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September 15, 2009

Mr. Keith Garber
Chief Transportation Planner
Houston-Galveston Area Council
P.O. Box 22777
Houston, Texas 77227-2777

Dear Mr. Garber,

Enclosed are the comments of the Houston Regional Group of the Sierra Club (Sierra Club) regarding the 2040 Regional Aviation System Plan (RASP) Update.

1) The Sierra Club is concerned about how this process was planned and begun. Already the Phase I Report is complete with interviews of over 250 stakeholders. However, the Sierra Club, which has had an interest in airports for over 20 years, was never contacted or interviewed and apparently is not considered a "stakeholder."

By planning and beginning the process in this manner HGAC already has a certain preconceived perception about the issues and who is important as so-called stakeholders. It will be difficult for the public to alter this perception and the residual will continue throughout the process. The Sierra Club would have preferred that HGAC had a public meeting first, provided some basic factual information about airports, and then asked the public what the issues were. Right now what HGAC has is a preconceived perception of what is needed from interviewing airport owners, operators, and whatever community leaders that were interviewed. HGAC should let the general public in first and find out what the public wants before it completes one-half of the process without public input.

2) Before the general public has even had a chance to comment on the update the Mission and the Objectives have already been prepared. So without public comment HGAC has already decided what it believes the Mission and Objectives should be. This puts the cart before the horse. People have a sense and pride of ownership in their work and it is harder for them to change something that they already have put a lot of effort into. Therefore the public's input on the Mission and Objectives will have less impact than if HGAC would have asked the public what it wanted and then prepared the Mission and Objectives from that input.

3) The Sierra Club supports, as a principle, using existing airports, instead of building new ones. In the past, private general aviation airports have had to

"When we try to pick out anything by itself, we find it hitched to everything else in the universe." John Muir

struggle because business is not great enough to support them all. More airports are not needed but better use of existing airports is needed.

3) In the Houston Area, airports have conflicts with birds and their habitats (homes). These birds have existed in our area for 100's of years. It is particularly of concern that a new airport, Houston Executive Airport, was built in the Katy Prairie where intense concentrations of birds have historically occurred for 100's of years. This was the wrong place to put an airport and HGAC, the aviation community, and our community leaders did not step up and state the obvious and recommend that this airport not be built. Now Houston Executive Airport wants to kill 2,400 birds each year to try to prevent bird strikes. Since HGAC knew that the Katy Prairie was a regionally sensitive habitat, has a great concentration of birds, is of interest to the public, and was mentioned in the Regional Transportation Plan, it seems odd that HGAC would not press this issue.

This particularly seems odd when the placement of airports in the Katy Prairie was also an issue during the 1986 and 1991 HGAC Regional Aviation System Plan revisions. This occurred when the City of Houston proposed building the Westside Airport on the Katy Prairie. The public rejected this proposal which ultimately failed. It is also peculiar since part of the RASP's mission is to provide "A safe environment with safe airports" and "protection of the environment and sustainable development." How can the placement of an airport on the Katy Prairie be safe when the risk of bird strikes is so high that that airport must get a permit to kill 2,400 birds each year?

There already is a very large green land infrastructure investment in the Katy Prairie. The Katy Prairie Conservancy has acquired over 13,000 acres of habitat for birds and other wildlife on the Katy Prairie. The Sierra Club does not support any more airports or expansions of airports in or near the Katy Prairie and urges the HGAC, the aviation community, and community leaders to speak with a united voice and ensure that this does not occur again.

The RASP, at a minimum, should clearly delineate all of the migratory bird pathways in the Houston Area so that everyone is educated and cannot say they did not know where the risk of bird strikes is highest.

3) The RASP states as part of its Mission that it wants to "establish a balanced system of general aviation, reliever and commercial airports for all aviation users." However, RASP does not define what "balanced" is. What does "balanced" mean?

4) In the RASP Mission, what does "Protection from incompatible land uses" mean? How does HGAC plan to protect airport from incompatible land uses when it is loath to criticize its own members and does not require its members to adopt land use protection laws, regulations, or rules?

5) In the RASP Mission, what does "Protection of the environment and sustainable development" mean? How does HGAC plan to provide protection of the environment and sustainable development when it is loath to criticize its own members and does not require its members to adopt laws, regulations, and rules that protect the environment and ensure that we live in a sustainable way? What does "sustainable" mean when HGAC uses this word in the Mission? How is the use of "sustainable" different than what HGAC has advocated in the past? How will "sustainability" be required and implemented?

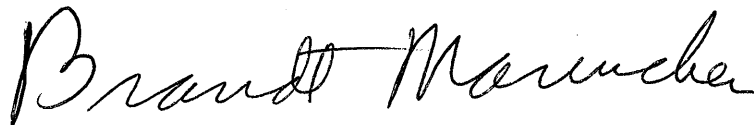
6) As a principle, the Sierra Club agrees that incompatible land uses should not be allowed near airports. But that begs the question of how this can be enforced without laws, regulations, and rules. Voluntary efforts will not protect airports from encroachment of residential, commercial, and other forms of incompatible development.

7) Airports need to provide more buffer zones to reduce the possibility of noise complaints. Airports need to buy enough land to buffer their facilities to provide safe conditions when they reach their maximum capacity. If this occurs there will be far fewer noise complaints.

8) For buffers that airports buy to shield themselves from noise, height, and other incompatible nearby uses or problems there should be an opportunity to provide for public recreation, scenery, and wildlife protection. This type of use should be encouraged and required so that airports give back to the community and provide community services in a variety of ways.

The Sierra Club appreciates this opportunity to comment. Thank you.

Sincerely,



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