19 is non-responsive.

J.: identify and quantify all medical costs and expected changes – agency's response of H-1 is non-responsive.

XXV.: cumulative impact – agency's response of K-1 is inadequate. The agency refers to cumulative impact response of "Section 4.24," (p. 4-63) which claims that there are no cumulative impacts of the proposal because CTAP is not connected to other actions, yet this is belied by the 1999 ACE Plan and other documents. See AReCO comments at FEIS B-326-33.

XXVI.: identify contaminants in aircraft washing waste water, including identity of and methods of handling radioactive isotopes – agency's response of G-4 is non-responsive.

XXVII.: identify conformity requirements – agency's response of E-21, that the CTAP changes would constitute a de minimis federal action and are therefore exempt from the conformity requirements, is incorrect. The EPA only exempted traffic control changes, not an "airport development" action that could bring hundreds or thousands of additional flights over the Chicago area each day, as CTAP would. 58 Fed. Reg. 63214, 63228 (1993). Thus, the agency must comply with the conformity requirements for VOC's as a precursor to ozone, and for all other covered pollutants.

XXIX.: identify environmental justice requirements and impacts – agency's response of G-4 is non-responsive.

XXX.: NPDES permit – identify permit violations, wastewater amounts from O'Hare operations, including sewage and sewage spills – agency's response of G-4 is non-responsive.

FEIS page B-323, AReCO's questions, AReCO template, p. 17:

XXXI.A.: identify/ quantify components of and name expected changes of: solvents in aircraft paint, vehicle paint, cleaning fluids, fire suppression systems containing halons or chlorofluorocarbons, air conditioning and refrigeration systems, batteries on electric vehicles, oil, gas and electricity for building use, roadway lighting – agency's response of G-4 is non-responsive.

XXXII. Identify impact of proposal on general ground waste, landfill, hazardous, and toxic ground waste, in-flight waste, food incineration waste (identify permits) – agency's response of G-4 is non-responsive.

XXXIII. Less harmful alternatives to the proposal must be taken because millions of people are at risk of harm from O'Hare operations – agency's response of C-4 represents a superficial, inadequate consideration of alternatives to the proposed action, in violation of NEPA.

FEIS pages B-324-25, AReCO's questions, AReCO template, p. 18-19:

III.: As detailed in our previous comments at pp. 18-19, this EIS contractor has profound conflicts of interest on O'Hare issues. Therefore, this contractor cannot do an objective EIS and must be replaced – agency's response of M-1, N-7, and D-21 does not relieve Landrum & Brown's obvious conflict of interest regarding airport "development" and expansion.

FEIS page B-327, AReCO's 2/15/01 comments, AReCO template, p. 2 of 7:

3rd paragraph: the purpose of an EIS – agency's response of H-2 is plainly not even an attempt to seriously and adequately address the health impacts of the proposed action. The agency's conclusion in its Ch. IV and Appendix H, that CTAP will reduce emissions and noise pollution, is clearly incorrect as it fails to take into account the potential huge increase in flights at O'Hare by creating many more "arrival routes."

Agency's document does not accomplish this purpose – agency's response of L-10 misinterprets our comment. We want thorough and adequate environmental review of aviation projects, and protection of the public health, safety, security, and welfare, above all else. The agency should take care of these at the first EIS for efficiency's sake, not "streamline" the environmental process. The fault for poorly done EIS assessments lies with the FAA, not the NEPA statute. Also, full "cooperation" and "non-duplication" authority currently exists for federal agencies in the NEPA regulations. Thus, no "environmental streamlining" (code for removing people's rights under NEPA) statutes are needed.

FEIS page B-328, AReCO's 2/15/01 comments, AReCO template, p. 3 of 7:

Indented paragraph: the Chicago "Delay" Task Force's written document proving that one goal of this CTAP proposal is to "increase airspace capacity" – agency's response of N-8 is non-responsive.

1st full paragraph: what is cumulative effect of all aviation expansion plans? – agency's response of K-1 refers to cumulative impact response of "Section 4.24," (p. 4-63) which claims that there are no cumulative impacts of the proposal because CTAP is not connected to other actions, yet this is belied by the 1999 ACE Plan and other documents. See AReCO comments at B-326-33.

3rd paragraph: segmentation of expansion plan – agency's response of I-5 is non-responsive. DEIS inadequately addresses public health and environmental issues – agency's response of G-4 is non-responsive.

FEIS page B-328-29, AReCO's 2/15/01 comments, AReCO template, p. 3-4 of 7:

What technology does/will CTAP employ and where is it located, what are health impacts? – agency's response of N-9 is non-responsive as to health impacts.

FEIS page B-329, AReCO's 2/15/01 comments, AReCO template, p. 4 of 7:

2nd full paragraph: What categorical exclusions were used to concoct the DEIS? – we request a copy be provided of the categorical exclusion that was used to test CTAP.

Footnote 3: forecasts for passenger aviation show a wide range of growth rates – agency's response of D-22 is non-responsive.

FEIS page B-329-30, AReCO's 2/15/01 comments, AReCO template, p. 4-5 of 7:

Beginning 4th paragraph, page B-329: aviation "demand" forecasts grossly underestimate projections in the NAS plan, making any conclusions using those assumptions incorrect, and request for varied growth rates to be used – agency's response of D-22 is non-responsive.

FEIS page B-330, AReCO's 2/15/01 comments, AReCO template, p. 5 of 7:

1st full paragraph: FAA's statements do not reflect possible tripling of flights by 2010 – agency's response of D-22 is non-responsive.

3rd paragraph: metric "DNL" noise measurement does not protect health and environment – agency's response of F-19 is based on out-dated science, as we discussed previously in this response.

Noise studies cited by agency are outdated – see WHO's newer noise studies – agency's response of F-24 is incorrect and non-responsive. See detailed evidence discussed previously in this response.

FEIS page B-331, AReCO's 2/15/01 comments, AReCO template, p. 6 of 7:

1st paragraph: DEIS grossly underestimates number of people affected by O'Hare noise, actual number is 1.6 million or more – agency's response of F-29 is non-responsive. The FAA may choose to adopt a more protective standard in carrying out its mission to protect the public health, safety, and welfare, above all else, even if EPA has not formally recommended it.

2nd paragraph: the best way to protect safety, public health, and environment and to reduce "delays" is to reduce the number of flights to safer and healthier levels and to mandate that airlines terminate all of their "over-scheduling" of flights – agency's response of D-23 is non-responsive.

3rd paragraph: FAA's conclusory dismissal of all alternatives to proposed action is baseless, contrary to public health and welfare, and must be re-evaluated – agency's response of C-4 and C-5 represent the same.

4th paragraph: the only way proposed action could reduce cancer-causing, noise, and other toxic emissions and pollution, and other harmful effects of aviation is if number of operations were frozen or reduced, and without such reductions, the only reasonable course of action is to implement "no action" or build now a nationwide, world-class network of high-speed rail to provide people in the U.S. with a much safer, much more secure, much more efficient, much healthier, much less toxic form of mass transit for inter-city travel, and to spur economic growth in this country, and other alternatives – agency's response of K-1, I-1, G-1, and C-4 are non-responsive or insufficient evaluations of the possible alternatives to increasing the density limits of airspace used by aircraft and airport landscape.

FEIS page B-333, AReCO's 2/15/01 DEIS Addendum, AReCO template, p. 1 of 1:

Accidents

1.1. Aircraft accident assessment (air and ground) – agency's response of I-1 is non-responsive.

1.2. Ground vehicle traffic assessment – agency's response of K-1 is non-responsive.

Health Impacts – agency's response of H-1 is inadequate. See our previous analysis of H-1.

- 2.1. Cumulative impacts from all airports using same airspace
- 2.2. Ramifications of U.S. Federal Justice ruling in 2000 that American Disabilities Act entitles asthmatics to mitigation when government degrades the air
- 2.3. Dept. of Public Health Study for 1992-1996 identifies statistically significantly higher illnesses and mortality by SeaTac Airport that coincidentally correspond to the types of illnesses associated with airport pollutants.
- 2.4. New Dept of Health Data for 1997-1998, run just on asthma hospitalizations, shows about 1/3 increase since the last health Study. The upward trend was statistically significant compared to King County, which did not show a statistically significant upward trend.
- 2.5. New studies indicate exposure to noise can make serious illnesses become terminal
- 2.6. Smog linked to heart attacks
- 2.7. Particulates linked to premature deaths
- 2.8. New Chicago study indicates impairs health as much as 32 miles from airport
- 2.9. New Boston study shows significant asthma differences as function of distance
- 2.10. New Santa Monica Study shows significant increase in cancer risk by adding just 5,000 operations

Noise – agency's response of F-30 does not reflect the actual noise from these aircraft.

- 3.1. Hush kits just shift noise to different locations
- 3.2. Noise model did not consider ALL airport operations

Exposure to unburned fuel worse – agency's response of E-5 fails to address this very real problem, and only disclaims responsibility for it.

- 4.1. Communities smell of jet fuel
 - 4.1.1. What is the total populace exposed including airport workers and travelers?
 - 4.1.1.1. What are the health effects?
 - 4.1.1.2. Show a health-risk analysis