



U.S. Department
of Transportation

**Federal Aviation
Administration**

November 15, 2017

The Honorable John Thune
Chairman, Committee on Commerce,
Science, and Transportation
United States Senate
Washington, DC 20510

Office of the Administrator

800 Independence Ave., S.W.
Washington, D.C. 20591

Dear Mr. Chairman:

In accordance with Section 804 of the FAA Modernization and Reform Act of 2012, I am pleased to provide you with the Federal Aviation Administration (FAA) National Facilities Realignment and Consolidation Report, Part 3. The report was published in the Federal Register from July 17, 2017, through August 31, 2017, and public comments were requested. About 80 comments were received and are appended to the report. The report was not otherwise significantly modified.

To develop this report, we formed a workgroup of representatives from the FAA, the National Air Traffic Controllers Association, and the Professional Aviation Safety Specialists. This workgroup formulated a comprehensive process to analyze different realignment and consolidation scenarios and incorporated input from local stakeholders.

The realignment recommendations outlined in the report are the result of a collaborative process that we believe provides a stable foundation for any future realignment analyses or recommendations.

We have sent identical letters to Chairman Shuster, Senator Nelson, and Congressman DeFazio.

If I can be of further assistance, please contact me or Chris Brown, Assistant Administrator for Government and Industry Affairs, at (202) 267-3277.

Sincerely,

Michael P. Huerta
Administrator

Enclosure



U.S. Department
of Transportation

Office of the Administrator

800 Independence Ave., S.W.
Washington, D.C. 20591

**Federal Aviation
Administration**

November 15, 2017

The Honorable Bill Nelson
Ranking Member, Committee on Commerce,
Science, and Transportation
United States Senate
Washington, DC 20510

Dear Senator Nelson:

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**Federal Aviation
Administration**

November 15, 2017

The Honorable Bill Shuster
Chairman, Committee on Transportation
and Infrastructure
House of Representatives
Washington, DC 20515

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Washington, D.C. 20591

**Federal Aviation
Administration**

November 15, 2017

The Honorable Peter A. DeFazio
Ranking Member, Committee on Transportation
and Infrastructure
House of Representatives
Washington, DC 20515

Dear Congressman DeFazio:

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**U.S. Department of Transportation (DOT)
Federal Aviation Administration (FAA)**



Section 804 Collaborative Workgroup

**FAA National Facilities Realignment and
Consolidation Report
Part 3 Recommendations**

Response to U.S. Congress

FAA Reauthorization Bill

Public Law 112-95

Section 804

Submission date: November 15, 2017

Contents

Executive Summary	1
Introduction.....	2
Section 804 Collaborative Workgroup	2
Four-Step Process for Facilities Realignment Analysis.....	3
Report Scope.....	4
Analysis Scenarios	4
FAA Administrator’s Recommendations	5
Recommendation #1: Realign Peoria, IL (PIA) and Springfield, IL (SPI) TRACON Operations to St. Louis, MO (T75) TRACON	5
Background.....	5
Approach	5
Recommendation and Administrator’s Justification	6
Projected Costs and Savings.....	7
Recommendation #2: Realign Pasco, WA (PSC) TRACON Operations to Spokane, WA (GEG) TRACON.....	8
Background.....	8
Approach	8
Recommendation and Administrator’s Justification	8
Projected Costs and Savings.....	9
Proposed Timing for Implementation of Recommendations.....	11
Federal Register Publication.....	11
Conclusion	11
Appendix A: Federal Register Comments	12

Executive Summary

Pursuant to Section 804 of the FAA Modernization and Reform Act of 2012 (P.L. 112-95), a collaborative workgroup of representatives from the Federal Aviation Administration (FAA), the National Air Traffic Controllers Association (NATCA) and the Professional Aviation Safety Specialists (PASS) labor unions was established to analyze the FAA's Terminal Radar Approach Control (TRACON) facilities for realignment.

The Section 804 collaborative workgroup conducts ongoing analysis of FAA Air Traffic Control facilities by gathering and reviewing operational and technical requirements for facilities undergoing analysis, considering existing Agency assets and inventory, considering workforce impacts, gathering and evaluating stakeholder input, and estimating costs and benefits of potential realignments.

The workgroup developed, validated, and presented its realignment recommendations to FAA and labor union leadership, and drafted this report for the FAA Administrator's review and submission to the Federal Register and Congress.

The following recommendations are contained in this report:

1. Realign Peoria, IL (PIA) and Springfield, IL (SPI) TRACON operations to St. Louis, MO (T75) TRACON
2. Realign Pasco, WA (PSC) TRACON operations to Spokane, WA (GEG) TRACON

Per statutory requirements, the justification and details for the collaboratively-developed recommendations are provided in the sections below.

Introduction

Section 804 of the Federal Aviation Administration (FAA) Modernization and Reform Act of 2012 (P.L. 112-95) requires the FAA to develop a plan for realigning and consolidating facilities and services in an effort to support the transition to NextGen, and to reduce capital, operating, maintenance, and administrative costs, where such cost reductions can be implemented without adversely affecting safety.

To comply with Section 804 requirements, the FAA formed a collaborative workgroup with the National Air Traffic Controllers Association (NATCA) and the Professional Aviation Safety Specialists (PASS) labor unions. The workgroup developed a comprehensive process for facilities and service realignment analysis, and was chartered to conduct the analysis and to develop recommendations, taking the following factors into consideration:

- NextGen readiness of facilities
- Terminal Automation Modernization and Replacement (TAMR) program schedule
- Operational and airspace factors
- Existing facility conditions
- Existing Agency assets
- Workforce impacts
- Industry stakeholder input
- Costs and benefits associated with each potential realignment alternative
- Facilities and engineering planning and priorities
- Employee career development

Per statutory requirements, the workgroup develops realignment recommendations in coordination with the FAA's Chief NextGen Officer and the Chief Operating Officer of the Air Traffic Organization (ATO), and the FAA Administrator approves all recommendations.

Section 804 Collaborative Workgroup

The Section 804 collaborative workgroup developed the criteria and guiding principles for evaluating and analyzing existing Terminal Radar Approach Control (TRACON) operations, capturing recommendations, and outlining next steps.

The workgroup developed a repeatable and defensible process to:

- Evaluate facility TRACON operations and prioritize for analysis
- Determine realignment scenarios and develop a set of alternatives for each scenario
- Collect facility and operational data, and document system requirements
- Document facility, equipment, infrastructure, operational, and safety data
- Capture qualitative workforce considerations, including training, transition, facility, and potential workforce impacts of potential realignments

- Consider potential impacts on operations, airspace modifications, route/fix changes, arrival/departure procedures, intra/inter-facility coordination, and pilot community interaction
- Collect and consider industry stakeholder input
- Quantify benefits and cost of potential realignments
- Develop a recommendation for each realignment scenario

Four-Step Process for Facilities Realignment Analysis

The four steps of the process developed by the workgroup are outlined below:



Section 804 Four-Step Process for Facilities Realignment Analysis

The process serves as the platform for analyzing Air Traffic Control (ATC) facilities and services for potential realignments. To evaluate the realignment scenarios, the workgroup conducts working sessions at FAA headquarters, followed by site surveys at all facilities under analysis. At each facility, the workgroup leadership facilitates sessions with facility management, labor representatives, and stakeholders. Stakeholders are briefed on the process, and meetings are held to answer questions and collect input.

The workgroup's technical and operational experts evaluate the airspace, equipment, facility, operational, and safety factors for each alternative in the analysis, and document the findings in Systems Analysis and Requirements Documents (SARDs), which serve as the basis for subsequent business case analysis. The workgroup captures, documents, and reviews workforce impact considerations, and future staffing and training requirements prior to making recommendations.

Throughout each step of the analysis, the workgroup interfaces with multiple FAA programs and organizations to fully inform its analysis and provide regular updates. The workgroup continually improves its processes by reviewing lessons learned from previous realignments, eliciting feedback from the facilities undergoing analysis, and refining working activities.

Realignment recommendations resulting from the four-step process are developed to:

- Maintain or improve operational safety and ensure service resilience
- Facilitate the transition to NextGen

- Enable operational improvements
- Improve facility conditions
- Prioritize current and future investments
- Utilize agency assets more effectively
- Enhance controller proficiency
- Enhance career development and training opportunities

The workgroup operates in conjunction with the agency's NextGen deployment initiatives. It focuses on smaller TRACON facilities and operations. In the future, the process and analysis may be adapted to include the FAA's larger ATC facilities. However, at this time, the FAA does not have the necessary funds or planning capacity to consider these facilities for realignments or consolidations.

Report Scope

This report contains the details and results of analyzing seven TRACON facilities (three potential transfers and four potential receivers), which were identified for analysis using the collaboratively-developed process and criteria.

Analysis Scenarios

Initial analysis conducted by the workgroup encompassed TRACON facilities in the following scenarios:

- Realign Peoria, IL (PIA) TRACON operations and Springfield, IL (SPI) TRACON operations to St. Louis, MO (T75) TRACON or Chicago, IL (C90) TRACON, or sustain/maintain TRACON operations at the current sites
- Realign Pasco, WA (PSC) TRACON operations to Spokane, WA (GEG) TRACON or Portland, OR (P80) TRACON, or sustain/maintain TRACON operations at the current site
- Realign Grant County, WA (MWH) TRACON operations to Spokane, WA (GEG) TRACON or Seattle, WA (S46) TRACON, or sustain/maintain TRACON operations at the current site
- Realign Charleston, SC (CHS) TRACON operations to Myrtle Beach, SC (MYR) TRACON or Savannah, GA (SAV) TRACON, or sustain/maintain TRACON operations at the current site

Throughout the Section 804 analysis process, there are multiple decision points where the workgroup assesses each scenario and alternative for continuation in or removal from the process. Thus, some of the facilities listed above were removed from analysis. These facilities may be studied further in the future.

FAA Administrator's Recommendations

In conformance with the requirements established by Congress in Section 804 of P.L. 112-95, the following realignment recommendations are proposed:

1. Realign PIA and SPI TRACON operations to T75 TRACON
2. Realign PSC TRACON operations to GEG TRACON

Details for both realignment recommendations are provided in the sections below.

Recommendation #1: Realign Peoria, IL (PIA) and Springfield, IL (SPI) TRACON Operations to St. Louis, MO (T75) TRACON

The Section 804 workgroup evaluated Peoria (PIA) and Springfield (SPI) TRACON operations for realignment to St. Louis (T75) TRACON or Chicago (C90) TRACON.

Background

PIA Tower/TRACON was constructed in 1950. It is owned and maintained by the airport authority and leased by the FAA. PIA is an ATC level 6 facility and it operates 24 hours a day. PIA TRACON operations in Calendar Year (CY) 2015 were 72,727¹.

SPI Tower/TRACON was constructed in 1980. It is owned and maintained by the FAA. SPI is an ATC level 5 facility and the hours of operations are 0600-2200. SPI TRACON operations in CY 2015 were 40,530.

T75 TRACON was constructed in 2002. It is owned and maintained by the FAA. T75 is an ATC level 9 facility and it operates 24 hours a day. T75 TRACON operations in CY 2015 were 303,254. T75 is sufficiently sized to accommodate PIA and SPI TRACON operations.

C90 TRACON was constructed in 1996. It is owned and maintained by the FAA. C90 is an ATC level 12 facility and it operates 24 hours a day. C90 TRACON operations in CY 2015 were 1,248,503. C90 is sufficiently sized to accommodate PIA and SPI TRACON operations.

Approach

The workgroup conducted a working session at FAA headquarters with representatives from the potential transfer and receiver facilities, followed by stakeholder meetings and site surveys at PIA, SPI, T75, and C90.

Following the working session and the site surveys, C90 was removed from further consideration as a potential receiver. This decision was based on the following factors:

- Expected negative business case
- Lack of operational synergies
- Non-contiguous airspace
- Air traffic complexity and training considerations
- Service limitations

¹ FAA Air Traffic Activity System (ATADS) was the source for all CY 2015 facility traffic counts quoted throughout this document.

Additional analysis indicated significant costs due to increases in facility level pay and locality pay. Preliminary calculations indicated an NPV of negative \$14.5M for realignment to C90, as compared to an NPV of positive \$16M for realignment to T75.

The decision to remove C90 as a receiver for this scenario was communicated to the facilities involved, and analysis of C90 was discontinued. No formal business case analysis for any alternative with C90 as a receiver facility was conducted.

Recommendation and Administrator's Justification

Upon applying the agreed-upon process and analysis, the workgroup recommends realigning TRACON operations from PIA and SPI to T75 TRACON. Consistent with Congressional direction, the realignment is expected to support the transition to NextGen and result in operational efficiencies and other benefits.

Based on the data collected in the working session, workforce impacts discussions, and site surveys, the workgroup believes that realigning PIA and SPI TRACON operations to T75 TRACON may increase retention of the less-tenured workforce in the area. The lower level facilities within the NAS with slower air traffic, such as PIA and SPI, are traditionally difficult to staff and may experience significant attrition. Reductions in attrition may help retain local knowledge, which the workforce and stakeholders deem important. Realigning the TRACON operations to a larger, newer facility, such as T75, may diversify staff experience and encourage them to remain at the same facility for a longer duration.

Realignment of PIA and SPI TRACON operations to T75 TRACON may improve coordination between Kansas City Air Route Traffic Control Center (ARTCC) (ZKC) and post-realignment T75. Additional efficiencies may be gained for ZKC arrivals and departures. Additionally, realignment may improve coordination with Scott Air Force Base.

Based on the preliminary analysis conducted at T75, TRACON operations from PIA, SPI, and T75 may be conducted from just two RADAR positions during the midnight shift. This may create the opportunity to provide 24-hour approach services to the entire airspace, further enhancing service.

The realignments will allow the newer T75 facility to be used more efficiently. After realignment, employees at PIA and SPI who are currently working in aging facilities will operate in a NextGen-enabled state-of-the-art facility that meets current standards and building codes.

The PIA Tower/TRACON building replacement is an ongoing FAA facilities project. The design phase for the new PIA Tower is near completion. If PIA TRACON operations are approved for realignment, the design would continue for PIA Tower but the need for a TRACON replacement would be negated resulting in a reduced footprint and additional cost savings. If TRACON operations are not realigned, the automation in PIA TRACON would need to be brought up to full compliance with NextGen initiatives. A temporary modular expansion of the equipment room may be required to accommodate necessary equipment, increasing footprint and resulting in additional costs to the agency.

The consolidated T75 TRACON is expected to continue providing the same of level of service and coordination as currently provided at the individual PIA, SPI, and T75 TRACONs. Realignment is not expected to result in deterioration of service or negatively impact national security.

Projected Costs and Savings

The PIA and SPI business case indicates that realignment of PIA and SPI TRACON operations to T75 TRACON provides a positive return-on-investment with a benefit-to-cost (B/C) ratio of 1.3, and a Net Present Value (NPV) of \$16M, given the analytical timeframe of 2016 to 2034. A B/C ratio of 1 or above is considered positive. Costs have been risk-adjusted to the 80% confidence level in accordance with FAA and OMB guidance.

The PIA facility is currently scheduled for replacement. Thus, the choices that were compared were strategically realigning PIA into another TRACON versus the costs to plan, manage, construct, equip and maintain a new facility.

Table 1 reflects the costs in Then-Year (budget) dollars. The Investment Facilities & Equipment (F&E) costs are \$46M for the modify/sustain alternative and \$35.7M for the realignment alternative. However, most of these costs are for the PIA Tower/base building, and only \$2.5M is directly attributable to the realignment for planning, training, site preparation, equipment, telecommunications, and decommissioning of the current facility and/or equipment. Most of the remainder of the investment costs are related to the PIA Tower and 9,500 s.f. base building.

Table 2 shows the lifecycle economic comparison of realignment costs to cost savings in realignment alternative, in present value (discounted) dollars. The primary cost drivers of the realignment are additional salary costs to compensate for increased facility levels, transition and training, and employee relocation (Permanent Change of Station entitlements). The primary benefits (cost savings) expected from the realignment are equipment savings, construction cost savings associated with reducing the footprint at PIA, air traffic staffing scheduling efficiencies, and eventual air traffic salary savings due to expected Tower downgrades at PIA and SPI.

Table 1: Cost Summary (Risk Adjusted, Then-Year \$K)

Type	Mod-Sustain	Realign
Investment Facilities & Equipment (F&E) Total	\$ 46,093	\$ 35,773
Indirect F&E Total	\$ 16,668	\$ 5,896
Operations & Maintenance (O&M) Total	\$ 377,306	\$ 379,007

Table 2: Economic Analysis Summary (Risk Adjusted, Present Value \$K)

Type	Realign
Realignment Costs	\$ 47,237
Cost Savings/Avoidance	\$ 63,349
Net Present Value (NPV)	\$ 16,112
Benefit/Cost (B/C) Ratio	1.3

Business Case Summary for PIA and SPI

*Note: Table 1 is presented in Then-Year (Budget) Dollars.
Table 2 is presented in Present Value (Discounted) Dollars.²*

² The cost summary table lists Then-Year (budget) dollars, which are adjusted for inflation in accordance with OMB guidelines to reflect the actual amount of money that will be required in the year it is needed. The economic analysis summary table lists present-value (discounted) dollars, indicative of the amount that the investment costs today.

Recommendation #2: Realign Pasco, WA (PSC) TRACON Operations to Spokane, WA (GEG) TRACON

The workgroup evaluated Pasco (PSC) TRACON operations for realignment to Spokane (GEG) or Portland (P80)³.

PSC TRACON operates the PSC and Yakima (YKM) airspace; for the purposes of this document, PSC and YKM operations will be known as either “PSC” or “PSC and YKM” interchangeably.

Background

PSC Tower/TRACON was constructed in 1988. It is owned and maintained by the FAA. PSC is an ATC level 6 facility and its hours of operation are 0600-2200. PSC TRACON operations in Calendar Year (CY) 2015 were 56,181.

GEG Tower/TRACON was constructed in 2007. It is owned and maintained by the FAA. GEG is an ATC level 7 facility and it operates 24 hours a day. GEG TRACON operations in CY 2015 were 138,282. GEG is sufficiently sized to receive PSC and YKM TRACON operations.

P80 TRACON was constructed in 1958. It is owned by the Port of Portland and leased by the FAA. P80 is an ATC level 9 facility and it operates 24 hours a day. P80 TRACON operations in CY 2015 were 303,307. P80 is sufficiently sized to receive PSC and YKM TRACON operations, though some reconfiguration of TRACON positions and additional equipment would be required.

Approach

The workgroup conducted a working session at FAA headquarters with representatives from the potential transfer and receiver facilities, followed by stakeholder meetings and site surveys at PSC, P80, and GEG.

Additional telecons were conducted by the workgroup with the PSC facility representatives, both Labor and Agency, to discuss daily operations and additional concerns expressed by facility members and stakeholders.

Recommendation and Administrator’s Justification

Upon applying the agreed-upon process and analysis, the workgroup recommends realigning TRACON operations from PSC to GEG TRACON. Consistent with Congressional direction, the realignment is expected to support the transition to NextGen and result in operational efficiencies and other benefits.

The realignment could create more efficient air routes, improving controller procedures and reducing workload. There is existing pilot / community interaction between PSC and GEG: many aircraft operate between GEG and PSC during Operation Raincheck, which is a pilot protection and survival plan program.

PSC TRACON handles similar aircraft, has similar weather patterns, and is geographically similar to Spokane (GEG). Controllers from PSC expressed familiarity with the city of Spokane and the surrounding area.

³ Concurrently, the workgroup evaluated Grant County (MWH) TRACON operations for realignment to GEG or Seattle (S46). The workgroup is conducting additional analysis on that scenario.

PSC TRACON was constructed in 1988, and is approaching 30 years old. Future building construction would be less costly without a TRACON and would reduce the long-term costs of maintaining the NAS infrastructure.

GEG is one of the agency's newer facilities with redundant power systems, including a facility uninterruptible power supply (UPS) and backup HVAC systems. The operations room at GEG is currently underutilized, with positions available for additional facilities. Realigned employees from PSC would have the opportunity to work in a newer, state-of-the-art, NextGen-enabled facility. The PSC realignment is expected to reduce the number of automation systems in the NAS, allow the Standard Terminal Automation Replacement System (STARS) platform at PSC to be repurposed for future TRACON replacements, and utilize the GEG TRACON more efficiently.

PSC TRACON, which currently operates part-time, may obtain 24-hour approach control services once realigned to GEG. If TRACON operations for PSC airspace become 24-hour, this will potentially enhance user benefits and enhance service.

Historically, PSC has had high controller turnover and high training workload. Realignment to GEG may provide the relocated workforce with enhanced career progression opportunities, and create a more effective training environment through additional levels of complexity and higher traffic volume.

The consolidated GEG TRACON is expected to provide the same level of service and coordination as the status quo. Realignment is not expected to result in deterioration of service or negatively impact national security.

Projected Costs and Savings

The PSC business case analysis indicates that realignment of PSC TRACON operations to GEG provides a positive return-on-investment, with a benefit-to-cost (B/C) ratio of 1.1, and a Net Present Value (NPV) of \$1.1M, given the analytical timeframe of 2016 through 2034. A B/C ratio of 1 or above is considered positive. Costs have been risk adjusted to the 80% confidence level in accordance with FAA and OMB guidance.

Table 3 reflects the costs in Then-Year (budget) dollars. The Investment Facilities & Equipment (F&E) costs are \$4M for the mod/sustain alternative and \$3M for the realignment alternative. The direct Investment F&E costs of the realignment include planning, site preparation, equipment, telecommunications, controller training, and decommissioning of the current facility and equipment.

The quantitative benefits (cost avoidance) of the realignment include equipment cost avoidance and air traffic staffing savings at PSC Tower. Additionally, there is a Tech Ops cost avoidance: a systems specialist I-band promotion, which would occur with the installation of a Standard Terminal Automation Replacement System (STARS) platform in the legacy case, will not take place at the realigned facility.

Table 4 shows the lifecycle economic comparison for the realignment alternative in present value (discounted) dollars.

The primary cost drivers of the realignment are salary increases associated facility level increases for PSC controllers realigning to GEG, cross-training of all controllers on GEG and PSC airspace, additional telecommunications, locality adjustment, and employee relocation (Permanent Change of Station entitlements).

Table 3: Cost Summary (Risk Adjusted, Then-Year \$K)

Type	Mod-Sustain	Realign
Investment Facilities & Equipment (F&E) Total	\$ 4,213	\$ 3,346
Indirect F&E Total	\$ 4,991	\$ 2,409
Operations & Maintenance (O&M) Total	\$ 395,455	\$ 397,985

Table 4: Economic Analysis Summary (Risk Adjusted, Present Value \$K)

Type	Realign
Realignment Costs	\$ 7,485
Cost Savings/Avoidance	\$ 8,560
Net Present Value (NPV)	\$ 1,075
Benefit/Cost (B/C) Ratio	1.1

Business Case Summary for PSC

Note: Table 3 is presented in Then-Year (Budget) Dollars.

Table 4 is presented in Present Value (Discounted) Dollars.⁴

After the PSC business case was presented and approved, the STARS automation platform was delivered to PSC TRACON. At the time of the analysis, it was assumed that the delivery could be avoided, and the system deployed elsewhere. This delivery impacts the business case, resulting in an NPV of -\$649K and a B/C ratio to 0.9.⁵ Realignment of PSC to GEG makes sense for more efficient and safe management of the NAS and ATC facilities. The collaborative workgroup of FAA, NATCA, and PASS believe this realignment to be both beneficial to the NAS and consistent with the direction from Congress.

⁴ The cost summary table lists Then-Year (budget) dollars, which are adjusted for inflation in accordance with OMB guidelines to reflect the actual amount of money that will be required in the year it is needed. The economic analysis summary table lists present-value (discounted) dollars, indicative of the amount the investment costs today.

⁵ These numbers assume that the STARS will be returned to the FAA Depot where it can be repurposed. A small benefit was captured for returning the system.

Proposed Timing for Implementation of Recommendations

The implementation of facility and operational realignments and staff moves are subject to current labor and FAA collective bargaining agreements, which requires notification to the workforce of up to 12 months, as well as other FAA policies, and regulations. The FAA currently plans to notify the workforce of the recommendations in 2017, initiate project implementation in 2018, and begin cutovers in 2019. Implementation of each realignment is contingent on funding and resource availability.

Federal Register Publication

Following the process outlined in Section 804 P.L. 112-95, the FAA published the National Facilities Realignment and Consolidation Report, Part 3 in the Federal Register for public review and comment from July 17 through August 31, 2017. About eighty comments were received. The comments are included as an appendix to this report.

Conclusion

The realignment recommendations outlined in this report are the result of a congressionally directed collaborative process that involved a multi-disciplinary workgroup of representatives from FAA management, labor, field facilities, finance, and subject matter experts. The outcome is consistent with the requirements set out by Congress via Section 804 of P.L. 112-95.

The repeatable and defensible process developed by the workgroup serves as a stable foundation for realignment analyses and recommendations that will be developed in the future. The workgroup will use the process to maximize operational, administrative, and maintenance efficiencies, support transition to NextGen, and deliver the highest value to stakeholders.

Through continuous analysis and assessment of facilities through this process, the FAA supports its goal of ensuring safe and secure operations across the nation.

The FAA's success in conducting realignment analysis, continuing to develop realignment recommendations, and implementing those realignments is contingent upon stable multi-year funding, continued collaboration with labor unions, and coordination with industry stakeholders.

Appendix A: Federal Register Comments

Public Comment Period: 7/17/17 – 8/31/17

GENERAL COMMENTS	AUTHOR
<p><i>I am 100% in support of the realignments. These facilities are struggling and not only to have the traffic but to keep staffing. Move the radars to where they have the capability, technology, and staffing for it to be successful. It would also allow controllers to advance in their career, where as if the realignment doesn't occur, they would be stuck in facilities that are hard to keep staffed with poor technology.</i></p>	<p>Anonymous</p>
<p><i>Aviation Management Associates, Inc., a Washington DC-based aviation consulting firm was commissioned in 2012 to complete a study of ATC facility consolidation and realignment. The study team was led by Mike Harrison, former FAA Air Traffic System Chief Architect.</i></p> <p><i>The 71-page study titled "Air Traffic Control -From Anywhere to Anywhere: The Case for ATC Consolidation" is dated August 20, 2012 and has been uploaded and made available in support of this Docket topic.</i></p>	<p>Gary Church, Aviation Management Associates, Inc. Washington DC</p>
<p><i>When merging these airspaces occurring arose several problems regarding the safety and security of the Air Traffic Control. Since the workload is not balanced for varying sectors smaller facilities are being metered with bigger facilities that are updated are more productive than others. This is every cost efficient so that all Air Traffic Controllers are being productive, which will addition aid in efficiency and tend to the capacity of the airspace. With the shrinking facilities there will be a higher demand for controllers. For an Air Traffic Controller there is a single pay structure for a facility, depending on the level of the facility. With facilities merging into higher level facilities pay allocation should be higher. However, with all this dependency on technology in the event of an ADS-B crash, will the Air Traffic Control be able to handle that load especially with the increased capacity and their plan to have these few placement, but without that system their precision will fail. If they rely too much on these systems in times of havoc that will not benefit them at all. On the other hand when it's performing at its full capabilities this is outstanding technology for efficiency, safety, and saving on cost. NextGen works to ensure all aspects of air travel are working together to improve the daily operations of air travel. To comply with the FAA Modernization and Reform Act of 2012 airplanes as well as airports need to be modernized and updated with this new technology so that all plane has to be equipped with the technology that will allow communication to be easier with operations and Air Traffic Control and</i></p>	<p>Imani M. (3 copies received)</p>

<p><i>vice versa. To ensure that this works as expected, various plans need to be put in place so that in case of failure airlines and pilots know how to approach the situations.</i></p>	
<p><i>Your first two points are quite true, but the third would positively affect how many controllers, exactly? And what happens to the careers of those "left behind?"</i></p>	<p>Anonymous</p>
<p>PSC COMMENTS</p>	<p>AUTHOR</p>
<p><i>I agree with the decision of the workgroup to realign PSC to Spokane.</i></p> <p><i>The service that pilots receive every day is often given from a facility that is a long distance from that pilot's position and destination. This fact does not affect the level of service or the safety of the service that they receive from air traffic controllers. Currently, Chinook Approach offers air traffic services to three other towered airports and numerous other non-towered airfields every day that are well outside of the local Tri-Cities area. The pilots that fly into Pendleton, Walla Walla, Yakima, Hermiston, Prosser, Sunnyside, Ellensburg, Desert Air, Boardman, or any of the other small air strips within that very large radius receive safe, orderly, and expeditious service every day from air traffic controllers that live in the Tri-Cities. These controllers may have never been to any of these other locations, but their training is such that they can safely service the pilots flying into these airports. That service will not change if it is being provided from Spokane. Talking to pilots landing in an area that the controller does not live in is a common situation throughout the nation.</i></p> <p><i>Also, if the facilities were combined it would be a much better facility for the training of new air traffic controllers. With Spokane and Pasco's traffic combined in one facility, the traffic levels would be much more consistent and it would be more beneficial experience for new controllers to move along to higher level facilities.</i></p>	<p>Anonymous</p>
<p><i>I am strongly opposed to any plan to move the Chinook Approach TRACON facilities from Pasco, Washington to Spokane, Washington. Such a move would create air space congestion and diminish the safety of aviation in the Pasco area.</i></p> <p><i>Chinook Approach provides radar coverage for the Tri-Cities Airport, as well as airports in Yakima, Walla Walla, Pendleton, Hermiston, Richland and Prosser plus two military installations and general aviation facilities in our large geographical area. Our region has one of the highest population growth rates in the country, a strong 2016 increase in operational activity, and the potential</i></p>	<p>Separate identical comments were received from Mike Berriochoa</p> <p>Louis Gietl, Mike George, Martin Towsley, Nancy Bussing,</p>

<p><i>for new air service on the horizon. A move of the TRACON at this time would significantly diminish the level of service that is now provided.</i></p> <p><i>The cost of operating out of Spokane will be higher, the safety of having controllers so far removed from our service area will diminish, and the unique characteristics of Chinook Approach with its multiple airports, military traffic, and large coverage area will be compromised.</i></p>	<p>and Robert Bussing</p>
<p><i>I object to moving Chinook Approach from Pasco to Spokane. Invaluable local knowledge would be lost. Part of the smooth and efficient operation of Chinook Approach is the relationships that exist among pilots and controllers.</i></p>	<p>Brian Thompson Selah, WA</p>
<p><i>It's not going to be a great saving for the tax payer to move something that serves the needs of the Aviation community & is right here now and working great</i></p>	<p>Jim Hodge Benton City, WA</p>
<p><i>The Tri-Cities Airport (PSC) is the major commercial service airport serving SE Washington and NE Oregon. The airport supports one of the fastest growing regions in the United States. Airport enplanements have increased 6% and 9% in the last two years. <u>Reducing air traffic control service in a rapidly growing community does not make sense and we disagree with the recommendation listed in the report to close the Pasco TRACON.</u></i></p> <p><i>This recommendation was also published with the knowledge that the Standard Terminal Automation Replacement System (STARS) was already being installed at PSC, which reduces the cost effectiveness of this realignment and results in a negative net present value and cost / benefit ration greater than 1. Why does FAA recommend moving forward with a project that will actually cost the taxpayers more than leaving the TRACON in place? It is particularly concerning that knowledge of the error in the financial analysis was pointed out and acknowledge by FAA during the report review period and yet the final report submitted to Congress still contains the erroneous analysis. There is only a small footnote to explain the updated data. We would strongly urge the FAA to correct the report to avoid any appearance of misleading Congress.</i></p> <p><i>Combining the Spokane (GEG) and Pasco (PSC) TRACONS would create one of the largest approach control areas in the nation. However, this airspace will not be contiguous as Moses Lake TRACON, which lies between GEG and PSC,</i></p>	<p>Donald Taft Pasco, WA</p>

has not been evaluated during this study. As a result, aircraft traversing the Spokane to Pasco airspace would experience multiple frequency changes as they would be transferred from GEG to Moses Lake then back to GEG. By merging multiple centers you are also increasing your risk in regards to airspace closures similar to the incident in Chicago in 2014 where an employee was able to disrupt operations resulting in approximately 2000 flight cancelations.

Aircraft operation numbers also do not support the realignment of PSC over Moses Lake. For the period July 2015 through December 2016 the PSC TRACON had 143,406 operations compared to 75,226 at Moses Lake TRACON, almost double the aircraft operations. The PSC TRACON serves three commercial service airports, six general aviation airports, and supports numerous military installations including the Yakima Firing Center, the Boardman Bombing Range and Military Instrument Routes from JBLM McCord, NAS Whidbey, Oregon Air National Guard, Oregon Army National Guard and the Pendleton UAS Test Center which is only one of five in the US. The Tri-Cities Airport is also a staging area for FEMA in the event of a Cascadia Fault Incident. Removing local control of the airspace will create a loss of local knowledge of terrain and other contributing factor that could have an effect on aviation safety.

This report states that GEG is a newer facility with redundant power systems. While not newer PSC also has redundant power systems that include generator power and two feeds from the Franklin county PUD which greatly reduces the impact of an external power failure.

This report also states that the “PSC TRACON, which currently operates part-time, may obtain 24-hour approach control services once realigned to GEG. If TRACON operations for PSC airspace became 24 hour, this will potentially enhance user benefits and enhance service”. Although the PSC TRACON operates “part-time” the airport is provided 24-hour service through Seattle Center. This realignment will not enhance user benefits and service as it is already provided.

This report touches on the PSC controller turnover and high training workload stating the following: “Realignment to GEG may provide the relocated workforce with enhanced career progression and opportunities, and create a

<p><i>more effective training environment through additional levels of complexity and higher traffic volume". Although PSC does have a high turnover rate and is considered a training station, PSC has placed controllers in level 9, 10, 11 and 12 facilities. These are some of the busiest locations in the nation and controllers prospects as they are already getting the training that they need to progress into a more complex working environment.</i></p> <p><i>In general it is hard to understand the reasoning behind this realignment report. It is not cost effective to consolidate PSC with GEG. The report states as much in a footnote at the bottom of the last page. Safety will not be enhanced. If anything safety will be degraded due to controller's unfamiliarity with local terrain and the large hole created in the middle of the airspace by Moses Lake TRACON. Controllers are being placed in high level facilities right out of the PSC TRACON. The PSC TRACON is an asset to the community and an asset to the aviation system. It provides cost effective management of the local airspace while giving its controllers the skills needed to work in complex high level facilities. This facility needs to stay in the Tri-Cities and continue to be an asset to our growing community and the airspace system.</i></p>	
<p>PIA / SPI COMMENTS</p>	<p>AUTHOR</p>
<p><i>In response to SPI/PIA/T75 realignment proposal:</i></p> <p><i>1) no services offered by ATC will be lost as a result of the realignment. Approach control services with a control tower will still be available to all users. If anything, services will be better provided as controllers become more skilled from working traffic with more volume & complexity and controllers are able to specialize (full time Approach and full time tower controllers vs. controllers who spend part time working each).</i></p> <p><i>2) As SPI Tower will continue to operate and is in severe need of equipment updates, it would be disingenuous to push the entire cost of the current equipment upgrade project on to this process. If SPI were to discontinue the TRACON equipment update, it would only serve to save a fraction of the total cost of the upgrade project because the tower and all supporting equipment would still require updating.</i></p>	<p>Anonymous</p>

<p><i>3) Not only does the realignment process save the FAA & tax payers money, it comes at great benefit to the employees who will be promoted as a result of the move and comes with no degradation of service.</i></p> <p><i>Win, Win, Win.</i></p>	
<p><i>I strenuously object to Recommendation #1: Realign Peoria, IL (PIA) and Springfield, IL (SPI) TRACON Operations to St. Louis, MO (T75) TRACON. My objection is based on the untimely data included in this study.</i></p> <p><i>1. PIA and SPI automation systems upgrades are already underway and not accounted for in the costs of this study. At the completion of these projects, the automation systems will be NEXGEN compliant. These projects will be completed prior to any realignment activities.</i></p> <p><i>2. PIA tower and TRACON building replacement design phase has already been completed (100%). This study did not take into account the costs associated with re-accomplishing the Tower and TRACON building replacement study after the TRACON has been relocated.</i></p> <p><i>3. It is very likely that the timing of this realignment from PIA and SPI to T75 would be late enough that the PIA TRACON and Tower construction phase would be funded, if not underway already. This study does not take these costs into account either.</i></p> <p><i>The timing of this relocation is such that it is very likely that the automation systems at PIA and SPI will be upgraded at each of their TRACONs, and then built again in a proposed new TRACON at PIA all prior to building these automation systems again for the second (SPI>T75) and third (PIA>T75) times.</i></p> <p><i>There is little chance of postponing the automation system upgrades as well, since the current automation system is due to be unsupported in the very near future.</i></p> <p><i>I recommend that the study include the costs to upgrade the automation systems in place at SPI and PIA from ARTS-IIe to STARS-ELITE prior to installing the automation systems for PIA and SPI at T75, and add the additional cost of</i></p>	<p>Anonymous</p>

<p><i>another PIA Tower Building Replacement Design. Then I recommend as a side note, adding in the additional cost to transfer if the realignment occurs after the PIA Tower and TRACON construction is fully underway and yet another STARS-ELITE automation system is installed. These changes will show a more accurate reflection of the cost to the Government for such a realignment.</i></p>	
<p><i>I oppose the Section 804 Collaborative Workgroup’s recommendation to realign Springfield, IL (SPI) TRACON operations and Peoria, IL (PIA) TRACON operations to the St. Louis, MO (T75) TRACON. The existence of Springfield’s TRACON is a vital to the safe and efficient operation at the Abraham Lincoln Capital and surrounding airports. I believe the outcome will negatively impact the usability, quality of service, and safety to pilots flying in Central Illinois.</i></p> <p><i>The proposed realignment would create too large of an airspace sector for the busy St. Louis facility to handle and will suppress future growth for aviation in Central Illinois. Springfield’s geographical location provides an important asset to our National Airspace System and provides a unique option for redundancy if there is ever an outage, natural disaster, terrorist attack, or fire that would cripple a remote radar facility.</i></p> <p><i>The consolidation report unfairly justifies government cost savings by bundling Springfield with the cost of Peoria’s new control tower and fails to account for the NextGen technology and automation presently being installed at Springfield’s Control Tower.</i></p> <p><i>The realignment of Springfield’s TRACON would undoubtedly be a loss for local aviation. Please keep the TRACON at Springfield, IL operational.</i></p>	<p>Separate identical comments received from Steven Barnes, Michael S., Mam Denth, Courtney Joyner, Jaime Rabins, Nic Gordon, Kenneth Smith, Thomas Fitzgerald, Kenny Paoni, Jeff Brown, Karl Barnhart, Randolph Martin, Robert Locke, Joel E., Tina Tousley, Barry Fitzgerald, Natalie Fitzgerald, Kim Foster, Gary E. McDonald, Julio C. Morales, Kenneth Foard, Michael Cherry, Paul Heintzman, Robert Gordon, Vincent Howard, C.W. Groesch, Terry</p>

	<p>Kirk, Curt Christensen, Timothy Grigsby, Terry Owens, Barry Hammon, Timothy Nudo, Ted Campbell, Jon J. Lord, Tyler Sinclair, Thomas R. Swift, Kenneth Boyle, Michael Olinger, James D. Stucky, Heather Southard, Jason Southard, Frank Edwards, Edward Boyd, Robert Pierce, Samuel A. Haycraft, Joseph Jacob Angermeir</p>
<p><i>I oppose the change, let's keep our local services in the community, they do a great job of controlling our airways and providing first class service both in Peoria and Springfield</i></p>	<p>J. Brown</p>
<p><i>The Metropolitan Airport Authority of Peoria is hereby submitting comments to Docket Number FAA-2017-0706-0014, regarding the proposal to consolidate the PIA and SPI TRACONs into the T75 TRACON near St. Louis, MO. The Airport Authority is strongly opposed to the proposed consolidation because it will result in a diminished level of safety and service. There are several points in the Section 804 recommendation report that are in error, or have been superseded by events and are no longer applicable. In addition, the business case for consolidating these two facilities as stated in the report is incorrect due to erroneous data used in the report and due to events that have occurred since the report was completed, as is explained in the attached documents. The attachments include a letter from the Airport Authority and a memorandum</i></p>	<p>Metropolitan Airport Authority of Peoria</p>

from the Wing Commander of the 182nd Airlift Wing of the Illinois Air National Guard.

Start Attachment 1

The Metropolitan Airport Authority of Peoria is grateful for the opportunity to provide comments to Docket Number FAA-2017-0706-0014, regarding the above captioned report. As background, the Airport Authority owns and operates two airports in Central Illinois. The General Wayne A. Downing Peoria International Airport on the southwest side of Peoria is home to six corporate flight departments (including one of international range and scope), a full service fixed base operator, a unit of the Illinois Army National Guard (flying CH-47 Chinook helicopters), a unit of the Illinois Air National Guard (flying C-130H airplanes), as well as a healthy General Aviation sector of owner flown aircraft. The airport hosts four airlines (Allegiant, American, Delta, and United) serving twelve direct, non-stop destinations, which is the largest number of destinations available in Illinois outside of the Chicago region. The Airport Authority also owns and operates the Mt. Hawley Auxiliary Airport on the north side of Peoria, which is a General Aviation airport with over 60 based aircraft that serves personal and business aviation needs in that rapidly growing section of the metropolitan area.

There are several points in the Section 804 recommendation report that are in error, or have been superseded by events and are no longer applicable. The Airport Authority strongly opposes the recommendation to consolidate PIA and SPI TRACONs into T75 TRACON, because it will result in a diminished level of safety and service. In addition, the business case for consolidating these two facilities as stated in the report is incorrect due to erroneous data used in the report and due to events that have occurred since the report was completed, as will be explained below.

The following points provide analysis documenting the case for maintaining separate TRACON facilities:

- 1. TRACON consolidation will result in operational inefficiencies and a reduction in the margin of safety.
 - a. If the PIA TRACON is relocated to T75, all local knowledge will be lost. T75 controllers will not be familiar with the aviation**

related landmarks Comments to Docket FAA-2017-0706-0014 August 21, 2017 Page 2 of 5 and especially the non-aviation related landmarks, so assisting lost aviators will become more difficult and less effective. Loss of local knowledge will increase the likelihood of fatal accidents. In addition, air traffic controllers are currently able to and do attend local aviation events, and can share knowledge and communications face to face with local pilots. Consolidation will eliminate this benefit.

- b. PIA is home to the 182nd Airlift Wing of the Illinois Air National Guard, which operates C-130 aircraft. The 182nd Airlift Wing is a significant part of the nation's defense readiness plans and is continually called upon for worldwide deployments on missions to support the US Air Force's airlift capacity. The Wing commander serves as Chairman of the national C-130 Weapon System Council. This base has developed major new combat technology that has been adopted by the regular Air Force as a whole and also adopted by foreign air forces (JTAC simulator). Military operations are not the same as typical airline and general aviation operations. The 182nd Airlift Wing is flying large aircraft practicing combat-type maneuvers in the airspace owned by PIA TRACON. Air Traffic Controllers handling this type of aircraft must develop familiarity with their unique maneuvers and airspace needs. Currently, the 182nd hosts quarterly Air Operations Board meetings in which the commanders, pilots, base operations, Airport Authority Operations, and FAA Air Traffic Control staffs meet to discuss these day to day challenges. Many times at these meetings, 182nd pilots and ATC staff work out difficulties to make operations work better in the airspace outside the local control of the tower, but still in the PIA TRACON area of responsibility. Consolidation and relocation of the FAA staff will make this face to face coordination much more difficult or impossible, and it will impose travel costs on all entities. (See attached memorandum from the 182nd Airlift Wing.)*
- c. Consolidating PIA TRACON to T75 will reduce system redundancy, resulting in lower system reliability. With consolidation, FAA will be putting all of their eggs in the same basket and increasing the risk of a catastrophic failure. A number of years ago (just prior to 2009), an incident occurred in Evansville, Indiana in which a contractor pulling new conduit for the phone company cut all the telephone cables in the airport's*

terminal complex. This resulted in a loss of telecommunications for the entire airport terminal area and all of its tenants, including the FAA's Air Traffic Control Tower. Air Traffic Controllers in the tower were using their personal cell phones to turn the EVV TRACON's airspace over to Indianapolis Center (ZID), which preserved services in that area because ZID had a separate phone system and radar. In addition, two of FAA's nearby facilities have recently been incapacitated by fires. Both Chicago Center (ZAU) and Elgin TRACON (C90) have experienced debilitating fires in the last few years. While these facilities were out of service, the existence of other nearby stand-alone TRACONs preserved the capability Comments to Docket FAA-2017-0706-0014 August 21, 2017 Page 3 of 5 to take over airspace and maintain traffic flow into Chicago's two major airports. Without the existence of SPI, PIA, and MLI approach control facilities, Chicago's major airports would have been reduced to non-radar environments for the duration of those outages. The addition of new STARS terminals at PIA, which has already been funded for this year, will enhance PIA's ability to serve as a backup for nearby facilities.

- d. PIA has entered into a letter of agreement with the US Army Corps of Engineers to serve as a facility to stage relief supplies and cargo in the advent of an anticipated major earthquake on the New Madrid fault. PIA was chosen by the Corps of Engineers for this role because the airport is close enough to the area that will be impacted by the quake to serve as a base of operations and supply, yet far enough away to not be impacted by the major damage associated with the quake. T75 will be squarely inside the major damage zone and could become incapacitated. Consolidation of PIA and SPI into T75 will result in the exposure of half the state of Illinois to a complete radar blackout, should this occur.*
- e. While T75 is a newer facility, it is just as exposed to incapacitation as the two Chicago facilities are, whether the result of acts of nature, accidents such as damage from unrelated contractors (such as happened in July with the area-wide power failure that occurred in North Carolina's Outer Banks or several years ago at the Evansville, IN ATCT), or willful acts by those with intent to harm.*

2. *TRACON consolidation will not result in cost reductions for ATCT replacement at PIA, and the report contains erroneous cost information in its comparisons.*
- a. *The report contained estimates of \$46 million to sustain the TRACON at PIA and \$37 million to consolidate at T75, yet it indicated that most of the sustainment cost involved construction of a new tower and TRACON. The cost estimate for constructing the new tower and TRACON base building is only in the neighborhood of \$20 million, not \$46 million as identified in the report. This cost will not be eliminated by consolidating the TRACON, since the existing building is essentially worn out and needs to be replaced regardless. If consolidation occurs, a new tower will still need to be constructed, albeit with a base building that has a few less square feet. The design for the new tower has already been completed at a cost of over \$1 million to the FAA. Should the FAA proceed with consolidation, additional design fees will be incurred to modify the design to remove the TRACON square footage and to re-route other affected infrastructure and associated equipment.*
 - b. *Eliminating the TRACON from the design will not eliminate the need for the new structure. The existing building dates to 1959 (not 1950 as identified in the report), and it will need to be replaced in the next five years. Within five years, the existing building will experience major failures in terms of building systems such as HVAC, plumbing, and other Comments to Docket FAA-2017-0706-0014 August 21, 2017 Page 4 of 5 systems. Construction of the same magnitude will still be required; eliminating the TRACON will not save significant dollars, and will actually cost more to re-design.*
 - c. *The design for this facility is essentially complete, and the only remaining item is the design to connect navaid and lighting cables to the new tower. That work element has been completed and submitted to the FAA design team for review. The FAA has already invested over \$1 million in this design effort. The completed design includes a TRACON. To delete the TRACON, the facility will have to be re-designed, which will increase Architectural and Engineering fees. The footprint will not be significantly smaller, due to other design considerations, such as FAA's facility security requirements, ability to provide access for semi-trailers to the facility, and other issues. The base building will only be a few square feet smaller, which will not*

significantly lower construction costs. Most of the cost of construction is driven by the height of the tower cab itself, since the main design consideration for the new tower is visibility to the runway ends. So consolidating the TRACON to T75 will not save significant construction dollars and will result in additional design fees that will offset most of the construction savings.

- 3. TRACON consolidation will not result in reductions in equipment costs. PIA is already equipped with the ASR-11 digital radar. New STARS terminals were in FAA's budget for this year for the existing tower to replace the existing ARTS II terminals. These new terminals will be installed later this year. Consolidating PIA to T75 will result in a waste of this expenditure. The installation of the STARS terminals was not included in the business case for consolidation and was not included in the Section 804 Workgroup analysis, which impacts the benefit/cost calculation in favor of maintaining separate facilities. In addition, the new STARS terminals will allow controllers at PIA to view radar readouts from other facilities, thereby greatly enhancing system redundancy that will be lost in consolidation.*
- 4. The report's cost/benefit numbers are not correct. If, as stated in the report, most of the \$46 million cost to maintain the TRACON at PIA is the cost to construct a new TRACON facility, then the benefit/cost ratio is incorrect. If the TRACON consolidation happens, nearly all of the construction cost will be required to occur during the study timeframe anyway. So consolidating the TRACON will not save most of the construction cost. Construction cost has been estimated at approximately \$20 million including the TRACON, so the \$37 million relocation/realignment cost represents a benefit cost ratio result of only 0.54, significantly below the level of 1.3 claimed in the study report.*

The foregoing analysis demonstrates that consolidating the PIA and SPI TRACONs into T75 does not make sense from an operational efficiency standpoint, and it also does not make sense from a financial standpoint. An alternative to consolidating these two TRACONs into the St. Louis area would be to consolidate them into the new facility that Comments to Docket FAA-2017-0706-0014 August 21, 2017 Page 5 of 5 will be constructed in Peoria. This would still allow FAA to reduce the headcount of air traffic specialists while preserving the operational and redundancy benefits of a separate stand-alone TRACON facility. Thank you for the opportunity to submit this information and analysis to the docket for consideration. Should additional information be

needed, please contact the Airport Authority at (309) 697-8272 ext 100 or via email at golson@flypia.com.

Start Attachment 2

- 1. The 182d Airlift Wing (182 AW) operates eight C-130 aircraft from the General Wayne A. Downing International Airport in association with the Metropolitan Airport Authority of Peoria (MAAP), Peoria TRACON, and the Peoria Air Traffic Control Tower. The 182d Airlift Wing is tasked with keeping 16 combat mission aircrews trained and proficient at all times in order to support continuing national defense objectives and state domestic operations.*
- 2. Our local training profiles include standard Instrument Flight Rule (IFR) and Visual Flight Rule (VFR) approaches, low and high altitude tactical departures and recoveries, and Night Vision Goggle (NVG) short field landings and takeoffs. We also conduct IFR and VFR singleship and formation routes which terminate in several variations of IFR and NVG airdrops. These routes require precise takeoff times and enroute control to arrive at our drop zone at an exact Time Over Target (TOT) in order to train to combat specifications.*
- 3. The 182d Airlift Wing has an intimate relationship with MAAP, TRACON, and the tower. We currently have seven Letters of Agreement (LOA) with these entities which help define our interactions and mutual expectations. Our local air traffic controllers understand and use these LOAs and their accumulated experience to deconflict our operations with commercial traffic. Peoria ATC members attend our quarterly Air Operations Board (AOB) where we discuss any trends and issues that affect local flying. This allows us to understand each other's needs and to discuss how we can work together more efficiently.*
- 4. The 182d Airlift Wing annually conducts approximately 600 local training missions to keep crewmembers current and proficient. With ever-tightening budget constraints we attempt to squeeze every ounce of training out of each sortie. Our crews take the building blocks of our local LOAs and construct complex training profiles intended to simulate actual combat situations to the maximum extent possible. We absolutely could not do that without the outstanding relationship we have with MAAP, TRACON, and the Peoria Air Traffic Control Tower.*
- 5. The Peoria controllers routinely accompany us on local training flights to gain a better understanding of our mission and the choke points associated with air traffic control. As a consequence, they better understand our training requirements and know how to adjust all*

<p><i>parameters to meet both civilian aviators and military objectives. An example: giving an aircraft a spacing vector is a routine ATC function. On certain missions, that would totally invalidate our TOT control and waste the entire sortie. We feel that this relationship would be impossible to maintain under the proposed consolidation due to the greatly increased number of controllers involved and the impracticalities associated with the distance between us.</i></p> <p><i>6. The Peoria Air National Guard excels at supporting all tasked requirements. We have a proud tradition of answering our nation’s call for over 70 years and train hard in order to bring our combat aircrews home every time. MAAP, TRACON, and the Peoria Air Traffic Control Tower are an integral part of that tradition. I ask that you consider these facts. Please contact me at (309)633-5200 if I can be of any assistance.</i></p>	
<p><i>Thank you for the opportunity to offer my input. I’ve been in aviation for 22 years and a pilot since 14 years old. I oppose the recommendation to consolidate Springfield, IL and Peoria, IL to the St. Louis, MO TRACON. Please consider my standpoint.</i></p> <p><i>The controllers at SPI do a remarkable job! I can tell you from pilot experience that there is a difference communicating to an onsite, local controller verses a controller at a larger remote TRACON facility. With an onsite TRACON you get better quality of service and an extra backing of safety due to the expanded knowledge and experience from the local controller. This is especially important to plot training and local pilots based to the location. The FAA says SPI will get the same service, but I know it won’t. Without question, communication flows more effectively while working with controller local to the area.</i></p> <p><i>I disagree with their approach to direct their consolidation recommendations to airports with lower air traffic operations. Pulling these facilities out from underneath them will pset the local economy and provide a negative environment to support growth in aviation in that region. The FAA themselves estimate increasing congestion in the air transportation system of the United States. I understand that new radar and PS technology will enhance our airspace system. I am all for this, but pilots still have a need to have quality communication. There’s a reason the United States has the safest airspace system in the world and technology will not replace the human element in aviation.</i></p>	<p>Neal Stoller</p>

<p><i>I don't think the consolidation report has done a very good job of justifying cost. I think if a genuine study were done, you would find that overall costs for consolidating would be much higher than revealed in the report. I think it would also reveal that the actual cost of operating a TRACON at SPI and PIA is minute in comparison to other less valued government expenditures. SPI's tower is a fairly modern facility, built in the 80's, and is currently being retrofitted to be Nextgen STARS compliant. It would be irresponsible for our Government to pursue a consolidation of this facility after dollars were already spent on this upgrade.</i></p> <p><i>The report is short of being both collaborative and comprehensive. It seems the report was written in the best interest for the air traffic labor unions and not the real stakeholders at these airports. The workgroup offered one impromptu stakeholder meeting. Those in attendance said that it seemed they had a one-sided agenda and felt unrepresented. I discredit the workgroup for citing in the report that they included all stakeholder input. I suggest the administrator form a more comprehensive workgroup to include real stakeholders and professionals other than labor unions to fabricate a genuine report. This report fails in many ways to support any continued consolidation efforts.</i></p>	
<p><i>I have major concerns regarding the proposal to realign the Springfield, IL TRACON and Peoria, IL TRACON. I currently am based at SPI. I don't know how our operations will be handled by the busy St. Louis facility. Will we be lost in all the "more important" traffic down south? I know that is just my personal concern. However, the controllers here know our airspace and our needs, I worry that moving the facility will change that.</i></p> <p><i>My second concern regards redundancy and safety. I know about a couple years ago there was a fire at the St. Louis TRACON. If there are any problems, power outages, fires, terrorist attacks, etc. moving all of the operations to one place does not diversity our risk. As it is, if St. Louis does have a problem, Springfield can serve as a reliever until St. Louis is back on line. If too many operations are moved to St. Louis and there is a problem, St. Louis could become too big to fail, which could be disasterous.</i></p> <p><i>Finally, I do not believe the government will save as much as it is calculating. Springfield currently has some NextGen technology and automation already installed. It seems foolish to waste that effort and move everything.</i></p>	<p>Elise Ransdell Springfield, IL</p>

<p><i>Thank you for considering my opinion. I just think the negatives outweigh to positives here, especially regarding the need for redundancy.</i></p>	
<p><i>I support the overall goal of increased efficiency and safety that may be supported by the NexGen implementation, however I believe the removal of the Springfield, IL TRACON facility would be a detriment to the safety, usability and quality of service to pilots in Central Illinois.</i></p> <p><i>The proposed realignment would create too large of an airspace sector for the busy St. Louis facility to handle and will suppress future growth for aviation in Central Illinois. Springfield's geographic location provides an important asset to our national airspace system and provides a unique option for redundancy if there is ever an outage at a remote radar facility.</i></p> <p><i>The consolidation report unfairly justifies government cost savings by bundling Springfield with the cost of Peoria's new control tower and fails to account for the NextGen technology and automation presently being installed at Springfield's control tower.</i></p> <p><i>The removal of local TRACON personnel in Springfield, IL would be a loss for local general aviation, which is thriving, and the existing commercial service.</i></p> <p><i>Please reconsider the proposal to remove the Springfield TRACON facility.</i></p>	<p>Matt Heyen Springfield, IL</p>
<p><i>The Illinois Air National Guard has serious concerns with the Collaborative Workgroup's recommendation to realign Springfield, IL (SPI) TRACON and Peoria, IL (PIA) TRACON operations to the St. Louis, MO (T75) TRACON. Both PIA and SPI have Air National Guard wings as tenant organizations. PIA has the 182d Airlift Wing (182 AW) and SPI has the 183d Wing (183 WG)</i></p> <p><i>The 82 AW operates eight C-130 aircraft and is mandated to keep at least sixteen aircrews trained and proficient in all aspects of combat readiness. Training includes, but is not limited to, Instrument Flight Rule (IFR) and Visual Flight Rule (VFR) approaches, and Night Vision Goggle short field landings and takeoffs. They also conduct IFR and VFR single ship and formation routes, which terminate in several variations of IFR and VFR airdrops, requiring precise control to drop at exact times.</i></p> <p><i>Both the 182 AW and 183 WG have personal relationships with their respective airport authorities, TRACONs and towers. 182 AW conducts approximately 600</i></p>	<p>Richard Hayes Springfield, IL</p>

<p><i>local training missions per year, and the effectiveness of these missions is critical. TRACON and their integration into the nuances of specialization military aircrew training is key to the 182 AW success. The 182 AW and PIA TRACON have frequent face to face interaction, which provides reciprocal synergy in understanding objectives.</i></p> <p><i>Both the 182 AW and 183 WG are vital players in the State of Illinois homeland security and domestic operations. The 183 WG is located in the state capital and is the predesignated headquarters of the National Guard’s Joint Task Force. This Task Force is continuously poised to become the hub of all response operations in the event of natural or man-made disaster. The 182 AW serves as an Aerial Port of Debarcation for the United States Corp of Engineers in their Mississippi River Valley disaster response, as well as several other regional plans, including New Madrid and Wabash Valley earthquake response.</i></p> <p><i>The existence of local TRACONs at both Peoria and Springfield is vital to continuing safe and efficient operations, both in peacetime and when called to duty. We cannot afford to compromise this critical capability in our support to the nation. We feel consolidation of safety of air operations will negatively impact usability, quality of service, and safety of air operations in central Illinois. We advocate reconsideration and subsequent denial of the aforementioned consolidation.</i></p>	
<p>SUBJECT: Impact of Terminal Radar Approach Control (TRACON) Consolidation Proposal</p> <ol style="list-style-type: none"> <i>1. The 182d Airlift Wing (182 AW) operates eight C-130 aircraft from the General Wayne A. Downing International Airport in association with the Metropolitan Airport Authority of Peoria (MAAP), Peoria TRACON, and the Peoria Air Traffic Control Tower. The 182d Airlift Wing is tasked with keeping 16 combat mission aircrews trained and proficient at all times in order to support continuing national defense objectives and state domestic operations.</i> <i>2. Our local training profiles include standard Instrument Flight Rule (IFR) and Visual Flight Rule (VFR) approaches, low and high altitude tactical departures and recoveries, and Night Vision Goggle (NVG) short field landings and takeoffs. We also conduct IFR and VFR singleship and formation routes which terminate in several variations of IFR and NVG airdrops. These routes require precise takeoff times and enroute control</i> 	<p>William P. Robertson, Colonel, IL ANG</p>

<p><i>to arrive at our drop zone at an exact Time Over Target (TOT) in order to train to combat specifications.</i></p> <ol style="list-style-type: none"> <i>3. The 182d Airlift Wing has an intimate relationship with MAAP, TRACON, and the tower. We currently have seven Letters of Agreement (LOA) with these entities which help define our interactions and mutual expectations. Our local air traffic controllers understand and use these LOAs and their accumulated experience to deconflict our operations with commercial traffic. Peoria ATC members attend our quarterly Air Operations Board (AOB) where we discuss any trends and issues that affect local flying. This allows us to understand each other's needs and to discuss how we can work together more efficiently.</i> <i>4. The 182d Airlift Wing annually conducts approximately 600 local training missions to keep crewmembers current and proficient. With ever-tightening budget constraints we attempt to squeeze every ounce of training out of each sortie. Our crews take the building blocks of our local LOAs and construct complex training profiles intended to simulate actual combat situations to the maximum extent possible. We absolutely could not do that without the outstanding relationship we have with MAAP, TRACON, and the Peoria Air Traffic Control Tower.</i> <i>5. The Peoria controllers routinely accompany us on local training flights to gain a better understanding of our mission and the choke points associated with air traffic control. As a consequence, they better understand our training requirements and know how to adjust all parameters to meet both civilian aviators and military objectives. An example: giving an aircraft a spacing vector is a routine ATC function. On certain missions, that would totally invalidate our TOT control and waste the entire sortie. We feel that this relationship would be impossible to maintain under the proposed consolidation due to the greatly increased number of controllers involved and the impracticalities associated with the distance between us.</i> <i>6. The Peoria Air National Guard excels at supporting all tasked requirements. We have a proud tradition of answering our nation's call for over 70 years and train hard in order to bring our combat aircrews home every time. MAAP, TRACON, and the Peoria Air Traffic Control Tower are an integral part of that tradition. I ask that you consider these facts. Please contact me at (309)633-5200 if I can be of any assistance.</i> 	
<p><i>The Springfield Airport Authority, owner and operator of the Abraham Lincoln Capital Airport, Part 3 to combine both the Peoria, IL (PIA) and Springfield, IL (SPI) Terminal Radar Approach Controls (TRACON) to Saint Louis, MO (T75)</i></p>	<p>Mark E. Hanna, A.A.E</p>

<p><i>TRACON. We believe, on behalf of our stakeholders, that it is best to continue the operation of the current TRACON at Springfield, Illinois (SPI) ATCT facility.</i></p> <p><i>The Abraham Lincoln Capital Airport is a vital asset to Springfield, the Illinois State Capital. The airport facilities are in great condition and the airport has shown positive growth trends in many areas. We continue to report a solid financial posture and our airline passenger traffic continues to grow. Many Central Illinois area businesses utilize the airport and consider it an asset to the region and critical to their business operations. Its dedicated users and employees in all facets, including our local FAA Air Traffic Controllers, largely contribute to the safety and success of our airport.</i></p> <p><i>The FAA continues to suggest that a consolidated radar control center can provide the same level of service without affecting safety no matter its location. Pilots, users, and operators of the system will tell you otherwise and the FAA continues to dismiss what they are telling them. When approach radars are shut down at local airports and shipped to a remote location, invaluable knowledge of the terrain and geography surrounding these airports disappears. "Situational awareness" is an invaluable tool for both pilots and air traffic controllers. There are countless saves made by a controller's ability to communicate their "local knowledge" to pilots.</i></p> <p><i>Springfield's geographic location and on-field facilities deliver many advantages. Springfield offers a full range of precision and non-precision instrument approaches including an on-field VORTAC Navigation Beacon. Our on-site TRACON also has the capability to offer pilots ASR surveillance approaches for pilots flying distressed aircraft with instrument failure. The ASR surveillance approaches are a key service offering that is regularly requested from military users of the facility, especially for training missions from Scott AFB. The loss of our TRACON would result in the loss of our surveillance approach and pilots flying in Central Illinois would have one less tool to use in emergency situations.</i></p> <p><i>We should not forget about the unfortunate and catastrophic arson event in 2014, when a saboteur shot down Chicago's radar facility and disrupted traveling passengers around the globe and numerous airborne aircraft in the upper Midwest. Springfield's ATCT TRACON facility, given its unique geographic</i></p>	<p>(2 copies received)</p>
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central location situated at the nexus of four ARTCC Centers (Chicago, Memphis, Indianapolis and Kansas City) provides the system a valuable asset to serve as a backup facility to accommodate traffic during catastrophic events. A remotely operated TRACON will undeniably lower the level of aviation safety and remove critical secondary assets that can ensure continuity and provide instant contingency solutions.

Springfield's currently configured TRACON and Tower combination has many advantages to a remotely located TRACON. It is considered an "up / down" facility. This means that Tower Controllers and TRACON Controllers cross-train in each discipline and they are able to do both jobs. On a typical shift, they rotate through the tower and TRACON roles. If a controller calls in sick or is on vacation, another controller in the facility can easily be substituted to accommodate the absence; this provides continuity, increases safety and offers various efficiencies at the facility. Local airport conditions are communicated from the airport to the controllers more efficiently. The ability to communicate conflicts and potential hazards to pilots is absolutely more timely and efficient than having to utilize a telephone and communicate with a remote facility.

The result of consolidating Springfield and Peoria's TRACON into St. Louis' Airspace will undoubtedly affect the level of service and decrease safety to pilots in Central Illinois. Combined, both Springfield and Peoria total approximately 115,000 TRACON operations annually. Commercially operated aircraft contribute to approximately 45,000 TRACON operations annually. Approximately 8,400 TRACON operations annually are from Military aircraft conducting training. General aviation contributes to around 62,000 TRACON operations. When you add Springfield and Peoria's 115,000 operations to St. Louis' 315,000 annual operations, we can now see that services and the level of safety to pilots will indeed be affected. The proposed consolidation TRACON, located in the already busy St. Louis metropolitan area, would easily become strained due to the massive airspace coverage and having to pick up an additional one-third of the workload. The once personable dependent basis and with a controller unfamiliar with the nuances of the local airspace and geographic landmarks. The air traffic control resources will most likely give priority to commercial and airline aircraft operating at the larger facilities. Pilots are concerned they may have a harder time asking and receiving traffic advisories, flight following, and radar separation services for practices approaches. Aircraft may have longer delays for receiving clearances. There may be delays for them departing the airport since local tower controllers will

no longer be able to launch aircraft without telephone approval from the remote TRACON. These delays or service interruptions will inflict additional cost to pilots, airlines and other operators. In fact, the 375th Air Mobility Wing and 932d Airlift Wing, based at Scott Air Force Base in St. Louis, prefer to use the Abraham Lincoln Capital Airport (SPI) over airports in St. Louis due to the fact that St. Louis Approach Control is usually too busy to accommodate them during their flight training. Scott AFB routinely uses Springfield nearly on a daily basis and tells us that they receive better quality service from the Springfield air traffic service providers than they do in St. Louis.

Another concern, which won't be mentioned in their report, is that the loss of our TRACON may open up the opportunity for the FAA to downgrade Springfield's airspace in the future. Without a TRACON operated locally out of the Springfield Airport, it is possible the FAA may find no reason to maintain our Class "C" Airspace and may downgrade it to a Class "D" Airspace. The appearance of smaller, "less significant" airspace may impose a negative image to Springfield, IL; its ability to attract airline and businesses may become negatively impacted. As a result, Illinois' Capital City would be covered with a potentially less safe and secure airspace. Although this is not included in this recommendation, we are concerned that losing the SPI would be just the beginning of a decline to our airport and the Capital City by making it less safe and secure and less attractive for continued and future economic development activities.

The most notable concern is the FAA's cost justification for consolidating the TRACONS. The Springfield, IL TRACON has already been funded and the installation is already in process for modernizing with new state-of-the-art radar equipment to support Next-Gen technology and automation. Taxpayers have already paid for this equipment upgrade. If the FAA received approval for their recommendations to relocate Springfield's TRACON, we will essentially have a brand new modernized Next-Gen ready facility paid for by taxpayers sitting unused.

Based on the proposed analysis portrayed in the FAA National Facilities Realignment and Consolidation Report, Part 3 recommendations, they are proposing a cost-to-benefit ration of only 1.3 to consolidate Springfield and Peoria TRACON to St. Louis. This cost-to-benefit ratio is hardly of any significance to justify the consolidation. Especially when Springfield will already

have the equipment and technology installed to operate a Next-Gen ready TRACON. Adding to this, FAA would have to relocate the air traffic controllers out of Illinois to St. Louis, MO. This not only raises concern for jobs and talent moving out of Illinois, it will also require a higher locality pay for the controllers to move and live in St. Louis. It's difficult to see any sort of real savings.

We sincerely believe Springfield was unfairly chosen and will be negatively impacted as part of these consolidation recommendations. The report fails to detail the real costs and savings involved by bundling Springfield with Peoria and the costs of Peoria's new control tower. We additionally feel taken advantage of, as it appears we are being used to cover up the FAA's miscalculation to overspend and over build the St. Louis facilities. Next-Gen enhancements have already been funded and are being installed in the Springfield ATC facility, meeting the FAA's own initiative as cited in the 904 process to facilitate the process to make facilities Next-Gen ready. Installing new next-gen technology at the SPI TRACON then abandoning it is potentially another example of government waste. The consolidation report fails to include and identify this as a savings factor. The report also falsely promotes that moving the TRACON will allow for 24-hour radar coverage when, in fact, Springfield already has 24-hour radar coverage.

The Abraham Lincoln Capital Airport (SPI) has provided a constantly safe operating environment for air transportation in Central Illinois and for Illinois' Capital City. The loss of Springfield's TRACON will be significant; a significant safety apparatus will be removed and many depress certain aviation activity in Springfield and the surrounding region. It is important to ensure that Springfield's TRACON will be significant; a significant safety apparatus will be removed and may depress certain aviation activity in Springfield and the surrounding region. It is important to ensure that Springfield's TRACON maintain its current configuration. Its loss would greatly affect the service and level of safety provided to every aircraft including commercial, private, medical and military. The people who staff the Springfield, IL TRACON are truly part of the local aviation and economic development community in Central Illinois.

We recommend a joint resolution of disapproval be enacted in regard to the FAA National Facilities Realignment and Consolidation Report Part 3 Recommendation to realign Peoria, IL (PIA) and Springfield, IL (SPI) TRACON operations to St. Louis, MO (T75) TRACON.

<p><i>I oppose the Section 804 Collaborative Workgroup’s recommendation to realign Springfield, IL (SPI) TRACON operations and Peoria, IL (PIA) TRACON operations to the St. Louis, MO (T75) TRACON. For the past 45 years I have been flying out of the Abraham Lincoln Capital and other central Illinois airports in vary capacities, including student pilot, private pilot, commercial pilot, charter operator, flight instructor, and first officer on a commercial carrier. In my opinion the existence of Springfield’s TRACON is vital to safe and efficient flight operations at the Abraham Lincoln Capital and surrounding airports. I believe the proposed realignment will negatively impact the usability, quality of service, and safety to pilots flying in central Illinois.</i></p> <p><i>I am concerned that the proposed realignment would create an airspace sector that is too large for the busy St. Louis facility to handle. I also feel that such a realignment would inhibit the future growth of aviation in central Illinois. As a pilot, I know how important redundancy of systems can be to the safe outcome of a flight when something goes wrong. Springfield’s geographical location provides an important asset to our National Airspace System and unique option for redundancy if there is ever an outage, natural disaster, terrorist attack, or fire that would cripple a remote radar facility. At a time when we are experiencing more weather extremes, continued terrorism and computer hacking threats, and even the potential of nuclear attack, it does not seem prudent to reduce the number of TRACON operations. Just because the probability of a disaster is very low, doesn’t mean it can’t happen, as shown by the recent accidents sustained by our naval fleet.</i></p> <p><i>The consolidation report cites cost savings as a reason for the realignment. I am generally in favor of the government reducing costs, but not at the risk of compromising safety. I am also concerned that the cost savings of eliminating the Springfield TRACON may have been skewed by combining it with the cost of Peoria’s new control tower and failing to account for the NextGen technology and automation presently being installed at Springfield’s control tower.</i></p> <p><i>In conclusion, it is my opinion that the realignment of Springfield’s TRACON to St. Louis would be significant loss to local aviation. Please take the necessary action to keep the TRACON at Springfield, Illinois operational.</i></p>	<p>Brian R. Borecky</p>
<p><i>Let it be known that I oppose the Section 804 Collaborative Work group’s recommendation to realign Springfield, Illinois (SPI) TRACON operations and</i></p>	<p>Robert Brauer</p>

<p><i>Peoria, Illinois (PIA) TRACON operations to the St. Louis, Missouri (T75) TRACON. The existence of Springfield's TRACON is vital to the safe and efficient operation at the Abraham Lincoln Capital and surrounding airports. I believe the outcome will negatively impact the usability, quality of service, and safety to pilots flying in central Illinois.</i></p> <p><i>The proposed realignment would create too large of an airspace sector for the busy St. Louis facility to handle and will suppress future growth for aviation in central Illinois. Springfield's geographical location provides an important asset to our National Airspace System and provides a unique option for redundancy if there is ever an outage, natural disaster, terrorist event, or fire that would cripple a remote radar facility.</i></p> <p><i>The consolidation report unfairly justifies government cost savings by bundling Springfield with the cost of Peoria's new control tower and fails to account for the NextGen technology in automation presently being installed at Springfield's control tower.</i></p> <p><i>I am based at, and have been flying out of, the Abraham Lincoln Capital Airport for some 17 years. The service, safety, and professionalism of Springfield, Illinois TRACON is unparalleled. The realignment of Springfield's TRACON would undoubtedly be a loss for local aviation and a detriment to the safety and future of those flying in and out of central Illinois aviation sector. Please keep the TRACON at Springfield, Illinois Operational.</i></p>	<p>St. Louis, MO</p>
<p><i>The General Wayne A. Downing International Airport in Peoria, Illinois (PIA) and the Abraham Lincoln Capital Airport in Springfield, Illinois (SPI) are great assets for the region. The facilities' strategic location and operational capabilities, including TRACON technology, benefits our nation's military forces and effectively serves commercial and general aviation operating from the regional hubs. We strongly oppose any effort by the Federal Aviation Administration (FAA) to relocate PIA and SPI's TRACON technology to the St. Louis approach control facility (T75). The consolidation activity could result in operational inefficiencies, reduce safety, and fail to accomplish overall cost savings.</i></p> <p><i>The Peoria Airport is home to the 182nd Airlift Wing of the Illinois Air National Guard, which operates C-130 aircraft. The 182nd has served our nation with</i></p>	<p>Darin LaHood (IL-18) and Rodney Davis (IL-13)</p> <p>(3 copies received)</p>

distinction for years. The unit is a significant part of the nation's defense readiness plans and is continually called upon for worldwide deployments to support the U.S. Air Force's airlift capacity. The Wing Commander, Col. William P. Robertson, serves as Chairman of the national C-130 Weapon System Council. The 182nd's large aircraft frequently engage in combat-style training maneuvers that take place in airspace owned by PIA TRACON. Air traffic controllers handling this type of aircraft must develop familiarity with the 182nd's training maneuvers and airspace needs. In fact, the 182nd has quarterly meetings with PIA staff to discuss the unique situation. Relocating PIA TRACON will make coordination between all parties more difficult and could impact overall safety in the airspace.

Springfield Airport is a tenured training facility for two squadrons based at Scott Air Force Base in Belleville, Illinois. Scott Air Force Base utilizes SPI airspace for training missions due to customized approach capabilities at the facility. This capability does not exist for certain situations in St. Louis airspace due to congestion issues. Relocating SPI TRACON would diminish SPI's capabilities to handle these missions and their strategic benefits.

In addition to the unique military considerations, we urge you to consider other operational and strategic benefits to PIA and SPI-based TRACON technology. General aviation in the region greatly benefits from local air traffic controller's firsthand knowledge of the area. In certain situations, when lost, pilots will most likely describe local landmarks they see from the cockpit to air traffic control. Local knowledge of the area, in addition to radar, helps the controller more effectively assist pilots get back on course. If PIA and SPI TRACON is relocated to T75, local knowledge will be lost, which could reduce safety.

System reliability for our air traffic control is paramount. The consolidation of PIA TRACON to T75 reduces a layer of coverage for the region that could impact reliability in cases of emergency. As an example, over the past several years, PIA-based TRACON technology has served as an effective backup for FAA facilities Chicago Center (ZAU) and Elgin TRACON (C90) when they experienced debilitating fires. While these facilities were out of service, the existence of other nearby TRACONs preserved the capability to take over airspace and maintain traffic flow into Chicago's two major airports. Without the existence of PIA and 2 other approach control facilities, Chicago's major airports would have been reduced to non-radar environments for the duration of those

<p><i>outages. The addition of new STARS terminals at PIA and SPI, which the FAA already funded and will be operational by next June, will also enhance the airports' ability to serve as backup for nearby facilities.</i></p> <p><i>Finally, we have concerns with the report's estimates on overall cost savings. As an example, the report indicates that sustaining PIA TRACON would cost \$46 million, while consolidating the technology at T75 would cost \$37 million. At first glance this appears to reduce cost, but the report makes some incorrect assumptions about sustainment costs. The report adds into sustainment costs the construction of a new PIA tower and TRACON. Cost estimates to construct a new tower are about \$20 million. Additionally, FAA has already spent more than \$1 million to design the new PIA tower with the TRACON technology. However, the report fails to recognize that the \$20 million cost will not be eliminated by consolidating TRACON to T75, since the existing tower is at the end of its life cycle and needs to be replaced regardless. Should the FAA proceed with consolidation, existing design plans will actually need modification to remove the TRACON and associated equipment, which will add costs to the agency.</i></p> <p><i>We strongly oppose any effort by the Federal Aviation Administration (FAA) to relocate PIA's TRACON technology to the St. Louis approach control facility (T75).</i></p>	
<p><i>I write to express serious concerns with the Collaborative Workgroup's recommendation to realign TRACON operations at Peoria's General Wayne A. Downing International Airport (PIA) to the St. Louis, MO (T75) TRACON. Continuing TRACON operations at PIA is critical for safe and efficient operations in the region and the ongoing Air National Guard mission located there.</i></p> <p><i>PIA is home to the 182nd Airlift Wing of the Illinois Air National Guard. There, the 182nd operates eight C-130 aircraft, which train on approaches and short field landings and takeoffs at the facility. The unit conducts approximately 600 local training missions annually. This work directly supports the US Air Force's missions where airlift capacity is needed, and their operations take place in airspace overseen by PIA TRACON. Because of their proximity to the TRACON itself they are able to interact closely with the controllers there, which Major General Richard Hayes, the Adjutant General of the State of Illinois, says "provides reciprocal synergy in understanding objectives." Eliminating this</i></p>	<p>Cheri Bustos (IL-17)</p>

<p><i>ability to interact with TRACON personal face-to-face on a regular basis could hinder the 182nd Airlift Wing's training and safety in the region.</i></p> <p><i>Additionally, I share the Metropolitan Airport Authority of Peoria's concerns that the cost reductions stated in the Collaborative Workgroup's recommendation do not properly take into account the existing plans to construct a new tower at PIA. The existing air traffic control facilities at PIA are housed in an outdated building with structural and electrical issues that require construction of a new air traffic control facility in the immediate future. In cooperation with the FAA, design for a new tower has been completed at a cost of more than \$1 million. This design includes space for the TRACON to remain at PIA. With or without the TRACON on site, this tower will need to be replaced to support operations at the airport. To include the cost of a new tower in the sustainment costs for TRACON at PIA misrepresents the situation and fails to take that need into account.</i></p> <p><i>Thank you for your consideration and the opportunity to express my concerns. I respectfully request that you reconsider this proposal before submitting a final recommendation to Congress.</i></p>	
<p><i>The General Wayne A. Downing International Airport in Peoria, Illinois (PIA) and the Abraham Lincoln Capital Airport in Springfield, Illinois (SPI) are great assets for the region. The facilities' strategic location and operational capabilities, including TRACON technology, benefits our nation's military forces and effectively serves commercial and general aviation operating from the regional hubs. We strongly oppose any effort by the Federal Aviation Administration (FAA) to relocate PIA and SPI's TRACON technology to the St. Louis approach control facility (T75). The consolidation activity could result in operational inefficiencies, reduce safety, and fail to accomplish overall cost savings.</i></p> <p><i>The Peoria Airport is home to the 182nd Airlift Wing of the Illinois Air National Guard, which operates C-130 aircraft. The 182nd has served our nation with distinction for years. The unit is a significant part of the nation's defense readiness plans and is continually called upon for worldwide deployments to support the U.S. Air Force's airlift capacity. The Wing Commander, Col. William P. Robertson, serves as Chairman of the national C-130 Weapon System Council. The 182nd's large aircraft frequently engage in combat-style training maneuvers that take place in airspace owned by PIA TRACON. Air traffic</i></p>	<p>Darin LaHood (IL-18) and Rodney Davis (IL-13)</p>

controllers handling this type of aircraft must develop familiarity with the 182nd's training maneuvers and airspace needs. In fact, the 182nd has quarterly meetings with PIA staff to discuss the unique situation. Relocating PIA TRACON will make coordination between all parties more difficult and could impact overall safety in the airspace.

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System reliability for our air traffic control is paramount. The consolidation of PIA TRACON to T75 reduces a layer of coverage for the region that could impact reliability in cases of emergency. As an example, over the past several years, PIA-based TRACON technology has served as an effective backup for FAA facilities Chicago Center (ZAU) and Elgin TRACON (C90) when they experienced debilitating fires. While these facilities were out of service, the existence of other nearby TRACONs preserved the capability to take over airspace and maintain traffic flow into Chicago's two major airports. Without the existence of PIA and 2 other approach control facilities, Chicago's major airports would have been reduced to non-radar environments for the duration of those outages. The addition of new STARS terminals at PIA and SPI, which the FAA already funded and will be operational by next June, will also enhance the airports' ability to serve as backup for nearby facilities.

Finally, we have concerns with the report's estimates on overall cost savings. As an example, the report indicates that sustaining PIA TRACON would cost \$46 million, while consolidating the technology at T75 would cost \$37 million.

At first glance this appears to reduce cost, but the report makes some incorrect assumptions about sustainment costs. The report adds into sustainment costs the construction of a new PIA tower and TRACON. Cost estimates to construct a new tower are about \$20 million. Additionally, FAA has already spent more than \$1 million to design the new PIA tower with the TRACON technology. However, the report fails to recognize that the \$20 million cost will not be eliminated by consolidating TRACON to T75, since the existing tower is at the end of its life cycle and needs to be replaced regardless. Should the FAA proceed with consolidation, existing design plans will actually need modification to remove the TRACON and associated equipment, which will add costs to the agency.

Due to these reasons, we strongly oppose any effort by the Federal Aviation Administration (FAA) to relocate PIA's TRACON technology to the St. Louis approach control facility (T75). The move could result in operational inefficiencies, reduce safety, and fail to accomplish overall cost saving.

If you need any additional information, please contact Ashley Antoskiewicz (ashley.antoskiewicz@mail.house.gov) in Congressman LaHood's office or Miles Chiotti (Miles.Chiotti@mail.house.gov) in Congressman Davis' office.