



VILLAGE OF RYE BROOK

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REVISED LETTER

July 27, 2017

Hon. Robert P. Astorino
Westchester County Executive
148 Martine Avenue, 9th Floor
White Plains, New York 10601

Hon. Michael B. Kaplowitz, J.D., CFP
Chairman of the Board
Westchester County Board of Legislators
148 Martine Avenue, 8th Floor
White Plains, New York 10601

RE: Comments on Westchester County Airport Draft Master Plan

Dear County Executive Astorino and Chairman Kaplowitz:

I am writing to you in regards to the Westchester County Airport Draft Master Plan (the "Airport Master Plan"). The Village of Rye Brook has outlined the following concerns regarding the Airport Master Plan and its potential impacts on airport expansion, the environment, and other related items that could impact the Village and other municipalities in the region:

The following are some of our initial concerns with the Airport Master Plan:

1. On page ii, there is a comment about airlines "*gradually reducing service by regional jets and shifting to larger air carrier aircraft.*" Despite the passenger restrictions currently in effect, the Village is concerned that the number of flights will be increased along with larger aircraft. The Master Plan should address if the total number of flights will be increased or decreased with larger aircraft and fewer regional jets in the future.
2. Page iv of the Executive Summary identifies proposed construction of additional airport features including taxiways, some with high speed exits, and a new shoulder for Runway 16/34 which would

alleviate some of the existing airline traffic on the ground. There is a concern that these additional features and higher turnover could also result in an increase in the total number of flights at the airport which would negatively affect the surrounding region.

3. Page v indicates an area next to the existing commercial terminal as being *“set aside for future development and would preclude any other type of development in the vicinity.”* The Airport Master Plan language seems intentionally vague in this area and does not address alternative uses for this area. More information on what type of commercial activity this space could be used for is needed in the Airport Master Plan.
4. Also on page v, the Airport Master Plan identifies the need for expanded parking facilities such as a multilevel parking garage. There is a concern that that Airport Master Plan seeks to either build additional parking facilities for its peak usage periods, or potentially to support expansion activities at the Airport. It is also noted that the review of existing parking only includes on site facilities and fails to take in consideration the availability of existing or planned off-site parking at Purchase College and in North Castle.
5. Page III addresses increased commercial jet activity, and the introduction states the anticipated need for construction of new corporate hangars, offices, and other related facilities. New hangars especially would indicate an increase in flight activity since this is in addition to the reconstruction of existing hangars referenced on page v of the Executive Summary. More information is needed in the Airport Master Plan on the intended impact of these new hangars.
6. On Page IV, Westchester County Resolution 245-2003 is referenced which states the County’s policy is *“To support no increase in the total capacity of the Airport’s runways, taxiways, ramps, gates, hangars, terminal, motor vehicle parking areas, or access roads in order to protect the Community’s fragile environment.”* Several areas of the Airport Master Plan, which are identified below, contradict this policy in that it recommends a potential increase in the number of runways, gates, taxiways, hangars, and parking facilities.
7. It is mentioned on page 1-11 that the Terminal Use Agreement (TUA) with its associated restrictions was renewed in 2015 for a term ending December 31, 2019. Clarification is needed on what will occur when the December 31, 2019 renewal period has expired. Is this the only renewal period or are other renewal periods available to the County in the future? On a similar note, it is stated on page 4-3 that the terminal forecast for demand presented is *“unconstrained and does not consider the TUR described above.”* It is the Village’s opinion that the existing terminal use restrictions (TUR) must be considered in any forecasts in the Airport Master Plan.
8. On page 1-35, there is a line regarding wind coverage requirements that reads *“Therefore, should the runway system be unable to meet the crosswind component requirements, an additional runway(s) is recommended”*. This language seems out of context and does not indicate where this additional runway would be or its configuration. The Airport Master Plan should indicate what specific crosswind factors would be considered to determine if the additional runway would be needed. It also noted that smaller aircraft, which makes up most of the fleet at HPN, could to be more seriously affected by this action. The mention of the additional runway does not seem to fit within the County’s stated vision of no expansion and the preservation of natural resources and the environment, and therefore more information is needed on this subject and its potential impacts if the runway was constructed.
9. Potential fleet mix evolution is mentioned on page 3-49 and states *“...the increasing reliance of jet aircraft by the corporate sector, in general, will be felt at HPN due to the number and amount of corporate users of the Airport”*. However, the Airport Master Plan does not elaborate on what the implications and impacts of more corporate jets will be on the airport and the surrounding region.
10. Page 4-11 identifies the importance of incorporating the County’s strategic vision, *as the Airport Sponsor*, for future airport development. If the airport is “privatized”, does that mean that

Westchester County would no longer be considered the “Airport Sponsor”? If so, the Village is concerned that a future private operator could become the Airport Sponsor and could therefore have a different strategic vision which could negatively impact the communities in the surrounding region.

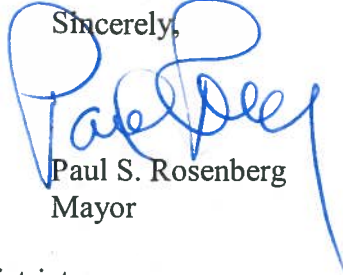
11. Page 4-25 reflects a proposed increase in the number of gates through “...*the conversion of two hardstand positions into active gates within the period of 2017-2022.*” The Village is concerned that this increase in the number of gates will result in Airport expansion and allow for an increase in the total number of flights and therefore increase the maximum number of passengers allowed in the Terminal Use Agreement. The Airport Master Plan should not disregard the no expansion policy or the restrictions in the Terminal Use Agreement. The future plan’s vision should be consistent with the current County policies so that passenger limits and the current number of gates at the facility are maintained.
12. It is stated on page 6-3 that “*The choice of reducing to width of Runway 11/29 to 100 feet was made in order to maintain flexibility for future operations for the airport in the long term.*” It is not clear how this reduction in width maintains “flexibility” and what those anticipated “future operations” entail.
13. Page 8-15 regarding On-Airport Sustainable Land Use notes that “...*aviation manufacturing, maintenance/repair/overhaul (MRO) facilities, corporate jet aircraft, airline passengers, and air cargo generate the most economic activity for airports.*” However, it does not explain how the development of these features can co-exist with the identified sustainable land use considerations for wetlands and other natural buffers. The Airport Master Plan does not clearly explain how these features relate to each other.
14. The outline of Sustainability Initiatives on pages 8-21 and 8-22 does not address noise pollution or jet fuel odor, both of which are environmental concerns that could be augmented by future development.
15. On page 9-10, “*Runway 11/29 length unable to accommodate larger jet landings of IFR operations*” was listed as an area of concern by respondents to the airside tenant questionnaires. Other airside tenant concerns include a desire for more hangars and apron space. More explanation is needed on how the information taken from these questionnaires is being taken into consideration in the planning of future airport development.

The Airport Master Plan is an import document representing the County’s vision for the future at this facility. As stated in the report’s own Executive Summary, “[t]he purpose of the Master Plan Update is to provide a framework for guiding future Airport development that meets facility requirements and is in line with the County’s vision.” (Executive Summary, p.i). As a result, the Village of Rye Brook remains very concerned with any vision that could lead to expansion at the airport or have negative impacts on the environment or the residents in the region.

Similarly, the Village of Rye Brook has also previously stated is concern that in the preparation of the update to the Airport Master Plan, the County should have followed the guidelines of the *FAA's Community Involvement Policy Statement*. The goals of this policy are to provide active, early, and continuous public involvement, provide reasonable public access to information, provide the public an opportunity to comment prior to key decisions, and solicit and consider public input on plans, proposals, alternatives, impacts, mitigation, and final decisions. To date, the County has not adequately involved the impacted communities throughout the preparation of this Airport Master Plan.

Thank you for your consideration of our comments and concerns.

Sincerely,



Paul S. Rosenberg
Mayor

CC: David B. Gelfarb, Westchester County Legislator, 6th District
Westchester County Board of Legislators
Rye Brook Village Board Members
Christopher J. Bradbury, Village Administrator