

ATTACHMENT B: PROJECT INFORMATION

_____ FOR FAA USE _____

PFC Application number: _____

1. AIRPORT WHERE PROJECT IS LOCATED: Chicago O'Hare International Airport
2. CHECK ONE: IMPOSE [] IMPOSE AND USE[X] USE []
3. PROJECT TITLE (And Public Agency Project Number, If Appropriate):
4. a. PROJECT DESCRIPTION: AIRFIELD DESIGN

Construction-ready design drawings will be prepared for the remaining airfield elements of the O'Hare Modernization Program (OMP), including Runway 9C-27C, Runway 10R-28L, extension to Runway 9R-27L, Taxiway LL, and related and enabling projects, necessary for implementation of these airfield elements. These airfield elements (Completion Phase), when constructed, will complete the OMP airfield shown on the Airport Layout Plan (ALP) approved by the FAA on September 30, 2005.

The first step of design will develop scope definition packages based on the facilities identified in the O'Hare Master Plan and as shown on the approved ALP. These scope definition packages will outline the key components of each airfield element, providing a comprehensive basis for design. Applicable design standards will be noted.

The next step of design will prepare detailed design documents for each airfield element in accordance with the identified scope. These designs will be prepared for at least three interim review levels (e.g., 30%, 60%, and 90%), as well as final for-construction documents. These documents will be reviewed in the same process used for Runways 9L-27R, 10L-28R and 10C-28C. This project will produce all engineering, plans and specifications necessary to proceed to procurement of construction services. The City expects to procure design services in 40-50 separate procurement actions.

Certain general specifications of airfield components were developed in the Master Plan for purposes of ALP submission and Environmental Impact Statement analysis. Those general specifications, which were sufficient for those purposes, are insufficiently specific to satisfy design requirements for construction. Although design of airfield components relies on the ALP, the design process costs included in this Application do not duplicate any part of the Master Plan work.

Costs of design and engineering of eligible airfield development projects are eligible for funding with PFC revenues. Order 5100.38C ¶¶ 300b, 310a (4) (b),

1002. This project includes all engineering, plans and specifications necessary for the following eligible projects, all of which are shown on the approved ALP:

Runway 9C-27C. 11,245' x 200' air carrier runway and related taxiways. This runway will be built to Airplane Design Group (ADG)-VI standards and will include 40-foot wide shoulder and Runway Safety Areas (RSAs) that extend 250' from the runway centerline and 1,000' feet from each runway end. The runway will be served by 100-foot-wide parallel taxiways north and south of the runway with an ADG VI runway-to-taxiway separation distance of 600 feet. This project includes construction of new Taxiway WK which will be approximately 7,400' x 75' long and will extend from the west end of Runway 9R-27L to the west end of Runway 9L-27R. In addition, the project includes the conversion of Runway 14R-32L into new Taxiway U (3,038' x 75') and the construction of new Taxiway V which is a 4,000' x 100' taxiway that will lie parallel to the west of decommissioned Runway 14R-32L. The runway has three high-speed exit taxiways, two to facilitate Runway 27C landings and one to facilitate Runway 9C landings. Design of Runway 9C-27C includes design of site preparation; site grading; storm water drainage and management; demolition of facilities listed in Table B-1; relocation of the ARFF station #2 and ground run-up enclosure; demolition of other civil infrastructure including foundations¹, waterlines and sewer lines; construction and demolition of temporary and permanent security fencing; demolition and relocation of underground fuel lines, and telephone and electrical utilities; lighting, marking, signage, electrical, and navigation aids to support approach category II/III operations, instrument landing systems including approach lights, glide slopes, localizers, inner markers, distance measuring equipment, runway visual range equipment, far field monitors, and a fiber optic transmission system which supports navigational equipment. Design of this runway also includes design of demolition of existing VOR/DME and Local Area Augmentation System (LAAS) navigational aids. The function of this runway as a component of the OMP is described in Item 5 below. See Exhibits B-1 and B-3. Eligibility: Order 5100.38C ¶¶ 514, 515, 521, 525, 527a, 531, 533, 534, 535, 538, 547f, 554, 555, 556, 557, 581, 582, 587, 593a, 597, 609.

¹ The City does not yet know the amount, types or extent of underground civil infrastructure on the project site. Based on experience elsewhere at the airport, the City expects to find existing and abandoned utilities, foundations of previously demolished buildings, existing and abandoned conduit and duct banks. The design process described in this Application, including the subsurface investigation and survey described in paragraph 4.4 of Attachment F-1, will identify underground civil infrastructure. That information will be provided to the appropriate designers to design demolition. Construction of this project will require demolition of substantially all underground civil infrastructure.

Table B-1**Runway 9C-27C Impacted Facilities**

<u>Building Number</u>	<u>Building Name</u>	<u>Square Footage</u>
701	DOA Communications Service Center	7,700
702	Existing ARFF Station #2	15,600
723	AAL Ground Equipment Maintenance Building	82,500
725	AAL Maintenance Hangar #2	123,700
728	Sanitary Lift Station	N/A
729	UAL Ground Equipment Maintenance Building	162,300
732	AAL Fire Pump House	N/A
741	Gate Gourmet Flight Kitchen #1	59,100
742	Gate Gourmet Flight Kitchen #2	55,600
746	UAL Office and Medical Personnel Building	13,200
750	UAL Hangar 5/5A	159,300
761	Ground Run-Up Enclosure	N/A
789	Airport Repair and Construction Complex	12,400
800	Signature flight Services Terminal	30,400

Note: The relocation of facilities is necessary because existing facilities lie within runway safety areas, object free areas or must be relocated to facilitate construction and use of runways, taxiways, or service roads.

Source: O'Hare Airport Layout Plan, September 2005.
Prepared By: Ricondo & Associates

Runway 9R-27L Extension. 3,600' x 150' extension to existing Runway 9R and related taxiways. The overall length of the extended runway will be 11,260 feet at a width of 150 feet. The east end of the runway will be relocated 300 feet to the west to provide a full 1,000 RSA and localizer clearance from Bessie Coleman Drive. The existing parallel taxiway located south of the runway will be extended by 2,990 feet at a standard 400 feet of runway to parallel taxiway centerline separation to satisfy ADG V requirements. Design of this runway extension includes design of site preparation; site grading; storm water drainage and management; modified capacity of north storm water detention basin; demolition of civil infrastructure including foundations², waterlines and sewer lines; construction and demolition of temporary and permanent security fencing; demolition and relocation of underground telephone and electrical utilities; lighting, marking, signage, electrical, and navigation aids to support approach category II/III operations, instrument landing systems including approach lights, glide slopes, localizers, inner markers, distance measuring equipment, runway visual range equipment, far field monitors, and a fiber optic transmission system which supports navigational equipment. Design of this runway also includes design of demolition of existing NAVAIDS and design of ASR-9, relocation of LAAS, extension of 9R NAVAIDS and Runway 27L localizer. The function of this runway as a component of the OMP is described in Item 5 below. See Exhibit B-1.

² See footnote 1.

5100.38C ¶¶ 514, 521, 525, 527a, 531, 533, 534, 535, 538, 547f, 554, 555, 556, 557, 581, 582, 587, 609.

Runway 10R-28L. 7,500' x 150' air carrier runway and related taxiways. This runway will have centerline spacing 3,100 feet south of Runway 10C-28C and will satisfy ADG V standards. A 7,200' x 75' parallel taxiway (an eastern portion of the taxiway was constructed as part of OMP Phase 1) will be constructed on the north side of the runway, spaced at 500 feet from the runway center line. Two high-speed exit taxiways are provided near each runway end to facilitate aircraft exiting from the runway. Design of this project includes design of site preparation; site grading; storm water drainage and management; demolition of civil infrastructure including foundations³, waterlines and sewer lines; construction and demolition of temporary and permanent security fencing; demolition and relocation of underground telephone and electrical utilities; lighting, marking, signage, electrical, and navigation aids to support approach category II/III operations, instrument landing systems including approach lights, glide slopes, localizers, inner markers, distance measuring equipment, runway visual range equipment, far field monitors, remote transmitter/receiver and a fiber optic transmission system which supports navigational equipment. The function of this runway as a component of the OMP is described in Item 5 below. See Exhibit B-2. Eligibility: Order 5100.38C ¶¶ 514, 521, 525, 527a, 531, 533, 534, 535, 538, 547f, 554, 555, 556, 557, 580, 581, 587, 609.

Taxiway LL. This taxiway is an approximately 3,250' x 75' taxiway north of the east end of Runway 10L-28R. This project includes design of site preparation; site grading; lighting, marking, signage, electrical, and navigation aids; and demolition of fuel super satellite system, fuel maintenance facility, truck fuel stand and glycol facility, and airline ground service equipment facilities. The function of this taxiway as a component of the OMP is described in Item 5 below. See Exhibits B-3 and B-4. Eligibility: 5100.38C ¶¶ 521, 525, 593, 606b.

Replacement ARFF #2 Facility. This facility is located in the construction area for Runway 9C-27C and impedes runway development. Design of a replacement 82' x 193' facility, associated 125' x 67' access road and demolition of the existing facility are included in this project. See Exhibit B-1. Eligibility: Order 5100.38C ¶¶ 540, 547, 593c.

Relocation of Ground Run-Up Enclosure. This facility is located in the construction area for Runway 9C-27C and impedes runway development. Design includes relocation of this 261' x 255' facility and site preparation for the new site. See Exhibit B-1. Eligibility: Order 5100.38C ¶ 593c.

³ See footnote 1.

New South Airport Traffic Control Tower. A new ATC (approximate footprint of 866 square feet, height of 150' AGL), including base building (90' x 100'), will be constructed to provide ATC services for new Runway 10R-28L because the existing tower does not provide unobstructed sight lines to the new runway. The exact location of the tower is subject to further FAA analysis. See ALP Note 12 and ROD p. A.2-176. See Exhibit B-2. Eligibility: Order 5100.38C 5100.38C ¶¶ 305, 563.

Service and Access Roads. Service roads shown on the ALP are necessary to separate airplanes and ground vehicles, provide access for aircraft rescue and fire equipment, operation and maintenance of the airport, temporary access to the airfield for construction equipment, improve runway safety by reducing the possibility of runway incursions, and movement of freight and cargo on the airport. Roads to be designed include new service road systems for the north and south airfields. The north airfield service road system will replace a portion of Tank Farm Road, which will be closed to allow for the development of Runway 9C-27C and the extension of Runway 9R-27L. The replacement service road (14,400 x 30 feet long) will run from the relocated Mt. Prospect Road near the fuel farm to the existing Tank Farm Road south of existing Taxiway W and includes a tunnel (1,225 x 30 feet long) under Future Taxiways V and U and existing Taxiway T. The construction of Future Taxiway WK will cross over the relocated Mt. Prospect Road and will require a tunnel (466 feet long) to be constructed. Relocation of facilities in the northwest maintenance hangar area will require the relocation of the hangar road (2,290 x 30 feet) and the construction of a new service road (2,450 x 30 feet long) to provide access to the facilities south of existing Taxiway Y. Table B-1 lists facilities impacted by future Runway 9C-27C. The facilities listed in Table B-1, with the exception of the Signature Flight Service Terminal (building 800) are in the northwest maintenance hangar area. Exhibit B-5 shows the location of the facilities listed in Table B-1. See Exhibit B-1 and B-5.

The construction of Runway 10R-28L will require the relocation of the Main Cargo Road. A portion of this road is being constructed in Phase 1. The portion included in the Completion Phase (3,650 x 30 feet long) is west of the future access to the relocated FedEx Facilities and will connect to the relocated Irving Park Road. This landside service road will require a tunnel (300 feet long) under Future Taxiway ZC. In addition, Post Office Road, which serves general airport traffic, will be relocated. The relocated road (2,675 x 30 feet long) will include a perpendicular tunnel (932 x 30 feet long) under the future runway. See Exhibit B-2. Eligibility: 5100.38C ¶¶ 527, 620.

Relocation of Irving Park Road. Irving Park Road is a State highway (Illinois Route 19) in the path of new Runway 10R-28L. It must be

relocated while maintaining roadway service in the corridor. The relocated road measured approximately 9,559 x 98 feet and will have the same capacity and similar dimensions as the existing road. Designs of interim locations of portions of the road are included in this design work. See Exhibit B-2. Eligibility: 5100.38C ¶ 593.

Relocation of Willow Creek. Sections of Willow Creek are being relocated because they are in the path of Runway 9R Extension and Runway 9C-27C and related airfield facilities. The relocation of the creek will protect the RSA and Object Free Area (OFA) of each runway and provide an FAA access road to the approach lighting system for each runway. The future creek will include approximately 957 feet X 30 feet of tunnel and culvert construction and approximately 2,341 feet x 30 feet of open ditch construction. This project includes design of the ditch and demolition of portions of the existing ditch. See Exhibit B-2. Eligibility: Order 5100.38C ¶¶ 515, 587, 609.

Relocation of Bensenville Ditch. Bensenville Ditch is being relocated in stages, with an interim location pending acquisition of sufficient land to provide the permanent location. Both the existing and interim locations are in the path of Runway 10R-28L and related airfield facilities. The permanent relocation of the ditch will protect the RSA and OFA for Runway 10R-28L and provide FAA access roads to the Runway 10R approach lighting system and the Runway 10R Glide Slope location. The City has a permit from the U.S. Army Corps of Engineers to relocate the ditch as proposed. The future Bensenville ditch will include approximately 5,500 feet X 30 feet of tunnel and culvert construction and approximately 3,443 feet x 30 feet of open ditch construction. This project includes design of the permanent ditch and demolition of portions of the existing and interim ditch locations. See Exhibit B-2. Eligibility: Order 5100.38C ¶¶ 515, 587, 609.

- b. If applicable for terminal projects,
1. Prior to this project, number of ticket counters ____, gates ____, and baggage facilities ____.
 2. Number of ticket counters ____, gates ____, and baggage facilities ____ to be constructed or rehabilitated.
 3. Net change in ticket counters ____, gates ____, and baggage facilities ____.

_____ FOR FAA USE _____

a. Description adequate [] not adequate [] (indicate deficiencies below)

b. If the project involves the construction of a new runway or modification of an existing runway, the requirements of Order 5200.8, with regard to runway safety areas have been met. YES [] NO [].

c. For terminal projects, information regarding ticket counters, gates, and baggage facilities for construction and/or rehabilitation indicated. YES [] NO [] N/A []

d. Comments:

5. PROJECT JUSTIFICATION:

Basic Justification Information

The OMP includes construction of new runways, relocation of existing runways, and construction of other airport facilities. The design projects included in this application will provide construction-ready drawings of each of the projects described under “Project Description” above. Those drawings are required to seek bids to construct the remaining elements of the OMP airfield. This project is justified on the same basis as the OMP itself, and each of its elements.

O’Hare has experienced major delays for many years, and has insufficient runway capacity to accommodate forecast demand in future years. The City, as owner and operator of O’Hare, proposed the OMP in order to modernize the airport, and provide improved service to local and connecting passengers, shippers and airlines. O’Hare is also a major contributor to delays throughout the National Airspace System (NAS). By improving O’Hare, the City will better perform its role in the national air transportation system.

The OMP was created by the City to solve O’Hare’s chronic problems.

Virtually all involved parties, from the competent committee in Congress, to the FAA, to the State of Illinois, to the City of Chicago, have made a compelling case that the OMP addresses a serious problem with national— indeed international—consequences. O’Hare is a vital transportation link for the Midwest region, for North America, and for the world. *St. John’s United Church of Christ v. City of Chicago*, 502 F.3d 616, 634 (7th Cir. 2007).

The State of Illinois, by law, established the urgent need for the OMP:

The reliability and efficiency of the State and national air transportation systems significantly depend on the efficiency of the Chicago O’Hare International Airport. O’Hare has an essential role in air transportation for the State of Illinois. The reliability and efficiency of air transportation for residents and businesses in Illinois and other States depend on efficient air traffic operation at O’Hare. . . . O’Hare cannot efficiently perform its role in the State and national air transportation systems unless it is reconfigured with multiple parallel runways. . . .The O’Hare Modernization Program will enhance the economic welfare of the State of Illinois and its residents by creating thousands of jobs and business opportunities. . . . O’Hare provides, and will continue to provide, unique air transportation

functions that cannot be replaced by any other airport in Illinois.” 620 ILCS 65/5(1)-(4).

Although City was required by law to submit the ALP showing the OMP to the FAA for regulatory review and approval, the project is the City’s project.

The City designed the ALP . . . The City submitted the plan to the FAA to retain O’Hare’s eligibility for federal funding. Before the FAA, the City fought for approval of its plan. The City will provide the lion’s share of the funding for the modernization project . . .” *Village of Bensenville v. FAA*, 457 F.3d 52, 65 (D.C.Cir. 2006).

“Chicago designed the plan for the project; it submitted that plan to the FAA and fought for its approval. . . . Chicago is committed to completing the project . . .” *St. John’s United Church of Christ v. FAA*, 520 F.3d 460, 463 (D.C.Cir. 2008).

Delay is a function of airport congestion and capacity. Capacity constraints exist at O’Hare and these constraints adversely affect the efficiency of air transportation for the City and the State of Illinois as well as the NAS. Increasing capacity at O’Hare will reduce current and anticipated congestion, thereby reducing delay. As demonstrated on the basis of thorough analysis in the Environmental Impact Statement for the OMP, the OMP reconfiguration, which includes the projects to be designed as proposed in this Application, will allow approximately 220,000 additional operations at O’Hare at 5.8 minutes of average annual delay. Based on the EIS analysis, approximately 130,000 of those additional operations are attributable to the Completion Phase projects covered by this Application. Based on the EIS analysis, O’Hare will be able to accommodate an increase of 23 percent in traffic over the existing airfield with a reduction of 66 percent in average annual delays. This will allow additional service by new and existing air carriers, thereby furnishing opportunities for enhanced competition. The EIS analysis shows that the OMP produces the lowest average annual delay at the forecast level of future O’Hare operations of all the alternatives proposed for consideration. See ROD 31-33 and discussion of EIS analysis of alternatives below.

The FAA selected the City’s proposed OMP as its preferred alternative for reconfiguration of O’Hare, consistent with its statutory authorities, including its mandate to support airport development necessary to provide a safe, efficient and integrated system of public-use airports. 49 U.S.C. § 47101(a)(7). The FAA Interim Administrator recently said:

[I]t’s imperative that Chicago continue full steam ahead with its modernization program. I can’t underscore that enough. The modernization program is the answer to growing capacity and heading delays and congestion off at the pass. Speech by Robert

A. Sturgell, June 16, 2008 (available at www.faa.gov/news/-speeches/news_story.cfm?newsId=10239)

The OMP (and therefore the specific OMP Completion Phase projects to be designed) is eligible for PFC funding because it will preserve and enhance the capacity of the national air transportation system (14 CFR § 158.15(a)(1)), and will furnish opportunities for enhanced competition between or among air carriers (14 CFR § 158.15(a)(3)). The project is further eligible because it is airport development eligible under subchapter I of chapter 49 U.S.C. (14 CFR §158.15(b)(1)).

The Completion Phase projects which are the subject of this Application complete the airfield portion of the overall development program. That program is an integrated single program consisting of a large number of interrelated elements. It is already under construction. The benefits of the OMP result from six parallel east-west runways with sufficient separations to allow multiple independent arrival streams in both good and bad weather. Each runway is a necessary part of that overall airfield redesign. The OMP elements proposed to be designed in this Application are justified as integral parts of that single overall development program and therefore are justified on the basis of the justification for the overall development program. Each element contributes to the overall benefits of the program and cannot properly be separately evaluated. The OMP could not legally have been segmented into each of its elements for purposes of analysis under the National Environmental Policy Act, and it cannot be segmented for purposes of determining project justification for PFC purposes. See 40 CFR § 1508.25.

Each of the elements to be designed plays a specific role in the overall development program and is justified on the basis of these functions.

Runway 9C-27C. This runway is one of the six parallel runways that will allow the airport to function on an east-west flow basis, thereby enhancing capacity of the airport and the national air transportation system and reducing delay by eliminating most runway intersections. It will be one of four arrival runways used for simultaneous quadruple arrivals. It will provide sufficient landing distance for all aircraft operating at the airport. This runway also provides Aircraft Design Group (ADG) VI capabilities on the north airfield. Most of the ADG-VI traffic simulated for the EIS, primarily international arrivals, arrived and departed over navigational fixes served by runways on the north airfield. Providing ADG-VI capability on the north airfield with Runway 9C-27C provides more efficient airfield and airspace operations. The OMP is designed to balance the north and south airfields. Without Runway 9C-27C, the departure capability of the north airfield would be substantially reduced in order to provide north airfield arrival capacity. Balancing the airfield is necessary to achieve the OMP's

benefits of enhancing the capacity of the airport and the national air transportation system and delay reduction.

Runway 9R-27L Extension. This existing runway is one of the six parallel runways that will allow the airport to function on an east-west flow basis, thereby enhancing the capacity of the airport and the national air transportation system and reducing delay by eliminating most runway intersections. This runway provides departure capability for all operations simulated for the EIS. As a result of this extension, departures from this runway will be able to depart from an intersection allowing aircraft arriving on Runway 9L-27R or Runway 9C-27C to taxi behind 9R-27L departures, eliminating runway crossings for those operations. Eliminating runway crossings makes the airfield more efficient and thereby enhances the capacity of the airport and the national air transportation system. With the runway extension, a displaced threshold will exist on the east end of the runway which will allow for compliance with runway safety area standards not currently provided on the existing airfield.

Runway 10R-28L. This runway is one of the six parallel runways that allow the airport to function on an east-west flow basis, thereby enhance the capacity of the airport and the national air transportation system and reducing delay. It is located with sufficient spacing from the next-closest runway to provide independent arrival capacity under FAA standards. The EIS evaluated an alternative that included all of the OMP runways except Runway 10R-28L – Alternative D. The TAAM simulation results in the EIS estimated average annual delay in 2018 at 10.5 minutes per operation for Alternative D. The delay reduction achieved without this runway is considerably less than the delay reduction achieved with the full OMP, including this runway. See ROD 28; EIS E-72. Only with this runway can O'Hare provide four independent arrival streams in good weather, with the resulting benefits to enhancement of capacity of the airport and the national air transportation system and delay reduction. Only this runway provides the potential, should the technology and procedures be approved by the FAA, of immediately implementing four independent arrival streams during all weather conditions. As a result, this runway preserves the potential to produce even greater enhancement of capacity of the airport and national air transportation system and delay reduction benefits than the EIS and ROD estimated for the total OMP. See EIS 3-58.

Taxiway LL. This taxiway provides operational flexibility in a congested part of the airfield. It allows multiple departure queues for Runways 28R and 28C, thereby relieving congestion of departing aircraft. This taxiway allows taxiway flows in both directions north of Runway 10L-28R at all times, thereby providing ground controllers with flexibility to move aircraft without delay or conflict through this congested area. By improving the

efficiency of the airport, this project enhances the capacity of the airport and the national air transportation system.

Replacement ARFF #2 Facility. This facility lies in the path of Runway 9C-27C and its construction area and therefore impedes runway development. See Exhibit B-1. It must be removed to allow construction and use of the runway. It must be replaced to provide required rescue and fire fighting capability for the airport. Because this project is necessary for the construction and use of Runway 9C-27C it enhances the capacity of the airport and the national air transportation system.

Relocation of Ground Run-Up Enclosure. This facility is located in the construction area for Runway 9C-27C and impedes runway development. See Exhibit B-1. This facility is used to reduce noise exposure in areas outside the airport and must be relocated. Because this project is necessary for the construction and use of Runway 9C-27C it enhances the capacity of the airport and the national air transportation system.

New South Airport Traffic Control Tower. A new tower will be constructed to provide ATC services for new Runway 10R-28L because the existing tower does not provide unobstructed sight lines to the new runway. It is required to permit full and safe use of the new runway. Because this project is required for full and safe use of Runway 10R-28L it enhances the capacity of the airport and the national air transportation system.

Service and Access Roads. Service roads shown on the ALP are necessary to separate airplanes and ground vehicles, provide access for aircraft rescue and fire equipment, operation and maintenance of the airport, temporary access to the airfield for construction equipment, improve runway safety by reducing the possibility of runway incursions, and movement of freight and cargo on the airport. Roads to be designed include new service road systems for the north and south airfields. The north airfield service road system will replace a portion of Tank Farm Road, which will be closed to allow for the development of Runway 9C-27C and the extension of Runway 9R-27L. Construction of Future Taxiway WK will cross over the relocated Mt. Prospect Road and will require a tunnel. New runways and taxiways will eliminate existing ground vehicle routes on existing roads, and therefore the roads must be relocated. Construction of Runway 10R-28L will require the relocation of the Main Cargo Road which intersects the new runway location. A portion of this road is being constructed in Phase 1. Because these projects are necessary for the construction and use of the runways and taxiways, they enhance the capacity of the airport and the national air transportation system.

Relocation of Irving Park Road. Irving Park Road lies in the path of new Runway 10R-28L and must be relocated. Because this project is

necessary for the construction of Runway 10R-28L it enhances the capacity of the airport and the national air transportation system.

Relocation of Willow Creek. Sections of Willow Creek are being relocated because they are in the path of Runway 9R Extension and Runway 9C-27C and related airfield facilities. The relocation of the creek will protect the RSA and Object Free Area (OFA) of each runway and provide an FAA access road to the approach lighting system for each runway. To maintain required flows in the creek, portions of the creek adjacent to sections that must be relocated will also have to be relocated. Because this project is necessary for the construction and use of Runway 9C-27C and the Runway 9R extension, it enhances the capacity of the airport and the national air transportation system.

Relocation of Bensenville Ditch. Bensenville Ditch is being relocated in stages, with an interim location pending acquisition of sufficient land to provide the permanent location. Both the existing and interim locations are in the path of Runway 10R-28L and related airfield facilities. The permanent relocation of the ditch will protect the RSA and OFA for Runway 10R-28L and provide FAA access roads to the Runway 10R approach lighting system and the Runway 10R Glide Slope location. To maintain required flows in the ditch, portions of the ditch adjacent to sections that must be relocated will also have to be relocated. Because this project is necessary for the construction and use of Runway 10R-28L it enhances the capacity of the airport and the national air transportation system.

Specific Information Under Order 5500.1 ¶4-8

Order 5500.1 states:

Ideally, the framework for the justification should establish the following:

- (1) The project accomplishes the PFC objective(s);
- (2) The project is cost-effective compared to other reasonable and timely means to accomplish the objective(s); and
- (3) Based on informed opinion or published FAA guidance, the cost of the project is reasonable compared to the capacity, safety, security, noise, and/or competition benefits attributable to the project.

The role of informed opinion in establishing these criteria is critical. Informed opinions may be provided by the public agency, persons providing comments on the project, and FAA personnel based on information provided in the PFC application (Order 5500.1 ¶ 4-8).

To demonstrate the need for the OMP (and therefore the project to produce construction-ready drawings of the remaining OMP airfield elements) in accordance with ¶ 4-8, the City submits the data and analysis in the EIS, the ROD, the Analysis and Review of City of Chicago's Application for Letter of Intent AGL 06-01 (A&R), and the publication of the Final Rule: Congestion and Delay Reduction at Chicago O'Hare International Airport, 71 FR 51382 – 51404 (August 29, 2006). All of this information is provided in this PFC application. These documents are submitted in their entirety as part of this Application, for the reasons set forth in Attachment F-5. The City also submits the FAA's informed opinion (i) selecting the OMP, and each of its elements, as the FAA's preferred alternative, (ii) committing more than \$300 million in AIP funds for a portion of the OMP following a determination that the benefit cost ratio for Phase 1 is "robust," and (iii) approving more than \$1.2 billion in PFC impose and use authority for OMP runway construction and land acquisition. The information provided in this PFC Application includes the information on which the FAA reached those informed opinions, and follows the format prescribed in Order 5500.1, ¶ 4-8b.

The types of inefficiencies that would result if the project is not pursued (e.g., aircraft and/or passenger delay). (Order 5500.1, ¶ 4-8b(1)).

If the projects included for design in this Application are not built and the OMP is not completed, the result would be that existing inefficiencies (e.g., aircraft and passenger delay) at O'Hare and in the NAS would continue to occur, and would increase. According to Bureau of Transportation Statistics data, O'Hare is among the most delayed airports in the United States for both on-time arrival and on-time departure performance. For calendar year 2007, O'Hare ranked 29th out of 32 major airports in arrival performance and 32nd out of 32 airports in departure performance. For calendar year 2006, O'Hare ranked 30th out of 32 major airports in arrival performance and 32nd out of 32 major airports in departure performance (Bureau of Transportation Statistics, Ranking of Major Airport On-Time Arrival Performance Year-to-date through December 2006 and December 2007; Ranking of Major Airport On-Time Departure Performance Year-to-date through December 2006 and December 2007, Tables 4 and 6). In both cases on-time performance was worse than calendar year 2005, when O'Hare ranked 22nd out of 31 airports in arrival performance and 29th in departure performance. This poor performance continues in 2008. For the first six months of 2008, O'Hare ranked 30th in arrival performance, one rank worse than the first six months of 2007, and 32d out of 32 in departure performance, as in the first six months of 2007. Departure performance for the first six months of 2008 was worse than the next worst airport by a wide margin (4.72% of on-time departures), the widest margin between airports on the entire list. (Bureau of Transportation Statistics, Ranking of Major Airport On-Time Arrival Performance Year-to-date through June, 2008; Ranking of Major Airport On-Time Departure Performance Year-to-date through June, 2008, Tables 4 and 6) This poor performance occurs even though the FAA imposed "Congestion and Delay

Reduction” rules at O’Hare (14 CFR Part 93, Subpart B, §§ 93.21 – 93.32 (Congestion Rule)). Copies of the BTS report pages are attached.

This data is recent evidence of historical inefficiencies at O’Hare, as shown by the FAA’s data on historical aircraft delay at O’Hare in the EIS. “By November 2003, O’Hare had the worst on-time performance of any major airport” (70 FR 15521 (March 25, 2005) (reprinted at EIS A-196)). The EIS provides detailed data on “Historical Delay at O’Hare.” (EIS A-35 – A45).

“Delays at O’Hare have a direct impact on the entire NAS, in part because approximately 51 percent of the total passengers traveling through O’Hare currently connect to and from other airports. . . . In light of the significant role that O’Hare plays for connecting traffic, this level of delay clearly impacts many other airports and propagates further delays and inefficiencies throughout the NAS.” EIS 2-23. These inefficiencies identified in the EIS exist and would continue to exist if the project is not pursued.

Inefficiencies at O’Hare, and the resulting congestion and delays, are a consequence of the Airport’s converging runway configuration, which does not provide balanced capacity in instrument flight rules (IFR) and visual flight rules (VFR) conditions or between arrivals and departures.

The runway layout at O’Hare has a major effect on airfield capacity and the resulting levels of delay. The layout consists of three converging and intersecting sets of parallel runways . . . As a result of this existing airfield layout, operations on any pair of parallel runways interact with operations on any other pair of runways. This operational dependency increases the separation required between the aircraft landing and taking off at O’Hare when more than two parallel runways are in use. Furthermore, during adverse weather conditions, these same separation requirements are increased still further. Increased aircraft separation, in turn, reduces the airfield capacity by reducing the rates at which arrivals can land and departures can take off from O’Hare’s runways. Finally, in most runway use configurations it is not possible to optimize airfield procedures for simultaneous arrivals and departures. (EIS 2-6).

The result is existing airport inefficiency, causing congestion and delay. Such inefficiencies are anticipated to grow worse in the future as demand increases. Currently, these limitations result in airport inefficiencies that significantly impact the efficiency and quality of air transportation available to origin and destination passengers for the City and the State of Illinois, connecting passengers whose use of O’Hare significantly improves air transportation services available to the City and the State, and the NAS, even in good weather during peak periods of the day. The continued delays at the Airport reflect the continued need for the construction of the OMP.

OMP provides additional parallel runway capacity, relieving inefficiencies of the existing intersecting runway system. The FAA identified the intersecting runways as a primary source of O'Hare congestion and delay (see above). The completed OMP will have six parallel runways in the east-west direction, allowing a substantial increase in parallel arrival and departure operations, thereby relieving a major cause of airfield and NAS inefficiencies. This approach to airfield design already exists at the other two major connecting hubs in the United States, Atlanta and Dallas/Ft. Worth. It is the most efficient airfield design available for modern jet aircraft. The project proposed in this Application would design the remaining components of the parallel runway system. Each of the three runway projects included in this Application – 9C-27C, 10R,28L and the extension of Runway 9R – contributes specific benefits to enhancing the capacity of the airport and the national air transportation system. These specific “types of inefficiencies that would result if each of these components is not pursued (e.g., aircraft and/or passenger delay)” (Order 5500.1 ¶ 4-8b(1)) are described above in this Item 5 under “Basic Project Justification Information.”

The benefits of the OMP as a whole are demonstrated by the extensive TAAM modeling performed for the EIS. The 344-page EIS Appendix D is included in the reference documents. It “describes the methodology, input data, review process, and results of airfield and airspace simulations” for the EIS (EIS D-1). The results show that the OMP relieves inefficiencies at O'Hare, and thereby enhances the capacity of the NAS. It compares the OMP (EIS Alternative C) with eight alternative configurations of O'Hare runways, and with the current configuration. It demonstrates that:

In terms of delay reduction benefits, while serving 1,194,000 annual operations in 2018, Alternative C (City's OMP) would have an average annual delay of 5.8 minutes per operation, Alternative D would have 10.5 minutes of delay per operation, and Alternative G would have 6.9 minutes of delay per operation. Notably, when comparing Alternative C to Alternative D, there is an 81 percent increase in average annual delay with Alternative D. When comparing Alternative C to Alternative G, there is a 19 percent increase in the average annual delay with Alternative G. Alternative C provides the greatest benefits in reducing delays in the Chicago region and consequently in the NAS. As discussed in the EIS, O'Hare affect the NAS because the airfield lacks adequate runway capacity and gate availability to handle both current and forecast levels of activity for O'Hare. In addition, delays at O'Hare have a direct impact on the NAS, in part because approximately 51 percent of the total passengers traveling through O'Hare currently connect to and from other airports.

In contrast with the Build Alternatives, the No Action Alternative is projected to serve 974,000 annual operations (constrained) in 2018

at an average annual delay 17.1 [sic] minutes per operation. This is approximately 200,000 less operations at a significantly higher level of delay than any of the Build Alternatives and does not meet the purpose and need.

...

All of the factors that led the FAA to identify Alternative C as the preferred alternative equally support a decision to select it and approve the related Federal actions necessary for its implementation at O'Hare. In addition, the FAA selects Alternative C for the following reasons. First, Alternative C is consistent with the FAA's statutory and policy obligations, specifically (1) the FAA's legal obligation to plan the kind of airport development necessary to provide a safe, efficient, and integrated system of public-use airports adequate to anticipate and meet the needs of civil aeronautics (49 U.S.C. § 47103), and (2) the Congressional declaration of policy that artificial restrictions on airport capacity are not in the public interest and should be imposed to alleviate air traffic delays only after other reasonably available and less burdensome alternatives have been tried [49 U.S.C. §47101(a)(9)].

...

[W]hen comparing Alternative C to Alternative G (which was demonstrated to be the next most effective in reducing delay after Alternative C), the FAA has calculated that Alternative C produces delay savings immediately commencing with the full build out. These savings total approximately \$150 million over a five-year time period after full build out, and would not be realized by any other alternative. Such delay savings would be even greater when Alternative C is compared with those of any other alternative. In addition, the FAA notes that Alternative C is the only alternative that has the potential, should the technology/procedures be approved of immediately implementing four independent arrival streams under all weather (ROD 31-33).

These FAA conclusions are supported by the extensive analysis in the EIS, particularly Appendix D, describing the methodology and results of the TAAM modeling of airport configuration alternatives. Appendix D is included in this application in its entirety. These FAA determinations show the "inefficiencies that would result if the project is not pursued (e.g., aircraft and/or passenger delay" as required by Order 5500.1, ¶ 4-8b(1). These FAA determinations were based on delay cost estimates using fuel costs in effect several years ago. With rising fuel prices, the cost of delay, and therefore the value of the OMP, has increased. See Attachment F-4.

The number or types of operations that could not be conducted if the project were not pursued. (Order 5500.1, ¶ 4-8b(2))

The FAA determined that the capacity of the current airfield is 974,000 operations annually. The FAA determined that Alternative C (OMP) “while serving 1,194,000 annual operations in 2018” would have an average annual delay of 5.8 minutes per operation (ROD 31). Therefore, the “number . . . of operations that could not be conducted if the project were not pursued” under Order 5500.1, ¶ 4-8b(2) is 220,000 in 2018. Before that, with the completion of Phase 1 of the OMP, the FAA’s analysis projects that the airfield will accommodate approximately 90,000 additional forecast operations with a decrease in average annual delay per aircraft of approximate 33% below today’s delay per aircraft at O’Hare. The FAA’s analysis is based on the analysis described in EIS Appendix D (attached). The Completion Phase projects, which are the subject of this Application, are the projects that increase capacity by approximately 130,000 operations annually.

The Completion Phase provides four runways with sufficient separation between them to allow four independent arrival streams in good weather, supplemented by departure runway capacity to balance arrivals and departures. FAA also determined that the OMP (Alternative C) “is the only alternative that has the potential, should the technology/procedures be approved of immediately implementing four independent arrival streams under all weather” (ROD 33). The runway capacity required to achieve this objective is included in the projects described in this Application. Quadruple simultaneous independent arrivals in good and bad weather are “types of operations that could not be conducted if the project were not pursued” and demonstrate that the OMP satisfies the justification requirements for PFCs set forth in Order 5500.1, ¶ 4-8b(2).

The proposed project would correct the capacity problem in a reasonable and cost-effective manner and is justified in proportion to the cost of the project. (Order 5500.1 ¶ 4-8b).

A formal BCA is not required for a PFC application (Order 5500.1, ¶ 4-8; *Southeast Queens Concerned Neighbors v. FAA*, 229 F.3d 387, 394 (2d Cir. 2000)). And see *Air Transport Ass’n of America v. FAA*, 169 F.3d 1, 9 (D.C. Cir. 1999); *St. John’s United Church of Christ v. FAA*, 520 F.3d 460, 462 (D.C. Cir. 2008). The following analysis is provided under Order 5500.1 ¶ 4-8b.

In the ROD, the FAA made the following determinations:

FAA has concluded, based on review and analysis of data, that the increased airline user charges expected to result from OMP implementation, while important, are likely to be reasonable in the context of the benefits of the investment; such user charges (e.g., landing fees and terminal rents) represent a relatively small share

of airline operating costs compared to other costs such as labor and fuel; there is a logical economic basis for the OMP that has been evidenced. FAA has also reviewed additional cost-related information applicable to the project. For purposes of this review under NEPA, the FAA has concluded that the estimated costs of the project are reasonable. FAA has also concluded that it is reasonable to assume that, based upon the impact O'Hare has on the Chicago region, as well as the NAS, and the benefits to the regional economy, there will be sufficient funds to complete the proposal, if approved. In addition, FAA believes that with a project of this magnitude and importance, the availability of projected funding sources is sufficiently reasonable and capable of being obtained (ROD 88).

See Attachments F-3 and F-4 for a discussion of financial viability and cost benefit analysis.

_____ FOR FAA USE _____

a. Is justification adequate? YES [] NO [].

b. Comments:

6. LEVEL OF COLLECTION: \$1.00[] \$2.00[] \$3.00[] (go to 8)
\$4.00[] \$4.50[X] (public agencies of medium and large hub
Airports go to 7; all others go to 8)

7. SIGNIFICANT CONTRIBUTION:

Before approving this application at the level of \$4.50, the FAA must find that the project "will make a significant contribution to improving air safety and security, increasing competition among air carriers, reducing current or anticipated congestion, or reducing the impact of aviation noise on people living near the airport" (49 USC 40117(b)(4)(A)). The information supplied under Item 5 above satisfies this requirement and is included in this Item 7 by reference.

The following additional information is supplied to demonstrate that the projects to be designed as described in this Application will make a significant contribution to reducing current and anticipated congestion and to increasing competition among air carriers.

Reducing Current and Anticipated Congestion

Basic Information About Reducing Congestion

As described in Item 5 above, O'Hare suffers from long-standing serious congestion. It does not have the runway capacity to efficiently process the

demand for arrivals and departures, particularly in bad weather. Current and anticipated congestion are a result of O'Hare runway configuration.

The runway layout at O'Hare has a major effect on airfield capacity and the resulting levels of delay. The layout consists of three converging and intersecting sets of parallel runways . . . As a result of this existing airfield layout, operations on any pair of parallel runways interact with operations on any other pair of runways. This operational dependency increases the separation required between the aircraft landing and taking off at O'Hare when more than two parallel runways are in use. Furthermore, during adverse weather conditions, these same separation requirements are increased still further. Increased aircraft separation, in turn, reduces the airfield capacity by reducing the rates at which arrivals can land and departures can take off from O'Hare's runways. Finally, in most runway use configurations it is not possible to optimize airfield procedures for simultaneous arrivals and departures. (EIS 2-6).

The Completion Phase projects which are the subject of this Application make a significant contribution to reducing current and anticipated congestion by constructing two more parallel runways to enhance capacity and thereby reduce congestion, and extending a third runway to enable it to play a more efficient role in a parallel runway operation allowing it to make a significant contribution to reducing current and anticipated congestion. These projects also include taxiways and other projects required to make the six parallel runway system work properly. These projects complete the modernization of O'Hare by providing six parallel runways that can be used under most conditions, instead of the three converging and intersecting sets of runways.

The OMP is an integrated single program consisting of a large number of interrelated elements. The OMP, which is already under construction, will make a significant contribution to reducing current or anticipated congestion. The benefits of the OMP result from six parallel east-west runways with sufficient separations to allow multiple independent arrival streams in both good and bad weather. Each runway is a necessary part of that overall airfield redesign. The OMP elements proposed to be designed in this Application each make a significant contribution to reducing current and anticipated congestion because they are integral parts of that single overall development program which makes that significant contribution. Each element contributes to the overall benefits of the program and cannot properly be separately evaluated. The OMP could not legally have been segmented into each of its elements for purposes of analysis under the National Environmental Policy Act, and it cannot be segmented for purposes of determining project justification for PFC purposes. See 40 CFR § 1508.25.

Each of the elements to be designed as described in this Application plays a specific role in the overall development program. Each makes a significant contribution to reducing current and anticipated delay, as follows.

Runway 9C-27C. This runway is one of the six parallel runways that will allow the airport to function on an east-west flow basis, thereby increasing the capacity of the airport and making a significant contribution to reducing current and anticipated congestion. It will be one of four arrival runways used for simultaneous quadruple arrivals. It will provide sufficient landing distance for all aircraft operating at the airport. This runway also provides Aircraft Design Group (ADG) VI capabilities on the north airfield. Most of the ADG-VI traffic simulated for the EIS, primarily international arrivals, arrived and departed over navigational fixes served by runways on the north airfield. Providing ADG-VI capability on the north airfield with Runway 9C-27C provides more efficient airfield and airspace operations. The OMP is designed to balance the north and south airfields. Without Runway 9C-27C, the departure capability of the north airfield would be substantially reduced in order to provide north airfield arrival capacity. Balancing the airfield increases the capacity of the airport and thereby makes a significant contribution to reducing current and anticipated congestion. This runway, and the airfield balance that it enables, is necessary to achieve the delay reduction of current and anticipated congestion benefits of the OMP.

Runway 9R-27L Extension. This existing runway is one of the six parallel runways that will allow the airport to function on an east-west flow basis, thereby increasing airport capacity and making a significant contribution to reducing current and anticipated congestion. This runway, with the extension, provides departure capability for all operations simulated for the EIS. Departures from this runway will depart from an intersection allowing aircraft arriving on Runway 9L-27R or Runway 9C-27C to taxi behind 9R-27L departures, eliminating runway crossings for those operations. Runway crossings require controllers to direct and hold aircraft, which produces delay and queuing of aircraft with resulting congestion. By allowing controllers to direct aircraft more efficiently, current and anticipated congestion will be reduced.

Runway 10R-28L. This runway is one of the six parallel runways that allow the airport to function on an east-west flow basis, thereby increasing the capacity of the airport and making a significant contribution to reducing current and anticipated congestion. It is located with sufficient spacing from the next-closest runway to provide independent arrival capacity, thereby increasing the capacity of the airport and reducing congestion. The EIS evaluated an alternative that included all of the OMP runways except Runway 10R-28L – Alternative D. The TAAM simulation results in the EIS estimated average annual delay in 2018 at 10.5 minutes per

operation for Alternative D. The delay reduction achieved without this runway is considerably less than the delay reduction achieved with the full OMP, including this runway. See ROD 28; EIS E-72. Only with this runway can O'Hare provide four independent arrival streams in good weather, with the resulting benefits to reducing current and anticipated congestion, with resulting benefits to delay reduction and capacity enhancement. Only this runway provides the potential, should the technology and procedures be approved by the FAA, of immediately implementing four independent arrival streams during all weather conditions. As a result, this runway preserves the potential to produce even greater reduction in congestion, and the resulting delay reduction benefits, than the EIS and ROD estimated for the total OMP. See EIS 3-58.

Taxiway LL. This taxiway provides operational flexibility in a congested part of the airfield. It allows multiple departure queues for Runways 28R and 28C, thereby reducing congestion of departing aircraft. This taxiway allows taxiway flows in both directions north of Runway 10L-28R at all times, thereby providing ground controllers with flexibility to move aircraft without delay or conflict through this congested area, thereby reducing current and anticipated congestion.

Specific Information Under Order 5500.1 ¶ 10-12b

Order 5500.1, *Passenger Facility Charge*, describes specific factors to be considered in assessing whether the significant contribution requirement has been met. The Order treats "congestion" and "capacity" together as a single set of factors to be considered.

FAA will consider all relevant factors, including but not limited to the following, in assessing whether the significant contribution requirement has been met: . . . b. Congestion (Capacity). Does the project support or is it part of a capacity project to which the FAA has allocated Federal resources or that would qualify for such resources? For example, is the project included in an LOI or does it satisfy the FAA's benefit-cost criteria for large AIP discretionary investments? Has the project been identified as an important item in an FAA Airport Capacity Enhancement Plan? Does the project alleviate an important constraint on airport growth or service? (¶ 10-12b)

The information below describes the application of two of these factors: allocation of federal resources and alleviating an important constraint on airport growth or service.

Capacity Project to which FAA has Allocated Federal Resources

The OMP is “part of a capacity project to which the FAA has allocated Federal resources” and part of the project is “included in an LOI.” On November 21, 2005, the FAA issued a Letter of Intent announcing its intention to make available future federal funds for the Phase 1 Airfield portion of the OMP. On September 25, 2006, the FAA sent to the City a “Grant Offer issued by the authority of the Administrator of the Federal Aviation Administration on behalf of the United States to pay the Government’s share of the allowable costs up to a maximum of \$29,300,000.00 for a project at Chicago O’Hare International Airport, under AIP Project No. 3-17-0022-87” (Attached). The LOI includes new Runway 9L-27R, for which \$125,000,000 has been allocated. The FAA funded the first grant contemplated by the LOI and the City expended the grant proceeds for a portion of Phase 1 Airfield project costs. On August 27, 2007, the FAA approved the City’s application for the second in this planned series of grants and extended a grant offer for an installment of \$28,400,000 of the federal funds referred to in the LOI. The City accepted the grant offer on August 28, 2007 and the FAA disbursed the funds on September 18, 2007. The City then immediately applied the funds to the project. On May 6, 2008 the City applied for the third grant in the series contemplated by the LOI. The application was for \$26,500,000 and the FAA approved the application in two increments. The first amount for \$24,820,437 was approved by the FAA on June 3, 2008. The City accepted the grant offer on June 10th and received the funds on August 26, 2008. The second installment for \$1,679,563 was approved by the FAA on September 8, 2008. The incremental approvals total the full amount of the third installment of \$26,500,000. The City will apply the funds to the project. The City intends to apply for an LOI for the Completion Phase projects within the next twelve months.

The OMP is a single project. Although divided into Phase 1 and the Completion Phase for administrative purposes, the OMP is a single, integrated project. The Federal resources so far allocated support an incremental stage of development of the whole OMP, which is substantially under construction. Even though the AIP financing process has not been initiated for the Completion Phase projects, FAA allocation of Federal resources to Phase 1 is allocation of Federal resources to the entire OMP – Alternate C described in the EIS and ROD.

FAA determined that the Phase 1 runway projects satisfy “the FAA’s benefit-cost criteria for large AIP discretionary investments.” The FAA reviewed substantial data, and concluded: “The FAA has considered the benefit and cost of the project and concludes that the project is cost beneficial over a range of parameters” (A&R 17). The FAA relied, in part, on its independent consulting team:

Under its contract with Brown, the FAA requested that GRA review the City’s supplemental BCA to ensure consistency with the guidance and direction given by the FAA and GRA. GRA also

concluded that the project showed robust benefit cost ratios over a range of parameter values and that the supplemental BCA was consistent with the methods outlined in Appendix C of the BCA guidance and with GRA's prior direction and guidance (A&R 16).

Because the City has not yet applied for AIP funding for the Completion Phase runways, the FAA has not issued an LOI or otherwise committed federal funds to the Completion Phase elements of the OMP. However, the FAA has indicated that an additional LOI, similar in amount to the Phase 1 LOI, is a reasonable assumption for determining the financial feasibility of the total OMP.

The totality of the AIP funding sources appears large but not out of line with AIP funding commitments made toward other large airport development projects. The LOI amount of \$616M includes 6 runway projects, and when considered on a per runway basis, is on a par with the FAA's normal planning target of \$100 million discretionary dollars per runway for LOIs at large hub airports. On a percentage basis, the \$616M amount (approximately 10 percent of the project cost of the Total OMP cost estimate) is among the lowest of any LOI request for runways at large hub airports (A&R 28).

The FAA also made the following determination with respect to AIP funding for the total OMP:

Having found OMP Phase 1 provides significant improvement at one of the nation's most important airports, the FAA can be expected to continue to fund the overall OMP, assuming that the City is able to comply with the statutory and regulatory guidance on LOI/AIP funding, and that funds remain available when those applications are filed. A&R, Attachment F, p. 2

Both the allocation of federal resources for the OMP to date, and the FAA's statements suggesting that the "FAA can be expected to continue to fund the overall OMP," are factors relevant to the FAA's consideration under Order 5500.1 ¶ 10-12b in determining whether the work described in this Application will make a significant contribution to reducing current or anticipated congestion.

Alleviate an Important Constraint on Airport Growth or Service

The FAA found, based on the extensive analysis in the EIS and the thorough TAAM simulations performed for the EIS that:

The proposed project removes airfield constraints at O'Hare by both reconfiguring and adding new runways thereby providing additional arrival capacity. With this additional arrival capacity, the proposed project helps

reduce the need for air traffic controllers to slow air traffic en route to O'Hare thus reducing en route airspace congestion (ROD A.2-49).

Capacity, congestion and delay are interrelated. Order 5500.1, ¶ 10-12 treats "congestion" and "capacity" as the same criterion ("Congestion (Capacity))." "The FAA's preferred approach to reducing delay and congestion is to increase airport infrastructure so that capacity meets demand" (70 FR 15529 (March 25, 2005), reprinted at EIS A-205). The FAA imposed flight limitations at O'Hare. "This rule is intended to be an interim measure only, and the FAA anticipates that the rule will yield to longer term solutions to traffic congestion at the airport. Such solutions include plans by the City of Chicago to modernize the airport and reduce levels of delay, both in the medium term and long term." 71 FR 51382 (August 29, 2006); substantially the same statement appears in the Notice of Proposed Rulemaking (70 FR 15520; EIS A-196).

The ROD states:

The FAA finds that there is a compelling governmental interest in taking immediate Federal action that addresses the aviation needs of the Chicago region by reducing delays at O'Hare, thereby enhancing capacity of the National Airspace System (NAS) (ROD 93).

The EIS's airfield simulation modeling "demonstrates that the OMP will provide meaningful congestion/delay relief" (EIS U.4-255). "The modeling clearly demonstrates that the OMP will significantly reduce congestion and delays" (EIS U.4-216). EIS Exhibit D-9 (included in the attached Appendix D at page D-26) shows the incremental benefits of the OMP as runways are placed into service. The entire 344-page EIS Appendix D, which is included in this Attachment, provides detailed data and analysis of runway capacity, and the effect of removal of constraints on O'Hare growth and service. Delay and congestion are currently an important constraint on airport growth and service at O'Hare, as demonstrated by the history of delay which has been unrelieved for many years. The simulation modeling demonstrates that the OMP will alleviate it, and is a relevant factor under Order 5500.1 ¶10-12b to be considered by the FAA in determining whether the "significant contribution" requirement has been met.

As described above in this Item 7 under "Basic Information About Reducing Congestion", Runways 9C-28C and 10R-28L each contribute to alleviating an important constraint on airport growth or service by providing an additional east-west parallel runway, increasing the ability of controllers to operate the airport in a parallel runway configuration and reduce conflicts in the air and on the ground, thereby reducing congestion, increasing capacity and reducing delay. The extension to Runway 9R and Taxiway LL contribute to alleviating an important constraint on airport growth or service by improving the efficiency of the airfield.

Increasing Competition Among Air Carriers

The project also will make a significant contribution to “increasing competition among air carriers” by adding capacity (49 USC 40117(b) (4) (A)). The project will “mitigate or remove barriers to increased competition at the airport” (Order 5500.1 ¶ 10-12d). The contribution of the project to increasing competition among air carriers benefits both passenger and cargo carriers.

A fundamental barrier to increasing competition among air carriers at O’Hare is the lack of airfield capacity to handle additional competitive operations by incumbent carriers, and operations by new entrant carriers. By increasing airfield capacity and reducing congestion, the OMP provides room at O’Hare for competitive service that does not exist today.

“As indicated in the comments, carriers of all sizes have expressed a desire to expand their operations at O’Hare, or at least preserve the option to grow” (Final Rule on Congestion and Delay Reduction at Chicago O’Hare International Airport, 71 FR 51382, 51385 (August 29, 2006)). Limited operations capacity at O’Hare is one barrier to increased competition at the airport. In the Purpose and Need section of the EIS, the FAA noted the adverse effect on competition resulting from capacity constraints at O’Hare:

[I]t is possible that the Agency’s policy of continuing to promote competition in the nation’s third largest market could be impeded by extraordinary levels of delay and limited capacity. Especially in light of the region’s projected aeronautical needs, it is vital for both Chicago and the NAS that these delays be reduced (EIS 2-28).

Runways 9C-27C and 10R-28L each increase the capacity of the airfield by incrementally enhancing the parallel operation of the airport, as described above in this Item 7 under “Basic Information About Reducing Congestion.” The extension to Runway 9R and Taxiway LL increase the capacity of the airfield by reducing congestion and delay, making room for additional efficient operations. Current and anticipated congestion deter new competitive service. Each of these projects plays a role in the overall OMP in reducing congestion.

In addition to these benefits to competition among passenger carriers, the FAA also found that the OMP will improve competitiveness for cargo activity.

[T]he OMP Phase 1 and the Total OMP (and Total Master Plan components) will permit an increase in aircraft operations while reducing or maintaining current levels of delay at the airport. Thus, the project will provide opportunities for increased all-cargo flights at the airport. Therefore, having considered the matter, we conclude that the project will likely foster competitiveness in securing air cargo activity at O’Hare and

because of O'Hare's importance to the national airport system it will likely have a global effect as well (A&R 21).

One objective of PFCs was to provide airports with a source of revenue for capital projects independent of incumbent carrier vetoes.

The PFC Program was authorized in 1990 to provide a new source of funding for airport development in addition to the Airport and Airway Trust Fund. The 1990 legislation recognized that the federal government would not be able to go beyond its historic role of funding 20-30% of airport development. In addition, we concluded that a new source of local funding was needed to help overcome problems which had arisen under revenue bonds, the traditional method of local airport funding. It was alleged by some that many of these bonds gave the airlines supporting the bonds veto power over new capital development, and that incumbent airlines had used their veto power to block development which would benefit their competitors (House Report No. 103-240, 1994 United States Code Congressional and Administrative News 1676, 1696).

To overcome incumbent carrier efforts to impede competition, the law prohibits carrier interference with PFCs:

A contract between an air carrier or foreign air carrier and an eligible agency made at any time may not impair the authority of the agency to impose a passenger facility fee or to use the passenger facility revenue as provided in this section (49 USC § 40117(f)(1)).

Although incumbent carriers at O'Hare have indicated their support for the OMP, from time to time they have acted to restrain the City's efficient pursuit of the OMP. For example, some of them certify disagreement with this PFC application. Incumbent carriers resist airport improvements that increase availability of the airport to their competitors. These PFCs will enable the OMP to proceed efficiently despite such objections by incumbent carriers and allow the City to "mitigate or remove barriers to increased competition at the airport" even though incumbent carriers object. See Attachment E, Response to Carrier Comments.

_____ FOR FAA USE _____

- a. Air safety. Part 139 [] Other (explain) _____
Certification Inspector concur. Yes [] No [] Date _____
- Air security. Part 107 [] Part 108 [] Other (explain) _____
CASFO concur. Yes [] No [] Date _____
- Competition. Competition Plan [] Other (explain) _____
- Congestion. Current [] or Anticipated []
LOI [] FAA BCA [] FAA Airport Capacity Enhancement Plan []
Other (explain) _____
- Noise. 65 LDN [] Other (explain) _____

___ Project does not qualify under “significant contribution” rules. (explain and go to 6. Project Justification - FOR FAA USE – for analysis).

b. Comments:

8. PFC OBJECTIVE:

The ROD states that one purpose of the OMP is to “address the projected needs of the Chicago region by reducing delays at O’Hare, and thereby enhancing capacity of the NAS” (ROD 16). The objectives of Runways 9C-27C and 10R-28L, the extension of Runway 9R, and Taxiway LL, are to enhance the capacity of the national air transportation system and furnish opportunities for enhanced competition between or among air carriers. The OMP as a whole satisfies this objective.

Alternative C [the OMP] is clearly superior in terms of reducing average annual delays. It is more effective and efficient than any of the other build alternatives in meeting the purpose and need of reducing delays at O’Hare, thereby reducing delays in the National Airspace System. ROD 31.

Each of the OMP components described in this Application plays a specific role in achieving these objectives.

Runway 9C-27C. This runway is one of the six parallel runways that will allow the airport to function on an east-west flow basis, thereby enhancing airport capacity and reducing delay by eliminating most runway intersections. It will be one of four arrival runways used for simultaneous quadruple arrivals. It will provide sufficient landing distance for all aircraft operating at the airport. This runway also provides Aircraft Design Group (ADG) VI capabilities on the north airfield. Most of the ADG-VI traffic simulated for the EIS, primarily international arrivals, arrived and departed over navigational fixes served by runways on the north airfield. Providing ADG-VI capability on the north airfield with Runway 9C-27C provides more efficient airfield and airspace operations. The OMP is designed to balance the north and south airfields. Without Runway 9C-27C, the departure capability of the north airfield would be substantially reduced in order to provide north airfield arrival capacity. Adding a parallel east-west runway to the more efficient parallel runway system at O’Hare, and balancing the north and south airfields, are necessary to achieve the objective of enhancing the capacity of the national air transportation system. Increasing airport capacity makes room for competitive service, thereby furnishing opportunities for enhanced competition between or among air carriers.

Runway 9R-27L Extension. This existing runway is one of the six parallel runways that will allow the airport to function on an east-west flow basis,

thereby increasing airport capacity and reducing delay by eliminating most runway intersections. This runway provides departure capability for all operations simulated for the EIS. Departures from this runway will depart from an intersection allowing aircraft arriving on Runway 9L-27R or Runway 9C-27C to taxi behind 9R-27L departures, eliminating runway crossings for those operations. Elimination of runway crossings increases airfield capacity by increasing airfield efficiency. Improving airfield efficiency is necessary to achieve the objective of enhancing the capacity of the national air transportation system. Increasing airport capacity make room for competitive service, thereby furnishing opportunities for enhanced competition between or among air carriers.

Runway 10R-28L. This runway is one of the six parallel runways that allow the airport to function on an east-west flow basis, thereby increasing airport capacity and reducing delay. It is located with sufficient spacing from the next-closest runway to provide independent arrival capacity. The EIS evaluated an alternative that included all of the OMP runways except Runway 10R-28L – Alternative D. The TAAM simulation results in the EIS estimated average annual delay in 2018 at 10.5 minutes per operation for Alternative D. The delay reduction achieved without this runway is considerably less than the delay reduction achieved with the full OMP, including this runway. See ROD 28; EIS E-72. Only with this runway can O'Hare provide four independent arrival streams in good weather, with the resulting benefits to delay reduction and capacity enhancement. Only this runway provides the potential, should the technology and procedures be approved by the FAA, of immediately implementing four independent arrival streams during all weather conditions. As a result, this runway preserves the potential to produce even greater delay reduction benefits than the EIS and ROD estimated for the total OMP. See EIS 3-58. Adding a parallel east-west runway to the more efficient parallel runway system at O'Hare, and providing the capability for four independent arrival streams, are necessary to achieve the objective of enhancing the capacity of the national air transportation system. Increasing airport capacity makes room for competitive service, thereby furnishing opportunities for enhanced competition between or among air carriers.

Taxiway LL. This taxiway provides operational flexibility in a congested part of the airfield. It allows multiple departure queues for Runways 28R and 28C, thereby relieving congestion of departing aircraft. This taxiway allows taxiway flows in both directions north of Runway 10L-28R at all times, thereby providing ground controllers with flexibility to move aircraft without delay or conflict through this congested area. Improving airfield efficiency is necessary to achieve the objective of enhancing the capacity of the national air transportation system. Increasing airport capacity make room for competitive service, thereby furnishing opportunities for enhanced competition between or among air carriers.

_____ FOR FAA USE _____

- a. Safety, Preserve Enhance
 Security, Preserve Enhance
 Capacity, Preserve Enhance
 Furnish opportunity for enhanced competition between or among air carriers at the airport
 Mitigate noise impacts resulting from aircraft operations at the airport
 Project does not meet any PFC objectives (explain)

b. Comments:

9. FOR FAA USE (Public Agencies go to 10) _____

a. Project Eligibility:

- 1) Indicate project eligibility by checking the appropriate category below.
 Development eligible under AIP criteria (paragraph ___ of Order 5100.38_ or PGL ____);
 Planning eligible under AIP criteria (paragraph ___ of Order 5100.38_ or PGL ____);
 Terminal development as described in 49 U.S.C. 47110(d);
 Noise compatibility planning as described in 49 U.S.C. 47505;
 Noise compatibility measures eligible under 49 U.S.C. 47504. Check one of the following - project approved in an approved Part 150 noise compatibility plan ; or, project included in a local study . Include Title and Date of local study:
 Terminal development as described in 49 U.S.C. 40117(a) (3) (C);
 Shell of a gate as described in 49 U.S.C 40117(a) (3) (F) (air carrier _____, percentage of annual boardings _____); or
 Project does not meet PFC eligibility (explain).

b. Comments:

10. ESTIMATED PROJECT IMPLEMENTATION DATE (Month and Year): January 2009.

ESTIMATED PROJECT COMPLETION DATE (Month and Year): December 2012

_____ FOR FAA USE _____

a. For IMPOSE AND USE or USE-ONLY project, project will begin within 2 years of 120-day approval date? YES NO

b. For IMPOSE ONLY project, project will begin within 5 years of the charge effective date or approval date, whichever is sooner? YES NO

c. Comments:

11. For an IMPOSE ONLY project, estimated date USE application will be submitted to the FAA (Month and Year):

_____ FOR FAA USE _____

a. Is the date within 3 years of the estimated charge effective date or approval date, whichever is sooner? YES NO .

b. Comments:

12. a. LIST CARRIERS CERTIFYING AGREEMENT:

None

b. LIST CARRIERS CERTIFYING DISAGREEMENT:

Aerlingus
All Nippon Airways
American Airlines
Continental Airlines
Delta Airlines
Northwest Airlines
United Airlines

Recap of Disagreements:

See Attachment E, Response to Carrier Comments.

Public Agency Reasons for Proceeding:

See Attachment E, Response to Carrier Comments

13. a. LIST RESPONDENTS CERTIFYING PUBLIC NOTICE AGREEMENT:

None

b. LIST RESPONDENTS CERTIFYING DISAGREEMENT:

Joseph V. Karaganis, Counsel for Villages of Bensenville and Elk Grove Village, St. John's United Church of Christ, Helen Runge, Shirley Steele, Bernardo Flores, Gail Flores, Robert Rackow, Arlene Benson, William Baird, Robert Baird and Nelson Marrero.

Recap of Disagreements:

See Attachment E, Response to Public Comment

Public Agency Reasons for Proceeding:

See Attachment E, Response to Public Comment

_____ FOR FAA USE _____

a. Comments:

14. FINANCING PLAN:

PFC FUNDS: Pay-as-you-go \$177,535,973.00

Bond Capital \$0

Bond Financing & Interest \$0

*** SUBTOTAL PFC FUNDS: \$177,535,973.00

If the amount of PFC requested is over \$10,000,000, follow directions found in the attached instructions.

EXISTING AIP FUNDS:

Grant # Grant Funds in Project \$0

*** SUBTOTAL EXISTING AIP FUNDS: \$0

ANTICIPATED AIP FUNDS (List Each Year Separately):

Fiscal Year: Entitlement \$0 Discretionary \$0 Total \$0

*** SUBTOTAL ANTICIPATED AIP FUNDS: \$0

OTHER FUNDS:

State Grants \$0

Local Funds \$0

Other (please specify) \$0

*** SUBTOTAL OTHER FUNDS: \$0

*** TOTAL PROJECT COST: \$177,535,973.00 (See Attachment F-1 for detail on the amounts included in this total project cost.)

*** FOR EACH PROJECT PROPOSING PFC FUNDING IN EXCESS OF \$10,000,000: the public agency provided detailed basis of cost information. This detailed information should, at a minimum, provide detail regarding the cost of each major project component. YES [X] NO []

***PROJECT REQUESTING PFC FUNDING LEVELS OF \$4.00 AND \$4.50:

a. Project costs cannot be paid for from funds reasonably expected to be available through AIP funding. YES [X] NO []

b. If the FAA determines that the project may qualify for AIP funding, the public agency would prefer that the FAA approve the amount of the local match to be collected at a \$4.50 PFC level [X] OR the entire requested amount at a \$3.00 PFC level [].

c. Terminal and surface transportation projects. The public agency has made adequate provision for financing the airside needs of the airport, including runways, taxiways, aprons, and aircraft gates. YES [] NO [] N/A [X]

d. Comments. Additional supporting detail on the financing plan for these projects is set forth in Attachments F-2, F-3 and F-4. Project components that are not eligible for PFC or AIP funding will be funded from other sources described in Attachment F-2.

_____ FOR FAA USE _____

- a. The amount of PFC recommended for approval will not result in revenue that exceeds the amount necessary to finance this project.
- b. Does the project include a proposed LOI? YES [] NO [] If YES, does the Region support? YES [] NO []. If YES, list the schedule for implementation:
- c. For any proposed AIP discretionary funds, does the Region intend to support? YES [] NO []
- d. For any proposed AIP funds, is the request within the planning levels for the Region's five year CIP? YES [] NO []
- e. For project requesting PFC funding levels of \$4.00 and \$4.50:
Project costs cannot be paid for from funds reasonably expected to be available through AIP funding. YES [] NO []
Terminal and surface transportation projects. The public agency has made adequate provision for financing the airside needs of the airport, including runways, taxiways, aprons, and aircraft gates. YES [] NO [] N/A []
- f. Comments.

15. BACK-UP FINANCING PLAN: See Attachment F-2.

_____ FOR FAA USE _____

- a. Is the back-up financing/phasing plan viable? Yes [] No [].
- b. Comments:

_____ FOR FAA USE _____

ADO/RO RECOMMENDATION: Approve [] Partially Approve [] Disapprove []

I have examined the cost estimates provided by the public agency for this project within the confines of the project's purpose and in relation to the project's scope and find that based on the FAA's past experience with similar projects, the estimated amount for this project is [] is not [] reasonable.

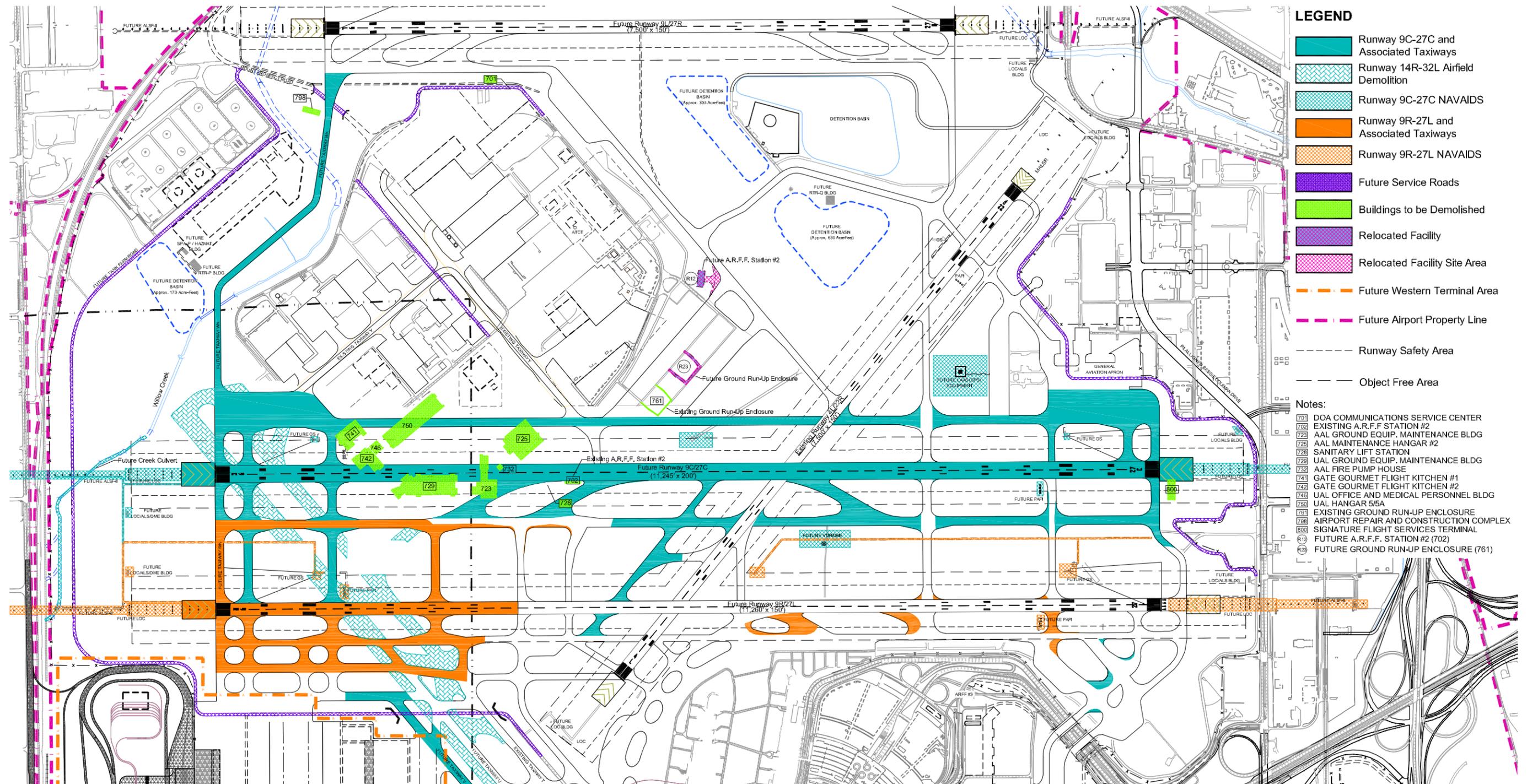
ADDITIONAL INFORMATION (If appropriate, include explanation of recommendation, congressional interest, pertinent background, etc.):

Application Reviewed by:

Name

Routing Symbol

Date



LEGEND

- Runway 9C-27C and Associated Taxiways
- Runway 14R-32L Airfield Demolition
- Runway 9C-27C NAVAIDS
- Runway 9R-27L and Associated Taxiways
- Runway 9R-27L NAVAIDS
- Future Service Roads
- Buildings to be Demolished
- Relocated Facility
- Relocated Facility Site Area
- Future Western Terminal Area
- Future Airport Property Line
- Runway Safety Area
- Object Free Area

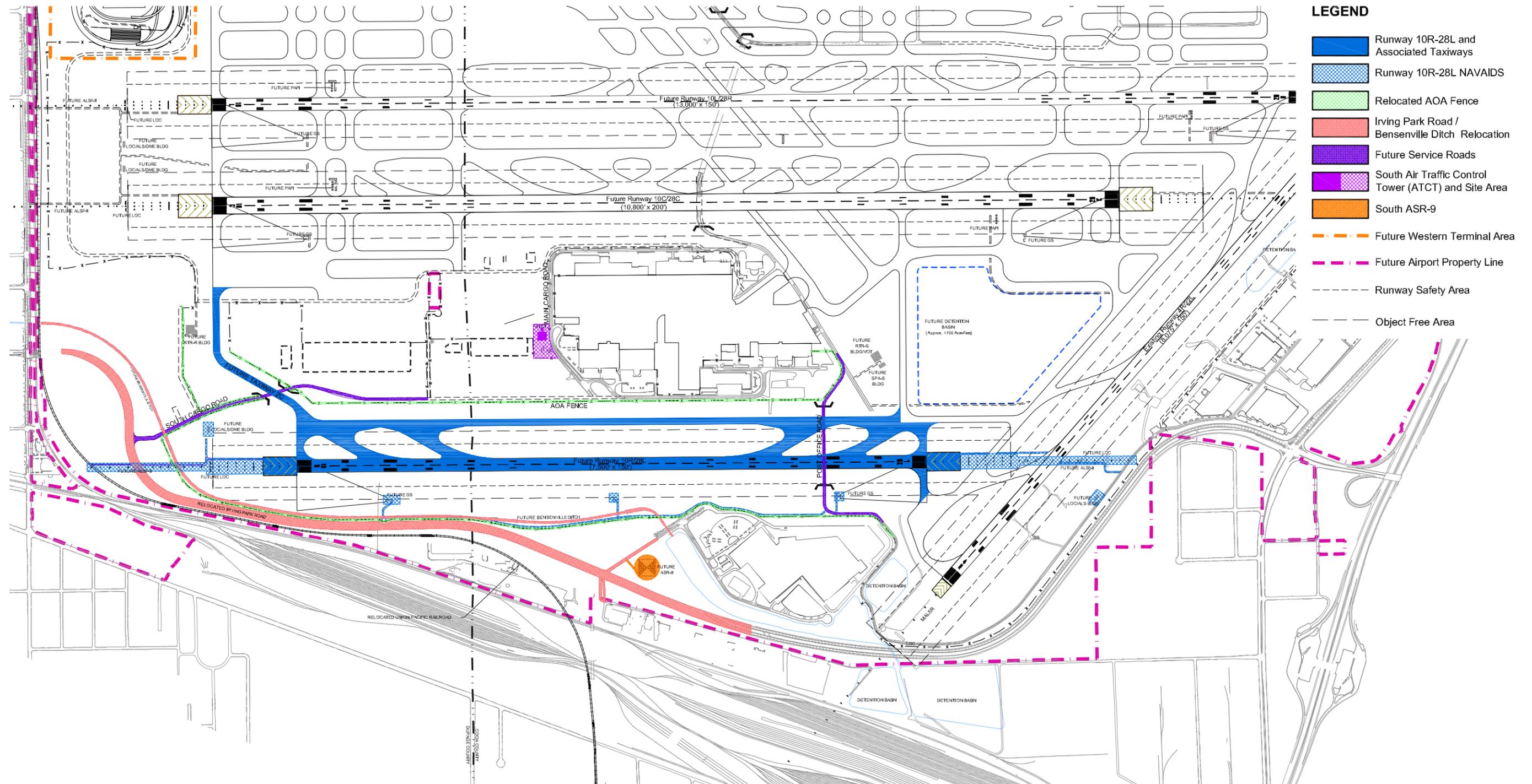
- Notes:**
- 701 DOA COMMUNICATIONS SERVICE CENTER
 - 702 EXISTING A.R.F. STATION #2
 - 723 AAL GROUND EQUIP. MAINTENANCE BLDG
 - 729 AAL MAINTENANCE HANGAR #2
 - 728 SANITARY LIFT STATION
 - 729 UAL GROUND EQUIP. MAINTENANCE BLDG
 - 732 AAL FIRE PUMP HOUSE
 - 741 GATE GOURMET FLIGHT KITCHEN #1
 - 742 GATE GOURMET FLIGHT KITCHEN #2
 - 749 UAL OFFICE AND MEDICAL PERSONNEL BLDG
 - 750 UAL HANGAR 5/5A
 - 761 EXISTING GROUND RUN-UP ENCLOSURE
 - 761 AIRPORT REPAIR AND CONSTRUCTION COMPLEX
 - 800 SIGNATURE FLIGHT SERVICES TERMINAL
 - R11 FUTURE A.R.F. STATION #2 (702)
 - R23 FUTURE GROUND RUN-UP ENCLOSURE (761)

Source: O'Hare International Airport, Airport Layout Plan, September 2005; Ricondo & Associates, Inc.
 Prepared by: Ricondo & Associates, Inc.

Exhibit B-1



North Airfield



Source: O'Hare International Airport, Airport Layout Plan, September 2005; Ricondo & Associates, Inc.
 Prepared by: Ricondo & Associates, Inc.

Exhibit B-2

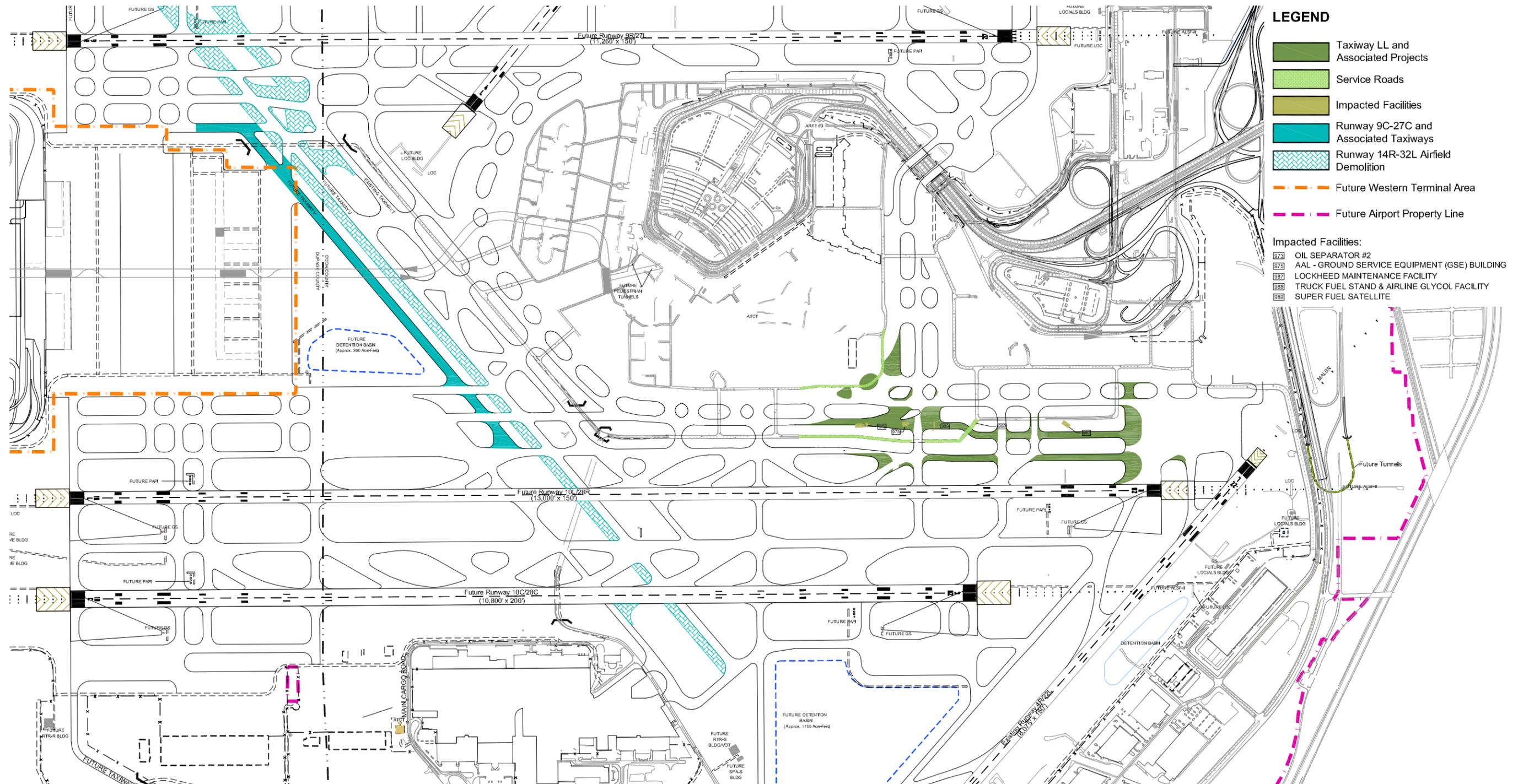


South Airfield

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PFC Application

October 21, 2008

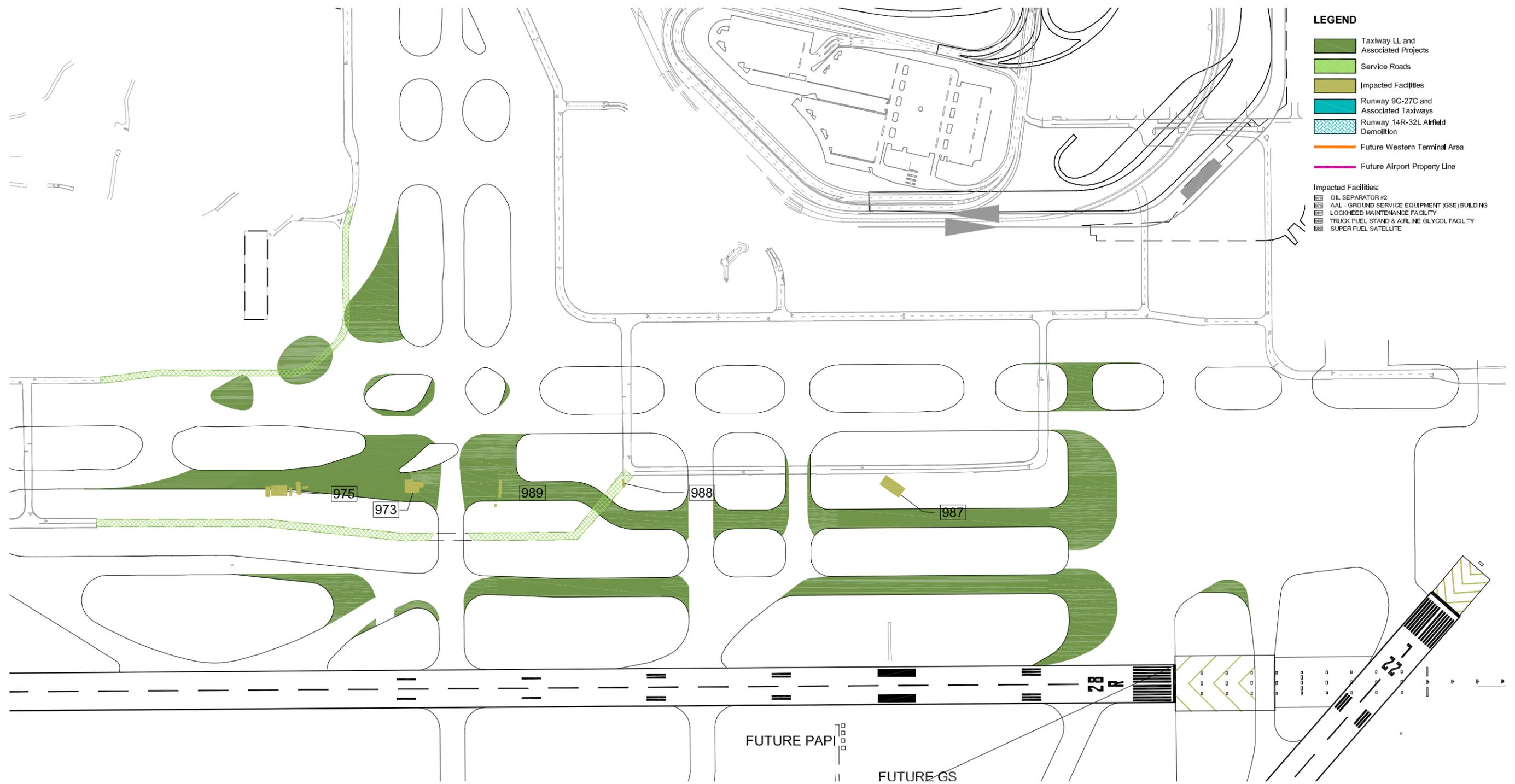


Source: O'Hare International Airport, Airport Layout Plan, September 2005; Ricondo & Associates, Inc.
 Prepared by: Ricondo & Associates, Inc.

Exhibit B-3



Central Airfield



Source: O'Hare International Airport, Airport Layout Plan, September 2005; Ricondo & Associates, Inc.
Prepared by: Ricondo & Associates, Inc.

Exhibit B-4

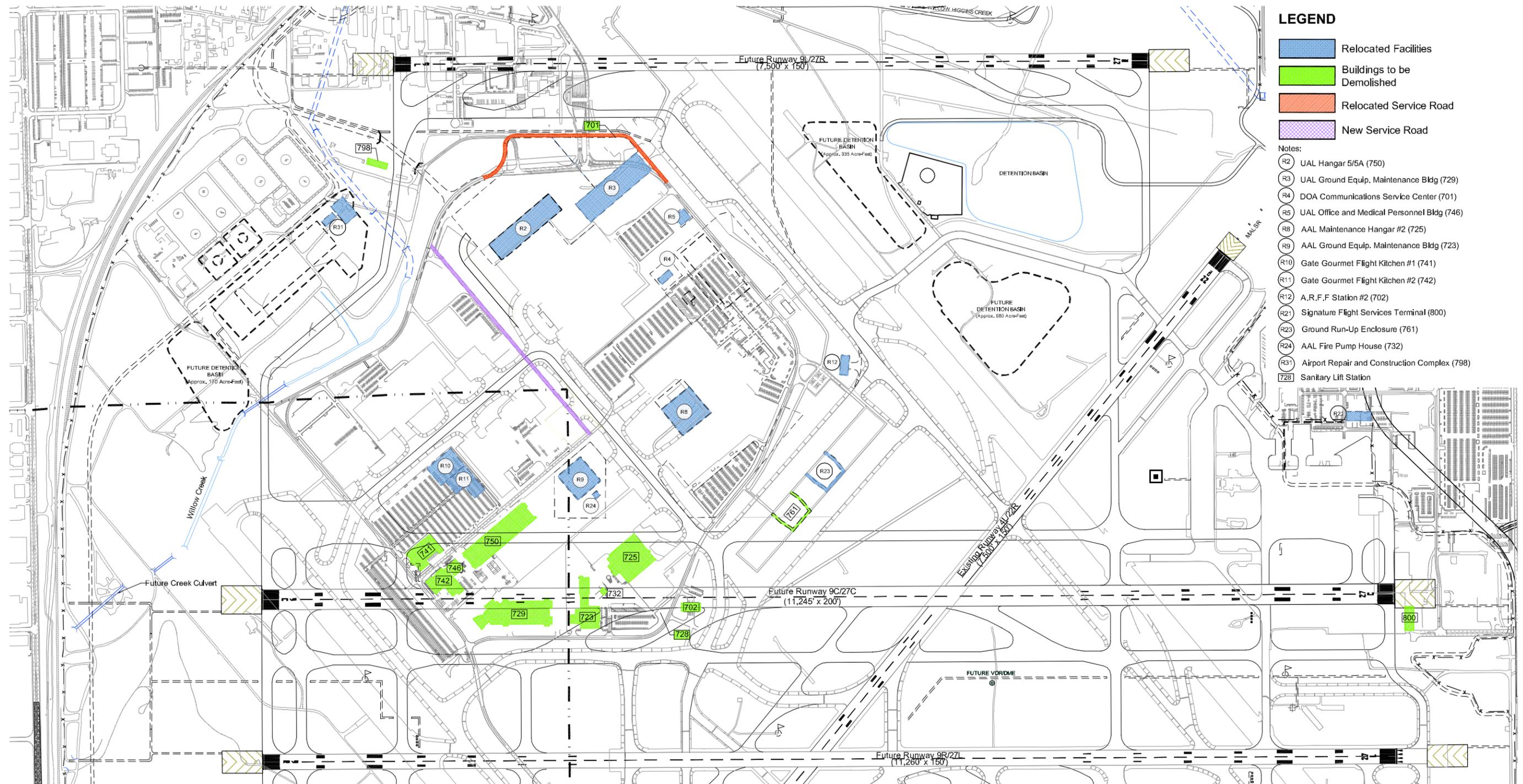


Taxiway LL

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PFC Application

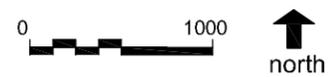
October 21, 2008



- LEGEND**
- Relocated Facilities
 - Buildings to be Demolished
 - Relocated Service Road
 - New Service Road
- Notes:**
- (R2) UAL Hangar 5/5A (750)
 - (R3) UAL Ground Equip. Maintenance Bldg (729)
 - (R4) DOA Communications Service Center (701)
 - (R5) UAL Office and Medical Personnel Bldg (746)
 - (R8) AAL Maintenance Hangar #2 (725)
 - (R9) AAL Ground Equip. Maintenance Bldg (723)
 - (R10) Gate Gourmet Flight Kitchen #1 (741)
 - (R11) Gate Gourmet Flight Kitchen #2 (742)
 - (R12) A.R.F.F Station #2 (702)
 - (R21) Signature Flight Services Terminal (800)
 - (R23) Ground Run-Up Enclosure (761)
 - (R24) AAL Fire Pump House (732)
 - (R31) Airport Repair and Construction Complex (798)
 - (728) Sanitary Lift Station

Source: O'Hare International Airport, Airport Layout Plan, September 2005; Ricondo & Associates, Inc.
 Prepared by: Ricondo & Associates, Inc.

Exhibit B-5



Northwest Maintenance Hangar Area New Service Road and Service Road Relocation

Drawing: Z:\Chicago\ORD\Financial\PFC Application - Completion Phase Design\Application\Exhibits\Ultimate ALP_Simplified_Service Rds.dwg_Layout: 11x17L_B5_Oct 21, 2008, 4:18pm

ATTACHMENT B: PROJECT INFORMATION

_____ FOR FAA USE _____

PFC Application number: _____

1. AIRPORT WHERE PROJECT IS LOCATED: Chicago O'Hare International Airport
2. CHECK ONE: IMPOSE [] IMPOSE AND USE[X] USE []
3. PROJECT TITLE (And Public Agency Project Number, If Appropriate):

Western Terminal Area Planning

4. a. PROJECT DESCRIPTION: WESTERN TERMINAL AREA PLANNING

Western Terminal Area Planning will refine the O'Hare Master Plan for a new terminal campus located west of the existing terminal core in the area defined in the Master Plan and shown on the Airport Layout Plan approved by the FAA on September 30, 2005 (ALP). See Exhibit B-6. The O'Hare Master Plan states that "more detailed program requirements for terminal expansion will be developed in subsequent planning phases." Master Plan IV-25. The proposed project is a subsequent planning phase. The ALP shows the western terminal complex and western roadway access in very general conceptual terms which must be refined in subsequent planning. This project will not duplicate any work done for the Master Plan or the EIS.

The area covered by this planning project is approximately 195 acres. Plans will be prepared for the western terminal complex including, gates, service roads, service buildings, automobile parking, entrance roads, intermodal connections and related facilities. The plans will be limited to conceptual analysis and drawings that include dimensioning of overall plans, building restriction lines, height limitations, shadow studies, and schematic drawings of building sections and profiles necessary to depict concepts and ensure that safety and operational factors are considered. The plans will include alternatives for use of the western terminal complex for international gateway, domestic hub, and origin and destination service, and will refine the relationship between the western terminal area facilities and the rest of O'Hare. This planning includes planning of public roadway access to the western terminal complex through the western boundary of O'Hare. This project does not include design or engineering of buildings, roadways or other structures. This project will ensure that the terminal development is consistent with airfield developments and that airport-wide utility infrastructure is appropriately sized and located.

This project will be coordinated with the Illinois Department of Transportation's Elgin O'Hare-West Bypass Project, which is analyzing the roadway system west of O'Hare to which the western access to O'Hare will connect. It will allow the City to perform analysis critical for use in coordination with IDOT to insure that the internal terminal roadway system on the west side of the airport efficiently receives traffic from, and delivers traffic to, the public roadway system on the west boundary of the airport.

This project is an eligible supplemental plan under Order 5100.38C ¶403a (3). It supplements the 2003 O'Hare Master Plan.

- b. If applicable for terminal projects,
 - 1. Prior to this project, number of ticket counters ____, gates ____, and baggage facilities ____.
 - 2. Number of ticket counters ____, gates ____, and baggage facilities ____ to be constructed or rehabilitated.
 - 3. Net change in ticket counters ____, gates ____, and baggage facilities ____.

____ FOR FAA USE _____

- a. Description adequate [] not adequate [] (indicate deficiencies below)

- b. If the project involves the construction of a new runway or modification of an existing runway, the requirements of Order 5200.8, with regard to runway safety areas have been met. YES [] NO [].

- c. For terminal projects, information regarding ticket counters, gates, and baggage facilities for construction and/or rehabilitation indicated. YES [] NO [] N/A []

- d. Comments: _____

5. PROJECT JUSTIFICATION:

Enhanced Capacity of the National Air Transportation System

O'Hare expects to need more gates to satisfy the demands of new and existing carriers. Although O'Hare can provide passenger handling facilities sufficient for the growth that will be accommodated by the runways and related facilities to be built in the Completion Phase of the O'Hare Modernization Program (OMP) without construction of new gates, in the absence of new gates significant numbers of passengers would have to be handled through crowded and inefficient terminals, and through aircraft parking positions that do not have contact gates with terminal buildings. In the absence of new gates, existing gates could not be reconfigured to accommodate larger aircraft without reducing the number of gates available at the airport. Maintaining the existing number of gates or, if reconfiguration becomes necessary to accommodate larger aircraft, reducing the number of gates, would result in increased congestion at an already congested airport. Congestion effectively limits capacity.

The City intends to provide a high level of customer service for its origin and destination passengers, and for connecting passengers. The City's and State's air transportation benefits from an efficient hub by providing greater frequencies and more non-stop destinations. Accommodating connecting passengers efficiently and comfortably is therefore also essential to the City's and State's basic air transportation needs. Airport gate capacity, and the efficient handling of passengers that accompany it, are essential components of the national air transportation system. As the City's Master Plan demonstrates, new gates will be required.

The City's Master Plan analyzed gate requirements for the 2018 planning horizon and beyond. Master Plan IV-23 – IV-26; V-44 *et seq.*. Among other things, this analysis relied on FAA Advisory Circular 150/5360-13, *Planning and Design Guideline for Airport Terminal Facilities*. The Master Plan finds that gate frontage of existing terminal facilities is approximately 25,529 linear feet. With the incorporation of the proposed WGP [World Gateway Program] (without the Terminal 2 modifications), the linear footage capability would increase to a total of approximately 29,761 linear feet Airport-wide. Master Plan V-46. Based on gate assignment modeling for the forecast 2018 peak period, the Master Plan concludes that “minimum overall apron requirement” is 38,070 linear feet of apron frontage. Id.

The need for substantial new gate frontage at O'Hare, based on standard criteria for airports, is confirmed by the EIS.

In busy periods, especially when flight schedules have been affected by delays, arriving aircraft are sometimes forced to wait for a gate to become available. In addition to causing further delays, a shortage of available gates can lead to the use of remote aircraft parking positions to load and unload passengers. Remote aircraft parking positions sometimes require the use of shuttle buses to move passengers between the aircraft and the terminal building, which provide poorer service for passengers and less efficiency for airlines. Overall, lack of gate availability can lead to passenger inconvenience, increased passenger travel time, more aircraft idling and emissions, higher costs, and increased aircraft activity into nighttime hours. These inefficient practices are likely to increase as demand increases due to the lack of adequate gate availability.

Additionally, O'Hare's existing gate configuration lacks the flexibility to efficiently accommodate the evolving aircraft fleet, which varies in length and, more importantly, wingspan. This affects the number of aircraft that can park at a terminal/concourse. Many of O'Hare's gates were designed for earlier generation narrowbody aircraft . . . Many of the newer, more efficient narrowbody aircraft that have largely replaced earlier generation narrowbody aircraft have somewhat larger wingspans than those being replaced.

Because O'hare has limited flexibility in its gate configuration, flights are increasingly being held at the departure airport or are being required to wait on the airfield after landing until an appropriate gate becomes available. EIS 2-33 – 2-34.

This is a capacity problem. The national air transportation system cannot function unless, in addition to adequate airside capacity, there also exists adequate gate capacity, and related facilities, such as parking and roadway access, to make the gates function properly and efficiently.

The Master Plan considered options for accommodating the required additional linear feet of apron frontage, and concluded:

The West Terminal Development Area provides the following attributes, which are not likely available in the other areas:

- Maximizes the available gate frontage consolidated into one area (over 70 percent of the ultimate additional gate frontage required to meet 2018 demands is accommodated);
- Can accommodate easy and direct flow of aircraft from the North and South Airfields;
- Can accommodate the widest range of aircraft types including New Large Aircraft;
- Can provide landside components that are in balance with the additional gate capacity; and
- Avoids disruption to existing operations during implementation (the West Terminal alternatives lend themselves to reasonable incremental and modular development that can be expanded economically in parallel with airfield improvements). Master Plan V-84.

As a result of this extensive Master Plan analysis, the City's proposed ALP showed the western terminal complex. After further analysis in the EIS, the FAA approved the ALP showing a western terminal complex. This complex, and the further planning for it included in this Application, are justified on the basis that O'Hare needs more gates, and as demand develops the requirement for new gates will grow. According to the Master Plan, the western terminal area is both suitable and desirable for future gate development. The planning project described in this Application will refine the plans for the western terminal area, and thereby advance the process for developing the needed new gates.

In the Master Plan, the City also proposed a new access roadway on the western side of O'Hare to relieve some of the traffic and shorten some of the ground transportation trips that now must pass through the east side of the airport. Master Plan § 5.4.2.1. The Illinois General Assembly found that O'Hare needs western access "to passenger terminal and parking facilities located inside the boundary of O'Hare and reasonably accessible to that western access." 620 ILCS 65/5(5).

The proposed project will support planning of the western terminal complex, and thereby advance the reduction of anticipated congestion.

Order 5100.1 establishes the following requirement for a showing that a terminal project satisfies the requirement in 14 CFR § 158.15(b)(1) that a project "preserve or enhance safety, security, or capacity of the national air transportation system."

New terminals, gates, or concourses are justified based on documented current demand. An eligible terminal project may make reasonable accommodation for growth, considering such factors as economies of scale, local economic and near

term (e.g., 5 years or less) passenger growth or a desire to limit frequent construction disruptions at a rapidly growing airport. Order 5100.1 ¶ 4-8

A ground access project must be justified as follows:

In the case of standard airport access road projects, the case for new or enlarged roads can usually be made by a straightforward traffic study. The traffic study should demonstrate the impact of the access road project in reducing roadway congestion and trip times to the airport. Typically, the need for new road capacity is evident to all users of an airport and can be clearly demonstrated based on these studies. Order 5100.1 ¶4-8

As described above, the Master Plan, EIS and ROD recognize the need for new gates and a new western entrance at O'Hare. The ROD (quoting from the EIS) states that one of the purposes of the federal action approving the future ALP for O'Hare is to "ensure that existing and future terminal facilities and supporting infrastructure (access, landside, and related ancillary facilities) can efficiently accommodate airport users." ROD 16, EIS 2-22. The ROD explains this purpose as follows:

To meet the needs of airlines, passengers, air cargo operators, and other Airport users, the capacity of terminal and support facilities should be in balance with the capacity of the airfield. Thus, this component of purpose and need simply reflects the FAA's recognition that any undertaking to enhance the airside capacity at an already congested location also needs additional non-airfield capacity, including terminals, gates, and associated infrastructure. ROD 15.

The EIS further explains this need as follows:

In 2002, O'Hare accommodated 33 million annual enplanements. The current terminal complex contains about 4.7 million square feet, providing 189 contact gates with 25,529 linear feet of frontage, as well as 20 remote parking positions, or "hard stands". Based on the forecast of peak hour operations, it is estimated that a total of 232 gates will be needed by 2018, although differing gate requirement analyses yield a range of 219 to 265 gates for the same level of demand. Expansion of other terminal functional areas and terminal apron areas will also be required to meet forecast demand. (EIS 2-31 – 2-32)

In addition, the EIS notes that the existing terminal configuration presents the following items that contribute to constraints: need for additional gates, need to decrease physical separation of alliance partners, need for additional federal inspection services facilities, need for accommodating new entrants, and the need to increase gate availability and efficiency. (EIS 2-32 – 2-34)

The EIS also states the need for efficient surface access to O'Hare.

Currently, access points leading to the passenger terminal and other functional areas are located at the east and northeast perimeter. Consequently, airport users on the west and southwest of the airport must travel around the perimeter of the airport. To enhance convenience for airport users accessing O'Hare from the west and southwest, roadway access to O'Hare from the west should be provided. (EIS 2-34)

The Illinois General Assembly found and determined that:

Public roadway access through the existing western boundary of O'Hare to passenger terminal and parking facilities located inside the boundary of O'Hare and reasonably accessible to that western access is an essential element of the O'Hare Modernization Program. That western access to O'Hare is needed to realize the full economic opportunities created by the O'Hare Modernization Program and to improve ground transportation in the O'Hare area. 620 ILCS 65/5(a)(5)

O'Hare has limited land area. The ALP shows that planning the airport to include all required facilities and accommodate construction is a complex airport planning process that accounts for both the airport's needs and compliance with FAA's rules and guidelines for airport safety, utility and efficiency. The Western Terminal Area Planning Project will analyze and provide conceptual plans for the ways in which new passenger handling facilities, parking and roadway access to O'Hare from the west can be developed in the limited land area available, consistent with FAA requirements for safety, utility and efficiency of aircraft operations, consistent with requirements for air transportation security, and consistent with the airfield projects which are to be designed in the other project which is the subject of this application. Western terminal gates will reduce anticipated congestion that will result, in their absence, from the need to use gates at the extreme limits of their capacity and use hard stands, perhaps extensively, to handle passengers.

The Western Terminal complex is part of the OMP. See Items 5 and 7 of Attachment B for the Airfield Design project in this Application for justification of the OMP.

Enhanced Competition Between or Among Air Carriers

Order 5500.1 provides:

For a project to meet the competition objective, the public agency must describe the following: existing conditions that limit competition between or among air carriers and foreign air carriers at the airport; the manner in which the project will foster opportunities for enhanced competition between or among such carriers; and the expected results of such initiatives. ¶ 4-8d

Virtually every gate at O'Hare is currently controlled by a large incumbent carrier, which imposes a barrier to enhanced competition at the airport. New gates are required to provide the City with the gate capacity to serve prospective new entrants or increases in service by small incumbent carriers. This Application is justified by the need to furnish opportunities for enhanced competition between or among air carriers by refining plans for up to 60 new gates in the western terminal area so that new gates for competitive service can be made available with reasonable efficiency when competitive carriers seek them. See Item 7 below.

_____ FOR FAA USE _____

a. Is justification adequate? YES [] NO [].

b. Comments:

6. LEVEL OF COLLECTION: \$1.00[] \$2.00[] \$3.00[] (go to 8)
\$4.00[] \$4.50[X] (public agencies of medium and large hub
airports go to 7; all others go to 8)

7. SIGNIFICANT CONTRIBUTION:

Before approving this application at the level of \$4.50, the FAA must find that the project "will make a significant contribution to improving air safety and security, increasing competition among air carriers, reducing current or anticipated congestion, or reducing the impact of aviation noise on people living near the airport" (49 USC 40117(b)(4)(A)). The information supplied under Item 5 above satisfies this requirement and is included in this Item 7 by reference. The following additional information is supplied.

Increasing Competition Among Air Carriers

The project will make a significant contribution to "increasing competition among air carriers" by planning additional gate capacity (49 USC 40117(b) (4) (A)). The project will "mitigate or remove barriers to increased competition at the airport" (Order 5500.1 ¶ 10-12d). A major barrier to new competition at O'Hare is the lack of available gates for carriers which might compete with the large incumbent carriers. The 21 gates and 5 hard stands in Terminal 5 today are the only nonexclusive gates at O'Hare. Consequently, new entrant carriers must either use these gates or sublease gates from an incumbent carrier. Gates at the other terminals (Terminals 1, 2, and 3) already average 7 to 11 turns per day, which is above the national industry average for gate utilization. (ROD 15) Terminal 5, which is the international terminal and separated from the domestic core of the airport by non-secure transportation, is not a competitively useful alternative for carriers seeking to compete with domestic incumbents. The incumbent carriers have an effective veto over competition by controlling gates.

Demand by carriers for more capacity at O'Hare, including gate capacity, is well-established. "As indicated in the comments, carriers of all sizes have expressed a

desire to expand their operations at O'Hare, or at least preserve the option to grow" (Final Rule on Congestion and Delay Reduction at Chicago O'Hare International Airport, 71 FR 51382, 51385 (August 29, 2006)).

One objective of PFCs was to provide airports with a source of revenue for capital projects independent of incumbent carrier vetoes.

The PFC Program was authorized in 1990 to provide a new source of funding for airport development in addition to the Airport and Airway Trust Fund. The 1990 legislation recognized that the federal government would not be able to go beyond its historic role of funding 20-30% of airport development. In addition, we concluded that a new source of local funding was needed to help overcome problems which had arisen under revenue bonds, the traditional method of local airport funding. It was alleged by some that many of these bonds gave the airlines supporting the bonds veto power over new capital development, and that incumbent airlines had used their veto power to block development which would benefit their competitors (House Report No. 103-240, 1994 United States Code Congressional and Administrative News 1676, 1696).

To overcome incumbent carrier efforts to impede competition, the law prohibits carrier interference with PFCs:

A contract between an air carrier or foreign air carrier and an eligible agency made at any time may not impair the authority of the agency to impose a passenger facility fee or to use the passenger facility revenue as provided in this section (49 USC § 40117(f)(1)).

Although incumbent carriers at O'Hare have indicated their support for the OMP, from time to time they have acted to restrain the City's efficient pursuit of the OMP. For example, they object to this PFC application. Incumbent carriers resist airport improvements that increase availability of the airport to their competitors. These PFCs will enable the OMP to proceed efficiently despite such objections by incumbent carriers and allow the City to "mitigate or remove barriers to increased competition at the airport" even though incumbent carriers object. The City has received requests from carriers for gates that it cannot easily accommodate. A recent request received by the City from a carrier proposing to begin service at O'Hare pointed out that today there is just one common use domestic gate, and it is already occupied by Jet Blue. That proposed new carrier's proposal requires two gates.

These PFCs will enable the OMP to proceed to plan for new gates to accommodate new entrants and expanded operations by existing carriers despite incumbent carrier objections, and allow the City to "mitigate or remove barriers to increased competition at the airport" even though incumbent carriers object. The project will make a significant contribution to increasing competition among air carriers. The western roadway access, parking and other elements of a complete western area plan are necessary for the western gates to function effectively. They are normal subsidiary elements of a terminal

complex, and a necessary element of a terminal area plan. As with the plan for the gates, planning for these elements will make a significant contribution to increasing competition among carriers.

Reducing Current or Anticipated Congestion

The western terminal complex will make a significant contribution to reducing current or anticipated congestion. As demand at O'Hare grows, passenger handling facilities must also grow. The City's Master Plan provides for new gate capacity to serve that demand.

To meet the needs of airlines, passengers, air cargo operators, and other Airport users, the capacity of terminal and support facilities should be in balance with the capacity of the airfield. Thus, this component of purpose and need simply reflects the FAA's recognition that any undertaking to enhance the airside capacity at an already congested location also needs additional non-airfield capacity, including terminals, gates, and associated infrastructure. ROD 15.

The City can accommodate all of the passengers who use the airport with the complete OMP airfield system and without new gates, but without new gates the operation will be inefficient and congested. Even with substantial reconfiguration of existing gates and extensive use of hard stands, anticipated congestion on both landside and airside will be reduced with new gates compared to conditions without them. If existing O'Hare gates must be reconfigured to accommodate larger aircraft, congestion resulting from gate deficiencies will increase. Lack of new gates produces congestion in terminal areas, delays in gating arriving aircraft, increased hold pad delays and similar consequences of insufficient gate capacity are likely to occur. The City believes that as demand increases, new gates will be developed by carriers or investors who will lease to carriers. However, the lead time in terminal development may be long, with congestion relief delayed while planning occurs. This project anticipates the need to reduce terminal area congestion by completing planning now, so that the City will be prepared for comparatively rapid gate development when demand requires it. The ability to develop new gates shortly after the demand exists, will make a significant contribution to reducing anticipated congestion.

See also Attachment E, Response to Carrier Comments.

_____ **FOR FAA USE** _____

- a. Air safety. Part 139 [] Other (explain) _____
Certification Inspector concur. Yes [] No [] Date _____
- Air security. Part 107 [] Part 108 [] Other (explain) _____
CASFO concur. Yes [] No [] Date _____
- Competition. Competition Plan [] Other (explain) _____
- Congestion. Current [] or Anticipated []
LOI [] FAA BCA [] FAA Airport Capacity Enhancement Plan []
Other (explain) _____
- Noise. 65 LDN [] Other (explain) _____

- ___ Project does not qualify under “significant contribution” rules. (explain and go to 6. Project Justification - FOR FAA USE – for analysis).

b. Comments:

8. PFC OBJECTIVE:

The ROD states that one purpose of the OMP is to “address the projected needs of the Chicago region by reducing delays at O’Hare, and thereby enhancing capacity of the NAS” (ROD 16). The objective of Western Terminal Area Planning is to enhance the capacity of the national air transportation system and furnish opportunities for enhanced competition between or among air carriers. The OMP as a whole satisfies this objective.

Alternative C [the OMP] is clearly superior in terms of reducing average annual delays. It is more effective and efficient than any of the other build alternatives in meeting the purpose and need of reducing delays at O’Hare, thereby reducing delays in the National Airspace System. ROD 31.

The western terminal area will contain facilities that will achieve the objectives of enhancing the capacity of the national air transportation system and furnishing opportunities for enhanced competition between or among carriers as follows.

Western Terminal and Concourse. The City needs to accommodate origin and destination passengers, and connecting passengers, with efficient passenger handling facilities. About half of O’Hare passengers are connecting passengers. The national air transportation system cannot function without gates and connecting facilities for passengers. Although O’Hare could manage all current and anticipated passengers without new gates, through the redesign of existing gates and use of hard stand positions, the result would be inefficient passenger handling, inefficiencies in airline operations and increased congestion. The City’s Master Plan, and the State’s O’Hare Modernization Act, establish the need for the development of the western terminal complex to provide more gates to better serve the public traveling in the national air transportation system. The FAA notes in its statement of purpose and need that “any undertaking to enhance the airside capacity at an already congested location also needs additional non-airfield capacity, including terminals, gates, and associated infrastructure.” (ROD 15). The objective of the work described in this Application is to enhance the capacity of the national air transportation system by advancing the process for providing additional gates at O’Hare through development of more detailed plans, refining the general plans for the western terminal area in the Master Plan and the general depiction of new western gates on the approved ALP.

Virtually every gate at O’Hare is currently controlled by a large incumbent carrier, which imposes a barrier to enhanced competition at the airport. New gates are required to provide the City with the gate capacity to serve prospective new entrants or increases in service by small incumbent carriers. The objective of

the work described in this Application is to furnish opportunities for enhanced competition between or among air carriers by refining plans for up to 60 new gates in the western terminal area so that new gates for competitive service can be made available with reasonable efficiency when competitive carriers seek them.

Western Access Roadway. The western terminal complex will require direct access to public roadways to function properly. Because of the location of other airport facilities, the only practical access point is on the west boundary of the airport, adjacent to the western terminal complex. The objectives of enhancing the capacity of the national air transportation system and furnishing opportunities for enhanced competition between or among carriers by development of new gates cannot be achieved unless reasonable public access to the complex is provided.

Other Western Terminal Area Facilities. This planning project includes planning for facilities necessary to support the western terminal gates, including public and employee parking and internal circulation roadways. The objectives of enhancing the capacity of the national air transportation system and furnishing opportunities for enhanced competition between or among carriers by providing additional gates cannot be achieved unless support facilities, such as parking and roadways, are provided.

_____ **FOR FAA USE** _____

- a. Safety, Preserve [] Enhance []
- Security, Preserve [] Enhance []
- Capacity, Preserve [] Enhance []
- Furnish opportunity for enhanced competition between or among air carriers at the airport
- Mitigate noise impacts resulting from aircraft operations at the airport
- Project does not meet any PFC objectives (explain)

b. Comments:

9. **FOR FAA USE** (Public Agencies go to 10) _____

a. Project Eligibility:

1) Indicate project eligibility by checking the appropriate category below.

- Development eligible under AIP criteria (paragraph ____ of Order 5100.38_ or PGL ____);
- Planning eligible under AIP criteria (paragraph ____ of Order 5100.38_ or PGL ____);
- Terminal development as described in 49 U.S.C. 47110(d);
- Noise compatibility planning as described in 49 U.S.C. 47505;
- Noise compatibility measures eligible under 49 U.S.C. 47504. Check one of the following - project approved in an approved Part 150 noise compatibility plan [] ; or, project included in a local study []. Include Title and Date of local study:
- Terminal development as described in 49 U.S.C. 40117(a) (3) (C);
- Shell of a gate as described in 49 U.S.C 40117(a) (3) (F) (air carrier _____, percentage of annual boardings _____); or
- Project does not meet PFC eligibility (explain).

b. Comments:

10. ESTIMATED PROJECT IMPLEMENTATION DATE (Month and Year): March 2009
ESTIMATED PROJECT COMPLETION DATE (Month and Year): December 2012

_____ FOR FAA USE _____

a. For IMPOSE AND USE or USE-ONLY project, project will begin within 2 years of 120-day approval date? YES [] NO []

b. For IMPOSE ONLY project, project will begin within 5 years of the charge effective date or approval date, whichever is sooner? YES [] NO []

c. Comments:

11. For an IMPOSE ONLY project, estimated date USE application will be submitted to the FAA (Month and Year):

_____ FOR FAA USE _____

a. Is the date within 3 years of the estimated charge effective date or approval date, whichever is sooner? YES [] NO []

b. Comments:

12. a. LIST CARRIERS CERTIFYING AGREEMENT:

None

b. LIST CARRIERS CERTIFYING DISAGREEMENT:

Aerlingus
All Nippon Airways
American Airlines
Continental Airlines
Delta Airlines
Northwest Airlines
United Airlines

Recap of Disagreements:

See Attachment E, Response to Carrier Comments.

Public Agency Reasons for Proceeding:

See Attachment E, Response to Carrier Comments.

13. a. LIST RESPONDENTS CERTIFYING PUBLIC NOTICE AGREEMENT:

None

b. LIST RESPONDENTS CERTIFYING DISAGREEMENT:

Joseph V. Karaganis, Counsel for Villages of Bensenville and Elk Grove Village, St. John's United Church of Christ, Helen Runge, Shirley Steele, Bernardo Flores, Gail Flores, Robert Rackow, Arlene Benson, William Baird, Robert Baird and Nelson Marrero.

Recap of Disagreements:

See Attachment E, Response to Public Comments.

Public Agency Reasons for Proceeding:

See Attachment E, Response to Public Comments.

_____ FOR FAA USE _____

a. Comments:

14. FINANCING PLAN:

PFC FUNDS: Pay-as-you-go \$4,742,200.00
Bond Capital \$0
Bond Financing & Interest \$0

*** SUBTOTAL PFC FUNDS: \$4,742,200.00
If the amount of PFC requested is over \$10,000,000, follow directions found in the attached instructions.

EXISTING AIP FUNDS:

Grant # Grant Funds in Project \$0

*** SUBTOTAL EXISTING AIP FUNDS: \$0

ANTICIPATED AIP FUNDS (List Each Year Separately):

Fiscal Year: Entitlement \$0 Discretionary \$0 Total \$0

*** SUBTOTAL ANTICIPATED AIP FUNDS: \$0

OTHER FUNDS:

State Grants \$0
Local Funds \$0
Other (please specify) \$0

*** SUBTOTAL OTHER FUNDS: \$0

*** TOTAL PROJECT COST: \$4,742,200.00 (See Attachment F-1 for detail amounts included in this total project cost.)

*** FOR EACH PROJECT PROPOSING PFC FUNDING IN EXCESS OF \$10,000,000: the public agency provided detailed basis of cost information. This detailed information should, at a minimum, provide detail regarding the cost of each major project component. YES [X] NO []

***PROJECT REQUESTING PFC FUNDING LEVELS OF \$4.00 AND \$4.50:

a. Project costs cannot be paid for from funds reasonably expected to be available through AIP funding. YES [X] NO []

b. If the FAA determines that the project may qualify for AIP funding, the public agency would prefer that the FAA approve the amount of the local match to be collected at a \$4.50 PFC level [X] OR the entire requested amount at a \$3.00 PFC level [].

c. Terminal and surface transportation projects. The public agency has made adequate provision for financing the airside needs of the airport, including runways, taxiways, aprons, and aircraft gates. YES [] NO [] N/A [X]

d. Comments. Additional information on the financing plan appears in Attachments F-2, F-3 and F-4.

_____ FOR FAA USE _____

a. The amount of PFC recommended for approval will not result in revenue that exceeds the amount necessary to finance this project.

b. Does the project include a proposed LOI? YES [] NO [] If YES, does the Region support? YES [] NO []. If YES, list the schedule for implementation:

c. For any proposed AIP discretionary funds, does the Region intend to support? YES [] NO []

d. For any proposed AIP funds, is the request within the planning levels for the Region's five year CIP? YES [] NO []

e. For project requesting PFC funding levels of \$4.00 and \$4.50:

Project costs cannot be paid for from funds reasonably expected to be available through AIP funding. YES [] NO []

Terminal and surface transportation projects. The public agency has made adequate provision for financing the airside needs of the airport, including runways, taxiways, aprons, and aircraft gates. YES [] NO [] N/A []

f. Comments.

15. BACK-UP FINANCING PLAN:

See Attachment E, Response to Carrier Comments, and Attachment F-2.

_____ FOR FAA USE _____

a. Is the back-up financing/phasing plan viable? Yes [] No [].

b. Comments:

_____ FOR FAA USE _____

ADO/RO RECOMMENDATION: Approve [] Partially Approve [] Disapprove []

I have examined the cost estimates provided by the public agency for this project within the confines of the project's purpose and in relation to the project's scope and find that based on the FAA's past experience with similar projects, the estimated amount for this project is [] is not [] reasonable.

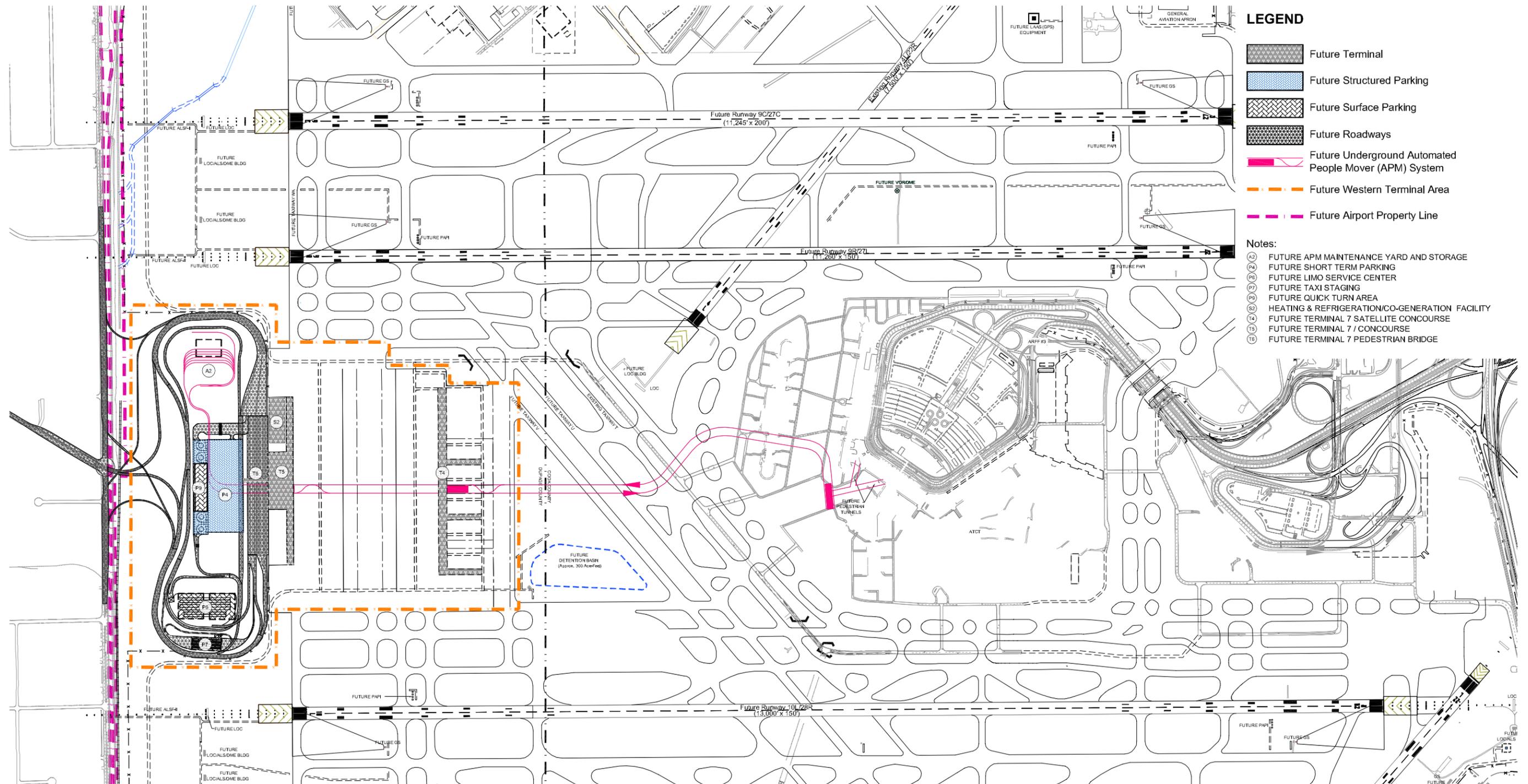
ADDITIONAL INFORMATION (If appropriate, include explanation of recommendation, congressional interest, pertinent background, etc.):

Application Reviewed by:

Name

Routing Symbol

Date



Source: O'Hare International Airport, Airport Layout Plan, September 2005; Ricondo & Associates, Inc.
Prepared by: Ricondo & Associates, Inc.

Exhibit B-6



Western Terminal Complex

Drawing: Z:\Chicago\ORD\Financial\PFC Application - Completion Phase Design\Application\Exhibits\Ultimate ALP_Simplified_V5.dwg_Layout: 11x17L_B6_Oct20, 2008, 6:40pm

PFC Application

October 21, 2008