

1 June 2009

Mayor John Hieftje
City of Ann Arbor
P.O. Box 8647
Ann Arbor, MI 48107

Dear Mayor Hieftje:

Thank you for the invitation, through Mark Perry, to provide a more detailed response to follow up on my City Council testimony of May 4. As I testified, my ultimate goal and that of my colleagues is to be as helpful as possible to you and the City Council and to ensure that you receive fact-based, objective findings from our extensive and ongoing research -- conclusions that challenge what has been presented to you previously regarding the Ann Arbor Municipal Airport expansion proposal. For that reason, I am answering you directly and copying all addressees to this initial request because I am sure you agree that unfiltered communications is always the best policy.

I must address these issues directly to you and Council members rather than the Environmental Assessment (EA) contractor JJR, as Councilman Greden suggested in a separate communication, because, regrettably, none of these issues fall within the narrow and restricted scope of the EA.

At the core of the Airport Advisory Committee's advice to Council is its admittedly focused constituency of approximately 200 pilots who populate the airport, while nowhere has there been corresponding representation of the 100 times that many citizens who live around the airport and how the proposed expansion could impact them. Since such a narrow, one-sided lens is inappropriate for a full flow of information so public officials can properly serve all the people, we are attempting to fill that void by default.

And unfortunately, the ongoing Environmental Assessment does little to improve things because unless you are an endangered species -- and sadly, human beings are not, as defined for the EA under FAA Order 5050.4B -- it will provide virtually no examination of the true impact of the proposed runway expansion and the potential added risk to people, save by noise or pollution. Mr. Perry's several months of private and public statements that, "It'll be covered in the Environmental Assessment," (repeated 23 times at the March 18 Airport Advisory Committee meeting attended by more than 100 concerned citizens, for instance) were initially reassuring to many, but upon further investigation proved to be inaccurate. For example, in the AAC meeting he repeatedly assured questioners that issues involving reported aircraft overrun incidents and the human safety impact of the proposed runway extension on surrounding communities would be studied as part of the EA. Further investigation into the study and its statutorily-prescribed 15-page maximum report issued under Order 5050.4B showed, however, that neither were, in fact, to be addressed in the EA study. The absence of any such investigation of the impact on local communities was a major contributor to why the governments of Pittsfield and Lodi Townships passed resolutions strongly opposing the proposed runway expansions in the face of such risks.

Additionally, I'd like to explain why my colleagues and I have been appearing before Council this spring, although airport action is not imminent on your agenda. The progression of the EA means things could advance quickly between now and this fall, with a public hearing and Council vote soon to follow. Our group includes several hundred citizens eager to attend every Council meeting, which we've discouraged because we understand Council is occupied with more immediate issues. Instead, one knowledgeable representative speaking in a three-minute slot at least allows us to keep more than one biased flow of information before Council, while emphasizing a few of the critical points we must in an attempt to ensure you receive a however-brief fair and balanced view on these critical and complex issues. Of course, we understandably relinquish speaking spots for more timely agenda issues when we must. But, when spots are available, we welcome the time to appear before Council and want you to be aware our rationale is to be helpful and not at all disruptive.

Against that backdrop and being sensitive that the airport is not a pressing Council issue at this time, also, I will attempt to provide enough facts to enlighten you and Council members about the critical issues underlying my Council appearance, without over-burdening you with details, information and data until you are ready. As I testified on May 4, my colleagues and I look forward to meeting face-to-face with you and the Council to discuss these issues in detail with substantive references -- as airport lobbyists have had the opportunity to do -- when the time is right.

That said, our research has shown that the Council and the public have been misled and misinformed on four broad fronts: State Street expansion, airport safety, airport classification vs. aircraft, and airport usage. We have numerous other issues to enlighten you about when we meet, as well. Regarding the critical four issues:

1. STATE STREET/ ROAD

CLAIM: State Street expansion will require moving the runway threshold 150 feet west.

FACT: There are no funds for State Street expansion.

BACKGROUND SUMMARY: A predominant and triggering argument for the initial Ann Arbor Municipal Airport (ARB) primary runway movement 150 feet west has been the widening of State Street / State Road, as recommended in a 2006 Washtenaw County Road Commission study. In fact state and county road planning documents that cover projects years into the future include no funding for the State Street / State Road project, rendering such road-widening arguments currently moot, premature and unjustified. To perpetuate such runway expansion arguments despite such funding realities misrepresents reality -- misleading Council to think that the currently recommended runway changes are necessary because of a road that is not funded and may not be built for years, if ever, and is wholly unjustified. The related argument that the FAA-operated control tower requires the runway change so controllers can have a clear view of the Runway 24 holding area is also misleading; that problem was resolved sufficiently in the approved January 2006 Airport Layout Plan (ALP) by raising the height of the tower, before plans to extend the

runway were developed. We believe these facts were also known and not reminded to Council as a viable alternative when you were asked to approve the current ALP in September 2008, another misrepresentation.

2. SAFETY

CLAIM: Safety was the principal justification for runway expansion.

FACT: Existing documented incident / accident data does not support this conclusion.

BACKGROUND SUMMARY: The city and its Airport Advisory Committee (AAC) have emphasized in public meetings and private letters that airport safety is the primary driver of runway expansion. Advocates have cited an elusive seven reported incidents where planes ran off the end of the runway, without specifying exactly what the incidents were during 1998-2008. However a comprehensive examination by our experts, including a certified accident investigator, found that, at most, only one incident might be considered a legitimate serious overrun -- that involving a pilot making a precautionary landing under stress in a thunderstorm, who admitted he did not properly control his speed and altitude, landing "high and hot," and skidded off the end of a wet runway, committing an admitted pilot error. In the only other reported incident of consequence, a low flight-hours pilot touched down halfway down the runway in a thunderstorm and crosswind, had inadequate braking traction and ran 30 feet off the runway. This pilot, when it was clear he was landing long, should have gone around again. (We look forward to sharing with Council our comprehensive analyses of these and all relevant federal incident / accident reports when we meet to fully inform your decision-making around safety.)

The details of these two pilot-error incidents should be examined by Council and the public -- not entrusted alone to airport lobbyists with an obvious agenda favoring expansion -- for a frank and open debate about whether it is wise public policy to extend an already-safe ARB primary runway because of the decision-making errors of one or two pilots among nearly 1 million operations, while in the process placing at increased risk thousands of people who live in neighborhoods surrounding the airport. To utilize this scant reported incident evidence as a basis to lengthen the runway 800 feet at the price of potentially jeopardizing thousands of people in surrounding communities with the larger and heavier aircraft carrying the greater payloads the lengthened runway would attract warrants a comprehensive policy study by qualified and objective experts, at a minimum. We do not believe such an examination has occurred and it will not occur as part of the Environmental Assessment, despite misleading assurances to the contrary in the March 18 AAC public meeting.

The city's EA contractor JJR underscored the narrow limitations of its study last week, writing, "The scope of this proposed project is to address the recommended runway length design parameters for the critical aircraft and to address line of sight issues from the tower..." without even mentioning safety -- despite the AAC's public commitments to fully investigate neighborhood safety.

In fact, as our investigation of the reported evidence took shape, testimony mounted in various forums that the airport is already very safe. Concurrently, supporters for airport expansion increasingly diverted their theme away from their airport safety mantra, deferring to others emphasizing, instead, arguments based on something called "critical aircraft" (explained in detail next).

3. AIRPORT CLASSIFICATION VS. AIRCRAFT

CLAIM: ARB will remain a B-II category airport -- with no need to serve "heavier" aircraft.

FACT: Even as a B-II airport, many heavier, faster and larger aircraft will utilize ARB.

BACKGROUND SUMMARY: While attempting to persuade Council to support expansion because of the safety need, it appears airport lobbyists also were collaborating with state officials to promote expansion through the Michigan Department of Transportation's Aeronautical Division (MDOT-AERO) strategic "critical aircraft" program. In fact, MDOT-AERO said in early May that safety and the city's emphasis on reports of safety-related overrun incidents at ARB were always regarded as "secondary and incidental" to the primacy placed on MDOT-AERO's critical aircraft standard.

Expansion advocates have argued that ARB will remain a Category B-II airport in the MDOT-AERO rating system, in what has proven to be an aviation illusion best demonstrated in the Mayor's March 10 letter to many citizens, saying, "I agree with you that there is no need for another airport in the area that can handle heavier planes. To the best of my knowledge there is absolutely no intent to bring larger airplanes into the Ann Arbor Airport now or in the future..."

In fact, the MDOT-AERO critical aircraft system of developing airports across Michigan is predicated on attracting perpetually larger and heavier aircraft, using as its basis the largest and heaviest aircraft that utilize an airport in any given year, often with minimal payloads, as benchmarks on which that airport's future growth is based, paying to build lengthened runways to serve those fully-loaded heavier aircraft with our federal and state tax dollars. That's exactly what would happen in Ann Arbor. And, once built, it enables still larger aircraft to come in the future, even though the Mayor has been led to believe otherwise. As such, the state's critical aircraft method is designed to be manipulated into a cascading, perpetual system of ever-increasing airport growth by repeating the cycle with larger and heavier aircraft. That could explain why future versions of the current ARB Airport Layout Plan show the western boundary fence extended all the way to Lohr Road, perhaps in anticipation of ARB's next future critical aircraft expansion.

Our research has identified at least eight larger and heavier aircraft, predominantly jets, that an ARB lengthened to 4,300 feet could attract. Airport lobbyists say they are still studying the situation and are not sure if larger aircraft would come to ARB (technical FAQ OPS 11, P. 19), although

Airport Advisory Committee members initially assured community citizens in their March 18 meeting that they agreed with the Mayor that no larger aircraft would come because of the proposed runway extension. Now even the city admits in its condensed FAQs that, "As a recipient of federal aviation funding the City agrees to operate and maintain the airport for a period of 20 years. The City also agrees to make the airport available for public use and without discrimination to all types, kinds and classes of aeronautical activities" (emphasis added) (condensed FAQ OPS 14, P. 13), meaning once the runway is lengthened it offers no guarantees that it can or will keep out larger aircraft. This growth would prove dramatically different from what the Mayor's March 10 words indicate.

Thus, the aviation illusion -- by focusing on airport category rather than the aircraft served, enlisting even the Mayor to emphasize that while the category will not change, the aircraft served could -- with the reality that aircraft at the bottom of the B-II category, where ARB is today, to heavy aircraft at the top being both dramatic and dangerous, indeed. Maximum allowable takeoff weights within the B-II category, for instance, range from 9,000 to 65,000 pounds. This range was further underscored by the fact that even ARB Manager Matt Kulhanek said to officials in the first meeting of the Environmental Assessment's Citizens Advisory Council that the actual posted weight of the ARB primary runway "should be 40,000 pounds," not the 20,000 posted and permitted today, far beyond the 12,500-pound weight limit established by Council resolution when the current runway was constructed, which would permit the airport to handle the much heavier aircraft forecast if expansion is approved -- the very heavier aircraft the Mayor has said the Ann Arbor Airport is not needed to serve!

4. AIRPORT USAGE

CLAIM: Critical, time-sensitive fixed-wing medical flights utilize ARB.

FACT: They don't. Such time-critical flights utilize more capable airports such as Willow Run.

BACKGROUND SUMMARY: The Mayor also reported in his March 10 letter about the importance of the runway extension to provide for medical flights, saying, "...the extra time it would take to land and transport from Willow Run would be unacceptable." The implication from the Mayor's statement as well as the airport's response in FAQ Econ 11 (2) that, "ARB serves the Ann Arbor medical and biomedical industries with daily professional air ambulance services transporting patients, organs, radio isotopes, and other biomedical products and services," is that the Mayor and Council have been led to believe these flights are of a very urgent, critical nature. The most critical of these are organ transplant shipments, of course, where even minutes can mean lives. In reality, virtually all local organ transplant flights utilize Willow Run or Pontiac International airports for their fixed-wing operations, also employing helicopters as warranted. Organ transplant is highly regulated and tracked by centralized state organ banks. Neither the University of Michigan Hospitals transplant programs nor St. Joseph Mercy Hospital's limited program utilize ARB for such urgent fixed-wing organ transfers. While patients traveling on air ambulance or "angel" flights may arrive at ARB on occasion, these are rarely of such an urgent nature that the

difference between Willow Run vs. Ann Arbor would be at issue since patients must arrive days or weeks in advance for such surgical preparations. The same logic is true for radio isotopes shipments.

It is far more likely that these "medical shipments" involve biomedical products shipped for the convenience and cost benefit of shippers based at ARB rather than being products of any medical urgency. Before Council accepts any contention from airport lobbyists as to any such fixed-wing medical urgency to justify a potentially dangerous runway expansion, it should appoint an independent and unbiased panel of experts from UM and St. Joe's, medically qualified to review such information under privacy provisions of the Health Insurance Portability and Accountability Act (HIPAA). To support expansion advocates claims, the expert panel would examine six-months of complete content manifests from all such claimed flights to ascertain whether such contents are of such an urgent nature that "the extra time it would take to land and transport (them) from Willow Run would be unacceptable," as suggested by the Mayor. No such independent, objective assessment by qualified medical professionals has been conducted. From our research inquiries at both medical centers, however, no such urgency exists.

In conclusion, upon examination, the principal arguments in favor of the runway expansion have all proven to be based on misleading information:

- * There's no money to pay for widening State Street, so all arguments flowing from that stream are tainted.
- * The airport safety incident evidence does not stand up to any objective investigation -- and the substantial risks to airport neighbors far outweigh any minimal benefits that might inure to fliers.
- * The so-called medical urgency demanded by the airport's proximity to area medical centers appears to be a myth.
- * And the state's cornerstone "critical aircraft" system, designed to attract a stream of perpetually larger planes, appears to fly in the face of the Mayor's belief that, ..."there is no need for another airport in the area that can handle heavier planes."

I have attempted to provide enough substantive background to assure you that our suggestions that the Council and the public were being misled and misinformed on these important issues were based on solid facts, investigation, research and evidence. To reiterate, my colleagues and I have as our only goal to provide you and the Council with all the facts so that you can make a fair and informed decision. We all love the airport, as it is -- and it should remain that way.

These are just the highlights. We have many more issues and details you need to know before making a fully informed decision. But we do not want this to be the start of an ongoing e-mail exchange, which can only be counter-productive for us all. Rather, we look forward to having the opportunity to meet with you and the Council to discuss these issues in detail, share all the evidence, as well as the critical supporting facts, to enable a rich

dialogue -- when you are ready. I look forward to staying in touch to learn when you will want to know more.

Thanks again for your interest.

Cordially,

Andrew R. McGill, Ph.D.

We endorse this letter written by Andrew McGill, on behalf of the Committee for Preserving Community Quality

/s/ Sol Castell, commercial airline pilot

/s/ Bob Gelpke, commercial airline pilot

/s/ Leah Gunn, Washtenaw County Commissioner

/s/ Mark Kaplan, M.D., Professor of Medicine, University of Michigan

/s/ Barbara Perkins, former Ann Arbor Airport Advisory Committee member

/s/ Michael Yi, Pittsfield Township Trustee