

Comments to the FAA on April 24, 2007

My name is Judy Neville and I am the First Selectman of New Canaan, Connecticut. I am here tonight representing the Towns of Greenwich, New Canaan and our surrounding neighbors in opposition to the Integrated Airspace Alternative. The Integrated Airspace Alternative selected by the FAA as its preferred alternative to the Airspace redesign project promises to reduce congestion and delays, but involves adding new flight paths and fanning aircraft on departure, which will have the most adverse noise impact over our residential communities.

We agree with the Chairman of the House Aviation Subcommittee Rep. Jerry Costello that the FAA delay this ambitious airspace redesign project to address issues of noise impact and inadequate noise modeling. We need to be assured that the FAA airspace redesign process addresses concerns on “citizens’ safety, health, education, and property values.”

Given that the FAA excluded aircraft noise mitigation from the project’s “purpose and need”, we do not believe that the FAA adequately reviewed the four alternatives, and that the preferred alternative is not in the public’s best interest. We do not believe that the Integrated Airspace will reduce delays, which principally are caused by adverse weather conditions. We believe the new, lower flight corridor over Fairfield County is a significant threat to our quality of life. Airplanes bound for New York City’s La Guardia Airport would begin their descent over the heart of Fairfield County and hug the coastline near Stamford and Greenwich before crossing over long Island Sound to land. Other than safety, quality of life should have been the most important consideration in the FAA’s decision.

We do not agree that of the 19 environmental categories identified in the report that the FAA needs to address only noise mitigation. We believe that other environmental concerns such as the impact of noise on educational development, air emissions on health as well as the adverse effects on property values and increased risks in ground safety need to be thoroughly reviewed. Your evaluation of 70 to 90 days of operational radar data is totally insufficient to address these concerns.

We have several questions that we would like the FAA to address.

1 We have been told that the new air traffic pattern would allow commercial jets

landing at LaGuardia to come in lower on arrival over Fairfield County. Minimum flight altitudes at various points along the proposed flight paths are not provided in the report. I was told at the FAA Hearing in Washington D.C. that the new Integrated Airspace Alternative would lower the operational altitude for arrivals over New Canaan to 5,800 to 6,200 feet. Reduction of aircraft altitude is contrary to widespread public recommendations taken during the project’s Scoping period and should have been outright dismissed by the FAA.

2. Most of the current complaints from residents involve low flying aircraft using either Westchester County or Danbury airports. Greenwich is one of the most severely impacted communities in the country. There is an average of 340 low altitude flights per day from five different airports. Air Tran and Jet Blue, low-fare airlines, are now both operating new flights at

Westchester County Airport. There are a large number of arrivals operating at 3000 feet over our area which already create significant noise. We understand that the number of flights over Fairfield County will double from a combination of the increased number of small private airplanes and the new commercial carriers. Has the FAA considered the impact of these recent developments and the resulting noise generated by more airplanes flying at lower altitudes?

3. We were told by the FAA at the hearing in New Canaan in October that this increase in small aircraft is an “unintended consequence of doing nothing.” What measures will the FAA take to assure the safety of small aircraft flying over southern Fairfield County?

4. The environmental impact statement omits numbers and altitudes of flights that will be redirected, making it virtually impossible to assess the impact to neighboring communities. What information can you provide us to evaluate the number of current flights, frequency of projected flights, altitude data and what aircraft model were used to calculate noise levels? This should be public information; however, I have been told that these numbers are vague and unavailable. When will the current and projected number of flights for arrival at La Guardia airport in the new flight corridor over New Canaan be made available? I have asked for this information as has Congressman Chris Shay’s office and Senator Chris Dodd’s staff on our behalf only to be told that it is unavailable. The residents of New Canaan have a right to know how many flights will fly over their community and at what intervals.

5. We understand that the FAA’s preferred alternative claims to save an estimated 12 million minutes of delay annually for the five major metropolitan airports— Kennedy, LaGuardia, Newark, Teterboro and Philadelphia. I was told at the FAA Hearing that the Preferred Alternative will save 6 minutes per flight and a total of 32% decrease overall in delays. What analysis can you provide that verifies this

information? Is it not true that small capacity improvements are rapidly taken advantage of by the carriers to schedule additional flights during peak period, so reduction in delays are unlikely? The FAA needs to study the real cost/benefit analysis of this proposal to verify what we believe is a marginal benefit compared with the substantial costs to our Towns.

6. The Noise Mitigation Report released on April 6th shows that departures from Westchester County Airport that used to be routed West will now make a right turn and climb East over Fairfield County. What will be the specific routes and altitude of these northbound departures from White Plains?

A few final comments on noise - The FAA does not consider any noise levels below 45 decibels and ONLY noise changes in excess of 5 decibels to generate a significant impact. The aircraft noise levels, for the most part, in the metropolitan area are in the 45 – 60 decibel threshold or lower. A noise change of 5 decibels is equivalent to a factor of 3.2 times increase in noise energy. In reviewing the grid completed by the FAA, New Canaan can expect a “slight to moderate” increase of four times the current noise level to a high of 41.8 decibels. The average increase in the report is 57% in Fairfield County.

The residential areas of Fairfield County are extremely noise sensitive and residents react vehemently to changes far less than this. Residents should know when over-flights might increase by a factor of even two or three as a result of proposed changes in order to evaluate and offer comment on these changes. Residents also need to know if the FAA intends to implement this proposal in slow, gradual steps through the year 2011 so the surrounding communities do not feel the immediate impact. If the FAA changes routes for arrivals or departures at or below 3,000 feet at Westchester County, will it not have to release an Environmental Impact Statement?

Furthermore, we believe that the DEIS is fatally flawed as to the impact on New Canaan since it relies on data from the year 2000 for noise assessment. The FAA only considered the instrument operations from 21 airports in its modeling of noise impacts for the proposed project. The FAA did not consider all military aircraft, over-flights, VFR aircraft and excluded air traffic from 119 airports.

In closing, I would like to mention that the First Selectman and Mayors of eight surrounding towns attending the FAA Public Hearing in New Canaan were unaware of the four alternatives presented by the FAA at the time of closing comments in July 2006. The FAA did not present the data in a timely and accessible manner for officials to make any kind of assessment in order to comment or respond. The Towns of Greenwich and New Canaan are very concerned that large constituencies of southern New York and Connecticut remain largely unaware about how the Airspace Redesign proposals may impact their communities.