# Statement in Opposition to the Expansion of the Ann Arbor Municipal Airport

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**Position:** I oppose the proposed expansion of the Ann Arbor Municipal Airport as described in the "Preferred Alternative" in the recent draft Environmental Assessment. The changes proposed neither greatly increase safety nor sufficiently enhance the operations of the airport to justify spending taxpayers' money on the proposed changes now.

**Proposal Summary:** The Ann Arbor Municipal Airport (ARB), owned and operated by the City of Ann Arbor, and located in Pittsfield Township, has proposed to improve the airport primarily using federal moneys available through the Airport and Airway Trust Fund. A draft Environmental Assessment (EA) has been prepared which includes as its "Preferred Alternative":

- Shift (150' SW) and extend existing primary Runway 6/24 (currently 3,505-feet long by 75-feet wide and oriented in a northeast/southwest direction, with the northeast end near State Road), resulting in a runway that would be 4,300-feet long by 75-feet wide.
- Shift and extend the parallel taxiway to coincide with the revised Runway 6/24.
- Provide a new taxiway connector to the extended Runway 6 end.
- Provide a new taxiway connector and holding bay to the shifted Runway 24 end.

The stated purpose of the proposed improvements at ARB is to provide facilities that more effectively and efficiently accommodate the *critical aircraft* that presently use the airport, as well as to enhance the operational safety of the airport.

The more specific objectives of the proposed project are to:

1. Enhance interstate commerce by providing sufficient runway length to allow the majority of critical aircraft to operate without weight restrictions.
2. Enhance operational safety by improving the FAA ATCT line-of-sight issues.
3. Enhance operational safety in low-visibility conditions by providing a clear 34:1approach surface to Runway 24, over State Road.
4. Reduce the occurrence of runway overrun incidents by small category A-I aircraft (local objective).
5. Relocate and potentially upgrade the Runway 24 Approach Light System.-

## Analysis:

**Objective 1:** The "critical aircraft" is defined by the FAA as the most demanding aircraft-type that performs a minimum of 500 annual operations at a particular airport. It is simply an airport design classification, and does not relate to whether those aircraft is "critical" to the accomplishment of any objective, such as balancing the ARB budget. AvFuel Corporation, a nationwide supplier of aviation fuels and aviation support services, is headquartered in Ann Arbor and bases its B-II Large category Cessna Citation 560 Excel Jet at ARB. AvFuel Corporation conducted 211 operations (each takeoff or landing counts as an "operation") at ARB in 2007 and 223 in 2008. The remainder of the critical aircraft operations at the airport are distributed among many other aircraft, with no other one being a dominant user.

ARB's "airport reference code" according to the Federal Aviation Administration (FAA) is "B-II Small Aircraft", which essentially means that it is designed for aircraft which have runway

approach speeds between 91 and 120 knots, wingspans between 49- and 79-feet, and maximum certificated takeoff weights of 12,500 lbs or less. The improvements in the Preferred Alternative would not change this classification.

Matthew Kulhanek, the Fleet and Facilities Manager at ARB, said that because there would not be a change in the airport classification from "B-II Small Aircraft" and because of insurance policy restrictions on where an insured aircraft can land without negating coverage, few, if any, larger aircraft would be attracted to ARB. The EA also forecast little increase in critical aircraft operations from the total estimated 586 in 2009 to an estimated 714 in 2030.

The theoretical effect of the length of runway is that under certain atmospheric conditions, such as a lack of a headwind (resulting in a longer use of the runway before liftoff at the prescribed air speed than with a head wind) or high temperature (making the air less dense and thus creating less lift for the aircraft), the critical aircraft may not be able to take off with a full load of fuel, if otherwise fully loaded with passengers or cargo.

The EA says, "Development of the primary runway at ARB to the recommended length of 4,300-feet would allow the majority of B-II Small classification aircraft to operate at their optimum capabilities (without weight restrictions). Interstate commerce into and out of a community can be negatively impacted if business aircraft are forced to operate with load restrictions (i.e. reductions in passengers, cargo, and fuel associated with aircraft range) due to lack of suitable runway length."

No such theoretic restrictions have actually been documented, however.

In short, Objective 1 provides little justification for the extension of the runway.

**Objective 2:** The line of sight issue relates to the current tower not being able to see the aircraft at the end of the runway due to obstructions. Shifting the runway 150' to the southwest would alleviate this problem. As nice as that would be, the EA at 2.2.1 says this is not considered hazardous.

By itself, Objective 2 provides little justification for the shift of the runway.

**Objective 3:** The current runway currently requires a 20:1 slope descent on final approach to meet the clearance requirements over State Road and yet touch down on the desired spot on the Runway 24. To avoid this steep of a descent, some pilots simply land a bit further down the runway, leaving them less remaining runway to slow the plane to taxiing speed. The shift of the runway 150' to the southwest would permit a 34:1 slope descent, which translates into a slower touchdown speed, and yet clear the potential obstructions on State Road, even if State Road were to be widened and improved into a 160-180' boulevard as currently contemplated sometime in the future.

The EA says, "This is particularly beneficial when aircraft are operating in low visibility conditions. Provision of a clear 34:1 approach surface would also potentially allow visibility minimums to the Instrument Approach Procedure to Runway 24 to be lowered to 3/4 of a mile, as opposed to the current 1-mile visibility minimum. This would enhance the all-weather capability of the airport (and also interstate commerce) by allowing aircraft to continue to access the airport when weather conditions resulted in visibility dropping below the current 1-mile minimum."

While the widening of State Road might be desirable, the widening of State Road is on no list for current or future funding of road improvements. In addition, widening State Road would not cure the primary traffic problem in the area, that being the bottleneck at Ellsworth to the north and at points between Ellsworth and I 94 during peak traffic periods.

Again, while the shift would be nice (decreasing minimum visibility from 1 mile to ¾ mile, a very minor change), it is not necessary, especially without any widening of State Road imminent.

**Objective 4:** The Frequently Asked Questions states an identified safety related issue at ARB as "unusually high incidence of runway overruns". An overrun is defined as going off the end of the runway on a takeoff or landing.

During the period from 1998 through 2008, there were a total of 8 reported overrun incidents or accidents, plus three unreported incidents, mostly on landings. There were no reported injuries, and with a few exceptions, minor or no damage to the airplanes. Causes were a combination of mechanical failures, wet runways, excessive airspeed and other pilot errors. The greatest damage occurred when (a) a pilot was "fearful" of overrunning the runway and hit a tree on final approach and (2) when a pilot decided to "go around" and not land.

The lengthening of the runway is forecast to reduce the incidents of overruns by 80%. About 1 overrun per year does not appear to be an "unusually high incidence", especially with no injuries and minor damage to the planes from those that have occurred.

Again, achieving this objective would be nice, but lends only weak justification for the proposal to lengthen the runway.

**Objective 5:** Enhancing the lighting system would also be a nice thing to do, to bring the lighting system up to the most modern standards.

The EA says, "The airport currently uses an Omni-Directional Approach Lighting System (ODALS) to identify the approach end of Runway 24. The sequentially-flashing strobe lights assist pilots in identifying the runway threshold location and runway centerline alignment in low-visibility conditions. Since the FAA no longer installs ODALS, the current approach light system would potentially be upgraded and replaced with the newer Medium Intensity Approach Lighting System with Sequenced Flashers (MALSF) as part of the relocation. The MALSF would serve the same function as the ODALS, and is structurally very similar."

The current system is not so outdated that it needs to be replaced. However, with the shift of the runway to the SW, at a minimum, the landing lighting system would need to be relocated, so this would be an optimal time to replace the system, as the cost of relocating the existing system could instead be applied to the installation of the new system.

In the absence of a shift, no new lighting system is required.

**Conclusion:** None of the stated objectives individually (or even collectively) is sufficient to justify the spending of public taxpayer dollars now. If State Road is widened in the future, then a shift of the runway to the SW would be appropriate, which would achieve objectives 2, 3 and 5.

But wait, "Isn't this money free, that is, federal money from the Airport and Airway Trust Fund, and if we don't spend it, someone else will?"

97.5% of the estimated $1.3 million cost would come from that fund, and 2.5% from the airport's operating fund. However, we need to take a principled view of this "free" money. Everyone acting as if federal money is free is exactly what has gotten us into the U.S. Congressional "earmark" game, as everyone tries to "get their share", to the point that the whole country suffers from budget deficits and an exploding national debt. If a project is not a good expenditure, it should not matter what the source of the funds are, as ultimately we all are paying the cost. In this case, the shift of the runway 150' SW may be needed in the future, but not now. The extension of the runway might never be justified. We ought not to spend these funds now.

**Other Considerations:**

**Noise:** Some residents might complain about the added noise caused by the extension of the runway. I believe this is a minimal issue. With the planes taking off 150' further SW if the runway end were shifted, Matthew Kulhanek showed charts that indicate that even the slowest planes would typically cross the airport boundary a mere 13' lower than currently on a takeoff from Runway 24. The difference in noise would be minimal. Now, planes landing on an extended Runway 6 would land 945' further to the SW than currently, but planes on landing are much quieter than planes on takeoff with engines full throttle, and thus should not be troublesome.

The EA projects very little growth in total operations at ARP as a result of the runway extension. In fact, airport operations have declined from a high of 134,059 in 1999 to 63,668 in 2008, and are not expected to recover significantly.

Airport noise can be considered a "nuisance" which few people should complain about if they "move to the nuisance". An example of this theory is the "right to farm" legislation where new rural residents are not allowed to sue for an injunction to stop the "externalities" caused by farming operations that were occurring before the new neighbors moved in. An exception to that concept is if the creator of the "nuisance" significantly increases the size of the operation, creating a much larger nuisance than before. Even that theory does not apply in the case of the proposed airport expansion, as the future operations are forecast to be much fewer than in years past.

**Geese:** Opponents cite the numerous geese which inhabit the ponds and surrounding areas in the subdivision to the SW of the runway. They note the hazard of plane and bird mid-air strikes, using Captain "Sully" and the Hudson River incident as an example.

Matthew Kulhanek reports, however, that there are no recorded bird strikes in the history of ARP. Further, he notes that if one were to occur, the most likely incident would be with a faster airplane, whose speed would lessen the time for the pilot to maneuver to avoid the birds. Those, he noted, have two engines, and the planes are designed to be able to gain altitude with a single functional engine. An incident knocking out both engines, as happened over the Hudson, is very rare. This is not to say that it is impossible, just highly unlikely. In any event, Matthew Kulhanek did say that when birds are noticed and a plane is about to depart, grounds crew are dispatched to scare them away with noisemakers.

**Economic development:** Proponents say that the expansion would be helpful to improve the area's economy, allowing better access to the area for new or expanding businesses. The EA makes no such projection, and in fact, forecasts very little growth in airport operations. Willow Run Airport is capable of handling many more such operations, and for larger planes than ARP would, even with the expansion.

The EA states that there is no fact based correlation between the length of the runway and the number of annual operations. In other words, the lengthening of the runway cannot be used to forecast additional usage of ARB, although the longer runway would allow some additional aircraft types to legally land there.

**Process:** The public hearing on the EA scheduled on Wednesday, March 31, 2010 t Cobblestone Farm, 2781 Packard Road, Ann Arbor, MI will not allow for oral testimony in front of any decision makers. All such testimony will need to be given in separate rooms and recorded.

While this seems odd, this is normal procedure for an EA. The EA is now a draft and any comments submitted in writing or recorded at the public hearing will be collected, added to the draft, together with responses by the EA team. This then will be submitted to the Ann Arbor City Council for their consideration. The City Council will provide an opportunity for public comment in their meetings, if they wish to proceed with the expansion.