

Appendix C - Responses to Comments

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A total of 7 written comments were received concerning the Draft Connecticut Statewide Airport System Plan (CSASP). See Appendix B for those letters. Each Letter is responded to individually as noted below. The responses below relate to a specifically numbered letter in Appendix B and only to substantive comments related to the Draft CSASP.

Letter 1 - Bud Fay, Email dated January 3, 2006

Noted.

Letter 2 - Dave Tyler, Skylark Airport, Email dated January 9, 2006

- 1.) The Connecticut Department of Transportation (ConnDOT) realizes the concern associated with keeping runway approaches free of obstructions (trees, buildings, towers, etc.). A recommendation of this plan is to further investigate ways to keep the runway approaches obstruction free, including legislation. This could include the preservation and protection of airspace through the purchase of obstruction easements on properties or other variations.
- 2.) This initiative has been taken by Towns surrounding airports throughout the U.S. and in Connecticut. This requires that when the sale of a property takes place that the buyer sign an "affidavit" recognizing that they are purchasing a property in an area that can expect a certain level of noise from an airport. This is typically within the 65 dnl at major commercial airports, however, could be adapted to any airport. The CSASP recommends creating a public awareness program in order to educate residents about airport noise if they live near or purchase a home near an airport.
- 3.) ConnDOT realizes that funding can be a significant hurdle for privately owned public use airports. The CSASP recommends establishing a state loan program where privately owned public use airports would be able to apply for state funds for security and maintenance projects at these airports with low or no interest loans. This would allow an operator to receive monies to maintain runways, taxiways and safety items for the airport. ConnDOT has suggested legislation regarding this to the Office of Policy and Management (OPM) for submittal to the legislature. However, the submission was not approved by OPM for the February 2006 session. ConnDOT plans to resubmit this important legislation for future consideration.
- 4.) The office of Airport and Port planning is willing and available to provide assistance, as needed, for the processing state or federal grants. However, presently federal funds do not typically reach privately owned, public use airports, unless the airport is listed as a reliever airport in the National Plan of Integrated Airport Systems (NPIAS). The only privately owned reliever in Connecticut is Robertson Airport in

Plainville, which has never received Federal Grant monies. If CT legislation were to be passed that would create a loan program for privately owned, public use airports, ConnDOT would assist, as needed, in the submissions for the state loan program.

Letter 3 - Robert W. Santy, President Regional Growth Partnership, Testimony dated January 9, 2006

- 1.) The categorization of airports by ownership gives a clear and concise way to organize this plan. It has been clearly stated that while HVN is owned by the City of New Haven, with the passage of Public Law 97-271, the Tweed-New Haven Regional Airport Authority is wholly responsible for its operation and management.
- 2.) Noted.
- 3.) This CSASP's aviation forecasts were created taking into account the HVN AMPU and adjusting the forecasts as deemed appropriate. This gave a CSASP forecast of 260,000 enplanements for year 2025. If the existing HVN AMPU projections were used and corrected for the level of use the airport received in 2004 (40,660 enplanements) as compared to the 2001 HVN AMPU projections for 2004 (161,794 enplanements) this would account for 136,000 enplanements. However, ConnDOT believes that HVN has much greater potential and will continue to use this CSASP enplanement forecast of 260,000 enplanements in 2025.
- 4.) This CSASP is created to work in conjunction with other ongoing regional plans and not as a final word in aviation demand and forecasts.
- 5.) ConnDOT has only limited ability to influence airline decisions when and where to operate, e.g. this is a largely private business decision. Therefore, it would be difficult for ConnDOT to be able to direct at which airports these private ventures operate. The individual airlines evaluate the location of operation as a business venture and utilize the facility where they can achieve the greatest financial return for their investment.
- 6.) ConnDOT realizes that the Coastal Area Management Act looks to preserve environmental concerns while balancing economic development. However, it is ConnDOT's experience that any environmental impact in the CAM is difficult to obtain permits for, as can be seen by the lengthy process of applying for permits for HVN. ConnDOT is attempting to be realistic about the timeframe for which RSA improvements within a CAM area could be permitted and implemented, and is not indicating that they are impossible to get, but they are difficult to obtain. Therefore, the wording of this CSASP will remain unchanged.
- 7.) Noted.

7.1.2) An airport is designated as a reliever airport based on criteria set forth in the National Plan of Integrated Airport Systems (NPIAS). These criteria are related to general aviation relief and Hartford and Plainville are already listed as relievers to BDL. As for designating HVN as a commercial service reliever, ConnDOT has only limited influence upon when and where airlines choose to operate, e.g. this is a largely private business decision. Therefore, it would be difficult for ConnDOT to be able to direct at which airports these private ventures operate. The individual airlines look at the location of operation as a business venture and utilize the facility where they can get the greatest financial return for their investment.

7.1.3) A statement will be added that ConnDOT will continue to support RSA development at all public use airports in CT.

7.1.4) Noted.

7.1.5) Noted.

7.1.6) Noted.

Other Recommendations: Noted.

**Letter 4 - Tom Maziarz, Capitol Region Council of Governments,
Letter dated February 2, 2006**

1.) General Comments

Noted

2.) Airport Preservation

ConnDOT realizes that development pressures on all airports can be attractive for the owner and that each airport that is lost to re-development, like Mountain Meadow Airport, would be extremely difficult, if not impossible, to replace. While there are no specific initiatives spelled out in the plan, ConnDOT will further investigate ways to ensure that Connecticut's aviation system stays in tact. A possibility for this could be financial assistance for the purchase of development rights for these airports. ConnDOT has proposed legislation to create a low-interest loan program for security and maintenance projects at privately owned public use airports. However, the prospect of expanding the potential criteria for this legislation to include the purchase of development rights will be explored.

3.) Land Use Planning & Compatible Land Use

Current Airport Master Plans do look at land use / Zoning surrounding the airport and make recommendations to the Towns for changes to land use / zoning and relays guidelines on what land use / zoning is compatible / incompatible for airport uses. A recommendation of this CSASP is to educate local officials of the benefits of appropriate land use / zoning around airports. It should be noted that neither ConnDOT nor the State of Connecticut has authority over land use / zoning on

municipal land. This decision is up to each community, though ConnDOT will continue to make recommendations regarding land use / zoning to the affected municipalities as part of their planning efforts.

4.) **Noise Measurement**

Noted

5.) **Air National Guard**

The 103rd Fighter Wing of the Air National Guard is mentioned in the inventory chapter. However, mention of the plan to move the Air Guard has been included, as well as ongoing efforts to keep the guard at BDL.

6.) **Competing Economic Development Goals**

A recommendation of this CSASP is to perform an Economic Benefit study for Connecticut's airports. This would identify the economic benefit of the airports to Connecticut as a whole, as well as to the individual towns and regions that the airports are located.

Letter 5 - Bill Thomas, Manager Simsbury Airport, Letter dated February 3, 2006

1.) Noted.

2.) This CSASP describes the benefits that you mention and recommends performing an Economic Benefit Study for all the public use airports in Connecticut.

3.) The Federal AIP program is not available to Privately Owned airports unless they are identified as a reliever in the NPIAS. However, you are correct in stating that AIP funds can be used to study the feasibility of and the purchase of privately owned airports by a public entity, such as a Town. This information will be included in the plan.

You are correct that eminent domain could be used for the preservation of an airport. However, at this time ConnDOT does not plan to use this course of action and is actively investigating other means by which to preserve airports.

4.) Noted.

To mandate that a privately owned venture has to receive a "permit to take an action that may result in the closure of an airport" would be difficult to implement. Because it is a private venture, this could be seen as a "big brother" proposal that may limit property owners / operators to not want to be shut out of potential changes in use. ConnDOT will continue to explore the possibility of purchasing development rights and offer loans to assist in keeping aviation facilities in operation.

Noted.

Noted.

Letter 6 - Raymond Pietrorazio, resident of Middlebury, Email dated February 4, 2006

- 1.) The folio you submitted entitled "Identification of Hazardous Land Use to Aviation & Land Use Issues" will be considered your comment to this CSASP. In response to your submittal, ConnDOT has the following comments (which are identical to the comments submitted on the CT Siting Councils request for comments on Docket 192):
 - A.) The Federal Aviation Administration (FAA) is currently conducting a "risk analysis for over flights of vertical plumes". It is recommended that any action regarding the submitted material reflect the outcome of FAA's "risk analysis".
 - B.) If requested by the FAA, ConnDOT will re-examine their "2001 Declaratory Ruling Concerning the Proposal Calpine/Towantic Energy LLC Power Plant at Woodruff Hill" and its effect on aviation proposed for Oxford, CT.
- 2.) The Federal Aviation Administration (FAA) has sole jurisdiction over airspace in the United States and presently has a method for reviewing and approving any structure over 200 feet above sea level. The FAA, as part of their review, requests ConnDOT to provide comments on these structures if in proximity to a State owned airport, which ConnDOT does upon request. However, to add another layer of study to an already cumbersome process would not be beneficial. In addition, the Connecticut Siting Council reviews these types of facilities in Connecticut and asks for ConnDOT review if deemed necessary, which ConnDOT does upon request.

Letter 7 - Michael Murphy, Director Planning and Development - Town of Groton, Letter dated February 9, 2006

Noted.

Connecticut Statewide Airport System Plan
