Chicago Air Cargo Managers Association
P.O. Box 66228
O'Hare International Airport
Chicago, IL 60666

06 September 2005

Federal Aviation Administration
Attn: Mr. Michael MacMullen,
Airports Environmental Program Manager
Chicago Airports District Office
2300 Devon Avenue
Des Plaines, IL 60018

Dear Mr. MacMullen,

We are submitting this correspondence as a formal submission within the public comment period on the FAA's Final EIS for O'Hare International Airport. Our comments and concerns will be directed at the Alternatives Section of the EIS. Specifically, the air cargo community at O'Hare has serious concerns about the FAA's recent decision to preserve the Rest Haven Cemetery within the footprint of the proposed O'Hare Modernization Plan, Alternative C. Preservation of this cemetery, as opposed to relocation, raises serious safety, security, operational and capacity issues for the new cargo areas being planned for the Southwest quadrant of the airport.

As a bit of background, the cargo community has had ongoing contact with representatives of the OMP and Department of the Aviation over the last 18 months. Cargo organizations involved in these discussions include the Chicago Air Cargo Managers' Association (CACMA), the International Air Cargo Assocation of Chicago (IACAC) and the Customs Brokers and Foreign Freight Forwarders Association of Chicago. These organizations, taken as a whole, represent virtually every major participant in the air cargo community in Chicago. Their members employ thousands of employees, move millions of tons of air cargo and are anxious to see O'Hare maintain its position as a viable and vibrant air cargo airport.

These informal discussions centered on the scope and design of cargo areas at O'Hare Airport. While new space is designated west of the existing South Cargo areas for new Cargo aircraft ramps and handling facilities, the majority of the new space seemed to be used for existing cargo facilities relocated by the construction of runway 10C/28C. Since the existing Fedex Metroplex and United Cargo facilities would be directly impacted by the new runway, they would required to be 'made whole' by the OMP process and would therefore receive a significant portion of the space allotted for Cargo in the Airport Layout Plan.

Most industry sources predict annual growth rates of 5% for the international air cargo industry over the next 10-12 years. The question posed most often by the cargo community during these discussions: Where would this growth be handled on the new O'Hare airport?

We are pleased to report that these discussions with representatives of the OMP and Department of Aviation left most cargo organizations reassured that the 'new O'Hare' would devote sufficient resources to the cargo community. The O'Hare cargo community felt that the future growth needs (including parking/handling of cargo-only aircraft) would not be constrained by lack of resources under the OMP alternatives.

Incumbent in these discussions, however, was that the expanded South Cargo Area would be created without interruption by non-cargo parcels. The FAA's decision to leave Rest Haven Cemetery at its present location creates a cargo area design incompatible with safe and efficient cargo activities in that area. Many members of the cargo community has expressed serious concerns since this decision was made public in late July 2005.

We would summarize these concerns into four main areas:

I. Safety of cemetery visitors
II. Security Perimeter
III. Restriction of aircraft ground movement
IV. Reduction of cargo capacity (economic losses)

We will outline each of these areas below. The remarks contained within the outline are based on the following scenario for the expanded South Cargo areas if the Rest Haven Cemetery is maintained at it present location:

1. The Rest Haven Cemetery would be surrounded on the north side by a taxi-way, on the east and west side by working cargo aircraft ramps and the south side by an access road used almost exclusively by air cargo trucking traffic.

2. The new South Cargo Ramp would be split in two. Each would have a single entrance/exit for use by aircraft. There would be no connection between the two new ramps. In essence, there would now be three non-contiguous aircraft ramps in South Cargo: the existing South Cargo ramp bounded on the west by a public road accessing the NW Cargo/Fed Ex Heavy buildings, a new ramp bounded by the same public road on the east and Rest Haven cemetery on the west, and a third cargo ramp bounded by the Rest Haven cemetery on the east and on the west by a taxi-way accessing the new 10R/28L runway.

3. Access to the cemetery would apparently be facilitated through a public access road which would run directly through an area planned for development of cargo handling facilities.

Using this scenario (and we see no other viable ramp designs given the central location of the Rest Haven Cemetery within the proposed cargo areas), we would like to address each area of concern in detail so that the impact of this decision is understood by all.

I. Safety of cemetery visitors – Aircraft ramps are shown by the Department of Labor to be one of the more dangerous workplaces in America. While many of these dangers are confined to the ramp area itself, certain of the hazards extend over the boundaries of the ramp by their very nature.

A. *Health hazards due to excessive noise from aircraft engines.* As noted in the scenario above, the Resthaven cemetery would be surrounded on 3 sides by working aircraft ramp areas. The decibel levels created by these ramp areas, at such close proximity to the cemetery, represent a hazard level to any cemetery visitors which exceeds those within OSHA guidelines. Ground crews and airline crews routinely wear hearing protection to mitigate this hazard. It seems unlikely that all visitors to the cemetery would be similarly protected.

B. *Health hazards due to excessive jet blast.* Upon arrival and departure, the large jumbo jet cargo aircraft (747F, MD-11, etc) generated significant jet blast hazard as they maneuver in/out of their parking areas. These areas extend for hundreds of feet to rear of the aircraft and are well-docmented within the airport safety regulations. Due to its small size and anticipated proximity to the cargo aircraft parking areas, the Resthaven cemetery would be within these blast areas from both adjacent cargo areas. If the cemetery remains in place in the final Airport Layout Plan, we recommend specification of blast fences on the east and west sides of the cemetery to mitigate this hazard.

C. *Health Hazards due to Hazardous material incidents.* Cargo carried on cargo aircraft has always contained Hazardous Materials. Many of these materials (radioactive, infectious substances, flammable materials, explosives, etc.) are prohibited from passenger airplanes and must be carefully handled according to published regulations. Regrettably, such materials do occasionally spill and require evacuation of ramp/cargo buildings. Each cargo facility has well-planned evacuation plans for the safety of its employees during such an event. Any visitors to the cemetery would also be subject to such a hazard and outside the evacuation plans for each carrier. Safeguarding such visitors would fall to the airport authorities. We question whether the response to such an event would come in time to prevent the visitors from being exposed to such a spill.

II. **Security Perimeter** – Clearly, security at airports has become of our country's top priorities in the post 9-11 area. Airport and TSA guidelines address, among many other points, access to airport ramps, cargo prepared to fly on flights (including passenger) and public vantage points within the airport footprint. We believe the retention of the cemetery raises several difficult points under this critical heading.

A. *Access to aircraft ramps.* The retained cemetery becomes a 'public peninsula' jutting out into the AOA perimeter of the cargo ramps. While we expect such an areas would be secured by the Department of Aviation with the normal AOA Perimeter fencing, etc., any such area where the public (with no business at the airport) can congregate so close to flight operations and fuel supplies is a concern.

B. *Cargo prepared to fly on flights (including passenger)* - This is a similar scenario to 'A' above. In this case, however, the threat is more indirect. Cargo is routinely staged on the secure AOA for departure on aircraft. Such a public area located so close to the prepared cargo presents a more difficult security problem than if the AOA has a uniform perimeter without interspersing public areas.

C. *Public vantage point within the airport footprint.* By definition, a cemetery area presumes green space, trees, gravestiesetc. Add to these chartacteristics our recommendation of jet blast fences to shield cemetery visitors from that aircraft hazard.... and the cemetery becomes a haven for those who wish to get as close as

possible to aircraft arriving/departing the airport. Such hidden proximity has obvious security consequences.

III. **Restriction of AOA ground movement** - Using the scenario outlined earlier, the South Cargo area of O'Hare airport would be developed around three non-contiguious aircraft ramps –this configuration has operational impacts in several ways.

A. *Restricted access to two cargo aircraft ramp areas* – Each new cargo ramp, separated by the Rest Haven cemetery, would now only have one way/one way out. This has implications for fuel burn for the aircraft (important to the airlines, perhaps not so important to the overall FAA criteria) but also has potential for a major operational incident. Many of the cargo airlines that function on the airport are working on extremely tight schedules. These schedules may be dictated by curfews at other airports, arrival schedules at domestic hubs, crew scheduling parameters, etc. By having only one way out of the ramps, any mechanical or ramp incident which blocks that egress effectively closes down ground traffic and traps planes within the ramp area. This scenario was not an issue under the previous ALP which showed two taxiways entering the new South Cargo ramp area.

B. *Interline transfer of freight* – The way of the airline world has become one of alliances and partnerships. A frequent outgrowth of these agreements if transfer of cargo from one carrier to another. Since each of the new cargo ramps might be 'isolated' from the other cargo ramp areas (only way out is by aircraft), such freight may have to be transferred the 300-400 yards via landside (truck) rather than rampside. This presents not only an economic burden on the airlines but also raises security issues as well.

IV. **Reduction of Cargo Capacity** – As mentioned at the outset, the cargo community has been quite concerned about the future resources devoted to handling of cargo on the 'new O'Hare'. These concerns are well founded; absent a firm plan for cargo handling at the old military ramp on the north side of the airport, the space allocated for new cargo areas seemed to be minimal when the relocation of operations affected by 10C/28R was taken into account. The retention of the Rest Haven cemetery further restricts the options for future cargo handling areas.

A. *Loss of Cargo Aircraft Parking spaces*– While it is difficult to estimate the exact number of parking spots lost to Rest Haven, one can easily foresee that two aircraft parking spots are no longer available due to the the intrusion of the 'peninsula' into the new South Cargo areas. While two spots does not seem significant, if one assumes each spot would be used once daily by a 747F freighter/300 days per year with payload of 80 Tons in/80 tons out (all conservative assumptions):

- Loss of 48,000,000 kgs of export capacity/48,000,000 kgs of import capacity due to no place to park the aircraft.
- Assuming 100,000 kg/month/warehouse employee (a common logistics assumption) this means 80 airport warehouse jobs are not realized as well as further employment implications which are difficult to calculate (truckers, freight forwarders, custom brokers, etc.).
- Access to foreign markets (both import and export) reduced for Chicago area manufactureres, distributors and consumers.

B. *Loss of Cargo Facility Development* Area – It is clear that some sort of public access road would have to be maintained to allow visitors to the cemetery to reach the grounds. Such a road would be placed, out of necessity, directly south of the cemetery grounds and connected to the main cargo road winding through the cargo area.

1. One of the primary concerns of the O'Hare Cargo community is the current lack of on-airport facilities for cargo warehouses/handling. This dearth of facilities would be made worse by the annexation/destruction of several current industrial developments south and west of the current South Cargo area (i.e. ProLogis, etc.). Removing any real estate from prime on-airport, on-ramp locations (as would be the case with the retention of Rest Haven) only serves to exacerbate this shortage.

When all aspects of this issue are taken into account, we believe it is self-evident that the long-term impact of retaining Rest Haven Cemetery in its current location on safety, security and commerce is significant and outweighs the regrettable short-term impact of moving the cemetery to a new location more appropriate for its long-term future.

We urgently request that the FAA approve re-locating the Rest Haven Cemetery as part of its Record of Decision.

Please feel free to contact me if you have any further questions or comments on this submission. I can be reached at the CACMA mailing address contained within our letterhead, by E-mail at **CACMAcargo@sbcglobal.net** or by telephone at 847/571-1971.

Thank you in advance for your consideration.

Sincerely,

Daniel Gadow
2005 CACMA Chairman