



Cuyahoga County Airport, Cleveland, Ohio

Airport Master Plan Update Draft Final Report and Draft Airport Layout Plan

Responses to FAA Preliminary Review Comments (dated July 23, 2009)

(Comments and responses are organized by topic and numbered sequentially. All FAA comments are included.)

	FAA Comment:		Consultant Response:	
	Runway Length			
1.	Based on our review of the planning documentation, there appears to be sufficient information to support the need for a 6,000' runway based on increasing the operational capacity of the existing users at the Cuyahoga County Airport (CGF). While the existing runway does accommodate airport users with adjustments based on the current runway length and surface conditions, the proposed runway extension to 6,000' would increase the runway capacity and eliminate weight penalties during certain operation conditions.	1.	No response needed: FAA concurs that the 6,000-foot runway length is justified.	Agreed.
	Forecasts			
2.	<p>The forecasts utilized in the Master Plan document were initially developed in 2003. The aviation industry as a whole and specific to CGF has recently experienced a substantial decline in total operations. I have included the most recent FAA Terminal Area Forecast (TAF) for your reference (Attachment B). The forecast utilized in the Master Plan differs from the TAF by more than 10% for the planning period and would therefore not be recognized by the FAA as currently accurate.</p> <p>It should be noted that irrespective of the total number of annual operations at CGF, the critical design aircraft or family of aircraft with substantial use (over 500 annual operations) continues to be sufficient justification for a longer runway length based on increasing operational capacity. The ADO concurs with the runway length analysis for the purposes of increasing capacity of the existing users at the airport. Therefore, the ADO is not requesting an update to the forecasts for the purposes of the master plan at this time. However, forecasts will need to be updated if and when future process requirements are pursued. Please see the <i>Future Process Requirements</i> section below for further discussion as it relates to proposed costs.</p>	2.	No response needed: ADO is not requesting an update to the forecasts at this time.	Agreed.
	Alternatives Analysis			
3.	Based on the scale of the drawings contained in the master plan the ADO is unable to verify the actual locations of where the declared runway ends will be. In an effort to better understand where the locations are we have utilized the existing ALP sheet from the draft ALP set submitted along with the Master Plan. The calculated declared distances as presented in the master plan do not appear to be correct. Please verify correct useable runway lengths for all of the alternatives that utilize declared distances. I have attached a copy of an FAA presentation on how to accurately calculate declared distances.	3.	Katy Jones at the ADO reviewed the declared distances analysis and provided guidance in a fax on February 10, 2006 and in a conference call on February 13. Further discussions and a follow-up memo from Kathy Kane at C&S on February 21 led to a referral to FAA HQ for a determination. A March 11, 2006 email from Katy Jones to C&S provided final guidance from HQ for declared distances for both runway ends and these were accepted and incorporated in the discussion and analysis for Alternative 8.	<p>FAA will provide new "tool" for calculating declared distances.</p> <p>C&S will go through a couple of alternative scenarios using this tool, spot check declared distances, and provide confirmation.</p>



4.	Table 5-2 identifies a summary of noise and land use impacts for the 40 alternatives evaluated. Please verify the land acquisition impacts associated with Alternative number 8. The ADO interprets this table to indicate that all subsequent alternatives (9 through 25) have the same impacts that are identified for alternative 8. Is this an accurate interpretation? Are there indeed no impacts or land acquisition required for alternatives 1 through 7? Please verify accuracy of table 5-2. The ADO requests that this table be filled out completely for clarification.	4.	It was agreed to with the ADO that, given the large number of alternatives, noise modeling and land acquisition areas and costs were limited to the existing (no-build) alternative (Alternative 1), the declared distances alternative for addressing RSA deficiencies but not capacity (Alternative 8), and the alternatives that provided 6,000 feet, addressing the capacity need.	Add footnote to Table 5-2 to clarify why data is missing. Populate table with data on hand including land costs, existing RPZs ("Affected Parcels" data). Add footnote with data source and date.
5.	The ADO recognizes that 40 alternatives were evaluated as part of this report update, however, there appears to be at least one variation of a declared distance concept evaluated under an incorrect heading. Recognizing some of the current physical constraints of the airport with the locations of Bishop and Richmond Roads, an alternative that has a minor runway extension to the runway 6 end (paving of the current stop way and declaring as a runway) and implementing declared distances will allow for increased pavement length greater than what has been identified in Alternative 8. This plan is essentially laid out in alternative 20 and would seem to better apply to the grouping for maintaining existing runway length. The ADO questions how this alternative would impact existing users and their required landing and takeoff distances, recognizing that this alternative is not intended to provide additional runway length to increase capacity but may be used to address current RSA conditions while maximizing existing runway capacity.	5.	Alternative 8 has an overall runway length of 5,102 feet and includes the 500-foot stopway in calculations for declared distances. Alternative 20 removes the stopway and extends the runway to 5,502 feet. With Alternative 20, the usable runway length for both landing and takeoff on Runway 6 is 4,607 feet, compared to 4,207 feet with Alternative 8.	Need to choose a preferred alternative for addressing RSA deficiencies.
ALP Drawings				
6.	<ul style="list-style-type: none"> • Title Sheet 1 of 12: <ol style="list-style-type: none"> 1. Add an approval block for the Ohio Department of Transportation (ODOT). 	6.	Will be addressed.	Agreed.
7.	<ol style="list-style-type: none"> 2. Delete the approval block for the FAA and add an area on the cover sheet to scan a future approval letter. 	7.	Will be addressed.	Agreed.
8.	<ul style="list-style-type: none"> • Existing Airport Layout Sheet 2 of 12: <ol style="list-style-type: none"> 1. The existing RSA dimensions should be identified in the ALP set. The ADO has not been able to verify the current conditions based on the ALP set submitted. The depiction of the RSAs and other design standards that do not meet the requirements as outlined in the FAA's design AC are identified in the plan view. There is no request for a modification to standard with the current condition while it is evident that currently critical design standards are not satisfied (RSAs, OFAs, runway to taxiway separation, etc). 	8.	A table listing existing runway safety area dimensions will be added to this sheet.	Agreed.
9.	<ol style="list-style-type: none"> 2. The residential property located along Richmond Road that is not owned by the airport but is included as airport land on this sheet (2.29 Acres owned by Joseph E. and M.L. Dalton). This correction of land ownership also applies to sheets 3, 4, 5, and 6. 	9.	This will be corrected.	Agreed.



10.	<p>• Airport Layout Plan Sheet 3 of 12:</p> <p>1. There are topographical relief lines identified on this figure, however, the actual grade changes are not clearly identified. Are the contour lines in 5, 10, or some other elevation increment?</p>	10.	The contour lines are in 5-foot increments. A note will be added to the drawing. (See Sheet 4 of 12, Terminal Area Plan, for readable contour labels.)	Agreed.
11.	2 The existing runway 6 end information is not included in the figure or in the tables	11.	The coordinates and elevation for the existing Runway 6 end are included in the Existing column of the Runway Data Table.	Agreed.
12.	3. There are several references in the runway data table to existing design dimensions that are not correct including existing RSA and OFA dimensions Please update tables and subsequent sheets to reflect actual current conditions and not just what standard dimensions should be.	12.	The runway data table lists standard dimensions based on the airport reference code. A table listing existing dimensions will be added to this sheet.	Agreed.
13.	4 The Master Plan identifies a need to improve future approach capabilities for runway 6 operations. The ALP set however does not anticipate any improvements to approach minimums for runway 6. If there is an actual plan to improve approach minimums for runway 6 then the associated RPZ may be impacted. The current approach minimums for runway 6 are visual and not lower than 1-mile and this corresponds to a RPZ with 500'x1,010'x1,700' dimensions. If the approach minimums are reduced to not lower than 3/4-mile or lower than 3/4 of a mile the RPZ will increase accordingly. The ADO is requesting that the sponsor clarify if there is an intension to reduce minimums for runway 6 as suggested in the master plan.	13.	The master plan discussed the potential for reducing approach minimums but there is no plan at this time to improve approach minimums for Runway 6. There was some discussion with the FAA re: a precision approach for Runway 6 but it was indicated that funding availability may be limited since the airport already has a Runway 24 ILS.	May add note in report re: impacts to residential areas southwest of airfield with increased size of RPZ.
14.	5. The ILS dimensional standards should be included on the site figure with the light lane and critical areas clearly identified and labeled.	14.	The limits of the NAVAID Critical Area/BRL are depicted on the drawing. The limits of the light lane and dimensions will be added.	Agreed.
15.	6 The ALP should have dimensions that clearly identify runway taxiway separation, RSAs, OFAs, RPZs, included on the figure	15.	The runway/taxiway separation is dimensioned on the drawing. Dimensions for RSA, OFA, and RPZs are listed in the runway data table and can be shown on the drawing as well.	Add table that shows existing dimensions (don't need to dimension on drawing).
16.	7. What are the hatched areas beyond each end of the runway? The legend does not identify this hatching. Is this supposed to be EMAS?	16.	The hatched areas are "Proposed EMAS" and are flagged on the drawing.	Add pattern to legend.
17.	8. Are there any issues with the ATCT located at CGF that should be noted on the ALP set (e.g. line of sight) Will there be any future issues with the current ATCT location with a runway extension	17.	There are no line of sight issues with the ATCT and none are expected in the future.	Add note to sheet.



18.	<ul style="list-style-type: none"> Terminal Area Drawing Sheet 4 of 12: <p>1. Please either add a legend to this sheet or refer the reviewer to a previous sheet with an applicable legend</p>	18.	Will be addressed.	Add note: "See legend on Sheet 3 of ____."
19.	<p>2. There are no fueling facilities identified on this figure. Please update either by a footnote of location(s) or with a marking that corresponds to a legend.</p>	19.	One fuel facility is identified on the drawing (north of "FBO Expansion Area." If there are others, they will be noted.	Add fuel facility at new FBO.
20.	<ul style="list-style-type: none"> Airport Airspace Sheet 5 of 12: <p>From the figure there appear to be no water towers, cell towers, or other tall structures that impact the Part 77 surfaces. Is this correct and been verified?</p>	20.	Photogrammetry prepared by Columbus Engineering Consultants, Inc., in October 2003 and the December 2003 Obstruction Study prepared by C&S are the data sources for the master plan's obstruction analysis. No tall structures that impact Part 77 surfaces were identified.	Agreed.
21.	<ul style="list-style-type: none"> Runway 6 Inner Approach Plan and Profile Sheet 6 of 12: <p>1. The existing runway end is not identified along with the design requirements for the existing condition (RSA, OFA, and RPZ). This figure will need to be updated to include existing, future, and ultimate conditions. The ADO suggests this be depicted on more than one sheet for the purposes of clarity</p>	21.	Drawing will be updated to show existing Runway 6 end. See responses to #46 and #56 below regarding the suggested "future ALP."	Agreed.
22.	<p>2. Should there be any ILS design features identified on this sheet?</p>	22.	Localizer will be identified on this sheet.	Identify on plan and profile.
23.	<p>3. Based on previous sheets there appears to be a security fence surrounding the entire airport property. These fences are not identified on the approach sheets and need to be added and evaluated as to any current, future, or ultimate penetrations to the approach or transitional surfaces and include within the summary data tables. The ADO is only aware of the perimeter fence that is absent from this figure. Is there any other vegetative screening or other obstacles located on airport property that should also be identified and evaluated?</p>	23.	The fence will be identified on this sheet. Removal/relocation of the fence and any vegetative screening or other obstacles would necessarily be included with a design project for the runway extension and road realignment.	The fence will be identified on plan and profile.
24.	<p>4. Is there a controlling object for the existing, future, or ultimate runway end?</p>	24.	Obstruction 6-2 (trees) will be labeled as the controlling object.	The controlling obstruction will be identified.
25.	<p>5. Please add the property boundary to this figure as well as sheet 7</p>	25.	The property boundary is shown on the drawing and in the legend.	Change color of property line (to white or yellow) so it is visible on drawing.
26.	<p>6. Consistent with the approach to runway 6 comments on sheet 3, if future minimums are anticipated to be reduced then appropriate RPZs will need to be identified on this figure</p>	26.	There are no plans for reducing minimums.	Agreed.



27.	<ul style="list-style-type: none"> Runway 24 Inner Approach Plan and Profile Sheet 7 of 12: <ol style="list-style-type: none"> The figure needs to be updated to show the existing runway end. 	27.	Will be addressed.	Agreed.
28.	<ol style="list-style-type: none"> See comments for previous sheet regarding airport fence. 	28.	See response to #23 above.	The fence will be identified on plan and profile.
29.	<ol style="list-style-type: none"> Should there be any ILS design features identified on this figure? 	29.	Will be labeled.	Agreed -- include light lane.
30.	<ul style="list-style-type: none"> Obstruction Data Sheet 8 of 12: <ol style="list-style-type: none"> The data tables do not identify the allowable elevations. Please add a column to the data tables that includes allowable elevations. 	30.	“Surface elevation” is included in the obstruction tables. This is the allowable elevation of the specified surface at the location of the obstruction.	Agreed.
31.	<ol style="list-style-type: none"> A triggering action needs to be identified for many of the obstructions (e.g existing approach, future runway extension, reduction of minimums, etc). Please add a column to the data tables for the triggering action 	31.	As noted on this sheet, obstruction mapping in 2003 was prepared for existing conditions. With the extension of Runway 6, there may be additional obstructions above and beyond the existing conditions case. The recommended actions for obstructions to the Runway 24 approach and transitional surfaces are based on the existing approach (as the location of the runway end does not change). At the Runway 6 end, penetrations of FAR Part 77 surfaces were recalculated based on the runway extension.	Add data tables for existing obstructions on a new sheet.
32.	<ol style="list-style-type: none"> Many of the recommended actions for the existing and future penetrations refer to footnotes 1 and 2 on this data sheet. Footnote 1 identifies the following “In lieu of this, they may be able to install obstruction lights on towers in the area as directed by the FAA”. It should be noted that it is the responsibility of the airport sponsor to develop a detailed plan on a marking and lighting strategy. The FAA will either concur with the plan or object to the plan in parts or in whole. The FAA does not direct the airport sponsor or develop plans for the airport sponsor to mitigate obstructions. Instead the FAA will develop approach and departure procedures based on existing conditions and any mitigating measures that have been implemented 	32.	The note will be corrected to as suggested.	Agreed.
33.	<ol style="list-style-type: none"> The recommended action for obstructions C, 6-12 A, and 6-12 B are identified as light. Are these currently lighted? 	33.	The building top (Obstruction 6-5 C) and two utility poles (6-12 A and 6-12 B) are not lighted.	The airport should propose a project on ACIP.
34.	<ol style="list-style-type: none"> Obstructions 6/24-7, 6/24-8, and 6/24-9 do not have any recommended actions. Are these penetrations currently lighted? Have they been evaluated by the FAA in a previous airspace study? 	34.	(These three obstructions in the primary surface are the FAA anemometer, County weather station, and glideslope antenna.)	They are lit.
35.	<ol style="list-style-type: none"> Are there any other existing obstructions that are not included on the data table that have been lighted as a mitigation measure (e.g. hangars, ATCT, cell towers, water towers, etc)? 	35.		For existing conditions, there are none unless indicated in table.



36.	<ul style="list-style-type: none"> Land Use Plan Sheet 9 of 12: <ol style="list-style-type: none"> The FAA has not received, reviewed, or commented on the noise contours generated by Charles M Salter Associated, Inc., July 2006 for the year 2025 	36.	Appendix F of the December 2006 Airport Master Plan draft final report contains the July 14, 2006 Noise Modeling Summary Report prepared by Charles M. Salter Associates, Inc. Noise modeling was done for twelve of the (then) 36 alternatives. Appendix F of the April 2008 Airport Master Plan draft final report contains the May 30, 2007 Noise Modeling Summary Report prepared by Salter. This report incorporates the work done earlier and adds modeling for four more alternatives (37, 38, 39, and 40). The note on this sheet will be updated to say "May 2007."	Agreed.
37.	<ol style="list-style-type: none"> Please add either a legend to this sheet or refer the reviewer to a previous sheet for a legend. 	37.	Noise contours and the airport property line will be flagged with labels.	Agreed.
38.	<ol style="list-style-type: none"> The apparent property boundary markings on this sheet do not match previous sheets 	38.	The out-parcel shown here will be corrected on Sheets 2, 3, 4, and 5.	Agreed.
39.	<ol style="list-style-type: none"> The property boundary appears to be labeled as EAPL. What does this stand for? Please add to legend or as a footnote to this sheet. 	39.	EAPL is existing airport property line. This will be noted.	Agreed.
40.	<ol style="list-style-type: none"> The majority of the airport property appears to be generally shaded white with a purple hue at the boundaries. What land use does this shading represent? 	40.	The purple shading outlines the airport property. The colored areas underneath are indicating land use. A label will be added to the drawing calling out the "Cuyahoga County Airport."	Agreed.
41.	<ul style="list-style-type: none"> Airport Property Map Sheets 10 and 11 of 12. <ol style="list-style-type: none"> The existing RPZ for the runway 6 end is not identified. Please update. 	41.	Will be updated.	Will be added to legend. Note "Existing and Future RPZ" on Runway 24.
42.	<ol style="list-style-type: none"> There are several parcels located within the RPZs on each sheet that are proposed for easement acquisition. The FAA strongly encourages fee acquisition of land within an RPZ where feasible. An easement is only pursued when a formal determination that it is not practicable or feasible to acquire the land in fee and concurred with by the FAA. I have enclosed a February 5, 1999 Policy and Procedures Memorandum 5300 1B entitled Runway Protection Zone and Airport Object Clearing Policy for your reference and further clarification on the Great Lakes policy on acquiring land within the RPZ. 	42.	Needs discussion. The master plan draft final report contains all information needed by the FAA to make a determination. In accordance with this guidance, we request approval for planned RPZ control.	Costs for fee simple acquisition are included in the report. Areas on drawings will be labeled PA-1, etc., (for Proposed Acquisition rather than PE for Proposed Easement) and flagged as "Acquisition (____ Acres)." Table on Sheet 12 will be renamed "Proposed Acquisition Table."
43.	<ol style="list-style-type: none"> The costs for fee acquisition of land in the RPZs also need to be included in the master plan alternatives cost estimates 	43.	See Table 5-4 for these costs.	Agreed.
44.	<ol style="list-style-type: none"> Note 3 on these sheets identify 0 acres of airport easements. This does not appear to be accurate when compared to the data tables on sheet 12 of 12. Please update accordingly. Also, please verify the total acreage of airport property as included in Note 2 	44.	Will be updated. The total acreage is as determined by Columbus Engineering Consultants property map (April 2005).	Agreed.



45.	5 For this initial review of the draft ALP set, the ADO has not completed a detailed review of each parcel identified on the property maps or within the data tables on sheet 12 of 12 to verify accuracy	45.	No response needed.	Agreed.
46.	The ADO requests an additional sheet be prepared that identifies how design standards can be implemented for the existing runway configuration and length. This sheet should correspond to a preferred alternative to satisfy existing design standard deficiencies as requested above. It is suggested that this sheet be identified as a future ALP. The sheet that includes the runway extension to 6,000' while incorporating EMAS and road relocations should be identified as the Ultimate ALP.	46.	The suggested sheet makes sense as a preferred alternative for the RSA Study. The future ALP for the master plan provides a 20-year plan for airport development that satisfies facility requirements and addresses capacity needs. (See response below to Comment #56 under "General Overall Approach/Study Approach.") Options: A. Rather than creating an additional "future ALP" and without significant cost, we could add a Phase 1 project to the master plan and the ALP: "RSA Improvements to Address Deficiencies." B. Disregard comment.	The separate "future" or "short-term" or "interim" ALP will roll out of the RSA Study and will be sent to Irene as a draft.
47.	With the incorporation of an additional "future ALP sheet" as requested above and converting sheet 3 as included with this set as an "ultimate ALP sheet" there may be substantial changes to subsequent sheets for the purposes of clarity. If the airport sponsor pursues an extension to 5,500' as identified in several alternatives, a preferred alternative for this option should also be depicted on a separate sheet. Depicting current, future, and ultimate conditions on a single sheet may be overly confusing and it is recommended that additional sheets be incorporated for not only the ALP but also for the approach plan and profile sheets.	47.	See response to #46 above. The preferred alternative (with a 6,000-foot runway) was selected by the sponsor for the ALP because it satisfies facility requirements and addresses capacity needs. This could be reconsidered in a future EA.	The RSA Study and Chapter 5 of the Master Plan will document that 5500' would be a capacity project; thus would need to have compliant safety areas.
48.	The ADO has not been able to locate a summary of existing deficiencies to the RSA for the entire runway. For CGF, the RSA for the existing runway is 500' wide for the entire length of the runway and extends 1,000' beyond each end of the runway. The ADO would prefer to see an inventory data table included with the ALP set that identifies all objects within the RSA, their frangibility, and proposed disposition of objects that are not fixed by function.	48.	See Appendix G: the April 2008 Runway Safety Area Study, Section 2, RSA Requirements and Deficiencies. Section 2.05 gives detailed information on RSA deficiencies.	Matt will send Figures 2-2, 2-3, and 2-4 from the October 2004 RSA Study to Irene, Brad, and Kevin.
Runway Safety Area Study				
49.	Overview comments on Section 5.02-5 and Appendix G (RSA Study) <ul style="list-style-type: none"> References to FAA Order 5200.9 need to be clarified by our additional memo dated January 4, 2008, and references to Advisory Circular 150/5220-22A "Engineered Materials Arresting Systems (EMAS) for Aircraft Overruns" need to be added 	49.	Will be addressed.	May need clarification on this comment.



50.	<ul style="list-style-type: none"> The FAA will require a preferred alternative for the existing runway length as well as all optional extended lengths (5,102, 5,500 and 6,000). Many of the alternatives that provide a less than 6,000' runway are dismissed because of the reduced runway length. The FAA does not support this as a sole justification for dismissal. Each potential alternative should all be evaluated evenly, for each optional length. 	50.	<p>The October 2004 Runway Safety Area Study draft final report evaluated meeting standards on the existing runway, addressing RSA deficiencies for each runway approach end and along the full length of the runway. See response #56 below. Following FAA approval of the ALP (based on the alternative that was selected from among those that met the facility requirements and capacity needs), we believe that an EA may consider other potential runway lengths and/or configurations.</p>	<p>Need a phased plan throughout. Definitely need to show an alternative at 5102' (maintaining existing runway length).</p>
51.	<ul style="list-style-type: none"> An alternative needs to be developed, as a baseline, for improvement for the existing runway length to create the best RSA that can be accomplished without significant cost (look at grading, correct drainage structures, and possible shift to balance RSA ends if doesn't make an existing RSA end significantly worse). What is the purpose and need for maintaining the stopway? We are looking for incremental improvements to enhance safety. Items that are not fixed by their function should not be located in the RSA. 	51.	<p>See the October 2004 Runway Safety Area Study draft final report which addressed these concerns.</p>	<p>Will prepare a single preferred alternative for addressing RSA deficiencies that incorporates both runway ends and along the runway.</p>
52.	<ul style="list-style-type: none"> Do the frangible couplings on all nav aids meet the 3" frangibility requirements? 	52.	(TBD)	<p>No. Only applicable is MALSR boxes, drop down boxes.</p>
53.	<ul style="list-style-type: none"> When utilizing the requirement to acquire additional land for complete control of the RPZ's for subject alternatives, you need to develop the baseline case as to how much land needs to be acquired for the existing condition to control the entire RPZ's. 	53.	<p>No land acquisition is needed for RPZ control at the existing Runway 6 end. Land acquisition for RPZ control at the Runway 24 end does not change with the preferred alternative developed for the ALP since the location of the Runway 24 end does not change.</p>	<p>Agreed.</p>
54.	<ul style="list-style-type: none"> Existing RSA lengths and widths need to be identified. 	54.	<p>The October 2004 Runway Safety Area Study draft final report includes this information.</p>	<p>Show dimensions.</p>
General Overall Comments/Study Approach				
55.	<p>The report identifies three main options, which include: 1) meeting FAA design standards for the existing runway length, 2) providing a 5,500' runway with appropriate FAA standards, and 3) providing a 6,000' runway with appropriate FAA standards. The implementation of the three options is evaluated in a total of forty alternatives for airport development. The alternatives range from a do nothing scenario to providing a 6,000' runway with full physical runway safety areas (RSAs). Since the existing 5,102' runway does not have standard Runway Safety Areas (RSAs), the Master Plan is required to focus on potential improvements to achieve standard RSA. While the focus of these review comments applies to RSA design standards, it is the ADO's expectation that all other FAA design standards will be met (OFAs, RPZs, taxiway separation, etc) or a modification to design standards will be requested by the airport sponsor.</p>	55.	<p>No response needed: Agreed that airport must achieve standard runway safety areas (RSAs) and that the ADO expects all other FAA design standards will be met or a modification to design standards (MOS) will be requested by airport sponsor.</p>	<p>Agreed.</p>



<p>56.</p>	<p>The report should first evaluate the existing conditions of the airfield, and then determine capacity needs to accommodate the current or forecasted demand. For the airport's single runway, this would mean separately evaluating meeting standards on the existing runway, which would be considered a safety/standards project; then evaluating any potential runway extensions that would increase capacity at the airport.</p> <p>These are two distinctly different needs within the report (meeting FAA design standards on the existing runway and increasing runway length), yet the report only recommends an alternative that involves a runway extension while meeting design standards. The preferred alternative identified in the report includes a runway extension to 6,000' while incorporating Engineered Material Arresting Systems (EMAS) and the relocation of two roads in order to satisfy FAA design standards. This alternative adequately addresses both a proposed runway length that will increase capacity for the existing aircraft fleet mix at the airport as well as provide adequate RSAs. The report does not identify a recommended alternative that meets FAA design standards for the existing runway length or airport layout limitations.</p> <p>In order to proceed with further review and potentially concur with the sponsor's recommendations, the ADO is requesting that a preferred alternative that addresses the design standard deficiencies for the current condition be identified as part of the RSA evaluation. As presented, the ADO can not concur with your recommendation for implementing only Alternative 38 (capacity recommendation) in absence of a recommendation that addresses the current design standard deficiencies for the existing runway with no extension for capacity.</p>	<p>56.</p>	<p>Options:</p> <ul style="list-style-type: none"> A. Incorporate the analysis from the October 2004 Runway Safety Area Study draft final report which evaluated meeting standards on the existing runway, a "safety/standards project" as noted in this comment. It presented in detail alternatives for addressing RSA deficiencies and meeting RSA design standards for each runway approach end and along the full length of the runway. It made recommendations for RSA improvements only and did not address potential runway extensions to increase capacity at the airport. B. Disregard comment. 	<p>Agreed that a preferred alternative will be prepared that addresses RSA deficiencies and meeting RSA design standards only.</p> <p>Additional work has been requested for incorporating RSA preferred alternative into Master Plan report and ALP drawings set. Discussion in report and drawings will be added for one or two additional ALPs, obstruction analysis, costs, Airspace drawing(s), Approach Plans & Profiles, Obstruction Data sheet(s).</p>
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<p>57. FUTURE PROCESS REQUIREMENTS</p> <p>After all comments are addressed, the following actions will still be necessary.</p> <ol style="list-style-type: none"> 1. <u>Runway Safety Area determination</u> -- Based on CGF's recommended solution for the existing runway configuration and length, the ADO will need to evaluate the RSA alternatives and issue a RSA determination for the existing condition. Refer to Attachment D for a discussion on the ADO's RSA review comments that were included in the Master Plan 2. <u>Airspace Evaluation</u> -- When the additional sheet is added to the ALP set and design standards as outlined in FAA Advisory Circular 5300-13 are satisfied, the ADO will initiate an airspace study to determine if the future and ultimate layouts are safe and efficient use of airspace 3. <u>Environmental Clearance</u> -- After the ALP receives an acceptable airspace determination based on the evaluation in Number 2 above and before initiating any construction activities, any project(s) are required to be environmentally cleared with the completion of an environmental clearance document. Depending on the project(s) to be evaluated in the environmental process, either an Environmental Assessment or an Environmental Impact Statement will need to be prepared 4. <u>Financial Plan</u> -- The costs for achieving greater capacity as presented in the master plan are substantial. The ADO is requesting that a financial plan be prepared that outlines the proposed funding sources to complete the proposed project(s) and backup funding plan in the event that federal funds are limited or not available. Based on the cost estimates included in the report, the preferred alternative for a runway extension while meeting FAA design standards approaches \$40 million. Cuyahoga County will be required to prepare a benefit cost analysis (BCA). Due to the financial magnitude of the proposed alternative, the ADO recommends that the BCA be completed prior to initiating an environmental study in order to avoid the involvement and energy of the resource agencies and the general public, should at a later date the costs are determined to be impracticable to achieve. 	<p>57.</p> <p>Recommended solutions for the existing runway configuration and length presented in the October 2004 Runway Safety Area Study draft final report may be considered for a RSA determination.</p> <p>Depending on discussion, an additional ALP sheet may not be needed.</p> <p>We agree that an EA or an EIS project would follow acceptance /approval of the ALP.</p> <p>We agree that a BCA would be needed and it makes sense to prepare it either before initiating or simultaneously with an environmental study.</p>	<p>Agreed that RSA preferred alternative will be prepared.</p> <p>Noise impact would be trigger for an EIS (if threshold moved) which could take three years. Runway rehab needs to be done now or soon.</p>
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