



Sustaining the Oak Ridge Reservation for future generations

August 2, 2023

Mr. Tommy L. Dupree
Manager, Federal Aviation Administration,
Memphis Airports District Office
2600 Thousand Oaks Boulevard, Suite 2250
Memphis, TN 38118-2462

via email: tommy.dupree@faa.gov

Subject: Proposed Oak Ridge Airport Environmental Assessment

Dear Mr Dupree:

Advocates for the Oak Ridge Reservation (AFORR) is a local nonprofit established in 1999 to support the preservation and compatible economic development of the natural resources of the Department of Energy's ~23,000-acre Oak Ridge Reservation for the benefit of DOE, the local community, and national and international interests. AFORR has and continues to engage in decisions regarding natural landscapes conservation, environmental cleanup of legacy waste from DOE missions, as well as re-industrialization and reuse of brownfield lands and strategic greenfield sites.

AFORR recognizes general aviation (GA) airports are a big part of the US national economy and understands that they can be justified for a local economy. However, in the specific instance of a proposed GA airport in Oak Ridge, we believe there are no compelling merits, needs, or justifications for such an airport. The following points support our position that the development of an Oak Ridge airport is not warranted or needed.

- There is no defensible need for the airport. Oak Ridge has convenient access to three modern airports serving general aviation — DKX, RKW, & TYS. The proposed airport location in Oak Ridge does not meet one of the key FAA entry criteria for a new GA airport. It is a 25-minute ground travel time from the proposed Oak Ridge airport site to the Rockwood Municipal Airport (RKW). FAA Order 5090.3C Chapter 2 Entry Criteria requires a new GA airport to be 30 minutes or more average ground travel time from the nearest airport under the National Plan of Integrated Airport Systems.

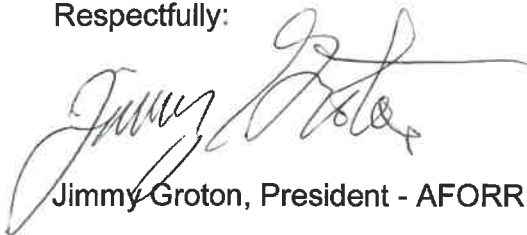
- The senior staff of experienced airport professionals at the Metropolitan Knoxville Airport Authority sponsored and studied a proposed Oak Ridge airport for 10 years, investing \$2.2 million in their effort. Eventually, it seems that they concluded the project was not worth pursuing further and handed off the project to the City of Oak Ridge in July 2020.
- Heritage Center (heritagecenter.com), site of the proposed airport, appears to be an unsuitable location for an airport. The existing infrastructure on the site and location of classified burial sites makes siting of an airport in the industrial park extremely difficult and a huge waste of taxpayers' money. The airport planners were left with a strip of land immediately adjacent to a major 4-lane highway. A forced fit for the runway will be required. Obtaining sufficient length for the runway will require cutting and leveling of a 100-foot ridge with the soil pushed out and covering a large environmental mitigation area including the 26-acre K-1007-P1 Pond. This would block the front entrance to the industrial park forming a wall (60-foot' high runway on one end) about a mile long across the front of the industrial park complicating access to the park.
- The planned runway location will result in the filling of the 26-acre K-1007-P1 Pond/riparian area. DOE remediated the P-1 Pond creating a wonderful recreation area for birdwatching and walking trails. This natural area and recreational resource would be eliminated with the current airport design. This pond is widely used by great blue herons and many other wading birds and waterfowl.
- Initially when it was first proposed during the recessed economic times of 2009, it was speculated an airport would spur the Oak Ridge economy. Today Oak Ridge has more jobs (estimated 25,000) than at any point since the Manhattan Project in 1943.
- Economic development has grown dramatically in Oak Ridge in the past 5 years to the point the only sizable acreage at Heritage Center available for industrial development is this acreage being held aside for the proposed airport.
- The Oak Ridge Industrial Development Board's objective is to develop jobs and grow the industrial tax base. A tax exempt 230-acre GA airport with perhaps 6 jobs accomplishes neither. Industrial development of the proposed airport site would generate many more, higher-paying, long-term jobs than the airport ever will.
- GA airports for the most part serve mainly a few dozen recreational/leisure users and too often are subsidized by the local community or require state and federal grants/subsidies. The Metropolitan Knoxville Airport Authority estimated an Oak Ridge GA airport would have an operating deficit for the first 6 years. DKX with 140 hangars and \$800,000 in fuel sales in 2019 has historically operated at a deficit.
- Oak Ridge has many community-wide needs far greater than a GA airport, including a school bond indebtedness in the \$10's of millions, a new

elementary school to accommodate population growth, a new fire station, new \$78.3 million water plant-construction started Jan 2023, an ~ \$4 million conference facility to support business needs, and aging sewer and water infrastructure dating from 1943. Though most of construction will be provided by state and federal funding, the operation and maintenance costs must be provided by the City of Oak Ridge.

- There are more than 20 major companies/businesses in Oak Ridge with some new ones in the past five years. Not one of these companies correlate their business success to the prospect of an Oak Ridge GA airport.
- Residential growth within 1.4 miles of the proposed airport location has been substantial with development of The Preserve at Clinch River. The Preserve is on track to be home to 10,000 Oak Ridgers within the next decade. The proposed runway alignment would result in low altitude planes during take-offs and landings passing directly above The Preserve. Lead emissions from leaded fuel used by piston aircraft is another possible concern in the Preserve. <https://tnlandforms.us/google.php?trk=runway+gw&scale=14&lat=35.930671&lon=-84.385812&mt=1>
- Airport noise would also disturb nesting birds, wildlife, and recreational users in the Black Oak Ridge Conservation Easement.
- This proposed new airport has been under review for more than 13 years and there is still no independent professionally compiled benefit cost analysis.
- Oak Ridge has experienced remarkable nuclear technology economic development growth in the past 5 years. Based on this, and the Nation's heightened focus on clean energy research and development, AFORR is convinced the 230 acres of prime industrial development land has far greater economic value to the region and the nation than a fourth airport serving general aviation in a 30-mile radius.
- AFORR also wonders whether aviation will decline in the future in the face of an emphasis on mitigating global climate change.

The FAA with over 3,300 airports to manage & fund nationwide has no compelling reason to approve a fourth GA airport within 30 miles of Oak Ridge. We ask that the FAA cease any further consideration of a GA airport at this location.

Respectfully:



Jimmy Groton, President - AFORR

CC:

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