All comments must be postmarked or faxed no later than **midnight, Monday, July 28, 2008.**
Comments can only be accepted with the full name and address of the individual commenting.

Ms. Virginia Lane
FAA Orlando Airports District Office
5950 Hazeltine National Drive
Orlando, Florida 32822-5024

Regarding: FEIS – FLL South Runway Extension

Dear Ms. Lane,

As a concerned resident of Dania Beach, I wish to state the following items regarding the South runway expansion at FLL. First, in light of rising fuel costs, flight reductions by airlines and layoffs of employees by those airlines, I feel that any assumptions made by final EIS need to be readdressed. Second, the South runways alternatives (B1b + B1c) seem to have the most impact on parks, wetlands + nearby neighborhoods as opposed to a new north runway. Why are we set to destroy areas like John Lloyd State Park, West Lake Park + the neighborhoods that surround FLL, when a north runway would pose the least noise + environmental impact on these areas? Finally, as a former resident of NYC, I moved to Florida to enjoy the magnificent weather here. All mitigation proposals do not address the fact that people do not want to be prisoners inside their homes. An airport expansion would destroy my ability to enjoy the outdoors around my home. Before the airport expands, and runways are reduced from 3 to 2 and peoples lives + property values are impacted, I feel it has an obligation to reconsider the final EIS to determine if those assumptions are indeed still valid. Respectfully,

James M. Cooney
4470 SW 34 Ave.
Dania Beach, FL 33312

ROD 3.0
p 8.58
p 18.16
ROD 13.7
p 6.6
ROD 15.15

F-LC154

1410 Argonaut Isle
Dania Beach, Florida 33004
July 27, 2008

Ms. Virginia Lane
FAA Orlando Airports District Office
5950 Hazeltine National Drive – Suite 400
Orlando, Florida 32822-5024

Re: FEIS – FLL South Runway Extension

Dear Ms. Lane:

By now you are probably aware from my address that we will be immediately adversely affected by any expansion to the south runway. For many years my husband and I have joked that, by the time the airport destroys our neighborhood, we will be ready to move to an assisted living facility. That may well be the case, so I will avoid the personal in this letter.

I am afraid we will be living south of a white elephant. With fuel prices rising, several airlines have left Fort Lauderdale/Hollywood Airport. Others have reduced the number of flights. And, unfortunately, others have filed or will be filing for bankruptcy protection. Nothing I read or hear indicates that this trend will reverse itself for some years to come. I understand that FAA – like most governmental agencies and private businesses – seeks to expand its turf. But this just makes no practical or financial sense. ROD 3.0

I don't know if you are familiar with our area but, like most of South Florida, we are in an area of much beauty, which we are rapidly losing to expansion. The thought of further damage to our wetlands and the degradation of our treasured John U Lloyd Beach State Park breaks my heart. p 8.58

And, while I am not one who sees a terrorist behind every hibiscus, I am concerned that an elevated runway over U.S. 1, an international port, and a major railroad track will provide an attractive target. And it will certainly adversely impact the environment, to say nothing of the noise and pollution dropped on several parts of Dania Beach. The Green Belt – a lovely place to walk – currently shields us from some of the noise. But how can one be protected from an elevated runway? (Of course, there's also the question of safety on an uphill take-off and downhill landing, but fortunately we don't travel much so it won't be such an inconvenience for us to drive to Miami. Pity the poor folks who travel frequently!) p 4.4 ROD 13.8

F-LC155

I am afraid the current Environmental Impact Statement has too many flaws for me to address in one letter – especially at this late date.

I can only hope that wiser heads will prevail.

Sincerely,

Sandra j. Mitzel

F-LC155

JESUS KARMIN PRIETO

3361 sw 44 ct
Fort Lauderdale, FL 33312
954 962 9837

July 26, 2008

Ms. Virginia Lane
FAA Orlando Airports Disttrict office
5950 Hazeltine National Drive
Orlando, FL 32822-5024
Fax 407 812 6978

Regarding FEIS - FLL South Runway Extension

Dear Ms. Lane,

I want to start by thanking you for taking the time to listen to the concerns of the homeowners that are being greatly affected by the proposed South Runway Extension plans of the FAA. We are deeply concerned with the environmental impact that this will have in our area.

My husband and I are outdoor enthusiasts. We chose this area due to its variety of available activities. We can kayak or go boating from our backyard, go cycling or running from our front door, and frequent the wonderful state and county parks in our proximity. We bought our home three years ago, and at the time inquired about the effects of the airport to the quality of life. We were assured that it was only small private planes and that the disturbance would be minimal in comparison to the benefits of purchasing the home. Until now, it has proven to be true.

The implementation of any of the Runway Alternatives will impact the high quality wetlands, John U Lloyd State Park and West lake Recreational Area. The city of Dania will have increased noise which will affect our quality of life and make it impossible to enjoy something as simple as sitting in our own backyard.

p6.1
p8.58

The FAA wants this expansion based on the benefits it projects through the year 2030 from having less delays. However, the environmental impacts disclosed are through the year 2020. What if the undisclosed 10 year difference voids the supposed economic gains. Recently in the local news there has been a lot of talk of several airlines, (ie. American, United, Spirit) reducing operations at Fort Lauderdale Airport. There have been steady declines in airport operations and demand of flights. It may be possible that the expansion is not necessary due to less demand than was assumed in the Final EIS. It is time to update the data!

p6.0
ROD 3.0
ROD 3.10

F-LC156

The current economic forecast for the airport industry and the county are NEGATIVE. These are uncertain times, not just locally but for the entire country. At a time when property values are going down, (without the help of an increasingly noisy and polluted environment) and expenses are going up shouldn't we be allowed to feel POSITIVE about the things we do have. Let us at least enjoy the things we do not pay for... clean air, Florida weather, a good sweat, or a dip in a clean ocean.

Please help us by representing the people and delivering our concerns for the FINAL ENVIRONMENT STATEMENT and put a stop to the PROPOSED SOUTH RUNWAY EXPANSION PROJECT.

ROD 20.0

Sincerely,

JESUS and KAREN PEREZ

F-LC156

FROM: Kevin Letize – 4331 sw 34th Lane, Ft Lauderdale, Fl 33312 - email : letizepro@aol.com
TO: Ms. Virginia Lane- FAA Orlando Airports District Office Fax: 407-812-6978

FEIS and the FLL EXPANSION - IS THE SOUTH RUNWAY REALLY THE BEST CHOICE ?

Hello, my name is Kevin Letize and I own 2 homes here in Dania Beach, Florida -
I have a family of four, with two new children - We currently live directly under the s. runway flight path -

However, I am Not against airport expansion - but I am DEADLY against the south runway expansion

ROD 20.0

We know from what happened in the early 80's, that there is now a 3 mile wide area from 441 to I-95 , from the dania cut off canal to I-595 that was EMINENT DOMAINED and now provides no residential flyovers for the commercial jets -

My profession is construction: I am a general contractor here in the area
and I also know the old construction motto : The MORE IT COSTS, the MORE WE MAKE !

I also know roughly what it costs to knock down 13 buildings on n runway area -
relocate, and drop road rock and pave 8000 ft - in big business construction, NOT ALOT -

THAT VS - A 40 ft elevated runway than spans OVER us 1, with a elevated landing area, 2 tunnels, and bridges over the Dania Cut Off Canal -

It truly is THE MOTHER OF ALL CONSTRUCTION PROJECTS and it's clearly obvious which of the two options costs more to build - The estimated cost difference is : $270 million dollars !

It's also common knowledge that the airport is a CASH COW at 3$ a head for all, the ridiculous airport markup on food, drinks, magazines etc. FLL's airport account is bloated - We also know that if the airport doesnt spend its reserves on itself the county will reallocate their profit somewhere else -

So how does the airport try to solve this problem ?

Lee Fisher & Associates, is a airport aviation consultant assesment company - They create specific reports that gives the airport the justification it needs to build a grossly overdeveloped solution to ease its swollen airport account -

If the airport spends it's money on itself, the airport doesnt surrender it's profits to the county -

Obrien Kriotzberg is the building development coordinator for the airport - Their building is on the N side of the runway -
Do you think these guys want to relocate their building ? Who owns the 13 buildings on the N. runway ?
What do Wayne Huizenga, MOSS construction, and STYLES have to do with this project ?
Who are Landrum and Brown ? EIS study makers ? And where are they from ?

Manatees and my children cant speak to you -

But who will speak when the EIS study says new sourh runway "May affect but not likely to adversely affect" the manatees and my kids ? It May affect ? Ok, it may affect, but how ? IS adversely affect even an option we can consider ?

What about all the jet fuel already on everything now ? And that's just from the small planes...

ROD 7.10

What about the entire DANIA CUT OFF canal being a NO WAKE, MANATEE ZONE area ?
What about the mangroves ? What about the environment ? What about all the people on Mataleuca Gardens ?
Does anyone really think IMPACT glass will cut down the noise when we're all outside ?

Have we already gone too far and over extended ourselves ? We are already polluting the area ourselves at an alarming rate -

What about JOHN U LLOYD state park ? It's one of USA's top 4 parks recently featured on national television -
The proposed runway destorys atleast 12 acres of wetlands -
The South runway has more impact to parks, wetlands, and residents than N runway c1 -

P8.58

What about the POWER PLANT that is directly under the S. Runway flight path ? (441 / griffin)
What about the gasoline lines that run underground from here to port everglades, down to MIA international and out 27 ?
Could you imagine if something horrific happened here ? Besides the lack of electricity cut to most of broward and dade for weeks, the explosions would be so devastating, that people for 100's of years would always ask , " HAD NO ONE EVER EVEN THOUGHT OF THAT ? "

TO OUR ELECTED LEADERS, REPRESENTATIVES, COMMISSIONERS and PEOPLE WHO CARE ABOUT OUR WELL BEING

All we want is the LEAST OBTRUSIVE, LEAST EXPENSIVE,LEAST DAMAGING AIRPORT EXPANSION possible -
It's Alternative C1 – a 7,721foot at grade North PARRALLEL RUNWAY -

P6.16

So far I've haven't heard 1 explanation for the motivation behind why the most expensive, most damaging option of all choices, is the choice you support except for what I've found out so far -

WE THE PEOPLE ARE AWARE THAT THE AIRPORT HAS TO SPEND THE MONEY or LOSE IT TO THE COUNTY -

Hey, why not use some of that money and build a TRAIN or a peoplemover from the airport to the PORT for the tourists - Airport delays are 6 minutes. I have waited longer at intersection lights here in town than that !

IS 6 minutes worth of time worth what we will do EVERYONE AND EVERYTHING affected ?

-To the BROWARD CO. BOARD OF COMMISSIONERS, Shame on you for not protecting the people you are hired to represent

Please visit my website video : www.e3fla.com/airport.htm or on utube - keyword: FLL AIRPORT EXPANSION

F-LC157

All comments must be postmarked or faxed no later than **midnight, Monday, July 28, 2008.**
Comments can only be accepted with the full name and address of the individual commenting.

Ms. Virginia Lane
FAA Orlando Airports District Office
5950 Hazeltine National Drive
Orlando, Florida 32822-5024
Phone: 407-812-6331, Ext. 129 Fax: 407-812-6978

Regarding: FEIS – FLL South Runway Extension

Dear Ms. Lane,

- FROM TOP (the air), TO BOTTOM, line - THE AIRLINES / THE FAA'S DECISION SEEMS TO BE THE WORST ONE POSSIBLE! P3.37

- WITH SO MANY UNANSWERED QUESTIONS (REAL COST OF RUNWAY?) I CAN ONLY ASSUME THAT THE ANSWERS WOULD BE IN CONFLICT WITH LOGIC AND WITH THE HEALTH + HAPPINESS OF COUNTLESS BROWARD FAMILIES AS IS EACH DECISION MADE SO FAR. ROD 15.16

- PLEASE TAKE ANOTHER CLEAR-HEADED, CLEAR-HEARTED LOOK AT YOUR PLANS FOR THIS AIRPORT EXPANSION PROJECT. ROD 20.0

SINCERLY,
MIRANDA TAURASI
809 NW 8th AVE
HELLENICA GDNS, DANIA FL. 33004
F-LC158

7/26/2008

Ms. Virginia Lane
FAA Orlando Airports District Office
5950 Hazeltine National Drive
Orlando, Florida 32822-5024
Phone: 407-812-6331, Ext. 129 Fax: 407-812-6978

Regarding: FEIS - FLL South Runway Extension

Dear Ms. Lane,

As a 36 year Broward county resident and as a 26 Dania beach home owner, I would like to express my concerns over the proposed FLL South Runway expansion.

As you know we are in tough economic times and I feel they are going to get worse. As the value of the dollar continues its decline and inflation continues it's upward spiral, there will be less fliers, less flights, hence NO need to expand now or the immediate future. ROD 3.10

It also amazes me what little consideration was given to the North Runway alternative C1 (Could the reason be ignorance, politics or corruption)? P6.6

I won't get into the impact on John U Lloyd State Park or the residents West and South of the proposed expansion or that the mitigation proposals are unacceptable. P8.58

With that being said I would like to propose a 5-10 year moratorium on this project as in my view there is NO rush for this expansion. ROD 20.0

I hope you will consider my concerns.

Regards,

Richard Garabedian

Richard & Carolee Garabedian
4618 SW 28 Way
Ft Lauderdale, FL 33312
954-963-4235
dicrace@gmail.com

F-LC159

All comments must be postmarked or faxed no later than **midnight, Monday, July 28, 2008.**
Comments can only be accepted with the full name and address of the individual commenting.

Ms. Virginia Lane
FAA Orlando Airports District Office
5950 Hazeltine National Drive
Orlando, Florida 32822-5024

Regarding: FEIS – FLL South Runway Extension

Dear Ms. Lane,

I AM VERY CONCERNED ABOUT THE "NO RESTRICTIONS" ON AIRCRAFTS OPERATIONS FOR THE EXTENDED SOUTH RUNWAY. I LIVE ON 38TH TER AND IT WILL BE RIGHT OVER OUR HEADS. I HAVE A 95 YEARS OLD MOM THAT LIVES WITH US AND BESIDES OUR HEALTH I AM WORRIED ABOUT HERS TOO. NO BODY CAN BE HEALTHY WITHOUT SLEEP WHAT WOULD YOU DO IF THIS WOULD BE HAPPENING OVER YOUR HOUSE? P2.6

HELP US, PLEASE!!!!

FANIA R. G. JASPAN
DANIA ISLE 4407 SW 38TH TER
DANIA BEACH, FL 33312
954 894 7142 H.
954 683 6125 C.

F-LC160

JUL 27,2008 03:43P JASPAN 9549810819000 page 4

JUL-27-2008 15:38 FROM:CHRUL AND RON BUGUE 9548941549 TO:14078126978 P.1/1

Ms. Virginia Lane
FAA Orlando Airports District Office
5950 Hazeltine National Drive, Suite 400
Orlando, Florida 32822-5024

July 22, 2008

Ms. Lane, FEIS - FLL SOUTH RUNWAY EXTENSION

The environmental impact statement is flawed. This response relates to your latest acceptance of this study as developed by the Broward County Commissioners. The FAA has accepted recommendations of the BCC. Those recommendations are not in the best interests of Broward County residents nor the FAA!

The selection of the South Runway option impacts far more people than the reported 3000 homes. There are numerous homes and business developments directly under the proposed flight path that were not included in the study. I live in a 3 yr. old gated sub-division on the Dania Cut-Off Canal that was omitted from the study. The North Runway option affects only an estimated 60 households. **Based on those numbers, I cannot understand how you could possibly accept the recommendation of the commission.**

There is no environmental reason for FAA to accept the recommendation of BCC regarding south runway extension. **Thousands more residents will be negatively impacted by noise, pollution and dramatically reduced home value.** We live in South Florida for the outdoor lifestyle. All privately owned pools, spas and backyard barbeques will become unusable. Even boating on the Dania Cut-Off canal will be ruined with the sound of planes overhead. As a test, we've positioned ourselves north of our house in the path of the north runway. With the approaching airplanes at nighttime from west to east with head lights on, it feels like they are going to crash into us, and the noise and vibration is intolerable. Tell me how I'm going to be able to sell my new expensive home due to the need of getting away from the noise.

We have monitored noise levels of airplanes taking off to the west. These airplanes have frequently registered in excess of 100 decibles during early morning take-offs. We have reported excessive noise to no avail.

United, American and Spirit Airlines have announced dramatic reductions in service. Northwest Airlines has announced closing all flight operations! These are serious financial problems for the airline industry. How can you justify increasing the size of an airport under these conditions? ROD 3.10

There is no logic in destroying the crosswind runway to build an extended south runway. The citizens of this county cannot afford this politically driven mistake. The demand for an extended runway is not plausible. Flight numbers are diminishing daily and projections show more of the same. Air traffic is decreasing every day due to many factors. ROD 15.15 ROD 3.0

We need business driven decisions. We do not need politically driven decisions that do not benefit the citizens of Broward County.

Sincerely, Ron Bogue

Ron Bogue
3051 SW 44 ST.
DANIA BEACH, FL 33312

F-LC161

July 27, 2008

Ms. Virginia Lane
FAA Orlando Airports District Office
5950 Hazeltine National Drive, Suite 400
Orlando, Florida 32822-5024
Fax: 407-812-6978

Re: Comments on the FLL FEIS

Dear Ms. Lane:

As we've discussed in the past, where does one begin on a project of this magnitude. I believe this is the third EIS and I believe it is once again flawed, as is the FAA's preliminary decisions and the sponsors underlying data and calculations. More importantly, the sponsors preferred alternative should have been eliminated as a choice by the FAA feasibility studies, even if the FAA relied on Broward's erroneous, inaccurate, and in some cases, totally false data/information for the project. P 4.110

For example, for years, BCAD represented publicly that the cost of the runway would be in the $600-700 million dollar range. However, even while representing that publicly, in internal e-mails they admitted to the costs running somewhere north of the $800 million and even into the billion- dollar mark (and this is without any mitigation.) ROD 15.16

Another example includes the BCAD Director writing a memo to the FAA to discount the Tower Chief memo concerning the South Runway vs the North and/or any other choice of runway. He claims in the letter the cost to relocate the business on the North Side of the field would be costly and result in reduced area on the airport for future expansions. I am now hearing that the largest tenant on the North side of the airfield, Embrear may be moving away from FLL. Further, that BCAD may have known that when they extended their contract and agreed to fund expansion of their facility last year, as a means to further eliminate the North parallel runway as an option. It should also be noted that Mr. George's letter does NOT include the reduction of property taxes that will be collected by Broward County and the local municipalities when the South Runway is built due to lower values from noise impacts, nor does it I believe account for relocation of non airport related tenants to other areas of the county, freeing up more acreage (i.e. Animal Care and Regulation as well as the bus depot to name a few. Please note, Animal Care and Regulation will eventually have to be relocated, as those poor dogs/cats can't possibly be expected to tolerate jet noise from both sides!!! It is animal cruelty!!). The North parallel impacts fewer homes, resulting in almost no loss of property value, hence tax reductions. I believe this loss of residential and commercial property tax reductions of the affected properties off airport will more than set P 4.36 P 4.58 P 13,19

F-LC162

of his alleged and inflated $3 billion dollar impact. You have to admit though; he really pulls the big numbers out of this air when he is trying to scare you away☺

Final example, all along BCAD has indicated that probably 1 – 12 homes may be affected by the sponsors preferred alternative. Now in the FEIS, the map shows gray areas over my neighborhood, Melaleuca Gardens as well as a HUGE area west of the airport from I-95 west to 441, just north of Griffin Road! Makes you wonder what this is all about. I think it is about next Tuesday's August 5th meeting to pick a new project/program manager for FLL. It is my understanding that many of Broward politically powerful and rich may have an actual financial interest in URS, one of the bidders. URS has been the project manager at FLL and has not handled the jobs too well, losing millions in grants for which the projects were never done, major faults in the projects including a baggage area with no walls, by which the luggage and employees get wet when it rains (about every day here in South Florida, May though to Sept), a runway resurfacing which was botched and has to be redone, parking garages which have had structural issues which required expensive repairs, just to name a few. I understand the FAA has instituted a COMPLIANCE AUDIT for FLL to start in November. I would strongly urge you to hold any decision regarding expansion until after that audit is completed! One thing we've learned from MIA, is that you don't keep giving money to people who are mishandling it!

This expansion should be placed on hold in light of the current economic conditions in the United States, let alone in South Florida. Florida, for I believe the first time in it's history has more people moving out than in, so the economic feasibility study needs to reflect this new trend as the demand for flights will decrease accordingly to population and demand. In addition, Florida continues to have severe water shortage issues. It is my understanding that it will take a great deal of water to compact the fill necessary for the sponsors preferred elevated/escalated runway project. We just don't have it! It will be very interesting if the sponsors' project actually starts construction and Broward's residents are advised, there is not enough water for their homes, but there is for construction of a elevated/escalated runway that will cost taxpayers, in local, state and federal taxes over $2 billion dollars! P10.21 ROD 15.16

In addition, the cost of fuel and travel is now prohibitive for most Americans, let alone the airlines. The airlines have started reducing flight operations, as have the cruise lines at Port Everglades for which this expansion is supposedly necessary. The FEIS does not include updated data/counts with respect to flight operations, so the baselines used in the feasibility studies as well as the projections all need to be recalibrated. ROD 3.0 ROD 3.10 ROD 5.1

Issues with the FEIS include the following:

F-LC162

- The FAA will not approved any operational restrictions, on which Broward County has "sold" their preferred alternative to all of the surrounding communities in public hearings. At the very least, BCAD should be required to notify all of the same property owners who were noticed for these meetings in the past, that if the South Runway is selected and constructed, there will be NO LIMITATIONS as to use, include time of day, type of aircraft, etc.

P2.6

- The FEIS does not take into considering the latest economic conditions, including costs of fuel, airlines leaving FLL, operational changes at FLL and the local Cruise lines, and therefore the feasibility studies within the FEIS are flawed. Rather they are relying on the use of 2002 data, which we all know is drastically different from today's conditions. The feasibility studies need to be recalculated based on updated economic data as well as new baseline and projected flight operations information. It is my belief that the alleged six-minute delay by 2020 is no longer in existence. Furthermore, it should be noted that the expansion is based on economic and operational benefits to the year 2030, while the environmental review is only to 2020. Also it should be noted, many of the legacy airlines are now facing the prospects of bankruptcy.

RoD 3.0
RoD 3.10
RoD 13.7
P6.0

- The FEIS does not include the mitigation/acquisition costs of the various options, nor does it take into account the reduced value of affected residential and commercial properties with respect to tax dollars to the County coffers! There should be an offset of these dollars included in the feasibility analysis.

RoD 15.16

- One of the more humorous points used to try and eliminate other alternatives included the conclusion that these alternatives will encroach on Interstate 95 and the CSX railroad track. Maybe I should break the news to you...but the Sponsors preferred South Runway not only encroaches on US 1 and the FEC track, but will actually be built on top of them! Doesn't get anymore encroaching than that! Furthermore, the traffic on US1 is a bottleneck at this location every evening as it goes from 8 lanes in front of FLL to 4 lanes into Dania Beach. Therefore, these will not be fast moving cars (targets) as on I-95, but rather parked cars under a tunnel ready to be creamed!

P4,4

- Although the FEIS does not include noise studies, it does rely on estimated costs from the Part 150 for the financial feasibility ratios. <u>Fact of the matter is, the Part 150 has never been modeled to generate contours for the elevated configuration of the South Runway. That should be a requirement before any decisions are made as it may determine that hundreds of residents will be affected and thereby drastically affect the costs used for the feasibility study and decision on which alternative is the best!</u> Now I understand that is what the BCAD and other rich and powerful individuals are depending on as many view this whole plan as a land grab, but the FAA has an obligation to have accurate feasibility studies and ratios on which to make a decision.

RoD 8.20

- Why <u>not</u> the South Runway?

F-LC162

P23.21

1. It is WAY more expensive!
2. It has the most noise and environment impacts on the MOST homes and parks including the John U. Lloyd State Park, recently hailed by U.S. Representative Ron Klein on the floor of the House of Representative as a NATIONAL TREASURE!
3. The Tower Chiefs memo outlines operational delays on the tarmac and safety concerns!
4. Most pilots have indicated they won't use it.
5. It is ELEVATED AND ESCALATED over a MAJOR FEDERAL HIGHWAY and the FEC RAILWAY, which creates all kinds of operational and safety issues!
6. Firefighters have indicated it would be virtually impossible to manage an accident/fire on this runway configuration.
7. Other than to be used to GRAB LAND, it does not make any sense, unless URS is once again voted to manage the project, resulting in many of Broward County's political and powerful getting so much richer than they already are on the backs of the working class neighborhoods that surround the airport!

In the final analysis – the data really shows the professional, ethical, moral, economical, and wisest course is to delay any expansion at FLL until the economy recovers, which some say will take up to five years. In the alternative, if the FAA and BCAD really believe they need to expand, then everything points to the North Parallel runway as it is a safer configuration, costs less, has less noise and environmental impact and still allows for plenty of future growth of the airport up to four runways in the future and a great deal of space to the west and east for locating current and future tenants on the property!

Finally, my seven year old, who can't help to hear all of talk about this issue is terrified that a day will come that he can no longer ride his bike down our street, or worse, that will have to move from our home!

Again, let's do the right thing! It's a no brainer!! FLL does not need to be expanded at this time due to the economy, but if it does, the North Parallel is the obvious choice! Let's not give into the special interests and the wealthy and powerful few at the cost of so many middle class Americans who work hard every day and at the end of the day, just want to come home and enjoy their quiet slice of paradise with their kids, neighbors and friends!

Sincerely

Anne Castro

Anne Castro
838 NW 10th Avenue
Dania Beach, FL 33004

F-LC162

Ms. Virginia Lane
FAA Orlando Airports District Office
5950 Hazeltine National Drive
Orlando, Florida 32822-5024

Regarding: FEIS – FLL South Runway Extension

Dear Ms. Lane,

I believe in the Final Environmental Impact Statement on FLL Expansion you have potential major errors along with unanswered questions due to lack of proper data. The EIS studies were done only to 2020 for environmental impacts but FAA has based its' expansion decisions on benefits through 2030. FAA has also recently stated that it does not intend on complying with operational restrictions contained in the Inter-local Agreement between Broward County and the city of Dania Beach which will mean even more environmental impact than the present EIS show. Even if I believed that the EIS was truly accurate there are better alternatives.

P6.0
P2.6

The South Runway Alternatives will have a greater impact on wetlands, parks & residents than the North Runway C1 Alternative would have. The wetlands on the South are a high quality wetlands area where the wetlands on the North are a low quality wetlands area which will have less impact to these wetlands. With our Eco-system being destroyed as fast as it is why would we not choose an alternative that would have the least amount of impact? The EIS report acknowledges that there are endangered species that will be affected to some degree if the South runway is built. Should we not be trying to protect them to the very best of our ability instead of our second best? Also the surrounding parks will be impacted more from the South Runway Alternatives than the North Runway C1 Alternative. John U Lloyd State Park was just featured on Good Morning America and Congressman Klein heralded the park as a "national treasure" on the Floor of the House on July 17, 2008. With this type of national exposure we stand to attract more tourists to our area because of our own "national treasure". Why would we want to go ahead with the South Runway Alternatives creating even more deafening noise throughout more of the park for visiting tourists while destroying wildlife & the environment with more pollution than need be when the North Runway C1 Alternative would have a far less impact? Tourists mean a stronger economy for Broward but if we destroy the very thing they come for we will hurt all of Broward County. Also FAA has not taken into consideration the present air quality from the nearby power plant added to more and larger planes for the Raised South Runway in the final EIS. How will this affect people with breathing problems like me and some of our neighbors? In my home I constantly wipe up oily black dirt from furniture and countertops created from the power plant and the present airplanes flying over/near us. How much worse will this be with the South Runway Alternatives and at what health risk?

P6.4
P6.5
P11.4
P8.58
P6.4
P6.5
P14.4
ROD M.1

The South Runway Alternatives will also increase the noise in Dania Beach and will negatively impact the quality of life to residents. I live in line with the present south runway, with the north runway being just to the north, and the present noise can be extremely loud and disruptive at times. The planes wake me up &/or keep me awake at night or in the morning. Many times we have to stop talking because we cannot hear each other or simply can not enjoy a movie, TV or music. As I looked at the contour lines for projected noise for the proposed South Runway Alternatives it shows the noise level far worse than we presently have and the EIS does not even address the greater noise level of a raised runway. The noise from a raised South Runway will be deafening and far worse than the contour charts show. The Greenbelt buffer will provide no relief to noise for us and will in no way shield the ugly image of the runway. FAA has not addressed the Resident's enjoyment of Florida's gorgeous weather being severely impacted by the South Runway Expansion. We live out-of-doors all year around here in South Florida and the question of "how do you soundproof it" has not been answered. The fact is, is that the North Runway Alternative would have less impact in all of the above areas. Add to all of this the fact that FAA has failed to comply with its own environmental laws for years and there is no reason to believe that they will live up to their own mitigation assurances.

P6.1
P22.6
ROD 13.8

F-LC163

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P8.35

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P3.47
ROD 3.10
ROD 3.1

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P4.4
P16.2

Sincerely,
Patricia Wright
4391 SW 34 Lane, FT. Lauderdale 33312

F-LC163

Ms. Virginia Lane
FAA Orlando Airports District Office
5950 Hazeltine National Drive
Orlando, Florida 32822-5024

Regarding: FEIS – FLL South Runway Extension

Dear Ms. Lane,

I believe in the Final Environmental Impact Statement on FLL Expansion you have potential major errors along with unanswered questions due to lack of proper data. The EIS studies were done only to 2020 for environmental impacts but FAA has based its' expansion decisions on benefits through 2030. FAA has also recently stated that it does not intend on complying with operational restrictions contained in the Inter-local Agreement between Broward County and the city of Dania Beach which will mean even more environmental impact than the present EIS show. Even if I believed that the EIS was truly accurate there are better alternatives. P6.0 P2.6

The South Runway Alternatives will have a greater impact on wetlands, parks & residents than the North Runway C1 Alternative would have. The wetlands on the South are a high quality wetlands area where the wetlands on the North are a low quality wetlands area which will have less impact to these wetlands. With our Eco-system being destroyed as fast as it is why would we not choose an alternative that would have the least amount of impact? The EIS report acknowledges that there are endangered species that will be affected to some degree if the South runway is built. Should we not be trying to protect them to the very best of our ability instead of our second best? Also the surrounding parks will be impacted more from the South Runway Alternatives than the North Runway C1 Alternative. John U Lloyd State Park was just featured on Good Morning America and Congressman Klein heralded the park as a "national treasure" on the Floor of the House on July 17, 2008. With this type of national exposure we stand to attract more tourists to the area because of South Florida's own "national treasure". Why would anyone want to go ahead with the South Runway Alternatives creating even more deafening noise throughout more of the park for visiting tourists while destroying wildlife & the environment with more pollution than need be when the North Runway C1 Alternative would have a far less impact? Tourists mean a stronger economy for Broward but if we destroy the very thing they come for all of Broward County will be hurt. Also FAA has not taken into consideration the present air quality from the nearby power plant added to more and larger planes for the Raised South Runway in the final EIS. How will this affect people with breathing problems like my mother, son and other neighbors? In my parents home my mother and I constantly wipe up oily black dirt from furniture and countertops created from the power plant and the present airplanes flying over/near the house. How much worse will this be with the South Runway Alternatives and at what health risk? And who will pay for the added medical bills? P6.4 P6.5 P11.4 P8.58 P6.4 P6.5 P14.4 ROD 14.1

The South Runway Alternatives will also increase the noise in Dania Beach and will negatively impact the quality of life to residents. I live in line with the present south runway, with the north runway being just to the north, and the present noise can be extremely loud and disruptive at times. The planes wake me up &/or keep me awake at night or in the morning. Many times we have to stop talking because we cannot hear each other or simply can not enjoy a movie, TV or music. As I looked at the contour lines for projected noise for the proposed South Runway Alternatives it shows the noise level far worse than we presently have and the EIS does not even address the greater noise level of a raised runway. The noise from a raised South Runway will be deafening and far worse than the contour charts show. The Greenbelt buffer will provide no relief to noise for us and will in no way shield the ugly image of the runway. FAA has not addressed the Resident's enjoyment of Florida's gorgeous weather being severely impacted by the South Runway Expansion. People live out-of-doors all year around here in South Florida and the question of "how do you soundproof it" has not been answered. The fact is, is that the North Runway Alternative would have less impact in all of the above areas. Add to all of this the fact that FAA has failed to comply with its own environmental laws for years and there is no reason to believe that they will live up to their own mitigation assurances. P6.1 P22.6 ROD 13.8

F-LC164

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Sincerely,
Tina Harris
2672 Shannon Street, Orange Park, FL 32065

F-LC164

Ms. Virginia Lane
FAA Orlando Airports District Office
5950 Hazeltine National Drive
Orlando, Florida 32822-5024

Regarding: FEIS – FLL South Runway Extension

Dear Ms. Lane,

I believe in the Final Environmental Impact Statement on FLL Expansion you have potential major errors along with unanswered questions due to lack of proper data. The EIS studies were done only to 2020 for environmental impacts but FAA has based its' expansion decisions on benefits through 2030. FAA has also recently stated that it does not intend on complying with operational restrictions contained in the Inter-local Agreement between Broward County and the city of Dania Beach which will mean even more environmental impact than the present EIS show. Even if I believed that the EIS was truly accurate there are better alternatives. P6.0 P2.6

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F-LC165

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Sincerely,
Randy Wright
4391 SW 34 Lane, FT. Lauderdale 33312

F-LC165

Ms. Virginia Lane
FAA Orlando Airports District Office
5950 Hazeltine National Drive
Orlando, Florida 32822-5024

Regarding: FEIS – FLL South Runway Extension

Dear Ms. Lane,

I believe in the Final Environmental Impact Statement on FLL Expansion you have potential major errors along with unanswered questions due to lack of proper data. The EIS studies were done only to 2020 for environmental impacts but FAA has based its' expansion decisions on benefits through 2030. FAA has also recently stated that it does not intend on complying with operational restrictions contained in the Inter-local Agreement between Broward County and the city of Dania Beach which will mean even more environmental impact than the present EIS show. Even if I believed that the EIS was truly accurate there are better alternatives. P6.0 P2.6

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F-LC166

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Sincerely,
Lena Gill
1314A West College, Murfreesboro, TN 37130

F-LC166

To: Ms. Virginia Lane FAA Orlando Airports District Offic.

From: Dee Vance (Jesse & Dolores Vance)
4575 S.W. 29th Terr.
Ft. Lauderdale, FL 33312

Subject: FEIS - FLL South Runway Extension

〈Comments〉 Please don't do this!!!!

ROD 20.0

1. The North Runway is quite adequate! This is nothing more than Politics! A bunch of Broward County Commissioners whose lives will not be affected by this terrible move. A ~~few~~ months ago I was calling the airport constantly because of the air traffic, including Jets, that were landing on the South Runway from the North. This was night & day, and made our lives unbearable because of noise levels inside & outside our home. The planes come right over our rooftop. How would these Commissioners like that coming in over their homes??? It's not only loud, it's unsafe, and would not be a liveable condition if even bigger jets were to land in this manner on an extended South Runway.

ROD 3.10

2. The airport does not warrant extended a Runway. Many airline have pulled out of Ft. Lauderdale or ~~scaled~~ scaled back on the number of flights.

3. Not only would it have a great impact on the existing neighborhoods, but the newly contructed developements. (I think your numbers are wrong as to the amount of peoples whose lives would be impacted)

P 8.58

4. The negative impact on John Lloyd State Park!!!

F-LC167

July 24, 2008

Ms. Virginia Lane fax 1-407-812-6978
FAA Orlando Airports District Office
5950 Hazeltine National Drive
Orlando, FL 32822-5024

RE: FEIS- FLL South Runway Extension

Dear Ms. Lane:

We own a home in Melaleuca Gardens, Dania Beach, FL, a development that will be severely impacted by the South Runway Expansion at the Ft Lauderdale Airport.

Our neighborhood is close to the John U Lloyd Beach State Park. We visit this beautiful park often and it has recently been honored on the national news as a unique and scenic park. We would hate to have this taken away from us and future generations only to be destroyed with impacts from this proposed expansion. Just think, how many state parks are right on the ocean shoreline where you can drive to by car or by boat, and have a family picnic, go swimming, snorkeling, biking, watch all the wildlife???? P 8.58

With the FAA pursuing the building of the 8000 foot elevated south runway that would rise up over the railroad tracks and US1,not only will the John U Lloyd Beach State Park be obliterated with impacts, at least 12 acres of wetlands will be destroyed from this proposed expansion, and basically forces people to give up their homes as their quality of life will be destroyed. P 6.4 P 6.5

Also, brought to our attention by an Emergency Medical Service provider, in the event an emergency occured on the elevated runway, gaining access to the injured on a sloped runway would be difficult since they would only have access by 1 direction.What if jet fuel leaks and comes down the runway, this would be a big problem for emergency crews. R-LC109.3

We are opposed to expansion. With all you hear and see on the news daily of Airlines going bankrupt, air carriers reducing operations & pulling out of Ft Lauderdale, increase in jet fuel, massive layoffs, and all the economic impacts to our County, we just do not believe now is the time to spend over $2 billion dollars for an airport expansion. ROD 20.0 ROD 3.6 ROD 3.16

We enjoy where we live, we love being outdoors, and would hate to have this quality of life taken away from us. P6.0 P18.16

Thank you for taking the time to listen.

Sincerely,

Ed & Joyce Sethness

Ed & Joyce Sethness
935 Nautilus Isle
Dania Beach, FL 33004

F-LC168

July 24, 2008

Ms. Virginia Lane
FAA Orlando Airports District Office
5950 Hazeltine National Drive
Suite 400
Orlando, FL 32822-5024

Dear Ms. Lane,

I am writing this letter in regards to the **FEIS – FLL South Runway Extension.** I have been given your name as a contact person for the previously stated reason.

My husband and I live near the airport and are very concerned about the quality of life if the South Runway Extension gets approval for the go ahead. As we understand it there are other alternatives that could and possibly should be used. We cannot understand why this seems to be the winning decision when the others can be used and **save** everyone **millions and millions** of dollars.

P 6.1
ROD 15.14

In this economy saving everyone money seems to be the right decision to me and probably every American citizen out there. Things are changing daily with the airline industry and how long can they continue surviving in this economy? Is it that you are not informed of the other options or is it politics that win out with this decision? And most of all why would you use a study from 2002 and not gather more recent data?

ROD 3.0
ROD 3.10
ROD 13.7

We live approximately two blocks west of where the FAA drew the line for the Preferred Alternative Noise Exposure Contour Plan. From what we can understand this decision was based upon information where the runway would not be elevated. If the south runway is the choice why don't you explain how much greater the noise will be with an elevated runway not to mention all the safety hazards an elevated runway will propose? I can only imagine how uncomfortable it will be to sit outside, at my home, and listen to the noise.

LC109.3

What option or recourse do we have as tax paying citizens against a project like this? In this crazy world of ours do you at the FAA understand what it's like to be able to come home from work and enjoy your home inside and **OUTSIDE** as well? How would you feel to have airplanes dumping waste and most of all **INTERUPTING YOUR CONVERSATIONS WHILE THE AIRPLANES FLY OVER YOUR NEIGHBORHOOD?**

Hoping you will make the right decision, I truly am:

Gail L. Mason

Gail L. Mason
4701 S.W. 42nd Terrace
Dania Beach, FL 33314

F-LC169

Ms. Kathleen Butrim
201 NE 3rd Ave.
Dania Beach, Fl 33004

Ms.Virginia Lane
FAA Orlando Airports District Office
5950 Hazeltine National Drive
Suite 400
Orlando, Fl. 32822-5024

Via Facsimile

Dear Ms.Virginia Lane,

In reference to the Final Environmental Impact Statement I have some concerns that need to be addressed. I live at 201 N.E. 3rd Ave, Dania Bch, Fl 33004 .My concerns are the following: Table H.1-2 (Temporary Noise Monitoring Results), Site No. TM10 Shows the Sel Range at 73.4-77.9 with max range at 63.9-68.0, with peak aircraft group as turbo prop.
The extension of the runway would accommodate turbo jet aircraft. Exhibit 8-4 shows my property address outside the 65 DNL noise contour. My Questions are:

1) How can actual measurements by turbo props. be more than the projected noise by turbo jets?
2) Are the projected noise contours for both an east and a west operation? I would like to see the noise contours for both directions of operation, since the new runway would start well east of the current runway.
3) Is the new runway (9R/27L) going to be utilized by air traffic control in accordance with the inter-local agreement (dated sometime in 1994) between Broward County and the surrounding communities? Will air traffic control be required to justify not complying with the inter-local agreement?
4) Were these noise contours developed for both an east and west operation in accordance with the inter-local agreement? If not what % of departures and arrivals were used? What methodology was used?

ROD 8.21

P2.6

ROD 8.21

F-LC170

5) Those addresses that fall on the 65 DNL line, who makes the decision on whether they are eligible for FAA Assistance? When this decision is made, is there public involvement? ROD 15.0

6) If during construction, a decision to lengthen 9R/27L to more than the preferred alternative becomes apparent; will a new EIS be required? ROD 15.18

7) Will the noise berm be extended on the south side of the new runway? If not, why not? ROD 15.19

Thank you for your corporation will be waiting for your response.
My e-mail address is maui624@aol.com

Kathleen Butrim Date 7/24/08

RECEIVED AUG 0 6 2008

July 27, 2008

Ms. Virginia Lane
FAA Orlando Airports District Office
5950 Hazeltine National Drive, Suite 400
Orlando, Florida 32822-5024

Dear Ms. Lane,

We, the undersigned, would like to enter our comments into the public record in reference to the proposed runway expansion at Fort Lauderdale International Airport, FL. While we have many objections above and beyond the following, we confine our objections in this letter to those of a predominantly safety of flight and operational issues.

All of us are commercial pilots with either major Part 121 air carriers or freight operators. We have, between us, scores of years of flying experience and tens of thousands of flight hours.

We find many critical flaws in the proposed B1b/c design which, when taken in total, leave us with the opinion that this runway design should be strenuously opposed on the basis of its overall reduction in safety margin. RLC109.3

The proposal plans call for the new runway 9R to be the primary departure runway with runway 9L as the primary landing runway. This, contrary to normal operation and logic, results in aircraft using the shortest, uphill runway when the aircraft is heaviest (takeoff) and using the longest, level runway when lightest, upon landing. This also results in the largest noise contour (takeoff) being over an environmentally sensitive area -- John Lloyd Park.

The uphill design of the proposed runway 9R requires a performance penalty for an aircraft taking off on that runway. This means that the proposed 8,600' runway has an effective length of 7,500' - 8,000', a length that could nearly be accomplished on the existing field without elevating the runway.

The elevated east end of the proposed runway 9R would be surrounded on three sides by Mechanically Stabilized Earth (MSE) walls. These are sheer walls that would be catastrophic if an aircraft were to depart the runway, either to the side or on the east end, or if an aircraft approaching 27L were to land short.

Having a freight railroad running under the runway is unprecedented in the United States, and possibly in the world. This, combined with a multi-lane highway, means that the proposed runway is continuously exposed to whatever hazardous cargo is being transported beneath. The ease with which possible terrorists would have access to the underpasses is also a major concern.

Finally, and by no means the least of our concerns, the proposed runway design creates numerous unprecedented difficulties in the event of an aircraft accident or evacuation when the aircraft comes to rest on the eastern half of the proposed runway. The single entry point at the west end translates to an additional one and one half mile drive for the fire and rescue equipment, costing precious minutes.

An aircraft that stops off of the center line in the vicinity of the bridge design has potentially rendered one half of their emergency exits unusable lest the passengers slide over the edge of the bridge and onto the railroad or highway below. Similarly, emergency vehicles would be restricted in their approach to the side of the aircraft closest to the runway edge line.

Passengers assembling away from the disabled aircraft would be blocked from escape from the accident scene by the aircraft and firefighting equipment on one side and the edge of the railroad or highway bridge on the other, effectively trapping them. Jet A from ruptured fuel tanks would flow down the sloped runway and prevent fire fighting apparatus from gaining access to the crash site.

For these safety/operational reasons, in addition to the many other environmental and fiscal reasons of which you are well aware, we request that the FAA reject this ill-advised and inherently flawed runway design. RLC109.3

Sincerely yours,

Kenneth R.Holmes, B-747 Captain, 4934 SW 34th Terrace, Ft Lauderdale, FL 33312

Christopher L. Johnston, B-777 Captain, 745 NW 12th Ave., Dania Beach, FL 33004

Mike McKeever, B-737 Captain, 705 NW 7th St., Dania Beach, FL 33004

To: Ilieberman@broward.org, kjacobs@broward.org, sritter@broward.org, kkeechl@broward.org, lwexler@broward.org, sgunzburger@broward.org, jrodstrom@broward.org, dwassermanrubin@broward.org, jeggelletion@broward.org, Charlie.crist@myflorida.com, Virginia Lane/ASO/FAA@FAA, Rebecca Henry/ASO/FAA@FAA, Michael.sole@dep.state.fl.us, Stephanie.kopelousos@dot.state.fl.us, Felicia.goldstein@mail.house.gov, Jodi.davidson@mail.house.gov
From: Alex <blancoal@gmail.com>
Date: 07/25/2008 10:41PM
cc: "Lorraine Hofheinz" <hofheinz@bellsouth.net>
Subject: citizen opposition to the south runway ft. lauderdale project

As a resident of Davie in Broward county, I would like to register my opposition to the South Runway expansion plan for Ft. Lauderdale airport.

ROD 20.0

sincerely,
Alex Blanco
3240 Maple Lane
Davie, FL 33328

F-LC172

JANIE ROULETTE
4700 SW 25 TERRACE
FORT LAUDERDALE, FL 33312
PH: 954-218-4558

July 28, 2008

Virginia Lane
FAA

Re: Comments on Fort Lauderdale Airport Expansion

Dear Ms. Lane:

I live directly west of the planned south runway at Fort Lauderdale Airport. The distance from my home to the airport is less than one mile. We are already feeling the effects of the growth of the airport and at times the noise is already an issue. I however still strongly support the expansion of the airport due to its positive effects on the economy for Broward County, jobs, etc. While I do support the airport expansion, I understand that due to the vicinity of my home, I will suffer directly from the new runway. I do not believe that soundproofing would be an adequate remedy for the homes in my neighborhood because of their location. I sincerely hope that as we approach the final stages of the expansion, that Broward County and the FAA will move quickly to provide assistance to the homeowners in the direct path of the runway.

ROD 19.0

ROD 16.0

In the past when I attended the meetings regarding the expansion, it was always the people who oppose the airport that would get time to be heard. There are many, many people who support the expansion! Please do not let the negative influence be a deciding factor in the final decision.

I will be anxiously awaiting for the final announcement which I hope happens in the very near future.

Sincerely,

Janie Roulette

F-LC173

RECEIVED AUG 1 8 2008

All comments must be postmarked or faxed no later than **midnight, Monday, July 28, 2008.**
Comments can only be accepted with the full name and address of the individual commenting.

Ms. Virginia Lane
FAA Orlando Airports District Office
5950 Hazeltine National Drive
Orlando, Florida 32822-5024

Regarding: FEIS – FLL South Runway Extension

Dear Ms. Lane, : From Willard G. Lloyd & Donna D. Lloyd

Ms Lane, I recieved this late. I Know my Family, which have lived here in Dania Bch. - which when we moved here was a small town - 2 lane rd. and considerd in the country. We Thank GOD we own our home, of 30 years, with a Lot next DOOR. I Know this Airport expansion and Comminoner's dont care about the small people, whom also has a family owned buisness, which Grandpa Willard Pierce began in 1942, My self as A child was passed around to Family members all my Life - I met my husband willard Lloyd at Dania Bch 35 years ago and we are still together. married in 1976 - we have raised Two "Wonderful Children here in this Community They have Grown here and thrived We want to leave our Home & Property to them when pass. We worked so HARD FOR OUR Dream. Now they want to take it away - That airport dose [illegible] Need to expand Please help us retain our Dream.

F-LC174 TOTAL P.02

Ms. Virginia Lane
FAA Orlando Airports District Office
5950 Hazeltine National Drive
Orlando, Florida 32822-5024
Fax: 407-812-6978

RECEIVED SEP 1 5 2008

Regarding: FEIS – FLL South Runway Extension

Dear Ms. Lane,

I believe in the Final Environmental Impact Statement on FLL Expansion you have potential major errors along with unanswered questions due to lack of proper data. The EIS studies were done only to 2020 for environmental impacts but FAA has based its' expansion decisions on benefits through 2030. FAA has also recently stated that it does not intend on complying with operational restrictions contained in the Inter-local Agreement between Broward County and the city of Dania Beach which will mean even more environmental impact than the present EIS show. Even if I believed that the EIS was truly accurate there are better alternatives. P/6.0 P/2.6

The South Runway Alternatives will have a greater impact on wetlands, parks & residents than the North Runway C1 Alternative would have. The wetlands on the South are a high quality wetlands area where the wetlands on the North are a low quality wetlands area which will have less impact to these wetlands. With our Eco-system being destroyed as fast as it is why would we not choose an alternative that would have the least amount of impact? The EIS report acknowledges that there are endangered species that will be affected to some degree if the South runway is built. Should we not be trying to protect them to the very best of our ability instead of our second best? Also the surrounding parks will be impacted more from the South Runway Alternatives than the North Runway C1 Alternative. John U Lloyd State Park was just featured on Good Morning America and Congressman Klein heralded the park as a "national treasure" on the Floor of the House on July 17, 2008. With this type of national exposure Broward will attract more tourists. It has coral reefs just 100 yards off shore. To what affect will the vibration from the planes shock waves have on the well being to the coral? Also what about the oil spillage from the planes? The marine life must deal with the fuel spillage as planes use this approach to the airport. Why would we want to go ahead with South Runway Alternatives creating even more deafening noise throughout more of the park while destroying wildlife & the environment with more pollution than need be when the North Runway C1 Alternative would have a far less impact? Tourists mean a stronger economy for Broward but if you destroy the very thing they come for you will hurt all of Broward County. Also FAA has not taken into consideration the present air quality from the nearby power plant added to more and larger planes for the Raised South Runway in the final EIS. How will this affect people with breathing problems in the area and those visiting? The home of my niece constantly has oily black dirt on furniture and countertops created from the power plant and the present airplanes flying over/near them. How much worse will this be with the South Runway Alternatives and at what health risk and damage to houses and other belongings? P/6.4 6.5 P 11.4 P8.58 10.0 P/6.4 6.5 14.4 ROD 14.1

The South Runway Alternatives will also increase the noise in the area and will negatively impact the quality of life to residents. My niece lives in line with the present south runway, with the north runway being just to the north, and the present noise can be extremely loud and disruptive at times. The planes wake me up &/or keep me awake at night or in the morning when I visit. Many times we have to stop talking because we cannot hear each other or simply can not enjoy a movie, TV or music. FAA plans to have the same types planes take off and land on the new south runway as is presently using the North runway but the contour lines for the projected noise for the proposed South Runway Alternatives shows the noise level as being much smaller than the present North runway. How can that be? Added to that, the Final EIS does not even address the greater noise level of a 40 foot high (plus or minus) raised runway. The noise from a Raised South Runway will be deafening and travel much farther than the contour charts show. The Greenbelt buffer will provide no relief for and will in no way shield the ugly image of the runway. FAA has not addressed the Resident's enjoyment of Florida's gorgeous ROD 13.8 ROD 13.8

F-LC175

weather being severely impacted by the South Runway Expansion. They live out-of-doors all year around in South Florida and the question of "how do you soundproof it" has not been answered. The fact is, is that the North Parallel Runway Alternative would have less impact in all of the above areas. Add to all of this the fact that FAA has failed to comply with its own environmental laws for years and there is no reason to believe that they will live up to their own mitigation assurances.

Not only is the Raised South Runway Alternative the most expensive to build of all the alternatives but the cost estimate to build it did not include the cost of buying out hundreds of homes and property in Melaleuca Gardens and Atlantic Village which will be in the Runway Protection Zone and all of which the FLL/Broward will have to pay for. That means it will cost a lot more than what the cost estimate said it would take to build the Raised South Runway Alternative. The North Parallel Runway Alternative would not only be cheaper to build but there is land readily available, at no cost, to the business' that would have to be moved. However the cost estimates did not take this into account but rather added this cost onto their report along with moving costs when in fact FAA will pay for moving business not the FLL/Broward. So if you deduct these costs it makes the North Parallel Runway Alternative even less expensive than stated in the cost estimates. So taking all of the above into consideration what makes the Raised South Runway Alternative so much better than the North Parallel Runway? FAA has also not addressed the devaluation of homes in the area and the cost to the homeowners.

With the present economy in a downward spiral and fuel prices spiraling upward projections of demand overestimate growth at the airport. The Final EIS does not address the cost increase of jet fuel and how this will impact aircraft flying in & out of the airport nor the recent, or future, reduction in operations at the airport by airline companies. Operations at the Airport declined by 16% overall in 2006. Considering all this, it means that expansion may not be necessary as indicated by the Final EIS.

The FAA eliminated other alternatives as being fatally flawed because they encroached on I-95 and CSX Railroad. Why did they not eliminate alternatives that encroach on US 1 or the FEC Railroad as flawed? Why did FAA use 2002 data and not more recent data when looking at economic impacts to Broward County? This data did not include the current negative economic forecast for the airlines. South Florida is land locked between the Everglades and the ocean. Roads are already congested in the area and there are water shortages, coming power problems, poor school systems, high crime, high taxes and not enough land. If the airport expansion goes ahead and in this present economy can not produce the income to pay for itself after construction of new runways, gates, roads, buildings and whatever else needs to be done it will fall "we the Taxpayers" paying the ultimate price for it as Broward County goes bankrupt. Taking everything into consideration how can FAA justify the Raised South Runway Alternative?

Sincerely,
Kay Beers
215 North Canal Rd. #20, Lansing, MI 48917

F-LC175

RECEIVED JUN 2 3 2008

CITY of HOLLYWOOD, FLORIDA

OFFICE OF THE CITY MANAGER
2600 Hollywood Blvd. • P.O. Box 229045 • Hollywood, Florida 33022-9045
Phone (954) 921-3201 • Fax (954) 921-3314 • www.hollywoodfl.org

June 18, 2008

Ms. Virginia Lane, AICP
Project Manager
Federal Aviation Administration
Orlando Airports District Office
5950 Hazeltine National Drive
Suite 400
Orlando, Florida 32822

Dear Ms. Lane:

I am writing on behalf of the City of Hollywood, Florida, about the Environmental Impact Statement now being prepared for the proposed new runway at the Ft. Lauderdale-Hollywood International Airport. We recognize that the formal comment period for the new EIS is not yet in effect. However, we want to call to your attention two developments which could have a significant impact on the need for the runway.

First is the FAA's proposed use of runways 13/31 and 9R/27L to relieve congestion on 9L/27R and, as a result, to reduce delays at the airport. Although the agency has not yet identified the benefit of this action in terms of reduced delays, we have to assume that the benefit is not negligible. It follows that the No Action case in the EIS must assume implementation of the new runway use plan and adjust estimated delays accordingly. 3.1

Second, the Terminal Area Forecast underlying the EIS undoubtedly has been rendered obsolete by steep increases in fuel prices. It is reasonable to expect that higher fuel prices will result in higher fares, with a resulting reduction in demand, and/or service reductions, in reaction to deteriorating profitability. Press reports already are carrying accounts of carriers' plans to reduce domestic service. 3.0

Under these circumstances, we would urge the FAA to further review the need for an extended runway before publication of the Final EIS and/or the Record of Decision.

Yours truly,

Lorie Mertens-Black, Director
Intergovernmental Affairs

F-MCO01

Our Mission: We are dedicated to providing municipal services for our diverse community in an atmosphere of cooperation, courtesy and respect. We do this by ensuring all who live, work and play in the City of Hollywood enjoy a high quality of life.

"An Equal Opportunity and Service Provider Agency"

RECEIVED JUL 17 2008

CITY of HOLLYWOOD, FLORIDA

(954) 921-3201

July 7, 2008

Ms. Virginia Lane, AICP
Project Manager
Federal Aviation Administration
Orlando Airports District Office
5950 Hazeltine National Drive, Suite 400
Orlando, Florida 32822

Dear Ms. Lane,

Following are the comments of the City of Hollywood on the Ft. Lauderdale-Hollywood International Airport Environmental Impact Statement. We have concerns regarding the data and the analysis on which the EIS and the recommendations were generated.

It is unclear how the impact of the ongoing upheavals in the air transportation industry as a result of the unprecedented increase in the price of oil and aircraft fuel has upon the purpose and need for this runway expansion. Numerous press reports document airline bankruptcies and financial losses, as well as drastic actions to try to stem those losses, such as the removal of large portions of their fleets from service and a related sharp reduction in operations, as well as a series of actions raising the price of airline service and reducing the quality of that service. ROD 3.0

At this point, it is too early to incorporate the impact of these actions into the analysis of runway expansion. For example, the No-Action Alternative may completely change because of the industry's response to rising gas/oil prices. The most prudent course of action may be to postpone the release of the Record of Decision until the industry stabilizes.

We also have concerns over the selection of Alternative B1b over a north runway expansion option, specifically as it relates to the environmental impact and cost. We recognize that the FAA's primary concern is with the efficient discharge of its responsibilities for the nation's air traffic system. However, it is also charged under NEPA with protection of the environment and to balance the needs of the system with its environmental responsibilities. It is in that spirit that we urge you to modify your position, to further assess the need for the second air carrier runway and, if that need is validated, to choose the alternative which best meets the needs of the community. ROD 15.14

Sincerely,

Lorie Mertens-Black, Director
Intergovernmental Affairs

F-MCO01

RECEIVED JUL 2 3 2008

CITY OF
FORT LAUDERDALE
FLORIDA

The Venice of America
JIM NAUGLE
MAYOR

100 NORTH ANDREWS AVENUE • 33301
(954) 828-5003
(954) 828-5667 FAX
mayorjames@aol.com
www.fortlauderdale.gov

July 25, 2008

Ms. Virginia Lane
FAA Orlando Airports District Office
5950 Hazeltine National Drive, Suite 400
Orlando, Florida 32822-5024

Re: Final Environmental Impact Statement (FEIS) for the environmental impacts associated with the runway alternatives at Fort Lauderdale-Hollywood International Airport.

Dear Ms. Lane:

This letter is in response to your request for public input regarding the Final Environmental Impact Statement (FEIS) for the environmental impacts associated with the runway alternatives at Fort Lauderdale-Hollywood International Airport (FLL).

The City of Fort Lauderdale supports the Airport Sponsor's Proposed Project, **Alternative B1c**.

Alternative B1c - Redevelop and extend existing Runway 9R/27L to an 8,000-foot long by 150-foot wide Elevated Runway with EMAS (Engineered Material Arresting System), implementation of the operational noise abatement action described in the County's Airfield Development Program Objective Statement.

19.1

In the FEIS, the study stated, "the FAA's Preferred Alternative is **B1b**."

Alternative B1b - Redevelop and extend existing Runway 9R/27L to an 8,000-foot long by 150-foot wide Elevated Runway with EMAS (Engineered Material Arresting System) without the County's noise abatement action.

Although the City supports the Airport Sponsor's Proposed Project, Alternative B1c, if the FAA's Preferred Alternative, B1b, becomes the selected project, the City supports and urges Broward County to pursue a Part 150 Study to reevaluate runway use procedures in the future.

The aforementioned alternatives, along with pursuing the noise abatement actions, are in the best interest of the residents of the City of Fort Lauderdale and neighboring communities in the surrounding area.

Thank you for your consideration.

Sincerely,

Jim Naugle
Mayor

PRINTED ON RECYCLED PAPER

F-MC002

07/28/2008 15:38 FAX 305 358 5744 WHITE & CASE LLP 001

FACSIMILE

WHITE & CASE

White & Case LLP
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Direct Dial + (305) 995-5255 nmcaliley@whitecase.com

Date:	July 28, 2008	**No. of Pages (including cover):**	32
To:	Ms. Virginia Lane FAA Orlando Airports District Office	**Fax Number:** Contact Number:	(407) 812-6978
From:	Neal McAliley	**Reference No.:**	1504197.0002
Re:	City of Dania Beach, et al. v. FAA		

PLEASE NOTE: The information contained in this facsimile message is privileged and confidential, and is intended only for the use of the individual named above and others who have been specifically authorized to receive it. If you are not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, or if any problems occur with transmission, please contact sender or call (305) 371-2700. Thank you.

Copy of letter from Neal McAliley providing comments to the FAA Final Environmental Impact Statement dated June 2008. The attachments will be forthcoming via regular mail.

F-MC003

WHITE & CASE

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Wachovia Financial Center, Suite 4900
200 South Biscayne Boulevard
Miami, Florida 33131-2352

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www.whitecase.com

Direct Dial + 305-995-5255 nmcalliley@whitecase.com

July 28, 2008

ORIGINAL BY MAIL

Ms. Virginia Lane, ACIP
Project Manager,
Federal Aviation Administration
Orlando Airports District Office
5950 Hazeltine National Drive, Suite 400
Orlando, Florida 32822

Re: Final Environmental Impact Statement Issued June 2008 Regarding Expansion of the Ft. Lauderdale-Hollywood International Airport

Dear Ms. Lane:

I am writing to provide comments on the Federal Aviation Administration's ("FAA") Final Environmental Impact Statement ("FEIS") dated June 2008 regarding the proposed expansion of the Ft. Lauderdale-Hollywood International Airport ("Airport"). These comments are submitted on behalf of the City of Dania Beach, its residents, and business owners. This letter incorporates all prior comments made by the City of Dania Beach, and its representatives at prior public meetings. Furthermore, we adopt the comments of other local municipalities and individuals to the extent consistent with our own, including comments of the City of Hollywood and the Town of Davie.

The City of Dania Beach's survival and rich history is threatened by the possibility of irresponsible expansion of the Airport. Dania Beach is a city replete with small-town charm that still has proximity to big city amenities. With tens of thousands of residents stretching from the Atlantic Ocean on the east to the suburbs in the west, Dania Beach offers its residents miles of pristine beaches, established friendly neighborhoods, and a growing thriving community rooted in a unique history. Dania Beach, the first city in Broward County, dates back to the 1880's, well before the Airport's existence. Even though the town itself was not incorporated until 1904, Dania Beach's history is far-reaching and continues to grow. The City was known as the "Tomato Capital of the World" during the early 1900's and housed Broward County's first movie theater. Today, Dania Beach has a thriving antique business, with over 100 antique shops and malls found along a few short blocks in Downtown Dania Beach. The City's historical

progression can also be found in the various architectural styles in Dania Beach's buildings; buildings showcase styles ranging from the Greek revival to the Art Deco styles.

The operation and expansion of the Airport is an important issue facing the City of Dania Beach. Former parts of the City's commercial core were demolished to make way for past periods of expansion. Expansion of the Airport under the Airport's Proposed Project threaten to devour some of the oldest and most important neighborhoods in the City, including Melaleuca Gardens and the area near Ravenswood Road – both of which would be directly impacted by the potential expansion. The expansion not only threatens residents' tax base and the future of Dania Beach, but also looms over the existence of these neighborhoods. These neighborhoods have housed families for generations, allowing their residents to live and thrive both inside and outside their homes, enjoying bike riding, fishing, and the warm Florida weather. Unsurprisingly, residents of Dania Beach hope to pass this life on to their children and grandchildren. But, even without the threatened physical expulsion of people from their homes, operations at the Airport have already degraded the quality of life for Dania Beach residents, from the roar, fumes and soot of jets flying overhead to growing traffic jams caused by endless growth. Whether or not we like it or want it, the Airport – and constant fears of future expansion – is a continual part of residents' lives.

The City, however, does not oppose responsible redevelopment of the Airport. We are concerned that the FAA and its local sponsor, Broward County, are pursuing a plan of redevelopment based solely on a desire to have a larger airport without responding to a real need. The first example of this can be seen in the way the FAA summarily dismissed operational restrictions at the Airport that were agreed to by Broward County in an Interlocal Agreement it entered with the City of Dania Beach. Specifically, the FAA stated in the FEIS that, "[t]ypically the FAA would not approve a runway extension with the type of runway use restrictions that are proposed by the Interlocal Agreements. The runway use restrictions contained in the Interlocal Agreements reduce airfield capacity in the short-term as compared to the unrestricted use with Alternative B1b." (FEIS at 2-2). The fact that Alternative B1b does not include these runway use restrictions appears to have been factored into the FAA's decision to choose Alternative B1b as its Preferred Alternative over Alternative B1c. This was further confirmed by the FAA's response to comments regarding the Interlocal Agreement when the FAA said that it "is not a party to, nor bound by any local agreements or local ordinances that would limit runway use at [the Airport]. Therefore, the FAA would not approve a preferred alternative that imposes limits on the newly redeveloped runway." (FEIS at P.8-9). We are disappointed at the FAA's apparent decision to ignore an important agreement between the Airport Sponsor and the City of Dania Beach that was intended to protect local residents. 15.8

We are concerned about the haphazard planning for the Airport. Despite the requirement that an airport master plan be updated every five years (FAA Order No. 5100.38C, *Airport Improvement Program Handbook*, at ¶ 401e(2)), the Airport's Master Plan has not been updated since the 1990's. The current Master Plan Update process has been going on for years, and still is not complete. It seems absurd that the FAA would make such an important decision about the Airport – creating a second major air carrier runway – without a current plan. 3.2

We are also confused by the FAA's general approach to evaluating the Proposed Project. The EIS has specifically limited its environmental analysis up to the year 2020. This limitation, which allows the FAA and other evaluators of the Proposed Project to look at impacts only 12 years into the future, is particularly confusing when juxtapositioned against the FAA's common practice of using long-term forecasts for its own planning purposes, typically projecting operations 20 to 25 years into the future. The airport expansion has been going on since the mid 1990s, when the Airport Master Plan first discussed the redevelopment of Runway 9R/27L. (FEIS at 1-2). Throughout the EIS process, the FAA promulgated numerous National Environmental Policy Act ("NEPA") documents. (FEIS at 1-2 to 1-3). Because of the many years that have passed since inception of the environmental review process, there was a time when 2020 was a reasonable horizon to consider for environmental impacts. Yet, as the start date for construction gets pushed back, the horizon should have correspondingly expanded. 6.0

Looking only 12 years into the future does not provide a complete picture as to environmental impacts from the Proposed Project or any of the alternatives to the Proposed Project. The unnecessarily shortened time horizon in the FEIS also provides misleading information of environmental impacts that will result from the Proposed Project, especially the noise impacts. Because the FAA not only includes in the FEIS demand projections through 2030, but also has used these levels to encourage the most ambitious runway expansion alternatives, there is no good reason why the environmental impacts, including noise, should not be evaluated through 2030. 6.0

The lack of environmental information provided by this limited horizon is further highlighted by the FAA's statements as to when construction under any of the alternatives, including the Proposed Project, is projected to be completed. The FEIS provides that both the Proposed Project (B1c) and the FAA's Preferred Alternative (B1b) would take approximately six and one-half years to complete. (FEIS at E-76). So, if Broward County "commence[s] the procurement process during the 4th quarter of 2008, this would result in a project completion date in 2014, during which Runway 9R/27L would become operational." (Id.).[1] 6.1

There is no guarantee that the project will actually be completed by 2014, assuming a start-date at the end of 2008; this is simply an estimated target date. We believe this completion date is ambitious, at best, and that it is unlikely construction will be completed by 2014, let alone by 2012. Snafus often occur during construction, and delays could easily push the project back several years. In fact, Greg Meyer, a spokesman from the Airport told the South Florida Business Journal that the Sponsor "'hope[s] to start the runway in 2009 and complete it before 2014.'" (*Shrinking AMR. troubled airline industry prompt concern*, THE SOUTH FLORIDA BUSINESS JOURNAL (June 2, 2008). This statement reveals two important pieces of information. First, even the start-date for the project is being pushed back, as now the Airport is predicting it will not start construction until, at least, 2009. This will inevitably, however, push the completion date for the project back as well, likely to 2015 – six and one half years following the start date, if the runway starts being constructed in 2009. Second, and more importantly, the 6.1

[1] Although the FEIS discusses one solution for "potentially allowing" the project to be completed by 2012 (FEIS at E-76), even the FAA appears skeptical of such an early completion date. And, it is common knowledge that even the targeted date of completion for a large construction project is usually off.

Airport itself does not believe it will be able to complete construction of the project by 2012, the hopeful date for completion in the FEIS. Yet, with the 2014 completion date in mind, any impacts discussed for 2012 (one of the 2 years impacts are cited to) do not reflect impacts of the completed project, but rather reflect impacts only during construction. As such, the only impacts discussed for the expansion project that provide information as to impacts once the project is completed is impacts for 2020. But, even the 2020 impacts were not identified or discussed for each of the alternatives. The FAA should forecast environmental impacts through 2030, and perhaps even longer, as the Proposed Project will function far into the future, and many of the worst impacts can be expected to occur in later years in the project. 6.1

It should be noted that the FAA did not predict that any of the alternatives, if selected, would have construction completed prior to 2012. In fact, the FAA predicted that most of the alternatives would not be completely built and operational until 2013 or 2014. The FAA, however, appears determined to make it appear like each alternative, if selected, will be completed more quickly than the reality. When discussing the B5 Alternative, the FAA stated that, "[s]hould BCAD commence the procurement process at the end of 2007, this would result in a project completion date of 2014[.]" (FEIS at E-79). Yet, the FEIS itself was not issued until June 2008. This prediction will confuse the public as to when construction would be completed if the B5 Alternative were selected. 6.1

We also are concerned about the FAA's apparent "bunker mentality" toward local residents on this project. In several earlier letters, we have pointed out examples of where the FAA has tried to limit the input of Dania Beach and other local residents. Most recently, the City asked for a meeting with FAA decision makers about this project, only to be told to wait until the decision is a fait accompli. This contrasts with the FAA's constant contact and cooperation with Broward County, which for political reasons wants to pick the worst alternative that happens to harm Dania Beach. As a local government, we believe that we deserve better treatment. 1.0

The remainder of our comments relating to the FEIS are as follows.

I. The FAA's Preferred Alternative

As explained in the FEIS, the FAA is required to identify its preferred alternative in the FEIS if it was not identified in the Draft EIS. (FEIS at 8-1). As the FAA never identified its preferred alternative in the Draft EIS, it did so in the FEIS by identifying Alternative B1b. When discussing the FAA's Preferred Alternative, the FEIS provided that "[i]n the FAA's judgment, the FAA's Preferred Alternative should address the Airport Sponsor's goals and objectives to the extent practicable and in accordance with FAA regulations." (FEIS at 8-3). The FEIS then set out the sponsor's goals and objectives by summarizing the Airport Sponsor's purpose and need. (Id.). Among these goals was the need to "enhance capacity to accommodate forecast traffic through *2020*[.]" (Id. (emphasis added)). In its discussion, the FAA also pointed out that when Broward County chose its preferred alternative, Alternative B1c, the County concluded that "the EIS alternatives with north airfield development would limit opportunities for future growth on the airport." (Id.). The FAA used this information as a tool to eliminate any of the north airfield development options from consideration as the FAA's Preferred Alternative. The FAA did not 15.9

provide any details regarding how or to what extent the north runway alternatives will limit future growth. Also, because the purpose and need of the Proposed Project focuses on 2020, it is not a valid application of purpose and need to focus on 2030. It remains unclear how, beyond the assurance that the particular alternative meets the project's statement of purpose and need, the Airport Sponsor's goals and objectives should be a consideration for the FAA in choosing its Preferred Alternative, especially when these goals reach beyond the goals the airport sponsor has previously espoused in describing its proposed project.

15.9
6.1
15.9

Using the 2030 horizon (or beyond) as a timeframe for determining the FAA's Preferred Alternative is, however, in line with the FAA's decision to use two different set of books in evaluating and making decisions on the proposed project. As explained previously, the impacts for the project were only evaluated through 2020, yet many of the planning decisions, including the benefits analysis apparently were looked at through 2030. By focusing on the Airport Sponsor's concern that any of the north runway alternatives "would limit future tenant expansion capabilities, and would limit the potential for future on-airport tenant development within the existing airport envelope[,]" (FEIS at 8-6), it seems the FAA has made a decision based on "future expansion" beyond the 2020 timeframe. This conclusion is warranted because all of the North Runway Alternatives meet the project's statement of purpose and need, i.e., to meet projected capacity and demand at the Airport through some unstated date, presumably 2020. (See FEIS at 3-20).[2] So, for any of the North Runway Alternatives to result in a limitation on "future expansion" at the Airport, the FAA must have been looking beyond the 2020 timeframe of impacts discussed throughout the FEIS. If the FAA wanted to make a decision as to its Preferred Alternative based on some timeframe beyond 2020, then all of the information relating to this future timeframe should have been discussed in the FEIS and the purpose and need should have been revised to reflect the need to expand the Airport to meet capacity demands there until that future date. Otherwise, the FAA should have based its decision as to a "Preferred Alternative" on the timeframe, and other information, described in the FEIS and disclosed to the public.

15.10

Another odd "concern" of the Airport Sponsor that caused the FAA to eliminate the north runway alternatives from becoming its "Preferred Alternative," despite the north runway alternatives having less environmental impacts than the B1b/B1c Alternatives, was the Sponsor's concern relating to logistics and costs to relocate tenant facilities currently in the north runway area. (See FEIS at 8-6). Concerns about cost, however, make little sense, because the relocation costs associated with the north runway alternatives are disclosed in the FEIS, and the B1b/B1c Alternatives are both projected to cost approximately $810.1 million in 2007 dollars (FEIS at 4-61), while the C1 Alternative, including acquisition and relocation costs, is projected to cost $534.6 million (FEIS at 4-65). The C1 Alternative is approximately $270 million cheaper than the B1b/B1c Alternatives. In addition, the Airport Sponsor has deliberately increased these

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[2] For purposes of this discussion, it makes no difference whether the FAA's purpose was to meet projected capacity and demand at the Airport through 2020 or some other date, because clearly all the alternatives, including the North Runway Alternatives, meet this purpose or they would not have been discussed in greater detail in the FEIS, yet the north runway alternatives are eliminated for limiting growth at the Airport at some future date. When that date occurs makes no difference, because it is apparent that the FAA chose its Preferred Alternative based on criteria not considered by the FAA in its evaluation of impacts in the FEIS, and the facts behind the FAA's decision should have been clearly discussed in the FEIS.

relocation costs by recently entering into long-term leases with tenants in the C1 footprint (e.g., Embraer lease). The Airport Sponsor has entered these leases despite specific FAA guidance restricting its ability to do so. FAA Order 5050.4B specifically provides that, "*an airport sponsor may not* take action concerning a proposal that would cause adverse environmental effects or *limit the range or reasonable alternatives the approving FAA official would consider* while an EIS is being prepared." (FAA Order 5050.4B ¶ 1004(a) (emphasis added)). Yet, it appears that the Airport Sponsor has deliberately tried to eliminate the C1 alternative from consideration by agreeing to extend leases for facilities in the C1 footprint when the Sponsor knew the C1 footprint was under consideration by the FAA as a possible alternative. Such behavior should be condoned.

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Moreover, the Airport Sponsor's concerns over the actual relocation of facilities also make little sense. The FEIS provided that "[t]he combined total footprint of [vacant airport property] could accommodate all the tenant facilities displaced by Runway 8/26, assuming a replacement-in-kind of those displaced facilities." (FEIS at 4-52). Thus, there is enough on-airport land to provide replacement-in-kind for tenant facilities that would need to be relocated for the north runway to be built, and building a north runway option would not require the Airport to acquire any additional land, such as the Hilton. The B1b Alternative, the FAA's Preferred Alternative, also has greater adverse noise and compatible land use impacts than Alternatives C1, D1, or D2 (the north runway build alternatives), and more wetland impacts than Alternative C1. The reality is that the Airport Sponsor's only concern is its ability to expand the Airport's capacity beyond 2020. As explained above, however, if the Airport Sponsor wanted that ability then the FAA should have must refined its statement of project purpose and need and its impacts analysis to provide for and evaluate this capacity enhancement.

15.12

II. Project's Statement of Purpose and Need

In the FEIS, the FAA identified the purpose of the project as "to provide sufficient capacity for existing and forecast demand at [the Airport]." (FEIS at 3-20). The FAA also identified one of the needs for the project as the need "for sufficient airfield capacity, to the extent practicable, to accommodate existing and projected air carrier demand at a level of delay established for FLL in this EIS analysis[.]" (FEIS at 3-5). Among the Airport Sponsor's goals and objectives was the purpose of "enhance[ing] [the Airport's] capacity to accommodate future traffic through the year 2020 in a manner that will maintain annual average aircraft delay at or below the 6 to 10 minute annual average delay range[.]" (FEIS at 3-2). The FAA's statement of purpose and need, however, specifically did not provide a date range limitation within it. This is especially odd because prior iterations of the EIS have referenced the need to accommodate future traffic through the year 2020, echoing the Airport Sponsor's goals and objectives. FAA regulations specifically provide that "[t]he statement [of purpose and need] should summarize the benefits of FAA's decision, *including a proposed time for carrying out the action.*" (FAA Order 5050.4B, at ¶¶ 706b(2), 1007d(1) (emphasis added)). These regulations indicate that it is imperative that the FAA confirm the timeframe for what the project is trying to achieve. Based on the local sponsor's goals, it is apparent that 2020 is the relevant time frame for evaluating purpose and need. If the FAA is evaluating the alternatives without a time horizon in the project purpose and need, it would be impossible for the public to assess which alternative – if any – will meet the purpose and need. Clearly, the proposed project is not intended to accommodate

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capacity and demand at the Airport through eternity. Based on the FAA's decision to analyze impacts caused by the proposed project and alternatives to the proposed project through 2020 and the Airport Sponsor's statement that its goals are looking ahead until 2020, for purposes of this letter, we assume that the FAA adopted the Sponsor's timeframe.

There is a disconnect between the analysis of the project's impacts and its justification. The FEIS only analyzes environmental impacts to 2020. Yet, the FAA considers economic considerations to 2030. For example, for purposes of the Net Benefits Analysis in Appendix F, the FAA looked at benefits from the expansion through the year 2030. (See FEIS at F-21). Moreover, for planning traffic and travel demand, the FEIS also used a 2030 horizon. (FEIS at O.1-4 ("Broward County's travel demand model was used to obtain daily volumes for all future alternatives. The current Broward model has year 2000 validation and a planning horizon year of 2030")). Even for determining the FAA's Preferred Alternative, the FAA considered the Airport's ability to expand "in the future," presumably beyond the 2020 timeframe – as clearly all the alternatives discussed in detail meet the project's purpose and need of accommodating future traffic through 2020. This suggests that the FAA is making decisions at the Airport based on future time frames where environmental impacts were not disclosed. In other words, there are two sets of books being used.

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Even though the FAA's statement of purpose did not identify the type of capacity it was seeking to enhance through the project, the statement of need referenced *airfield* capacity rather than capacity in general. As will be discussed in the subsections below, by limiting the capacity sought to be enhanced to *airfield* capacity, the FAA artificially constrained ways in which demand could be accommodated, delay could be lowered, and other forms of capacity could be increased at the Airport. This artificial constraint caused a variety of alternatives, including use of demand management strategies, use of technology, and use of other airports, to be eliminated from detailed consideration, because they did not necessarily increase "airfield" capacity. In other words, this narrowed statement of purpose and need completely eliminated from discussion alternatives that would reduce air carrier delays without the need to spend hundreds of millions of dollars on additional runways.

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The FAA's statement of purpose and need was premised on a variety of bases, including alleged insufficient airfield capacity to accommodate aviation demand at delay levels stated in the FEIS, alleged inadequate infrastructure (both runway and taxiway) to accommodate larger aircraft, and alleged insufficient terminal gates and associated aircraft frontage requirements to meet demand through 2020 at the Airport. (FEIS at 3-3 to 3-6). The FAA also relied on flawed capacity and demand projections, flawed delay projections, and flawed aviation forecasts to assess the purpose and need for the proposed project. It is apparent that the FAA's and Broward County's goal is simply to make the Airport larger. We do not think this is in line with the public interest or the public's goals. We believe that it is improper for the FAA to artificially narrow the discussion in the way that it has through this statement of purpose and need.

3.5

A. Capacity and Demand Projections

As mentioned previously, the FEIS focused its purpose and need on "airfield" capacity. It appears that our comments in earlier letters relating to the Draft EIS's definition of capacity

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have gone unheeded by the FAA. The Draft EIS defined airfield capacity as "the total number of operations that the airfield can accommodate at an acceptable level of delay." (DEIS at 3-9). The FEIS has changed only a single word in its definition of "airfield capacity," stating that "[a]irfield capacity is defined as the total number of operations that an airfield can accommodate at an established level of delay." (FEIS at 3-11). Changing the word "acceptable" to the word "established," however, did not address any of the deficiencies identified in letters to the FAA. Prior to the Draft EIS, the FAA defined airfield capacity in terms of the number of aircraft that can land and use the Airport during a given time period. But, the new definition of airfield capacity suggests that "capacity" is defined more by the associated levels of delays than by the actual number of aircraft that can land and use the runways. This definition also indicates that alternatives that reduce air carrier delays at the Airport without increasing the number of aircraft that can takeoff and land qualify as increasing the Airport's "capacity." As such, we are confused as to why various alternatives, including demand management strategies and use of other airports, were eliminated from detailed consideration when they would clearly increase "capacity" at the Airport. Later in the discussion of purpose and need, the FAA defines "capacity" separately as "a measure of the maximum number of airport component in an hour." (FEIS at p. 3-20 n.35). The FEIS referred to this as "throughput capacity." Besides the use of delay as a component of airfield capacity, the difference between airfield capacity and throughput capacity is unclear. More importantly, it is unclear why calculations relating to "airfield capacity" play a greater role in justifying the need for runway development projects than calculations relating to throughput capacity.

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The definition of "airfield capacity" is also circular in the context of this project. The asserted need for the Airport's expansion is to add capacity to limit delays. (FEIS at 3-5 ("The need for sufficient airfield capacity, to the extent practicable, to accommodate existing and projected air carrier demand at a level of delay established for FLL in this analysis"). This indicates that "capacity" and "delay" are distinct concepts. Yet, because the FAA defined "capacity" to include within it the concept of limiting delays, the terms are not distinct as used in the FEIS. This is confusing at best, and circular at worst.

3.7

Many of the stated problems with the Airport are premised on perceived issues with "capacity" at the Airport to accommodate future demand and keep delays manageable. In the FEIS, the FAA based its insufficient airfield capacity problem on numbers it derived from the 2006 Terminal Area Forecast ("TAF"). In previous comment letters, we have pointed out, to no avail, numerous problems with relying on TAF numbers to support claims of insufficient capacity. The main problem with relying on TAF numbers is that in determining future operations at the Airport, the TAF assumes that capacity is in existence at the Airport to accommodate the future demand. The TAF itself explains this assumption, stating that "an airport's forecast is developed independent of the ability of the airport and the air traffic control system to furnish the capacity required to meet demand." (TAF Summary, Fiscal Years 2006-2025, at 4). By assuming the capacity is in place, the demand at the Airport is naturally inflated. In other words, if capacity is not in existence at the Airport, demand will necessarily be lower, as travelers will inevitably choose to travel from different or surrounding airports, such as Miami International Airport ("MIA") or Palm Beach International Airport ("PBIA"). This fact is born out by comments made at the May 2007 public workshop on the Draft EIS, when one Miami

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resident stated that even though he lives in Miami, he "tri[es] to travel or fly into or out of Fort Lauderdale as much as possible. It's a lot more convenient. It's faster and easier to get in and out of." (FEIS at Appendix P, May 1, 2007 FAA Public Workshop Transcript, at 9:4-10). As such, the TAF projections are naturally skewed to inflate future projections of demand at the Airport. 3.8

The TAF projections also do not account for increases in jet fuel prices. When one commenter noted that the price of oil will rise "well beyond $70 a barrel," (FEIS at P.3-20), the FAA responded with a non-responsive statement that the TAF is updated annually. This response indicates the lack of confidence that the FAA itself has in TAF projections, and highlights the reason TAF projections are updated every year: these projections can so easily overstate enplanements. Because certain factors fluctuate so much, including gas prices which have gone well beyond $135 a barrel (more than double in just over a year), TAF numbers should not be relied on for long-term projections. Now with oil prices almost double the original commenter's $70 a barrel, and no sign that prices will return to the $70 a barrel level, the FAA should have included discussions of these increased costs and how they affect capacity and demand at the Airport in the FEIS. It should be further noted that TAF is a crude model that uses linear multiple regression. The problems with TAF projections, including failure to consider increasing gas prices and assuming capacity when predicting demand, result in TAF projections for demand being overstated, thereby resulting in the illusion that there more capacity is needed at the Airport than is actually needed. 3.9

We also question the accuracy of the numbers given for "projected operational demand" at the Airport. We would like more information as to what is included in these numbers. It does not appear that these numbers consider the streamlining that is ongoing in the airline industry today. In other words, these numbers should have included a consideration of the reduction in schedules that most of the major carriers are implementing, and the large increase in fuel prices, including how this increase affects demand in various ways, e.g., through the increase in price to the traveler, who then may reconsider traveling. If these projections did include such considerations, the FAA should have explained why it did not bother to include such crucial elements in the analysis. Anybody who turns on the news today realizes the serious trouble the airline industry is in and the enormous increase in oil per barrel that is occurring in the world. The failure to include such discussion in the FEIS will be discussed in greater detail below. 3.10

Finally, we believe that the FEIS understated existing capacity at the Airport. Using FAA Advisory Circular 150/5060-5, *Airport Capacity and Delay*, the FEIS stated that the Airport's airfield has a "theoretical capacity of 113 mixed operations." (FEIS at 3-12). The FAA then suggested that somehow the level of forecast demand actually reduced the capacity or throughput of the airfield to only 84 operations per hour, "because there is insufficient general aviation demand to maximize use of Runway 9R/27L, and as discussed in Section 3.2.1, the deficiency in FLL airfield capacity is due to the level of air carrier demand." (See id.). This reasoning is confusing. Although capacity and demand combine to determine, along with other factors, the level of delays at an airport, an increase in demand does not in any way affect the "capacity" of the airfield or its runways. 3.11

B. Delay Projections

In the FEIS, the FAA also ignored our earlier comments regarding inaccurate and overstated delay projections in the Draft EIS as the FEIS stated that its modeling indicates that "with increased demand in future years 2012 and 2020, average delays at [the Airport] are estimated to increase to approximately 26 minutes per operation." (FEIS at 3-14). The FAA asserted this statement even though its own guidance provides that anytime average delay at an airport approaches 20 minutes per average delay – "approximately the highest recorded average delay per operation known to FAA at an airport in the U.S." – growth in operations at an airport will largely cease, and other factors will respond to decrease delay. (FAA Airport Benefit Cost Analysis Guidance at § 10.4.1.3). As we have previously explained, before reaching these levels airlines would adjust schedules, begin to use larger aircraft or consolidate and cancel flights during peak hours. (Id.). Moreover, passengers would make necessary decisions regarding air travel to assist in reducing delays; they would use alternative airports, (such as MIA); seek other means of transportation; or avoid making trips altogether. (Id.). In other words, delays start to limit demand and operations at the Airport. None of this appears to have been factored into the analysis. To the extent demand peaks at 20 minutes, many other impacts will decline, or at a minimum, stop increasing, because fewer airplanes will continue to use the airport. Yet, the FAA did not factor any of this into its analysis. 3.12

After we pointed out to the FAA that it was not accounting for this phenomenon, the FAA – seemingly misunderstanding the point of our comment – said that "[t]he No Action case is the only EIS alternative with delays exceeding the 20-minute rule. This level of delay already reflects a flatter schedule. Indeed, the level of delay in the No Action case was much higher with the unconstrained 2020 schedule. The schedule was therefore de-peaked in order to decrease the delays to a more reasonable level. Shifting operations from one airport to another is a market-based business decision of each airline. The FEIS alternative analysis determined that it was not reasonable to assume that enough commercial activity would shift and therefore provide additional capacity at FLL." (FEIS at R-3 to LC100). What the FAA seems to have missed is that the gross overstatement of delay projections for the No Action Alternative for 2012 and 2020 skewed the entire analysis for all other alternatives, as the delay savings calculations were determined by comparing each alternative to the No Action delay projections. The question is not which alternatives have delays exceeding 20-minutes, but rather which alternatives purport to provide a delay *savings* of over 20 minutes when compared with the No Action Alternative's overstated delay projections. The FAA's own guidance suggests that "where delay in the base case [No Action Alternative] begins to increase exponentially beyond 10 or 15 minutes per operation, it would be appropriate to modify the traffic projection developed for the airport." (FAA Airport Benefit-Cost Analysis at § 10.4.1.3). Yet, the FAA ignored its guidance here. The analysis also failed to include any discussion of the supposed "flattening out" of the schedule that the FAA claimed it performed prior to reaching the delay projections for the No Action Alternative. We also note that the projection of operations to 2020 does not show any flattening or "de-peaking" – they show a steady upward line. These projects are the bases of all environmental impacts discussions in the FEIS. 3.12

The FEIS also failed to quantify how many delays were attributable to capacity deficiencies versus other causes of delay. The FEIS acknowledged there may be different causes of delay. (See FEIS at 3-13 (pointing out that "[s]ome incidents of delay are directly attributable 3.13

to wind and weather at FLL, while others are related to conditions that occur throughout the National Airspace System[,]" and "[c]hanges in the hourly distribution of aircraft activity, fleet mix changes, and frequency of service on busy routes also combine to increase delays at FLL")). Yet, the FAA cannot justify its use of added capacity to reduce delays at the Airport, because it has not clearly articulated how many delays are caused by inadequate capacity (e.g., planes not being able to land or taxi to the gate because of lack of space) versus other causes (e.g., mechanical problems with the plane, weather, etc.). Without these hard numbers, it is impossible to assess whether or not additional capacity is really needed at the Airport. 3.13

The FEIS also included inconsistent discussions within it as to what the delay threshold target for the project is. In Chapter 3, the FAA provided a delay threshold of six minutes per operation "because it is within the range of the FAA's planning guideline and it is acceptable to the Airport Sponsor." (FEIS at 3-13). Yet, using a specific target as opposed to a target range of say six to ten minutes of delay is inconsistent with the approach taken by the FAA in other south Florida airport expansion projects. After we noted this discrepancy in comments to an earlier draft EIS, the FAA responded that "[t]he FAA assumes that commenter is referring to the Miami International Airport expansion project approved by the FAA in 1998. A delay range of six to ten minutes was used as a measure of acceptability, with six minutes as the maximum acceptable and ten minutes as the maximum tolerable. This is consistent with the threshold of FLL and the Airport Sponsor's objectives." (FEIS at P.3-8). This response is confusing, and muddles the delay target for the FEIS; it is unclear whether the FAA relied on a six minute delay target or whether the FAA aimed for a six to ten minute delay target, "with six minutes as the maximum acceptable and ten minutes as the maximum tolerable." Moreover, it is unclear which delay target the FAA used to calculate capacity needs at the Airport and to assess the need for increased capacity at the Airport. The delay target is something that should be consistent throughout the FEIS. 3.14

C. Aviation Activity Forecasts

Accurate aviation forecasts are essential to ensuring accurate environmental analysis. As explained by the FAA itself, "accurate, current aviation forecasts are the 'backbones' to efficient, accurate environmental analyses. Forecasts that are too high or too low will jeopardize the NEPA and decision making processes by affecting environmental and funding decisions." (FAA Order 5050.4B at ¶ 504b). The aviation forecasts stated in the FEIS appear to be too high, resulting in a deficiency that pervades the entire FEIS. The FEIS predicted a straight line projection for increases in aviation activity from 2006 to 2020. (FEIS at Ex. 3-3). By looking at Exhibit 3-3, where this straight line projection is predicted, however, one can see a noticeable decline in air travel at the Airport in 2006. Despite this noticeable decline, the FAA still predicted an ever-increasing straight projection in aviation activity at the Airport. The idea that there will be a steady uninterrupted increase in traffic from 2006 to 2020 makes little sense in light of prior fluctuations in airline traffic and the current unsteadiness of the airline industry as a whole. 3.15

Considering the decline in 2006, one would expect the FAA to have included in the FEIS quantitative information as to operations at the Airport in 2007, e.g., 2007 enplaned passengers, 2007 scheduled departing passenger seats, or 2007 air carrier aircraft operations. Yet, the FEIS 3.15

did not provide any such numbers for 2007 even though the FEIS was issued in June 2008, well after the 2007 numbers should be available. Because the 2006 numbers indicate a possible downward trend, the 2007 information is imperative for the public to assess whether the numbers are indicative of an ongoing trend or a one-year fluctuation. 3.15

When discussing the 2006 fiscal year decline, the FEIS provided that "enplanements at FLL declined year-over-year due, in large part, to Delta's system-wide decision to disband its low-fare Song and reduce its Delta Connection activity at [the Airport]. As a result, air carrier enplanements declined 5.3 percent in FFY2006, while commuter enplanements declined 10.7 percent." (FEIS at D-3). Even though the FAA made this observation, the FAA seems ignorant of the current static state of the airline industry throughout the U.S., and especially at the Airport. In other words, the entire airline industry is undergoing dramatic changes right now as major airlines throughout the country are cutting back schedules and operations and scaling down employment levels, with airlines such as ATA Airlines, Skybus Airlines, and Frontier Airlines even going so far as to file for bankruptcy and suddenly cease all operations. In fact, when ATA Airlines ceased operations, it left many passengers with paid tickets stranded in airports throughout the U.S. In ceasing operations, all the bankrupt airlines "cited some combination of high fuel prices and falling demand, among other factors." (The Associated Press, *Frontier Airlines files for Bankruptcy*, THE CHICAGO SUN-TIMES (April 11, 2008)). 3.16

Even though the FEIS acts as though the Airport is in a bubble protected from this grim situation, the Airport has not avoided fallout from this catastrophe. Recently, American Airlines announced it is cutting a third of its flights at the Airport and eliminating 79 jobs there "as it attempts to deal with sky-high fuel costs." (Ina Paiva Cordle, *American to trim flights at FLL*, THE MIAMI HERALD (July 9, 2008)). American Airlines is not the only airline reducing operations at the Airport: Spirit Airlines has also announced it will eliminate 250 jobs at its five bases, one of which is the Airport, and cut 6% of its capacity this fall, and United Airlines has said it is pulling out of the Airport at the end of the summer and cutting 50 jobs at the Airport "as it tries to eliminate its least profitable routes and spiraling fuel costs." (Id.). Moreover, USA 3000 will cease operations in Fort Lauderdale in August 2008, and Allegiant Air has announced it will end service to the Airport from five other airports. (Steve Huettel, *Airline to end local service*, ST. PETERSBURG TIMES (May 15, 2008); Jean Tarbett Hardiman, *Airport losing flights to Ft. Lauderdale*, THE HERALD-DISPATCH (July 19, 2008)).

Even Kent George, the Director of Aviation for Broward County has publicly indicated that operations at the Airport will decline in the near future. Mr. George told the South Florida Business Journal that he projected airport traffic and revenue to be flat in 2008 and that he was worried that American Airlines' parent company's new decision to charge for baggage will result in "slowdowns for discretionary travelers – the majority of the market[.]" (*Shrinking AMR, troubled airline industry prompt concern*, THE SOUTH FLORIDA BUSINESS JOURNAL, (June 2, 2008)). In a letter to the Sherriff of Broward County discussing budgeting for law enforcement at the Airport, Mr. Kent also stated as follows.

> I was surprised to receive this letter, especially following the discussions with our staff concerning the budget predicament we are facing. There have been four airlines enter various stages of

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> bankruptcy within the last year. Every single major airline in the country has announced cutbacks. I have received no less than half a dozen letters from airlines requesting review of our budget, further reductions, major cutbacks and complete elimination of capital programs *with the exception f the new runway for FLL.*

(June 25, 2008 Letter from Kent G. George to. Sherriff Al Lamberti, Re: Fiscal Year 2009 Budget). Shockingly, even in the face of large decreases in operations at the Airport and numerous airlines ceasing all operations at the Airport, the one item still in the budget is the expansion project. Yet, none of these reductions in operations was mentioned in the FEIS or considered in the aviation forecast, the determination of current and projected capacity, or the determination of current and projected demand at the Airport.

3.16

The Airport is especially prone to feeling the effects of the airline industry's downturn because the Airport is focused on discounted smaller airlines. The Airport has carved out a niche in the South Florida market by charging airlines less than other airports, such as MIA. In doing so, the Airport has attracted discounted airlines, such as JetBlue, Spirit, Southwest, and the now defunct Song. Analysts of the airline industry feel that smaller airlines are especially vulnerable to a downturn because the smaller airlines are unlikely to have sufficient cash to weather the current economic downturn and spike in fuel prices, and are thus more at risk of facing new cash withholding rules. (The Associated Press, *Frontier Airlines files for Bankruptcy*, THE CHICAGO SUN-TIMES (April 11, 2008); David Goldman, *Bankruptcies loom for airlines – report*, CNNMONEY.COM (July 15, 2008) ("So far, most of the recent bankruptcies in the industry have been linked to smaller carriers . . . that lack ample capital to cover losses from fuel costs. But in the fall, when air travel typically grows lighter, . . . the larger airlines may begin to suffer the same fate")). Thus, both the current and the potential future reduction in operations at the Airport should have been considered in the FEIS.

Continuing to project increases in passengers and operations at the Airport, like the FEIS did, also directly contradicts analyst's views of future traffic patterns. One airline consultant predicted to the Mercury News that the airline industry could see as many as five years of traffic declines. (Joshua Molina & Deborah Loshe, *Will San Jose airport expansion be a waste? Expansion Continues As Passenger Levels Decline, Fuel Costs Rise*, THE MERCURY NEWS (July 6, 2008)). "The most likely scenario, analysts said, is that airlines will scale back domestic flights of more than 400 miles – "long haul" flights. Fuel-guzzling planes like older 737s and MD 80s . . . 'are going to suffer,' Garfinkle said." (Id.). All of the indications are that airline operations at airports throughout the U.S. are steadily declining. Yet, the FEIS continues to treat the Airport as if it is the only airport in the U.S. immune to record jet fuel increases, airline bankruptcies, and airlines' cutting back in operations and restructuring schedules. Clearly, this is not the case.

The main impetus in the decline in the airline industry appears to be record prices for fuel that are being experienced currently in the U.S. As explained in one article from the Business Travel Coalition,

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> Airlines are paying about twice as much for fuel as they were just a year ago, and roughly four times as much as 2000. Fuel as a share of total airline operating expenses has jumped from about 15% in 2000 to more than 40% today, and is still climbing. It has become the largest single airline expense, now larger than either labor or aircraft leases. Roger King of CreditSights, a provider of credit research, summed up the situation: 'The race is on to see if airlines can raise fares high enough to cover the fuel bills before they run out of cash' (*Wall Street Journal*, May 22, 2008). Of course, what makes this race an uphill climb is that oil prices continue to rise to previously unthinkable levels – and pushing air travel far beyond affordability for the vast majority of the traveling public.

(*Beyond the Airlines' $2 Can of Coke: Catastrophic Impact on the U.S. Economy from Oil-price Trauma in the Airline Industry*, BUSINESS TRAVEL COALITION, at 2 (2008)). Several analysts have concluded that if oil prices stay anywhere close to $130 a barrel, "all major legacy airlines will be in default on various debt covenants by the end of 2008 or early 2009." (*Oil Prices and the Looming U.S. Aviation Industry Catastrophe: A Hole in the Transport Grid*, BUSINESS TRAVEL COALITION, at 2 (June 13, 2008)). These rising fuel prices have even led airline executives to predict disaster for the airline industry as a result. A spokeswoman for Southwest Airlines, Marilee McInnis, recently said, "[w]e are facing almost a catastrophic rise in the price of oil, and it is going to change the way we do business." (Joshua Molina & Deborah Loshe, *Will San Jose airport expansion be a waste? Expansion Continues As Passenger Levels Decline, Fuel Costs Rise*, THE MERCURY NEWS (July 6, 2008)). Yet, again, these rising fuel costs were completely ignored by the FAA in its analysis of the need for the proposed project.

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III. Alternatives

A. Alternatives Eliminated from Detailed Consideration

As discussed previously, the FEIS improperly narrowed the project purpose and need so that only alternatives that resulted in an increase in *physical* capacity at the Airport would meet the project's purpose and need. (See FEIS at 4-18). The FAA should not only have framed the statement of purpose and need to focus on real goals associated with the project – i.e., reducing delays and demand at the Airport through 2020 – but also should have analyzed the effectiveness of alternatives that do not necessarily increase *physical* capacity at the Airport but that still result in increased capacity there, such as demand management strategies and use of other airports. In doing so, the FEIS should have acknowledged that other forms of capacity increases beyond physical capacity or theoretical capacity can increase capacity and reduce demand at the Airport.

3.4

In eliminating the use of other airports alternative from detailed consideration, the FAA first noted, as stated above, that this alternative "would not enhance the air carrier capacity at [the Airport]." (FEIS at 4-10). Yet, this makes little sense; clearly by reducing or even eliminating one type of aircraft at the Airport – general aviation – there will be room for (and thus increased capacity for) additional different types of aircraft at the Airport. The FAA also stated that "[t]he FAA does not have authority to compel aircraft owner/operators to relocate to

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another airport. The decision to do so is a private business decision." (FEIS at 4-10). This statement is evasive, at best. The FAA may not have the authority to require the airline owners/operators to relocate, but the FAA does have the authority to implement pricing schemes at the Airport to incentivize general aviation flights to use airports other than the Airport. Moreover, the FAA could limit facilities at the Airport that cater to general aviation, effectively pushing them to other airports and freeing up runway capacity for commercial flights. It is completely disingenuous for the FAA to assert that it has no ability to affect the Airport's fleet mix. 4.2

The final reason the FAA provided for eliminating use of other airports as an alternative to the proposed project is because of the alleged "lack of overlapping markets with PBI" and MIA. The FEIS further claimed that the passenger drive time from "the Fort Lauderdale market area" to either PBIA or MIA "is beyond the time and distance threshold that most passengers would be willing to travel." (FEIS at 4-5). This is a ridiculous statement, especially considering south Florida passengers make decisions everyday as to which airport to fly out of based on a variety of factors, including cost, convenience, delays, etc. Moreover, MIA and the Airport are the same market. The FAA even recognized the joint market of both airports throughout the FEIS, stating that MIA, PBIA, and the Airport are part of the same regional area, share impacts, and share a customer base. Travelers in Miami commonly choose between flying out of FLL or MIA. Yet, in this section of the FEIS, the FAA eliminated the possible use of MIA and PBIA as an alternative to the proposed project because of a supposed "lack of overlapping markets." Clearly, this is inconsistent with other statements made throughout the FEIS and makes little sense in light of reality. 4.3

The FAA also eliminated various non-runway development alternatives from detailed consideration – even though the FAA admits they would reduce ground delays – because they "would not provide the airfield capacity necessary to accommodate future aviation demand levels." (FEIS at 4-18). Yet, the FAA did not explain what specific demand levels the alternatives would not accommodate. Is the FAA referencing demand levels in 2012? 2020? Or even 2030? Moreover, the FAA did not consider the possibility of combining some, or all, of these non-runway development alternatives to meet the projected demand at the Airport without adding additional runways. 4.4

B. Alleged "Fatal Flaws"

Despite numerous comments, including those from the City of Dania Beach, the FEIS continued to identify several so-called "fatal flaws" that it used to eliminate several potential alternatives from detailed consideration. The three alleged "fatal flaws" include: 1) encroachment of Dania Cut-Off Canal, Interstate-95 and/or Seaboard Coast (CSX) Railroad; 2) terminal impacts (but only certain ones); and 3) impacts to the electrical substation. (FEIS at 4-25). We have previously commented on the inconsistencies and confusing aspect of these so-called "fatal flaws," and specifically reincorporate all prior comments regarding this issue into this letter. 4.5

To restate one glaring example of this, however, it remains unclear why it is a fatal flaw for a particular alternative to encroach upon Interstate-95 and the CSX Railroad, but it is not a

fatal flaw to encroach upon U.S. 1 or the FEC Railroad. For some unexplained reason, the CSX Railroad is substantially more important than the FEC Railroad. Moreover, it makes little sense that the FAA considers encroaching on part of the passenger terminal to be a "fatal flaw," but does not even blink an eye at the demolition of a large hotel, the Hilton, and major marina/condominium development project, Atlantic Village, or the potential condemnation of entire residential neighborhoods. Nowhere did the FAA explain why it is unacceptable for the north runway alternatives to encroach on northern parts of the terminal while it is acceptable for other alternatives to encroach on western parts of the terminal. 4.5

We have previously asked the FAA to explain what makes these flaws qualitatively different than the many other flaws with the Proposed Action and the FAA's Preferred Alternative. In response to these queries, the FAA simply stated that "[t]hese fatal flaws are associated with direct impacts on existing facilities that would result in *substantial* redevelopment or *inhibit development or maintenance* of existing infrastructure." (FEIS at P.4-2). Yet, this is hardly an "explanation." Under this standard, the FAA should explain how inhibiting development or maintenance of some infrastructure and facilities does not qualify as a "fatal flaw" while inhibiting others somehow does qualify. The FAA should explicitly explain why a runway bridge to the west over I95/CSX Railroad/Dania Canal is considered a fatal flaw for alternatives requiring it, while one to the east over U.S. 1/FEC Railroad is not. (See FEIS at 4-27).

C. FAA's Discussion of Various Alternatives Analyzed in Detail in the FEIS

After eliminating various alternatives from detailed discussion because they did not meet the project's narrow statement of purpose and need or they had so-called fatal flaws, resulting in them not being considered further, the FEIS identified seven alternatives, including the No Action Alternative, to be analyzed in greater detail in the FEIS. (FEIS at 4-26).

The No Action Alternative, as described in the FEIS, assumed that Concourse A was in place already. (FEIS at 4-34). This assumption, however, should not be in the No Action Alternative, especially because Concourse A has not yet been approved by the FAA and the FAA has argued throughout the environmental analysis of Concourse A that Concourse A has "independent utility" from the Proposed Project. Assuming Concourse A is already in place simply highlights the improper segmentation that has been occurring throughout the Airport's expansion. Numerous expansion projects, including the development of Concourse A and the recently approved use of the Secondary Runways, should have been included in the FEIS rather than separately analyzed. To the extent that Concourse A, however, was discussed in the FEIS, its proper place for discussion was in the cumulative impacts analysis, and not as a part of the No Action Alternative. 4.6

In identifying the B1, B1b, B1c and D1 Alternatives, the FAA discussed the necessary acquisition of the Hilton property and Dania Boat Sales, as both would be impacted by the Runway Protection Zone ("RPZ"). (See FEIS at 4-39). Yet, the FAA failed to discuss acquiring the Atlantic Village property, even though a portion of it is located in the RPZ for those alternatives. (See id.). Currently, the Atlantic Village property is valued at $65 million, and has been given the go ahead by both the FAA and Broward County to develop the site into a 4.7

condominium. Yet, the FEIS stated that "[t]he proposed Atlantic Village Marina property is currently vacated, undeveloped land, therefore no acquisition would be necessary." (FEIS at 6.C.111). Moreover, in response to our prior requests that this acquisition and the cost associated with this acquisition be included in the FEIS, the FAA responded, "[l]and uses prohibits from existing, new, relocated, or expanded RPZs are residences and any place of public assembly . . . . For the Atlantic Village Marina property, parking lots or garages and the marina-water itself would be considered compatible within the RPZ." (FEIS at P.4-28 to P.4-29). The FAA then stated that "[t]he developers have proposed that this development will offer residential condominiums and boat slips, however, as of June 2008, no incompatible land uses have been developed on this section of the Atlantic Village parcel that is located within the RPZ for any EIS alternative. Therefore, the acquisition of this parcel is not required." (FEIS at P.4-29). We believe this is incorrect as a matter of Florida and Federal law. 4.7

The FAA has conceded its knowledge that Atlantic Village intends to develop the condominium unit at the site, which is clearly an incompatible land use in an RPZ, yet to support its argument that acquiring Atlantic Village does not need to be factored into the costs or analysis for the alternatives, the FAA relies on the notion that perhaps the portion of the Atlantic Village that is in the RPZ will not be the actual condominium units. This is disingenuous and misleading. The Atlantic Village Marina will inevitably have to be acquired if the FAA selects the B1, B1b, B1c, or D1 Alternatives. The costs associated with this acquisition should be factored into the costs of each alternative to ensure disclosure of the actual amount of taxpayer's money that will be used to implement the project. 4.7

The cost of acquiring the Atlantic Marina Village should have been factored into the analysis because a portion of the property will be in the RPZ for Alternatives B1, B1b, B1c, or D1. The RPZ is a part of the actual project and goes to the purpose and need of the project, i.e., to provide sufficient capacity at the Airport to meet projected demand through 2020 by expanding runways. This is vastly different from including the costs to relocate affected ground facilities in the north runway into the cost determination for the north runway alternatives (Alternatives C1 and D2). Because relocating affected ground facilities does not address the purpose and need of the project (which the FAA has asserted is the expansion of runways), the relocation of facilities should not be included as part of the action alternatives, but rather should be addressed in either the discussion of cumulative impacts from the proposed project or as mitigation for adverse impacts of each alternative. After we made comments to this effect in response to the Draft EIS, the FAA implicitly acknowledged that the proper place for a discussion of the relocation of facilities would be in the cumulative impacts analysis stating, "[t]he relocation of these facilities, whether on- or off airport, would occur as a result of implementing the alternative(s). Therefore, because the Alternatives trigger the relocation and are interdependent parts of the runway expansion, they are considered 'connected actions' within the meaning of Council on Environmental Quality's National Environmental Policy Act regulations." (FEIS at P.4-5 to P.4-6). Despite its own statements to the contrary, the FAA continues to discuss such relocation as a component of the alternative; wrongfully including cost considerations for such relocation into the cost of the alternatives themselves. 4.7

IV. Environmental Impacts Discussion

The FEIS spent some time discussing the environmental impacts associated with the various alternatives. Before getting into the various deficiencies found in that discussion, it is imperative that we comment on the FAA's chosen "Study Area" and "Detailed Study Area." According to the FEIS, "[t]he Study Area boundary was developed using a composite of the projected future 60 Day-Night Average Sound Level (DNL) noise contours obtained from previous airport studies for years 2008, 2012, and 2020. A buffer area was then added to allow for potential future growth in the 60 DNL noise contour off the crosswind runway and to include the Seminole Indian Reservation." (FEIS at 5.A-4). The FAA's use of the 60 DNL to define the affected areas failed to take into account many areas still affected by development. The remainder of our comments regarding the environmental impacts discussion in the FEIS are as follows. 5.0

A. Air Quality Impacts Discussion

The FAA also continued to provide that all the runway development alternatives result in a net reduction in emissions when compared to the No Action Alternative, because of an alleged reduction in aircraft queue delay and average taxi time that varies with each runway development alternative. (FEIS at 6.B-7). This statement appears premised on the incorrect assumption that air traffic will either be the same under the No Action Alternative and any of the runway development alternatives, or that air traffic will actually increase if the No Action Alternative is selected. This statement also appears to have ignored the basic premise that both aircraft traffic and emissions will increase as a result of an extended runway. Based on these two misconstrued concepts, the FAA predicted aircraft emissions under the Proposed Project and the FAA's Preferred Alternative will actually be less than emissions under the No Action Alternative. If the No Action Alternative's operations are capped or level off once delays reach an average of 20-minutes per operation, as the FAA's guidance suggests, then there will actually be fewer operations at the Airport under the No Action Alternative when compared to any of the action alternatives, which means that the action alternatives must result in more air emissions. This capping off or leveling off of traffic is something the FAA should have considered, but did not. 7.6

Moreover, there is little doubt that, over time, the number of aircraft operations, when considering the additional capacity provided under either the Proposed Project or the FAA's Preferred Alternative, will far exceed any estimate or projection of aircraft operations under the No Action Alternative as flights are diverted form the Airport to avoid delay. These incorrect assumptions to the contrary pervaded the FAA's analysis of air quality impacts and result in an inaccurate and incomplete picture of potential aircraft emissions that will result from implementation of any of the action alternatives. 7.6

Notably, when discussing air quality impacts caused by the different alternatives, the FEIS provided information relating to emissions in 2012, but only provided emissions in 2020 for Alternatives D1 and D2, because "[t]he full build-out and implementation [of these Alternatives] would occur by 2020[.]" (FEIS at 6.B-29, 6.B-32). The FAA's decision not to provide emissions data for emissions from 2020 for all the alternatives further showcases the error in the FAA's assumption that increased capacity will not impact air traffic at the Airport. Under this assumption, the FAA likely viewed including the 2020 data for all the alternatives as repetitive, because in its opinion traffic will not have increased at the Airport from 2012 to 2020. 7.7

Even if this is the assumption the FAA is working on, however, the emissions data for each alternative may be different from 2012 to 2020, because – as discussed earlier in this Letter – many of the build alternatives will not be completed until 2013 or 2014. Assuming, instead, that air traffic would increase as a result of the increased capacity at the Airport, surely the emissions levels at the Airport in 2020 under any of the build-alternatives would be greater than the emissions under a 2020 No Action Alternative scenario. Yet, this was not acknowledged or explained in any way in the FEIS. 7.7

The FEIS also concluded that the "annual number of motor vehicles in parking lots, on roadways, and the annual fuel used by stationary sources of emissions would also be the same as the 2012 Alternative A (No Action)" for either the Proposed Project or the FAA's Preferred Alternative. (FEIS at 6.B-19, 6.B-21). This conclusion also seems to have been based on a presumption that air traffic will be the same whether or not the South Runway is extended. If air traffic increases – and it certainly will if the South Runway is extended under either the Proposed Project or the FAA's Preferred Alternative – more people will frequent the Airport, resulting in more motor vehicles in the parking lot of the Airport, and more motor vehicles on the roadways going to and from the Airport. Because the FAA chose to ignore the commonsense result, i.e, from more capacity, increased operations follow, emissions from motor vehicles in and around the Airport (and from increased aircraft using the Airport) were not accounted for in the FEIS. Perhaps if these emissions were accounted for, it would become apparent that overall emissions (and aircraft emissions by themselves) will be greater if either the Proposed Action or the FAA's Preferred Alternative is implemented than if no action is taken. 7.8

The FAA also failed to use the most recent available data in determining the future air emissions that will result from the various alternatives. For instance, in the dispersion modeling of criteria pollutants, the FEIS provided that "one full year of the real-time weather data from 2003 was applied to dispersion modeling to reflect worst case scenario concentrations." (FEIS at 6.B-43). Yet, 2003 data is five years old, and the FAA did not bother explaining why the FAA selected a timeframe from five years ago. Another more disturbing example can be found in the FAA's decision to use data from 2005 as a baseline for the dispersion analysis. This is particularly bothersome because 2005 was the year with the highest number of operations ever at the Airport – 2005 had 10% more operations than any other year before or since. Because the number of operations at the Airport in 2005 appears to be an anomaly, these levels cannot possibly be representative of 2007 conditions, as was claimed by the FAA in the FEIS. (See FEIS at P.7-15 (FAA "believes the data presented in the EIS is representative of 2007 conditions"). At a minimum, the FAA should explain this glaring inconsistency. Yet, we believe the FAA should have used the most current background concentration levels that can be derived from monitoring data maintained by Broward County Department of Environmental Protection. (See FEIS at G.1-47 to G.1-49). Surely the monitoring data from at least 2006 was available and could have been used by the FAA in its analysis. 7.9

Moreover, despite our request, the FAA has refused to conduct a dispersion analysis for Hazardous Air Pollutants ("HAPs") because of the "many scientific uncertainties and lack of established standards and methodologies," and because it is not required by the Clean Air Act ("CAA")." (FEIS at P.7-2). We believe that the FAA should have conducted such an analysis as it would have been beneficial to the environmental evaluation. The FAA also refused to conduct 7.1

an analysis of soot impacts and jet fuel impacts from aircraft flying overhead. Specifically, the FAA claimed that it had conducted such an analysis at many airports across the country "with the uniform result that samples collected on or near the airport bore little chemical resemblance to either unburned jet fuel or soot from jet exhaust. Instead, the collected material was found to be chemically similar to general urban pollution, particles from burning heavy fuels, and motor vehicle exhaust. As such, the FAA concluded that soot and oily deposits in communities near Fort Lauderdale are primary due to non-Airport sources." (FEIS at P.7-17). (This is news to the thousands of residents who find soot and oily sheens on their cars when they are parked at their homes near the Airport, but not when their cars are parked somewhere else.). 7.10

The FAA then jumped to the conclusion that soot in neighborhoods surrounding the Airport was not caused by aircraft flying overhead without any analysis of the actual soot in the neighboring communities. Simply because communities surrounding other airports do not have soot from those airports does not lead to the conclusion, without any independent analysis, that soot in neighborhoods surrounding FLL is not caused by aircraft flying overhead. This would be like saying that because there are no noise impacts to parks surrounding various airports throughout the country, there is no noise impact to parks surrounding FLL from the proposed project. Impacts caused by other similar projects cannot be extrapolated to determine whether or not there are impacts in this instance. 7.10

B. Noise Impacts Discussion

As with most parts of the FEIS, the analysis of noise impacts is deficient. This is true in several ways. First, as with air pollution impacts, the noise impacts of the No Action Alternative are exaggerated compared to the action alternatives because there will be fewer flights with higher levels of delay. By increasing capacity, the FAA is increasing the number of operations, and hence increasing noise impacts. If you build it (more runways), they will come (more flights). 8.2

Second, our comments regarding the use of the 2005 baseline in the air quality impacts discussion are equally applicable here, as the noise impacts analysis also uses 2005 as its baseline year for comparison purposes. (FEIS at 5.C-1). Besides the comments made in the air quality impacts discussion regarding using 2005 as the baseline, using the 2005 baseline also means noise estimates did not take into account use of Performance-Based Navigation ("PBN") techniques such as Area Navigation ("RNAV") and Required Navigation Performance ("RNP"), which were authorized by FAA at the Airport in Fiscal Year 2006. This has a significant impact on the FEIS's assessment of noise impacts because the FAA has explained that these PBN procedures benefit the environment by reducing the effect of aircraft noise and emissions. There is no indication that the noise modeling in the FEIS for the various alternatives took into account any of these PBN procedures, either, which suggests that the noise modeling associates with those various runway expansion alternatives was similarly faulty. 8.3

Using 2005 as a baseline has the effect of overstating current noise levels at the Airport, which subsequently has the effect of understating the actual increases in noise that result from various alternatives. For instance, the use of the 2005 baseline is directly tied to the determination that no significant noise analysis needed to occur in noise-sensitive areas. The 8.4

FEIS pointed out that "[a] significant noise analysis would occur if analysis indicates that the proposed action would cause noise-sensitive areas to experience an increase in noise of DNL 1.5 dB or more[.]" (FEIS at 6.C-51). By using a baseline year – 2005 – where noise levels were particularly high, the FAA set it up so that it was less likely that a significant noise analysis would occur. In other words, if, under any year besides 2005, the proposed project would cause an increase of 2 dB, by using the 2005 data, the increase is not as great because the 2005 numbers start out higher. Instead of picking an anomalous year such as 2005, the EIS should have used data from the most recent year for which there is data available – either 2007 or 2006 – to have ensured current conditions were more accurately reflected. Although the FAA claimed that the 2005 data was used "because it was the most recent data available that would reflect current conditions," (FEIS at P.8-6 to P.8-7), we question this statement – as it is now 2008, and surely, at a minimum, 2006 data is available for use. Other deficiencies in the noise analysis will be discussed in greater detail as follows. 8.4

1. **DNL Contour**

The FEIS also focused on high DNL noise contours in its analysis. Specifically, the FEIS analyzed aircraft noise impacts in areas located within the 65+ DNL noise contour for the No Action Alternative. Although DNL is an appropriate measure of noise impacts and is prescribed in various FAA Orders and United States Environmental Protection Agency ("EPA") Guidelines for Noise Impacts Analysis, it is by no means the only appropriate measure of noise impacts. It is also clearly not the most inclusive measure of noise impacts. The DNL contour does not take into account loudness, the number of events, the time of day of the event, or seasonal differences as a relative factor in the average day/condition. Moreover, because 65 DNL is based on a measure of human noise interference, it is simply not relevant to an evaluation of thee impacts of noise on wildlife. Also, single or sporadic noise events involving high levels of noise are as annoying or disruptive as persistent, but lower, noise levels, and the DNL contour does not account for these. 8.5

Moreover, reliance on the 65+ DNL contour does not comport with contemporary scientific thinking. To the extent we have previously discussed this in prior comments; we specifically reincorporate all those comments herein. Noise experts increasingly recognize the importance of using a DNL of 55-57 in residential areas. A recent article, cited in a prior comment letter, indicated that children exposed to differences in noise exposure of between 50 DNL and 60 DNL show measureable physiological differences when compared with children who had not experienced this same exposure. The lack of lower threshold noise contours will lead to the underestimation of impacts to Dania Beach residents. The FEIS identified the number of residential housing units, the total population, and the number of noise sensitive public facilities exposed to a 60 to 65 DNL as a result of each alternative. Yet, the FAA provided such information with the caveat that, "[t]he identified land uses between the 60-65 DNL noise contours are considered compatible by FAA . . . . The disclosure of land uses between the 60-65 DNL noise contours is provided for local planning purposes only." (FEIS at 6.C-10). Perhaps the FAA did not want to consider the population impacted by the 60-65 DNL exposure in its analysis because the numbers of people and facilities impacted jump dramatically if one looks at the 60-65 DNL when compared with the 65-70 DNL. For instance, according to the FEIS, in 2012 under the B1b Alternative, 8,297 people will be exposed to a DNL of between 60 to 65 8.6

while only 1,590 (approximately 80% less than those exposed to the 60-65 DNL) people will be exposed to a DNL of between 65 to 70. (FEIS at 6.C-23).

Even though the FAA mentioned other metrics in the FEIS, the only metric used for actual evaluation purposes is the DNL contour; other metrics were not discussed in a usable way. The FEIS made a weak attempt to "employ" metrics besides DNL when it discussed noise levels in terms of SEL, Lmax, LEQ and TA, but the FAA did not bother to uses these numbers in its analysis of noise impacts. In other words, the FEIS did not conduct any modeling to determine SEL, Lmax, LEQ, or TA levels in the pertinent years (2012 or 2020) for the various alternatives; did not graphically depict these contours anywhere in the FEIS; and did not even both spending any time looking at these metrics in the substance of the FEIS itself, relegating their discussion to an Appendix to the FEIS. (See FEIS at H-2, H.1-4 to H.1-7). 8.6

What little data was provided in the FEIS from metrics other than the DNL contour further indicates how using 65+ DNL as the standard ends up leaving out areas that are severely impacted by a proposed project. For instance, even though under the 65+ DNL contour, the John U. Lloyd State Park may not be severely impacted by the Proposed Project, Single Event Levels there reach as high as 95 dB. For residents attempting to enjoy a peaceful day at the park, a jolt of 95 dB, even if not persistent, will surely ruin the park's beautiful natural setting. 8.6

2. **Noise Impacts Caused by Elevated Runway**

Several of the build alternatives (B1, B1b, B1c, and D1), including the Proposed Project (B1c) and the FAA's Preferred Alternative (B1b) contemplate building an elevated runway over U.S. 1 and the FEC Railroad. Yet, the noise impacts specifically from this elevated runway were not discussed in the FEIS. The elevated runway will increase the impact of sideline noise on residents to the south. Moreover, any ground noise attenuation that occurs will be diminished as a result of the elevated runway. The algorithms used in the noise modeling assumed that the ground absorbs a significant portion of the total source noise as aircraft land and takeoff. But, any of the alternatives that contemplate an elevated runway would result in Runway 9R/27L being increased from 6 to 8 feet above mean sea level ("MSL") to between 20 and 37.5 feet above MSL. Yet, neither of these two impacts was mentioned or analyzed in the FEIS, and the computer modeling used did not appear to account for the increasing elevation of the noise source over the length of the runway. 8.7

The Aviation Greenbelt currently acts as a buffer to attenuate aircraft noise through a shielding effect. The FEIS discussed the Greenbelt's current effectiveness, (FEIS at 6.C-55), and acknowledged that under the Proposed Project "the redevelopment runway elevation would be higher than the noise berm, [and therefore] the berm could have little to no effect on noise from aircraft operations." (FEIS at 6.C-56). But, the FEIS failed to quantify these noise increases or to discuss the impacts that residents currently benefiting from the buffer the Greenbelt provides will feel. The FEIS should have informed the citizens currently protected by the buffer of the large increase in noise that they will inevitably have to endure as a result of the Proposed Project (or any of the alternatives that contemplate building an elevated runway). Such information is crucial for the thousands of citizens in and around the Airport, who already are haunted by noise on a daily basis and who will wake up to large increases in their daily noise levels if the elevated 8.8

runway is constructed, as the elevated runway will cancel out the effectiveness of the Greenbelt's buffer. It is not reasonable for the FAA and Broward County to construct a berm under the Master Plan process to help attenuate aircraft noise and then to undermine is effectiveness through an elevated runway.

3. Other Deficiencies in the Noise Impacts Discussion

The FEIS also ignored vibration effects caused by low-frequency or "C-weighted" aircraft noise. The problem with vibration is that increasing the use of runway 9R/27L will increase the shaking of the windows, which now apparently is already caused by some aircraft. The FEIS failed to evaluate nighttime impacts exclusively, and did not provide additional contour maps to reflect impacts solely from nighttime flying. This information should have been included in the FEIS, especially considering the potential and inevitable unrestricted use of Runway 9R/27L. 8.9

Despite dedicating an entire comment letter to this issue, the FEIS still failed to analyze the significant potential adverse health effects from airport noise. We specifically incorporate our January 31, 2008 comment letter into this letter. As discussed in our letter, recent scientific studies indicated a significant potential for adverse health effects caused by airport noise. These studies implicated noise as a factor in producing adverse health effects like hypertension and heart disease. Certain studies have positively linked road traffic noise and heart attacks among men while other studies link exposure to aircraft noise to increased hypertension and increase use of medication for related cardiovascular diseases. Studies also suggested that long-term exposure to airport noise may cause poorly modulated emotional responses, thereby increasing the risk of hypertension and related cardiovascular diseases. The FAA did not, however, respond in any way to our comments and failed to discuss the potential negative health impacts associated with airport noise in the FEIS. 8.9

Finally, the noise analysis operated under the false assumption that "2012 future condition represents the year of anticipated project implementation and, therefore, was used to analyze noise impacts for the No Build/No Action and alternative development conditions, including the Sponsor's Proposed Project." (FEIS at H-1). Yet, as was discussed, earlier in this letter, the prediction for construction completion date is currently 2014 for alternatives B1, B1b or B1c if "BCAD commence[s] the procurement process during the 4th quarter of 2008[,]" with a *possible* solution that might result in the project being completed in 2012. (FEIS at E-76). The same type of construction completion analysis is performed for the other runway development alternatives as well. (See FEIS at E-79 to E-83). Because the project is unlikely to be completed by 2012, the FAA should have expanded its noise analysis (and the analysis of all impacts discussed in the FEIS) to a year when it is guaranteed the project will be complete. 8.10

C. Impacts to § 4(f) Properties

Under § 4(f) of the Department of Transportation Act, 49 U.S.C. § 303, Congress declared that it was the policy of the United States government "that special effort should be made to preserve the natural beauty of the countryside and public park and recreation lands, wildlife and waterfowl refuges, and historic sites." (Id.). Section 4(f) allowed the Secretary of

the Department of Transportation to approve a transportation project that used publicly owned parks *"only if"* – (1) there is no prudent and feasible alternative to using that land; and (2) the program or project includes all possible planning to minimize harm to the park, recreation area, wildlife and waterfowl refuge, or historic site resulting from the use." 49 U.S.C. § 303(c). The FEIS stated that there were no parks within the Study Area that will be "used" by the Proposed Project.

Yet, there are several parks within the Study Area, at least one of which – Brooks Park – will be physically used by the Sponsor's Proposed Project and the FAA's Preferred Alternative. Brooks Park is located directly in the path of the proposed runway expansion. In draft EIS's, the FAA acknowledged that Brooks Park was zoned as a park until 1997, when it was acquired by Broward County and rezoned for transportation purposes. (See February 2002 Supplemental Draft Environmental Impact Statement for the Proposed Expansion of Runway 9R-27L at the Airport ("SDEIS") at 5-54; Second Supplement to the Draft Environmental Impact Statement on the Proposed Expansion of the South Runway (Runway 9R/27L) at the Airport ("SSDEIS")). 9.1

The FEIS also indicated that implementing the Sponsor's Proposed Action or the FAA's Preferred Alternative would result in noise levels at John U. Lloyd State Park and West Lake Park increasing significantly when compared to the No Action Alternative (or under Alternative C1). The significance of this increase is even greater when one considers the following: 1) as discussed in the noise impacts discussion section of this Letter, the No Action Alternative for noise levels already overstates operations at the Airport as it is using 2005 as the baseline year, and the actual contours under the No Action Alternative should be lower; and 2) the discussion of noise impacts does not show noise contours after 2020, when operations at the Airport will be even higher, and thus, the noise will be greater. 9.1

Moreover, under the Proposed Project, almost all of Lloyd Park is projected to be covered under the 60 DNL noise contour through 2020. (*See* FEIS at Exhibits 6.C.1-7). Similarly, West Lake Park, which is completely outside of the 65 DNL contour under the No Action Alternative, will have a large section subject to those noise levels under the Proposed Action, with an even larger area subject to the 60 DNL noise contour in 2020. Moreover, because the FAA already has forecasted that aircraft operations will be much higher in 2030 than 2020, there would be much higher DNL contours over these areas. (The FEIS fails to show these higher contours, making it impossible for the FAA to determine if a constructive use of these parks will occur as a result of the runway expansion project.). Even the noise levels shown in the FEIS will severely undermine the values for which these two parks are used. Despite these obvious impacts, the FEIS concluded that "[n]o direct or constructive use of any Section 4(f) resources would result from any of the runway development alternatives." (FEIS at 6.D-9). The FEIS's conclusion that the Proposed Project will not constructively use local parks under § 4(f) of the Department of Transportation Act was seriously flawed. To ensure a more accurate determination as to § 4(f) coverage and to ensure that the public had a complete picture of how the Proposed Project will affect the parks surrounding the Airport, the FAA should have analyzed the amount of time that aircraft will be audible above background – not just above 65 dBA – in all areas of these parks. For instance, people enjoying the nature trail in Lloyd Park should know how many times they will hear jets flying overhead during their visit. 9.1

Notably, all of the 36 points outside the 65+ DNL contour indicate that some time each day noise levels at these points are above 65 dB. Several points are even predicted to exceed 65 dB for over an hour each day. If similar deviations occur within the parks, they will likely have significant ecological impacts, especially on nesting animals. They also would be temporary uses of the parks. Yet, these additional noise metrics were not –but should have been – modeled for local parks and evaluated in the FEIS.

Finally, because the Proposed Project will inevitably "use" parks – Brooks Park, at a minimum – the FEIS should have provided detailed analysis as to why various alternatives that do not "use" these beautiful natural settings are not prudent and feasible under § 4(f). As explained by the FAA itself, "[t]o meet Section 4(f) needs, an EIS must explain why a rejected alternative presents unique problems or explain the cost to carry out the action or its resultant community disruption is extraordinary." (FAA Order 5050.4B at ¶ 1007e(5)(b)). Yet, the FEIS fails to do this. 9.2

D. **Wetland Impacts Discussion**

In analyzing the impacts that the various alternatives will have to wetlands, the FAA failed to select the least environmentally damaging practicable alternative as its Preferred Alternative. All of the alternatives evaluated in detail in the FEIS meet the project's stated purpose and need. (See FEIS at ES-15). As such, the question then becomes which alternative is the least environmentally damaging practicable alternative. Based on pure numbers identified in the FEIS, the B4 Alternative impacts the least amount of wetlands, impacting only .13 acres. The D1 Alternative, on the other hand, impacts 21.87 acres of wetlands – the most of any of the alternatives. (See FEIS at 6.E-36). The B1b/B1c Alternatives impact 15.41 acres of wetlands while the C1 Alternative impacts 15.40 acres. (See id.). Just based on these numbers alone, Alternatives B1 (15.17), C1 (15.40), and B4 (.13) have less impacts to wetlands than the B1b/B1c Alternatives. 15.13

Yet, for some unexplained reason, the FAA chose the more environmentally damaging B1b Alternative as its Preferred Alternative. But, looking at the amount of impacts simply in quantitative terms does not provide a true assessment of the environmental damage caused by each alternative. In its comments on the Draft EIS, the U.S. Army Corps of Engineers ("Corps") noted that "Alternative C1 . . . results in 15.4 acres of impacts *that are almost entirely to very low quality exotic impacted wetlands* (11.54 acres), which are only partially jurisdictional, or tree farms (3.72 acres) with no impacts to mangroves." (FEIS at P.10-12).

Although the FEIS described the types of wetlands impacted and numerically identifies the wetlands when discussing impacts to wetlands from each alternative, the FEIS did not bother explaining in detail the quality of wetlands that each alternative will impact. The FAA should have discussed not simply the quantitative impacts to wetlands that will occur as a result of each alternative, but also the qualitative impacts to ensure the decisionmaker could properly determine the least environmentally damaging practicable alternative. For instance, simply stating that Alternative C1 will result in 15.4 acres of impacts to wetlands without explaining the relatively low value wetlands that will be impacted under C1 gives the false impression that Alternative C1 is more environmentally damaging than it is in reality. Moreover, simply stating that "[t]he 10.1

FAA's Preferred Alternative would directly impact 15.41 acres of wetlands" (EIS at 8-16) does not provide a complete assessment as to the wetlands that will be impacted by that alternative. The FAA should have discussed the low quality wetlands that C1 will impact and contrasted them with the quality of the wetlands that will be impacted under the B1b/B1c Alternatives. By doing so, one could have easily seen that the C1 Alternative is a less damaging practicable alternative than either the B1b or B1c Alternatives.

Even quantitatively, however, the statement as to the amount of impact from the C1 Alternative is misleading. None of the wetland impacts from Alternative C1, 15.40 acres, are due to construction of the north runway or associated navigational aids. Rather, the impacts derive from discretionary facility relocations that the FEIS claims will have to occur in wetlands for the C1 Alternative to be implemented. (See FEIS at 6.E-34). By definition, any facility moved east of U.S. 1 need not have access to airside facilities, since this area will not be able to directly access the airfield without crossing a major public road. All of the facilities located east of U.S. 1 could just as easily be moved to airport property west of I-95, where wetlands would not be affected, or to some other nearby location. The local Sponsor appears to have rigged its design of facility relocation to show – falsely – wetland impacts in the C-1 Alternative. The FEIS itself acknowledges the ability to move most of the facilities to the west side of the airport when it stated as follows. 10.2

> The proposed development of Runway 8/26 and its associated taxiway system would have a direct permanent impact on existing on-airport facilities, primarily those on the north airfield. Approximately 90 percent of those facilities require airside access. ***A majority of the facilities could be relocated to the west side of the airfield and maintain functionality.*** Facilities could also be relocated south of Runway 9R/27L or north of Runway 8/26. Those facilities that do not require airside access could be relocated to other on-airport sites that are not contiguous to the airfield as configured under Alternative C1. This includes areas east of U.S. Highway 1 and west of Interstate-95.

(FEIS at 4-51). The FEIS then provides that, "[a]pproximately 40 percent of the existing tenant leasehold facilities on the west side of the airfield do not require airside access. Relocating those facilities to their non-contiguous areas of [the Airport] would be possible." (FEIS at 4-51). Despite the Sponsor's attempt to lock in tenants into long-term leases at these north runway facilities to prevent the implementation of the North Runway Alternative, these impacts are not, however, fait accompli. The facilities do not have to be relocated into the wetland areas; as there are other areas in and around the north runway where the facilities could be relocated and wetland impacts could be avoided altogether. Yet, the FAA did not acknowledge or discuss this anywhere in the FEIS.

When assessing secondary wetland impacts, the FEIS stated that because "Broward County will prepare a permit only for the wetland impacts resulting from the implementation of the proposed action[,] . . . secondary impacts were determined only for the FAA's Preferred

Alternative." (FEIS at 6.E-36). This statement not only alludes to how the FAA has predetermined its chosen alternative before the environmental process is completed, but also indicates the FAA's assumption that the Corps will determine that the FAA's Preferred Alternative is the only way to go, and thus, only secondary wetland impacts for it must be reviewed. But, as discussed above, the B1b/B1c alternatives are not likely to be the least environmentally practicable alternative that meets the project's purpose and need. As such and because no decision has yet been officially made, the FAA should have analyzed secondary wetland impacts for *all* possible alternatives, not just the alternative it is predestined to choose. Even with this limited analysis in mind, the only discussion of secondary impacts found in the FEIS was a notation in the discussion of the FAA's Preferred Alternative that it would impact "1.42 acres of secondary wetland impacts." (FEIS at 8-46). The FAA did not discuss or analyze the types of secondary impacts that would occur, which wetlands would experience these impacts, the extent of the impacts, or the quality of the wetlands impacted. The FAA should have spent more time discussing the secondary wetland impacts not just from the FAA's Preferred Alternative, but also from other alternatives evaluated in the FEIS.

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E. Socioeconomic/Secondary Impacts Discussions

The FEIS concluded that implementation of any of the runway build alternatives will have "[n]o significant socioeconomic impacts[.]" (FEIS at 6.H-5 to 6.H-8). This suggestion is not valid and contradicts some of the FAA's own statements. For example, the FEIS acknowledged the need to provide a runway protection zone (RPZ) to the southwest of runway 9R/27L under the Proposed Project (or the FAA's Preferred Alternative). Yet, the FAA failed to acknowledge that this need is already stalling a proposed $50 million+ hotel development. Moreover, the need to provide a RPZ east of the extended runway will constrain development of proposed port facilities. Indeed, the noise and pollution impacts associated with the extended runway if the Sponsor's Proposed Project/FAA's Preferred Alternative is implemented will so negatively affect some of Dania Beach's residents and businesses that they may need to be relocated.

13.4

The FEIS also fails to have any meaningful discussion of security issues associated with building a major runway over U.S. 1 and the FEC Railway. As we have indicated in previous comment letters, addressing the security situation could result in major socioeconomic impacts, such as closing U.S. 1 to traffic following a terrorist event. It is appalling that the FAA has not considered this issue. The FAA also fails to acknowledge or to discuss the negative impact that aircraft overflight may have on property values or the quality of life in the community around the Airport. The FEIS should have discussed this, along with the potential for broad shifting of residential areas around the Airport to commercial or industrial uses.

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When discussing secondary impacts from the Proposed Project, the FAA failed to discuss how the Proposed Project will definitely change the development pattern around the Airport. Clearly, expanding the Airport will affect this pattern. At a minimum, the development pattern will be affected by the RPZ. Yet, the FAA did not discuss this when analyzing secondary impacts from the various alternatives requiring the RPZ be built. Moreover, the FAA boldly concluded that "[n]o residential acquisition or relocation, or significant commercial/business acquisition or relocation, would occur with the implementation of any of the runway

13.4

development alternatives." (FEIS at 6.H-25). The FAA reached this conclusion despite its earlier discussion of the need to acquire the Hilton and portion of the Dania Boat Sales to implement the B1b/B1c Alternatives. Not to mention the fact that other development projects in the area clearly would need to be halted. In view of this context, the FAA's statements regarding acquisition and relocation are confusing and contradictory. These conclusions are also puzzling considering that the FAA evaluated noise impacts only through 2020. As the worst impacts will occur the furthest away from the project being completed, additional relocation and acquisition will likely occur after 2020 that is not considered anywhere in the FEIS.

13.4

Moreover, in the FEIS, the FAA referenced information it used from a study conducted by Broward County on the economic impact the Airport had on the local and regional economy in 2002. (FEIS at 5.H-9). Yet, the FAA never explained why a study from six years ago was reviewed or what the significance of 2002 to the current economy in Broward County was. When estimating the direct economic impact of the airport on primary service region in 2002, the FEIS stated that, "[t]he 58 percent increase in economic impact between 1997 and 2002 was attributed to the 40 percent increase in the number of enplaned passengers over that period, as well as increases resulting from inflation." (FEIS at 5.H-14). The FAA, however, should have used information from a more recent year to estimate economic impacts today. These numbers clearly do not reflect the current trend in the airline industry to cut back operations and the reduction in enplaned passengers that has occurred recently as a result of increasing fares due in large part to the large increases in gas prices. By using 2002 numbers, the FAA inflated the economic impact from the Proposed Project.

13.7

Finally, the FEIS focused only on positive economic impacts caused by the expansion, e.g., increased use of hotels and restaurants around the Airport, potential for increased jobs. (FEIS at 5.H-12). Yet, the FAA failed to discuss other realistic economic impacts from the expansion that may not be as positive. For instance, the negative effect that airplane overflights will have on property values in the surrounding communities is not discussed. Another example of negative impacts not discussed in the FEIS is the impact caused by the loss of jobs in Dania Beach because businesses may have to shut down or relocate, e.g., the Hilton. The FAA's job in creating the FEIS is to provide a complete picture of both the positives and *negatives* associated with the proposed project. Yet, it appears the FAA has attempted to discuss the Airport's expansion through rose colored glasses, and as such, has left out various negative impacts from the discussion.

13.7

F. Cumulative Impacts Discussion

As a preliminary matter, all of the deficiencies that pervade the various discussions of impacts throughout the FEIS also necessarily pervade the cumulative impacts discussion, as these assumptions and errors are simply transferred into the cumulative impacts portion of the FEIS. For example, because the air quality impacts discussion originally discussed in Chapter 6 of the FEIS started with the false assumption that increased capacity would not result in increased operations at the Airport, and thus miraculously, any of the build alternatives would result in *less* emissions at the Airport than the No Action Alternative, any discussion of cumulative air impacts is also inherently flawed. (See FEIS at 7-2).

With this in mind, the cumulative impacts section appears to be more of a summary of impacts discussed in Chapter 6 rather than a true analysis of the impacts from the proposed project when combined with past, present, and foreseeable future actions. The FAA did not specifically discuss cumulative impacts of any particular alternative along with the Airport expansion. Instead, the FAA spoke in general terms, and mostly concluded that because there were no impacts associated with the Proposed Project, there were no cumulative impacts. This conclusion made little sense for two reasons. First, the concept of cumulative contemplated the notion that one of the actions by itself may have little or no impact while the totality of the various actions could result in a substantial impact. Second, as far as at least air pollution is concerned, there are several major sources of air pollution in the area that when combined with the Proposed Project clearly would result in some cumulative impact. These air pollution sources are Port Everglades, the FP&L power line, an incinerator, and I-95. Yet, the FEIS failed to analyze the cumulative impact of these sources along with the proposed project.

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14.3

The cumulative impacts discussion also failed to mention or discuss the cumulative impact of additional gate and terminal expansion that would be needed as a result of the Proposed Project. In discussing its Preferred Alternative, the FAA projected that a total of 67 to 77 gates will be "needed for the projected level of passenger-related activity through 2020." (FEIS at 8-13 to 8-14). (This is only true if demand increases despite delays, when FAA guidance indicates that demands will flatten out with higher delays.). Moreover, in its comments on the January 18, 2006 FAA Agency Milestone Meeting Presentation, the EPA noted that

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> the proposed expansion would not merely involve a runway extension but would also include gate and terminal expansion. This is important from a capacity perspective, 2012 and 2020 forecasting and the air quality analysis (we understand that the current 57 gates could be substantially increased to some 79 gates). As we have indicated in the net meeting and previously for this project, EPA requests consolidation of FLL activities that relate to additional gates and terminal capacities. Such activities are being proposed in separate, past and ongoing EAs (e.g., Concourse A) and should be reasonably consolidated in the pending EIS, preferably as part of the proposed project and P&N, but, at a minimum, in the cumulative impacts section (particularly the air quality analysis).

(FEIS at Appendix A). The FAA merely responded that "[t]hese issues w[ould] all be explained and described in the DEIS documentation." Id. Yet, the FAA failed to discuss the cumulative impact of developing 67 to 77 additional gates at the Airport in the FEIS. The FAA should have included alternatives that limit the number of gates, as a way to limit passenger demand and the need for runway expansions.

14.4

G. Other Environmental Impacts

There are several additional deficiencies throughout the discussion of environmental impacts caused by the various alternatives. In the water quality impacts discussion, the FAA

failed to discuss impacts caused by aircraft emissions of polycyclic aromatic hydrocarbons. The FAA also falsely assumed that stormwater mitigation measures and Best Management Practices will resolve any water quality issue that arises without explaining in detail how these practices and measures will actually resolve issues. (FEIS at 6.E-21 to 6.E-23). The FEIS even failed to calculate water quality impacts caused by induced development off-site from the Airport.

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The FAA also made the absurd statement that there are "no coastal resources, including coral reefs" in the Detailed Study Area (FEIS at ES-24). This argument is particularly confounding when one looks at a map of the Detailed Study Area and sees that the Study Area crosses over the coastline and includes beaches and natural areas. The FAA should have included some discussion in this portion of the FEIS as to what specific coastal resources exist therein and what impacts to these resources will result from implementation of each alternative.

10.5

The FEIS also continued to assert that there were "[n]o significant visual impacts" resulting from implementation of any runway development alternative. (FEIS at ES-28, 6.H-28 to 6.H-29). In response to our comment that Alternatives B1 and B5 would build a runway approximately four stories high running along the northern edge of Dania Beach, causing a visual blight on the residents of the City, the FAA stated that, "[t]he Aviation Greenbelt, landscaping along Griffin Road, and a wall along the south side of Griffin Road act as a buffer between airport property and the residential areas (Melalcuca Gardens) on the south side of Griffin Road." (FEIS at 6.H-32). The FAA further stated that the Aviation Greenbelt is approximately 25-feet high, and "[t]he trees and other landscaping materials extend the height of this berm." (FEIS at P.13-2). Yet, in another portion of the FEIS, the FAA acknowledged that "the redevelopment runway elevation would be higher than the [Aviation Greenbelt]" and the Aviation Greenbelt would not shield nearby residents from noise impacts from the elevated runway. (FEIS at 6.C-56). That the Greenbelt will ensure no visual impacts from the elevated runway, yet will be unable to shield noise impacts caused by the elevated runway should have been explained in the FEIS.

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Finally, the FEIS stated that "[p]otentially suitable nesting habitat for the Florida burrowing owl (*Athene cunicularia*), a state species of special concern, is present on-airport. The Florida burrowing owl was formerly reported to be nesting in open grassy areas associated with the runways at FLL. During field surveys conducted in November 2004, no evidence of burrowing owls or their burrows was observed within the airshed." (FEIS at 5.F-14). It is unclear from this statement how many field studies were conducted and how November 2004 was selected as the time to survey for burrowing owls. The FEIS should explain what time of day the survey(s) were conducted, because the optimal time of day to look for burrowing owls is after daybreak and again before nightfall. If the surveys were not conducted during those times, it is possible that burrowing owls are on the property, but were not seen in the survey conducted.

11.1

V. Net Benefits Analysis

The Net Benefits Analysis, found in Appendix F of the FEIS, contains the economic justification for the proposed Airport expansion. This analysis has not changed materially since the Draft EIS. The City of Dania Beach drafted a comment letter directly addressing the deficiencies found in Appendix F of the Draft EIS. We incorporate those comments in their

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entirety in this Letter, as the FAA has failed to address or remedy any of the problems with the Net Benefits Analysis in the FEIS. 16.0

The FAA tried to avoid having to comply with various FAA guidance by stating that this Appendix is "not intended to be a 'benefit/cost analysis' but was used to calculate the operational benefit of each alternative." (FEIS at P.16-1). But, simply calculating the operational benefit of each alternative does not mean that general principles espoused in FAA guidance dealing with Benefit/Cost Analyses are not applicable here. If the FAA felt the scientific principles discussed in the applicable guidance and mentioned in our prior letter were not applicable, the FAA should have further explained this conclusion. For instance, simply stating that the FAA does not agree with Dania Beach's assertion that the delay numbers provided in the Net Benefits Analysis are overstated is insufficient. The FAA should have provided in detail its reasoning as to why Dania Beach is incorrect in its statement. 16.1

Moreover, when responding to our request to include discussions of induced demand, the FAA stated that it did not include discussions of induced demand "due to the variability of condition associated with induced demand." (FEIS at R-3 for LC110, Appendix R). The FEIS, however, should have discussed induced demand in the text of the Net Benefits Analysis in Appendix F, and at a minimum, explained why the phenomenon was not included. By providing this information to the public, it ensures that evaluators of the project will at least have an awareness of such a phenomenon and the potential impact it might have on benefits to and costs of the project. 16.2

Thank you for considering these comments. All items cited to in this letter, besides references to the FEIS itself or FAA Orders, have been attached for your review. Please do not hesitate to call if you would like to discuss this matter further.

Sincerely,

Neal McAliley

cc: Tom Ansbro, Esq.
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