

Appendix B - Public Comments

Head, David M.

From: bud fay [bud_fay_8@msn.com]
Sent: Tuesday, January 03, 2006 1:13 PM
To: David.Head@po.state.ct.us
Subject: Groton New London Airport

This airport has become a major economic contributor to the economy in SE CT. In a tour of the AVCRAD facilities three weeks ago, their payroll alone contributes some 19 Million annually into this economy.

We seen litterally a dozen new company's entering business and building on the field and in the area immediately surrounding Groton New London Airport, creating a thriving industrial park likle area in the immediate vicinity.

With the advent of the Casino's, we've the opportunity to become the premier general aircraft destination in Connecticut. With the impending lay-off's at Electric Boat the State would be well advised to support the growth of this facility in every way possible to help our area through this impending downturn.

A program of advertising to the General Aircraft East Coast Community with Mystic and More, extolling the venues we have o offer would be a low cost way of reaching a segment of real travelers (who own their own airplane) to visit our area.

We can't compete with the Casino's in advertising dollars for tourism, so pinpointing segments of the market that can be reached at relatively low cost may be an answer. Last I believe, that it would be in our States best interest to have a "Community Relations" dedicated person who could assist the managers to reach out to the surrounding community for support and for programs that benefit bothe the Airport and the Community.

Thank you

Bud Fay

Bud Fay

Head, David M.

From: Dave Tyler [davetler@cox.net]
Sent: Monday, January 09, 2006 6:26 PM
To: David.Head@po.state.ct.us
Subject: Airports

David

Thanks for the information given today on Airports.

Here are some suggestions and concerns I voiced today at that meeting.

1 To maintain obstruction free approach zones I suggest making it clear to land owners in approach zones that they must maintain obstructions below a safe level or they may be held liable in the event of an accident..That approach worked in one case at Skylark with a neighbor in the approach zone. I am sure that there are other methods but it is important to motivate neighbors to maintain those areas in a safe manner.

2 Some sort of right to fly lay that would require sellers to notify buyers of the Airport on the deed that there is an Airport in the area and that the Airport has the right to operate. The reasonable noise and activity in and around the Airport is a normal operation and a part of the Airport presence.

3 Somehow get financial help to privately owner public use Airport to help maintain runways, taxiways, safety items and security systems. Also help level the competition field between state funded and non state funded Airports. As stated if airport "A" gets free runways and taxiways airport "A" can and does rent hanger and tiedown space for less than airport "B". This is unfair competition to airport "B"

What would help is some help paying for infrastructure. Also local property tax relief on that infrastructure. I understand there is a state statute allowing private public use airports to apply for tax relief on the areas used for direct airport operations. A program to buy the development right to the land the airport is on would help to take pressure off the airport to sell out to development. It would reduce the value of the land and therefore the taxes on the land which would also help.

4 Help from the state to guide us through the process of qualifying for feeder airport status or at least qualifying for state or federal grants .



Testimony of Robert W. Santy, President, Regional Growth Partnership and Director of Public Policy Development for the Tweed New Haven Regional Airport on the Draft Connecticut Statewide Airport System Plan (CSASP).

January 9, 2006

On behalf of the Tweed New Haven Regional Airport Authority, I am happy to submit these comments on the Draft CSASP. This follows our comments submitted to the Department on January 21, 2005 on the initial draft of the study.

The Airport Authority appreciates the efforts of the Department and the Office of Airport Planning in developing this Plan, and in integrating many of the comments we made in our earlier letter. We are happy to now also have the opportunity to comment on draft policy recommendations as included in section 7 of the Report.

1. Report Organization: We renew our comment that the report could be organized in a manner more consistent with the stated desired outcomes. Different airports serve different needs of the air service market, and in reviewing the airport system, it would seem that airports providing commercial service, airports dealing with freight operations and airports providing general aviation services should be evaluated together.

However, we appreciate changes that have been made throughout the report that seem to reflect this market driven organizational concept. We recognize that language has been changed in many parts of the report to reflect Tweed's role in a statewide system providing commercial service to Connecticut's population. We would recommend inclusion of language that outlines the statutory base of the Tweed new Haven Airport Authority, establishing it as a regional airport.

2. Runway Safety Areas: The Draft Plan discusses the current status of Runway Safety Areas at Connecticut Airports at some length. In Sec. 2.3.1 (p. 2-21) in discussing the specific situation at Tweed the report says the RSAs do not meet minimum standards "...and a study is under way to determine the best way to improve the situation."

We have been working for a number of years with the DEP on an appropriate plan to bring the RSAs up to FAA standards. We are well along in that process, and we believe the draft Plan's reference to a study does not correctly convey the status. We would recommend that the wording be changed to "...and to address this situation, the Authority has completed 100%



design documents and submitted a detailed application to DEP for permits to construct RSAs at each end of Runway 2-20. DEP is currently completing their review of the application.”

We anticipate that the DEP will shortly issue a letter of intent to issue permits for the HVN RSA project. We are pleased that DOT has recognized the need to implement the Tweed Master Plan and that Tweed’s growth in commercial service will complement growth at the state’s primary airport, Bradley. We invite the Department to participate in the anticipated public hearings on the RSA project. We know your testimony in support of RSAs that meet FAA standards would be important and convincing.

3. Airport Forecasts: In our January 2005 correspondence we commented on the independent forecasts developed for the draft plan. We renew our objection to the inclusion of these projections in the Draft Plan as they cannot be appropriately evaluated by the Authority, the FAA or other independent parties. The forecasts should be consistent with those developed for the Tweed Master Plan Update as approved by DOT and the FAA. As we said in January 2005, "Publication in this Plan of conflicting figures determined by a different methodology is likely to be misleading and problematic."

4. Airport Market Definitions and Capacity: In our January 2005 letter we commented on the Location and Market Coverage of Airports in the System. We renew our comment that the New England Regional Aviation System Plan (NERASP) provides a more comprehensive examination of air service coverage. The NERASP is a better measure of where air passenger demand exists, and translated that demand to the closest airport in New England or New York. We would strongly urge you to include a discussion of the NERASP market measurements in the final Plan. As we commented earlier, a similar analysis completed in 1995 represented a catalyst for development of the airports in Manchester, NH and Providence RI.

5. Current and projected airport capacity: This is an important component of air system market definition as well. Section 4.4 of the Draft Plan discusses “Operational Capacity Enhancement Strategies” to deal with possible limits in capacity at critical airports. The Draft Plan indicates that Bradley is currently operating at 56% of capacity and is projected to be at 80% of capacity in 2025. Yet, in subsection 4.4.2., “Demand Management” there is no discussion of strategies to utilize other system assets to relieve possible capacity issues at Bradley. Tweed is currently operating at 28% of capacity and will be at 43% of capacity in 2025. The Draft Report states that “Because the airport system operates as a whole, it has been analyzed as such” (Section 7.1) Therefore, more discussion of potential demand management that shifts users to commercial airports that have excess capacity should be included here, and recommendations on pursuing this strategy should be included in Chapter 7.

6. Comments on Coastal Management Act: Our January 2005 letter discussed the implications of the CMA on future airport development at length. To summarize, the CMA provides for a balanced evaluation of the environmental and economic impacts of airport expansion in Coastal areas. In section 3.6.1.2 of the Draft Plan (p 3-18), you state: "Because the airport is in the CMA, it is felt that obtaining permits for any projects regarding expansion or increased use of the airport would be difficult."

We would reiterate that first, the CMA has limited impact on *increased use* of the airport that does not require expansion and, second, that expansion plans must be balanced between the

environmental and economic implications of a particular project. Therefore, we would recommend that the above sentence be changed to "Because the airport is in the CMA, judgments are called for on proposed expansion projects which balance environmental considerations and economic development considerations."

7. Comments on Section 7 – Recommendations: First we want to thank the Department for the introductory language in this section that recognizes the integrated nature of the aviation system in Connecticut and the complementary role different system assets play. The recognition that recommendations on specific projects can be found within individual Master Plans is recognition that the plans need to be implemented.

7.1.2. In addition to discussion of terminal improvements at Bradley and Tweed, add recommendation that role of Tweed as reliever airport should be addressed.

7.1.3. In light of the fact that HVN has submitted 100% design documents to DEP for an RSA project that will meet FAA standards, we suggest that language be amended to recognize this fact. We suggest an additional bullet recommendation: "Support completion of the RSA project at HVN".

7.1.4. We thank the Department for recognizing the need for greater discussion between DOT and DEP on permitting issues. We have encouraged such discussions in our previous comment letter and in testimony before the Transportation Strategy Board. Greater cross-disciplinary discussions are anticipated by the TSB statutes and will clearly benefit many transportation infrastructure projects in the state, including implementation of the Tweed Master Plan. As an example of this type of engagement, we encourage DOT to testify in support of the HVN RSA project when public hearings are scheduled.

7.1.5. Specific Problems; Ownership Issues. The Draft Plan includes an important discussion of a number of specific problems facing airports, including ownership issues. The Draft Plan recognizes the issues inherent in an airport being located in 2 communities, and owned by one. We would appreciate the opportunity to work with the Department on this issue, particularly on whether some legislative proposal might help address many of the identified issues.

7.1.6 Safety; Obstructions. The Department is aware of the difficulty HVN has faced dealing with obstructions. We would welcome further discussions that would clarify what role the Department can and would be willing to play in clearing obstructions at none state-owned airports.

Other recommendations: We believe the Draft Plan identifies important policy issues throughout Chapter 7. If strategically developed and implemented, the recommendations could significantly enhance the airport system in the state of Connecticut. We would be interested in working with the Department to develop an appropriate implementation plan around each of the critical issues raised in this chapter.

We also want to thank the Department for the numerous instances in the Draft Plan where language changes have reflected the complementary nature of the commercial airports in the state. This plan could form the basis for a comprehensive system-wide approach to air service development in the state of Connecticut.

Capitol Region Council of Governments

241 Main St., Hartford, CT 06106-5310
Phone: (860) 522-2217 FAX: (860) 724-1274

Letter 4

To: Dave Head, Airport Planning
From: Tom Maziarz
Date: February 2, 2006
Subject: CRCOG Comments on Airport System Plan

CRCOG's Policy Board directed me to submit the following comments on the draft Connecticut Statewide Airport System Plan. The issues discussed below largely reflect comments we received from representatives of our member municipalities.

General Comments

We thank you for giving us the opportunity to review and comment on the draft plan. In general, we found that the plan provides a good overview of the issues and problems the State is facing in its efforts to meet the air transport needs of the State. We have no objections to the major recommendations presented in the plan, and support the goal of the plan to preserve and improve the airport system in Connecticut.

Airport Preservation.

One of the issues raised in the plan is the need to preserve the network of airports, and how the issue is particularly acute for privately owned public-use airports. We agree that the potential loss of airports posed by development pressure is a critical issue and airport preservation should be a primary goal of the State. The recent closure of Mountain Meadows Airport (formerly Johnny Cake Airport) in Burlington emphasizes just how real this threat is. The loss of a small airport can have a significant impact on the aviation system. It reduces options for air travel, and it puts more pressure on the remaining airports to serve the state's aviation needs.

While the draft plan identified airport preservation as a State goal, it lacked specific action items for promoting the goal of airport preservation. We believe the State needs to develop a proactive policy and program of airport preservation that includes specific preservation techniques. Methods such as the use of AIP discretionary funds for the purchase of airport property, or the purchase of the development rights associated with airport land should be considered as part of such a policy. These types of techniques will provide airport owners a financial option that allows them to continue running the airport, and not have to sell airport land to developers.

Land Use Planning & Compatible Land Use

The system plans calls for communities to plan for compatible land use, but there are no specific recommendations, no guidance, and no assistance offered. The State should offer specific and meaningful guidance on what constitutes land uses that are both compatible and offer meaningful economic benefits to the community. The State should also amend its process for preparing individual airport master plans to include areas and land uses off airport property. Current airport master planning practices preclude land use planning 'outside the fence.'

Noise Measurement

Current information on FAA noise measurement procedures are difficult for citizens to understand and do not readily relate to residents own experiences and perceptions of aircraft noise. The State or Federal

Aviation Administration should prepare a brochure that explains FAA noise measurement procedures in a manner that is more meaningful to residents.

Air National Guard

The draft plan made no mention of the proposal to remove the Air National Guard from Bradley Airport. The issue should be addressed in the plan.

Competing Economic Development Goals

CRCOG also received a comment from one member that airports use large areas of that might be better put to other economic development purposes.

Mr. David Head
State of Connecticut Dept. of Transportation
2800 Berlin Turnpike
PO Box 317546
Newington, CT 06131-7546

Letter 5

February 3, 2006

Dear Mr. Head

The Board of Directors of The Simsbury Flying Club is pleased to submit the following comments to you regarding the draft State Airport Systems Plan. The focus of our comments is preservation of the State's privately owned, public use, airports. The Plan effectively describes the threats to these airports, and the negative effects if they were to close, but we believe it would be greatly strengthened by the addition of actionable proposals to achieve the preservation the Plan advocates.

Our comments are as follows:

1. The Plan correctly outlines the threats to the continued existence of these airports, especially their shaky financial status and the resulting exposure to real estate development. It correctly states that closure of these airports would have a harmful impact on the remaining airports, and on air traffic generally. The Plan's conclusions would be strengthened by describing the negative effect a *mix of aircraft types* would have on the remaining airports (BDL, for example).
2. We suggest that the Plan include a description of the benefits that the threatened airports have to their Towns, or, conversely, the negative effect on the Towns if these airports were to close. Benefits to the Towns include at least the following:
 - Economic benefits, including jobs and serving as a base for local business
 - Future economic development. Because the existence of these airports is uncertain, investors may be unwilling to commit to ventures on or near them. If preservation is secured, investors will be more likely to sponsor development.
 - Open space preservation.
 - Convenient air travel for local residents, using their own or charter and corporate aircraft.
 - Services such as ambulance flights and Civil Air Patrol activities
 - The intangible value of having an airport as part of the local community, including attracting new residents, and civic pride.
3. We believe there is a major omission from the Plan. It does not describe the methods currently available for airport preservation. Further, one of these methods is described in a manner that could lead the reader to an erroneous conclusion.

-The Plan states that the Federal Airport Improvement Program is not

-2-

available to privately owned public use airports. While the AIP is not available to fund *improvements* in these airports, the Vision 100 Program makes AIP funding available for *purchase of land* for conversion of an airport from private to public ownership. The combination of Federal and State funding can cover all but 1 1/4% of the purchase price of private airport land. This method is currently under consideration for the Robertson Airport in Plainville. We strongly urge that this funding method be described in the Plan.

-The Plan does not mention that at least three existing State Statutes provide for use of eminent domain to preserve an airport. The current debate over eminent domain involves the emotional issue of taking land from an unwilling seller. In the case of an airport threatened with sale to a developer, however, this objection does not exist: the owner *has already decided to sell*. Eminent domain would serve to change the buyer of an airport from a real estate developer to a public entity, thus preserving the property for use as an airport.

In one of these existing Statutes, the Commissioner of Transportation is given the power to acquire an airport if, in his opinion, its closure would harm the State aviation infrastructure. The Plan concludes that closure of these airports would indeed harm aviation. Eminent domain should be described in the Plan as a tool now available to carry out the Plan's advocacy of airport preservation.

4. Assuming the Plan is approved, it would become public policy.....or at least would affect the formation of public policy. We find few proposals in the Plan to implement the policy it sets forth. We believe the Plan would be greatly strengthened by the addition of specific proposals to achieve airport preservation. Our comments and suggestions on this subject are described below.

-The Plan suggests that the State provide grants and low-interest loans. This is in the context of the financial threat to privately owned airports if they are required to install expensive security measures. With regard to low-interest loans, most of these airports can ill afford any loan payment, regardless of the rate of interest. Certainly, low-interest loans may help a few airports with additions to their infrastructure, but we believe it unlikely that such investments will be made at airports *whose very existence is threatened*. Thus, we believe low-interest loans offer little value in the effort to preserve our airports.

Grants are also likely to involve the same practical consideration noted above: would the State want to use public funds for grants to airports whose continued existence is in doubt? Probably not.

However, grants could have a major effect on airport preservation, with the additional benefit of improve these airports' safety, security, and infrastructure, if structured with the *same provision that is included in the Federal AIP*

-3-

program: that each grant trigger a *20 year period* during which the airport must remain open. This would preserve airports while also providing improvements to their operation, safety, and security. It would protect the purpose of the grant, and assure that the airport remains open long enough so that the grant is not wasted. This idea does not break new ground: as noted, it is already required in connection with AIP grants. Grants structured in this way, in even relatively small amounts could offer airport preservation at quite low cost to the State.

-The Plan concludes that closure of these airports would harm the State's aviation infrastructure. That being the case, we believe that the State should require airport owners to obtain a permit to take any action that would result in closure of the airport. We believe the Commissioner of Transportation should be required to make a formal determination that the closure of an airport *would not harm* the State's aviation system. Airport preservation is in the public interest. This is a reasonable step to ensure that threatened closure of an airport is reviewed and sanctioned by the State.

-New Jersey has adopted a program for funding the purchase of development rights to its privately owned airports. We understand other States are considering similar programs. We urge our State to adopt similar legislation. It would allow a private landlord to continue ownership of the airport property, while also providing for preservation of the airport.

-The Plan urges the Towns to adopt zoning in the areas *surrounding* airports to encourage economic development. We believe the Towns should also be urged (or required) to adopt a special "Airport" category of zoning for *the airport itself*. While this would not guarantee airport preservation, it would represent an impediment to real estate development, yet still leave the Towns with the final zoning decisions. If coupled with the Plan's suggestion that the Towns include airport preservation in their Plan of Development, this new category of zoning would certainly help to reduce the threat of airport takeover by developers.

We believe the above proposals should be considered for inclusion in the Plan, along with a description of the omitted methods already available for airport preservation. These changes would greatly strengthen the plan by providing for actions that could be taken by the State.

We would be happy to discuss these ideas with you at your convenience. Please contact Bill Thomas, Manager, Simsbury Airport, at 860-693-4550 or "wdthomas@snet.net".

Respectfully Submitted,



Bill Thomas, Manager, Simsbury Airport

Head, David M.

Letter 6

From: Raymond Pietrorazio [ray@ctcombustion.com]
Sent: Sunday, February 05, 2006 3:20 PM
To: David.Head@po.state.ct.us
Cc: Atty: Paulann Sheets
Subject: comment to: Draft Connecticut Statewide Airport System (Draft)

February 4, 2006

Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, CT 06131
Attn: Mr. David Head

Dear Mr. Head,

As you are aware, on July 18, 2005, I submitted to The Connecticut Department of Transportation (Department) a folio entitled "Identification of Hazardous Land Use to Aviation & Land Use Issues", which was mailed to your attention. I respectfully request the above document become my comment to the above captioned Draft.

In addition, I also respectfully request that the Department consider inclusion of the following restrictions into the Draft, in the interests of air travel safety and efficient use of airport facilities, based on aviation information that has recently come to the Department's attention:

"no land use having stack, cooling tower, or other sources of air emissions, within two (2) miles of any airport, or underlies an air traffic pattern, will be permitted without the applicant, at its sole cost, having provided to the Department a detailed, unbiased and professional Environmental Impact and Engineering Study (EIES). The study shall bear the burden to prove that such land use would not present any hazard to aviation, or would not in any way diminish, reduce or cause any negative change to airport operations, such as alteration of flight paths. It must also disprove any claims by opponents that certain adverse affects to aviation, or to the air quality in the vicinity of the airport, would be presented by such land use and its emissions. These restrictions are applicable to any future review of a land use application within two (2) miles of any airport statewide. These restrictions may become more rigid as future information suggests. Final acceptance/determination of all issues shall lie with the Department"

I wish to thank the Department for the opportunity to participate in these proceedings.

Respectfully,

Raymond Pietrorazio

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Middlebury, CT 06762

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TOWN OF GROTON

PLANNING AND DEVELOPMENT SERVICES
Planning Division

Letter 7

134 Groton Long Point Road
Groton, Connecticut 06340-4873
Telephone (860) 446-5970
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February 9, 2006

David Head, Intermodal Planning
Connecticut Department of Transportation
Bureau of Policy and Planning
2800 Berlin Turnpike
P.O. Box 317546
Newington, CT 06131-7546

Dear Mr. Head:

Thank you for this opportunity to comment regarding the Draft Connecticut Statewide Airport System Plan. Please enter the following comments into the hearing record for the Statewide Airport System Planning process now under consideration.

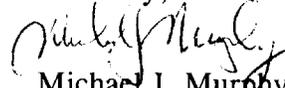
According to the forecasting levels set in the document the Groton-New London Airport (GON) is expected to see an increase of over 40 aircraft during the timeframe. In the past several years, Groton-New London Airport has been the site of increased activity. Several projects on the landside of the airport have increased the capacity of the airport especially with regard to hangar space. The Town of Groton would like to emphasize the importance of keeping the Part 139 certificate for the airport because of this increase in activity as it is already outpacing all documented plans for the future of the airport. Safety and security issues as well as the ability to allow for charters of over 30 people to operate out of the airport are of the utmost importance to our community. Also, several carriers have in the past operated scheduled service out of the airport and the Town of Groton would not want to miss a future opportunity to enhance its services with scheduled flights by having to go back through the certification process.

After September 11, 2001, upgraded security measures have become a significantly greater cause of concern for all airport facilities. The mandates that have come after this date have increased costs. The Part 139 certificate in itself justifies a level of safety and funding that won't be achieved without this certificate. Wildlife hazards alone constitute an issue of concern at the GON that are not currently being taken care of because of limited personnel on the ground. Fencing or other measures would not be funded without the certificate being in place.

On Page 6-2 there is a discussion of the operational status and concerns regarding capacity at GON. If GON is forecasted to see an increase of over 40 aircraft then surely a part 139 certificate should remain in place to encourage and facilitate growth with an eye on safety for the future of the Groton-New London Airport.

Thank you for the opportunity to comment on the Draft Connecticut Statewide Airport System Plan. Attached please find Appendix A which lists minor errors in the referenced document.

Sincerely,



Michael J. Murphy, AICP
Director of Planning and
Development

cc: Mark R. Oefinger, Town Manager
Catherine Young, Airport Manager/CONNDOT
Barbara Strother, Economic and Community Development Specialist

APPENDIX A

SPELLING ERRORS AND WORD USAGE ERRORS

- 1) On page 2-15, 3rd paragraph, “Poquonnock” is spelled incorrectly
- 2) On page 2-15, 3rd paragraph, the directions to the airport are not clear, to someone who is not familiar with the area it would be helpful to state that Poquonnock Road turns into High Rock Road and finally turns into Tower Avenue. Otherwise it makes the directions look as if they are missing information by providing three streets with no left or right turns.
- 3) On page 2-15, last paragraph, “southeastern” not southeast.
- 4) On page 2-16, 2nd paragraph, The City is zoned predominately low density residential should read “This area of the city is zoned predominately low density residential...”, otherwise it gives the impression that the City of Groton lacks large industry or other non-residential land uses and zoning, which is incorrect.

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