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**FAA Hearing re EA Tweed New Haven Airport expansion**

NOTE: Due to the three minute time limit required by the FAA on oral statements at the FAA hearing, the following statement may not be presented in full. The FAA prepared transcript should be consulted for the actual statement provided.

Like my colleagues, I have carefully reviewed the draft Environmental Assessment (EA) and discussed it with our team of professionals. As the Mayor said: we believe the EA is legally and substantively deficient and the FAA should remedy these deficiencies by either requiring a new EA or beginning the much more rigorous and transparent EIS process to the benefit of all stakeholders.

As has already been made clear, the project described in the EA -- the proposed runway extension, the relocation and expansion of the terminal building including associated facilities and infrastructure, and the routing of all airport traffic through East Haven -- will have a significant negative impact on the quality of the human environment.

I would like to address, in the short time I have, just a few of the problematic aspects of the EA.

Noise, Air and Water Quality, Traffic, and Environmental Justice Analysis

The analysis in the EA of noise, air and water quality, traffic, and environmental justice impacts are all based on the same fundamental flaw in the EA’s alternatives analysis -- as already discussed by Mayor Carfora – the assumption that the same exact amount of passenger demand will be accommodated whether the facilities supposedly needed to accommodate that demand are built or the Airport carries on with the existing, severely inadequate facilities.

This is an incredible assumption, given that the Master Plan Update recently completed by the Authority clearly stated that “Existing facilities are constraining commercial service at HVN.” The assumption that unconstrained (and vastly increased) demand could nonetheless be handled by the existing facilities, and the “no action” level of enplanements is, thus, identical to the number of enplanements that could be handled after completion of the proposed $165 million airport expansion project, makes a mockery of the intended environmental analysis.

In a more realistic assessment unconstrained demand could only be accommodated by the new facilities – otherwise they are not truly needed -- and unconstrained demand would not be fully met by the existing, inadequate facilities. Therefore, as one would expect logically, aircraft operations and related ground vehicle traffic – and their environmental impacts – would be greater under the build than the no-build scenario.

However, the EA, incredibly, reaches the exact opposite conclusion, claiming that aircraft operations – and thus, environmental impacts – are greater under the no-build scenario.

The consequences of the EA’s fundamental disconnect between its dire assessment of the current Airport facilities’ inadequacy to handle projected traffic and their remarkable ability to nonetheless accommodate massive increases in passenger activity are pervasive and infect virtually all of the subsequent environmental analysis.

It is also worth noting that despite stating up front that other airlines, such as Allegiant, want to serve the Airport but cannot because the current runway is too short and thus it is likely that other airlines would add flights to additional cities that will result in increased passenger levels at HVN beyond the No Action Alternative, the EA only considers the potential enplanements generated by future Avello flights. Thus, the EA likely undercounts the potential environmental impacts of the proposed project.

Access Roads

The EA simply ignores the very real and current issues with the East Haven roads designated in the EA for airport access. You have already heard from the Mayor and the public safety professionals who deal with these roads every day, and we will provide more specific evidence and information in our written comments.

The EA states that “Providing a more direct access route that avoids residential neighborhoods and is able to support the traffic to the Airport, is a key goal of the project. New access that favors compatible land use and safe and efficient routes between the terminal and I-95 is needed.” It goes on to find that the no-build alternative “does not provide suitable and efficient roadway access to the terminal area.”

The EA then goes on to find that the proposed alternative, access through residential neighborhoods in East Haven, does provide suitable and efficient access to the terminal. This notwithstanding the fact that the Town has informed the Authority and the FAA that the access route (also the Town’s “Main Street” and evacuation route) experiences frequent flooding – and not just related to storm events.

The proposed project would route Airport traffic through the Town, specifically through the critical intersection at Hemingway Ave (Route 142) at Coe Ave and Short Beach Road (Route 142), which has flooded twice in a recent two week period – which is far more frequent than the two times in the past 3 years that the existing terminal has flooded.

If this intersection is impassable, access to and from the Airport is cut off. Without ground vehicle access, Airport operations would be severely disrupted, passengers would be greatly inconvenienced, and emergency response to the Airport could be delayed or impeded to disastrous effect.

All Airport traffic coming from or going to Route One and I-95, as well as the Town, the City of New Haven, and most surrounding areas will have to approach or leave the Airport through that intersection. This is most of the Airport traffic.

Thus, the answer to the EA’s Evaluation Criteria question, “Does the alternative provide … suitable, efficient roadway access to the terminal area?” clearly must be “No.”

Yet, remarkably the EA does not even mention the flooding and simply declares that this access route meets the purpose and need for the project.

In the real world, however, this flooding is severe enough to block access to and from the Airport, and therefore, an alternate entrance to the Airport needs to be available in order to ensure safe and reliable access on a continuous basis and should have been included as an alternative for FAA consideration per regulatory requirements.

Residential Impacts

The EA also states that the proposed project will “provide better landside access through non-residential areas avoiding the New Haven and East Haven neighborhoods” and “[m]inimize use of access corridors through residential areas”, noting that, “Providing a more direct access route that avoids residential neighborhoods and is able to support the traffic to the Airport, is a key goal of the project.”

However, the proposed project does not avoid residential neighborhoods in East Haven. And, in fact, elsewhere, the EA acknowledges that “The area surrounding HVN is generally residential in both communities, including “single family, two family, and multi-family residential areas.”

I am going to reiterate here that the East Haven neighborhoods that are expected to shoulder this burden are designated Environmental Justice communities -- a designation that is intended to protect residents from exactly this kind of shifting of burden. These residents will also be faced with a new visual landscape: A two story terminal to be built on piles and a six story parking garage which is planned to have a peak 76 feet above existing grade. Both of these will be built on a raised grade due to the fact that this is a flood plain. The EA acknowledges that these structures will be visible year round regardless of the “vegetated buffer” that may provide a visual screen when fully leafed out.

Moving the terminal/access to the East side of the Airport via the Preferred Alternative does not adequately address the concern of avoiding impacts on residences. It simply shifts such impacts from New Haven to East Haven.

Impacts on Parks

We are also concerned with impacts on Town parks and civic activities held there, especially the Town Green, located along Hemingway Avenue (at Main St. and River Street) – which would become the primary road for egress and ingress to access the proposed new terminal.

The EA gives no consideration at all to potential interference by the rerouted Airport traffic on Town and community functions at the Town Green that are an important part of the Town’s character and appeal to its residents.

The Mayor and the Police Chief have described the impacts that the rerouted airport traffic will likely have in constraining, if not curtailing, the ability of the Town and its residents to use the Town Green for various community events.

These impacts raise significant concerns over the “constructive use” of the Town Green and other parks, which can result when “a project results in a restriction in access which substantially diminishes the utility of the property.” This is supposed to be studied and evaluated as part of the DOT Section 4(f) analysis, but there is no evidence in the EA that it was.

Instead, the EA merely states that “any proximity impacts resulting from the increased traffic flow would not substantially impair or interfere with activities, features or attributes that qualify resources for Section 4(f) or Section 6(f) protection,” without any reference to the Town Green or the other parks along the proposed Airport traffic route.

In fact, there are 10-20 public parks of local significance that we believe should be analyzed for potential 4(f) impacts, whether by overflights or ground vehicle traffic, such as the Town Beach and Memorial Field. Further information and analysis will be provided to the FAA in our written comments.

In Conclusion

I applaud all of the people here on a Saturday. This is a small town filled with passionate people who are engaged and working to keep the sense of community we all love. I join with my colleagues and neighbors to urge the FAA to do the right thing and simply follow applicable federal laws and regulations and require the preparation of an EA that meets standards or immediately move to requiring the preparation of an Environmental Impact Statement that will allow for fully informed decision-making, and consideration of all of the impacts of the proposed action based on adequate information and consideration of true alternatives.