

George Latimer  
County Executive

Department of Public Works and Transportation

Hugh J. Greechan, P.E.  
Commissioner

July 6, 2018

Evelyn Martinez, Manager  
New York Airports District Office  
Federal Aviation Administration  
1 Aviation Plaza, Suite 111  
Jamaica NY 11434

Re: Westchester County Airport Master Plan (Grant # 3-36-0123-107-2012)

Dear Ms. Martinez:

As follow up to your letter of April 24, 2018, attached is the Westchester County Airport Master Plan (Plan) and accompanying documents. A signed copy of the Airport Layout Plan (ALP) has been sent to Mr. Gerardo Mendoza, Director of the New York State Department of Transportation's Aviation Bureau in coordination with your office. The Plan and ALP were developed by the prior Westchester County administration in conformance with FAA grant requirements. We are submitting these documents without prejudice, and in compliance with the Grants Oversight and New Efficiency (GONE) Act (PL 114-117). We believe this Plan and ALP meets FAA requirements, as per the grant awarded in 2012 for an updated airport master plan study.

Although we are submitting the Plan and ALP as developed by the prior Westchester County administration without prejudice, based on the public input this administration has received, we believe more can and should be done to supplement this plan to better meet the vision of the Westchester community.

Specifically:

- **Public involvement between 2012-2017:** We believe there was insufficient public involvement regarding the plan. The County did hold public meetings on July 17, 2013 and July 27, 2017 regarding the master plan. However because the 2017 hearing was held at the same time as the prior administration was soliciting proposals regarding airport governance and potential privatization, the master plan public hearing became more focused on governance issues rather than aspects of the master plan (see attached transcript). Although the public input process complied with FAA requirements, it is this administration's position and philosophy that there should be significantly more public input throughout the planning process.
- **Strategic vision:** While the Plan focusses on many important aspects of the airport, this administration believes additional focus on the airport's role in Westchester County both today and going forward is needed. The airport is located in close proximity to several residential neighborhoods, businesses, and educational institutions, in an area that has been experiencing significant development and demographic changes. All stakeholders must be involved in a more robust visioning process.



- Demand forecasts: The Plan includes passenger projections that were developed based on FAA requirements, which evaluated low, medium, and high projections. However, this FAA forecast model and methodology does not consider the county's legal authority and local laws regarding its terminal use regulations. As a result, a distorted picture of the potential for growth and expansion may be created. It is Westchester County's intention to continue to abide by its Terminal Use Regulations.
- Environmental issues: This administration recognizes this is a Plan that does not authorize any specific construction. A NEPA Categorical Exclusion Form was approved on March 16, 2011 for this FAA grant. This administration also believes it is important to recognize that the airport is located within a watershed that is relied on for drinking water by millions of people in Westchester and New York City. This administration believes a more thorough review of the water, air, noise, and other potential environmental impacts is needed. Although such review is not an FAA requirement as part of the master planning process, Westchester County intends to comply with New York State and County standards going forward.
- General aviation: While we recognize that the FAA does not impose extensive requirements on general aviation operations, general aviation constitutes the overwhelming majority of Westchester County Airport operations. This administration intends to do a more in depth analysis of such operations.

On May 16, 2018, this administration announced a plan for moving forward to plan the future of Westchester County airport. It was divided into three categories: Master plan, Governance, and Operations with a specific public hearing for each category. It has become very clear from those public hearings that Westchester expects more from a master planning process than was done by the prior administration. While we believe the master plan we are submitting today meets FAA requirements and we are submitting it in compliance with the GONE Act requirements, it is our intention to do a supplement to the Plan that we are submitting today. The supplement will focus on a more robust visioning and more robust assessment of environmental issues and community benefits. We believe this supplement will re-shape the master plan we are submitting today.

We are starting the supplemental plan process immediately. We will develop a timeline for that process, including full environmental review, satisfying state SEQR and County requirements. The supplemental plan will be submitted to the County Board of Legislators for their review, modifications, and approval, and upon adoption will represent a revision of today's document submission.

Thank you for your guidance and cooperation as we move forward in the best interests of Westchester County and airport stakeholders.

Sincerely,



Hugh J. Greechan, Jr., P.E.  
 Commissioner  
 Westchester County Department of Public Works and Transportation

Attachments:

- Master Plan Documents
- Master Plan Public hearing transcript July 2017
- Master Plan Public hearing transcript June 6, 2018
- Additional written comments June 2018

cc: Joan McDonald, Director of Operations