



908 King Street
Suite 100
Alexandria Virginia 22314
Phone 703-683-5900
Fax 703-683-2564
www.ACConline.org

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800 Independence Avenue, S.W.
Washington, DC 20591

ACC Comments on the Desk Reference to Order 5050.4B

On behalf of the Airport Consultants Council (ACC), I would like to thank you for the opportunity to provide input on three sample chapters from the Desk Reference for Order 5050.4B. We received comments from two members of the ACC Environment Committee, which are attached. ACC would appreciate feedback from the FAA on the comments submitted herein.

If you have any questions regarding our comments, please do not hesitate to call me at (703) 683-5900.

Sincerely,

Paula Hochstetler
President
Airport Consultants Council

**ACC Comments to FAA on Sample Chapters from the
Desk Reference to Order 5050.4B**

November 3, 2006

ACC Comment	Accept/ Decline	FAA Response
<p>General:</p> <p><u>Comment 1:</u> There are references to various documents including the version of the document – i.e. Order 10501E. It would be a good reminder and also require less revisions to make references to 1050.1 – latest edition. This reminds the reader to make sure they have the latest edition and also reduces the need to update this document when a new version or change has come out.</p> <p><u>Comment 2:</u> General comment on the use of "notes" in the document. I find this documentation approach to be misleading. The font size and context of the notes inserted at various points gives the impression that they contain minor, unimportant information. If so, it might be more appropriate to include them as footnotes to whatever text they modify. That approach would also help to clarify how they relate to the main topic. In looking at the various notes included in the three chapters, it appears that they sometimes highlight important, rather than minor points. In that case, it would be more appropriate to include them as part of the main text.</p>		
<p>Section 1:</p> <p>A brief discussion of what this section is intended to present would be helpful prior to getting into the subsections. Such an introduction would be especially helpful in Chapter</p>		

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<p>21, Wetlands. In Chapter 21, the rationale for discussing non-jurisdictional wetlands prior to jurisdictional wetlands is not clear. It would seem better to define what jurisdictional <u>is</u> prior to saying what it <u>is not</u>. If there is a rationale, it could be explained in an initial paragraph.</p>		
<p>Section 2:</p> <p>The table seems to be the same as in 1050.1E. A source is given for the table in Section 7, and it would be helpful to state the source here as well.</p>		
<p>Section 3:</p> <p><u>Comment 1:</u> It appears that this section is intended to highlight key issues that typically apply to airport development. As noted in Section 1, it would be helpful to clarify the purpose of this section in an initial paragraph. As it is, I find the distinction between this section and Section 5 to be unclear. They both talk about what should go in the NEPA document. I <u>assume</u> that this section should emphasize technical issues and concepts, while Section 5 should emphasize process and document content. It would be helpful if a little more discussion of indirect impacts were included. To the extent that this issue is discussed, the description is too vague to provide. For example, the statement that changes in operations could lead to solid waste impacts: it's hard to say how changes in runway use or flight tracks could alter solid waste generation, I assume that the statement actually meant to imply that increased aircraft activity could lead to increased solid waste. Even making that assumption, it</p>		

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<p>would be helpful to indicate how increased aircraft activity would lead to increased solid waste; factors to consider would include the O&D split, construction of new support facilities, etc.</p> <p><u>Comment 2:</u> Para 3.e – making a statement like this regarding no federal funds involved could be misleading. Many state agencies have Coastal Zone protection programs.</p> <p>In addition, the statement can easily be misinterpreted that if no federal funds are involved in a specific project CBRS is not required. My understanding is that if the approved ALP identifies any project for federal funding, then all other projects regardless of funding source needs to comply with FAA environmental regulations. We have completed, at the requirement of some FAA offices, EAs for the construction of any items on an airport regardless of where the funds are coming from.</p> <p>I think this statement only applies if the ALP does not have any FAA funded projects identified.</p>		
<p>Section 4:</p> <p>No Comments</p>		
<p>Section 5:</p> <p>See comment on Section 3 above. Also, the rationale for separating Sections 5, 6, and 7 is not clear. The title of Section 5 implies that the requirements for environmental analysis are included, but they are actually described more in sections 6</p>		

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<p>and 7. It seems to be more logical to include sections 6 and 7 as subsections of Section 5. Again, an initial statement explaining the purpose of this section would be helpful. In Chapter 3, this section notes that to complete the analysis, the document should describe the action, but the text says to describe the alternative. Should the analysis describe the alternatives under consideration, or just the proposed action?</p>		
<p>Section 6: See comment on Section 5 above.</p>		
<p>Section 7: See comment on Section 5 above.</p>		
<p>Section 8: See comment on Section 5 above. Also, the title of this section implies that it describes the content. In fact, all it does is to describe the key finding that must be documented.</p>		