



Australian Government

**Department of Infrastructure, Transport,
Regional Development and Communications**

Submission to the Finance and Public Administration References Committee on the planning, construction and management of the Western Sydney Airport project

Introduction

The Department of Infrastructure, Transport, Regional Development and Communications (the Department) is pleased to provide this submission to the Finance and Public Administration References Committee on the planning, construction and management of the Western Sydney International (Nancy-Bird Walton) Airport (the Airport) project, with particular reference to the Terms of Reference. The Department would be happy to provide further information on any aspect the Committee requests.

Before specifically addressing each of the terms of reference, a short overview is provided below of the key steps in the planning and development of the project to date.

Overview of the project to date

The Joint Study on Aviation Capacity in the Sydney Region (2012) (the Joint Study) found that, under current conditions, Sydney (Kingsford-Smith) Airport (KSA) would be unable to meet the increasing demand for new aviation services. The Joint Study (**Attachment A**) identified substantial costs to the NSW and Australian economies if Sydney's future aviation demand could not be met:

- The cumulative impact (from 2010 to 2060) to the Australian economy was estimated to have been between \$34 billion and \$59.5 billion in foregone Gross Domestic Product.
- NSW would likely have been the most significantly affected economy, with an estimated cumulative impact by 2060 of \$17.5 billion in foregone Gross State Product.
- The total number of jobs that may have been foregone was estimated to grow over time as unmet demand increased. This was averaged to be 12,700 full-time equivalent positions per year in NSW and 17,300 full-time equivalent positions per year nationally over the period from 2011 to 2060. In 2060 alone, the annual estimate of foregone jobs was estimated to be approximately 57,000 in NSW and 77,900 nationally.

Following the completion of the Joint Study, the Australian Government announced in April 2014 that Badgerys Creek would be the site of a new Airport (see **Attachment B**). The Government also committed to jointly funding, with the NSW Government, the then \$3.6 billion Western Sydney Infrastructure Plan (WSIP) involving major road and transport linkages to capitalise on the economic gains from developing an airport at Badgerys Creek while boosting the local economy and liveability of Western Sydney. Details are available on the Transport for NSW WSIP webpage¹.

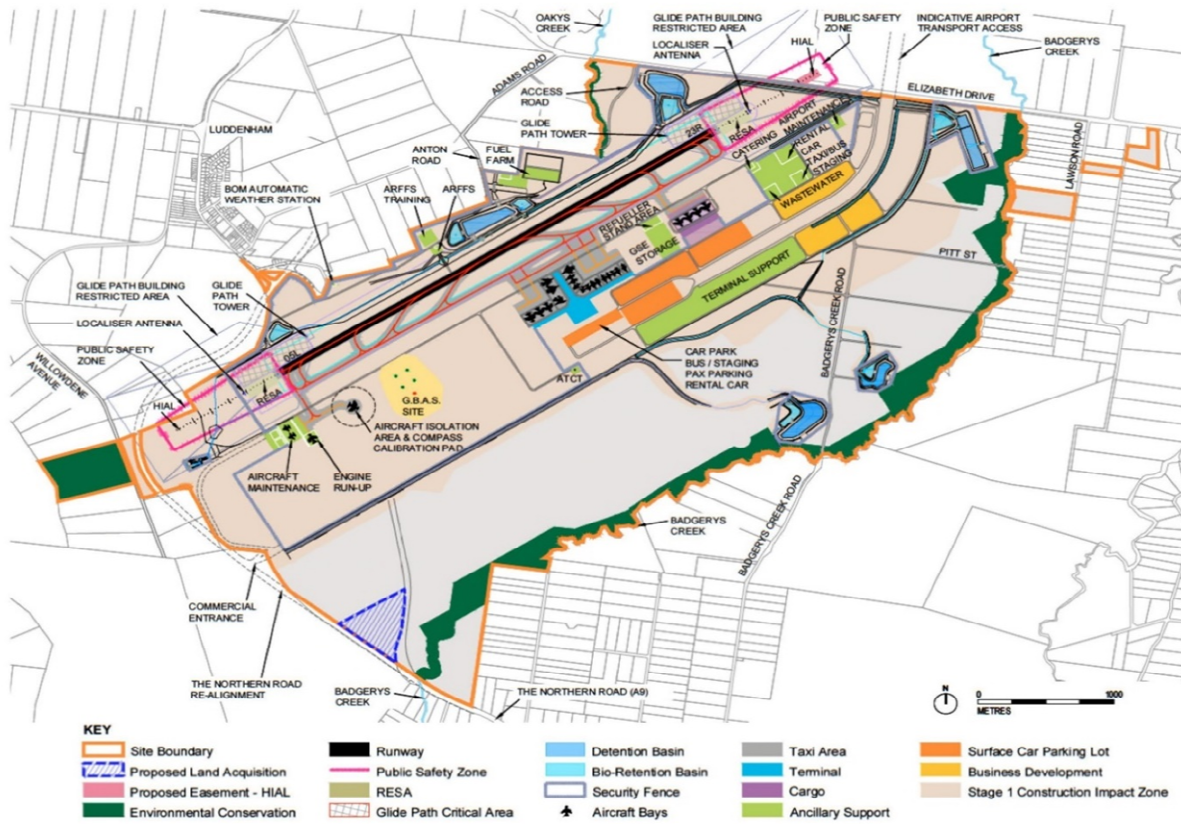
At the same time, the Government announced the establishment of a Project Management Office within the 'Western Sydney Unit' (WSU) of the Department to develop a business case for the Airport while undertaking a consultation process with the owners of Sydney Kingsford Smith Airport (KSA), Southern Cross Airports Corporation (SCAC). The requirement for the consultation process was an obligation, known as the 'Right of First Refusal' (RoFR), included in the sale agreement when SCAC purchased KSA in 2002.

In 2015, the Australian Government introduced an amendment to the *Airports Act (Cth)* to accommodate the master planning and planning approvals for this first major 'greenfield' Airport development in Australia in recent times. The *Airports Amendment Act (Cth) 2015* was passed by Parliament and received Royal Assent on 30 June 2015 (see

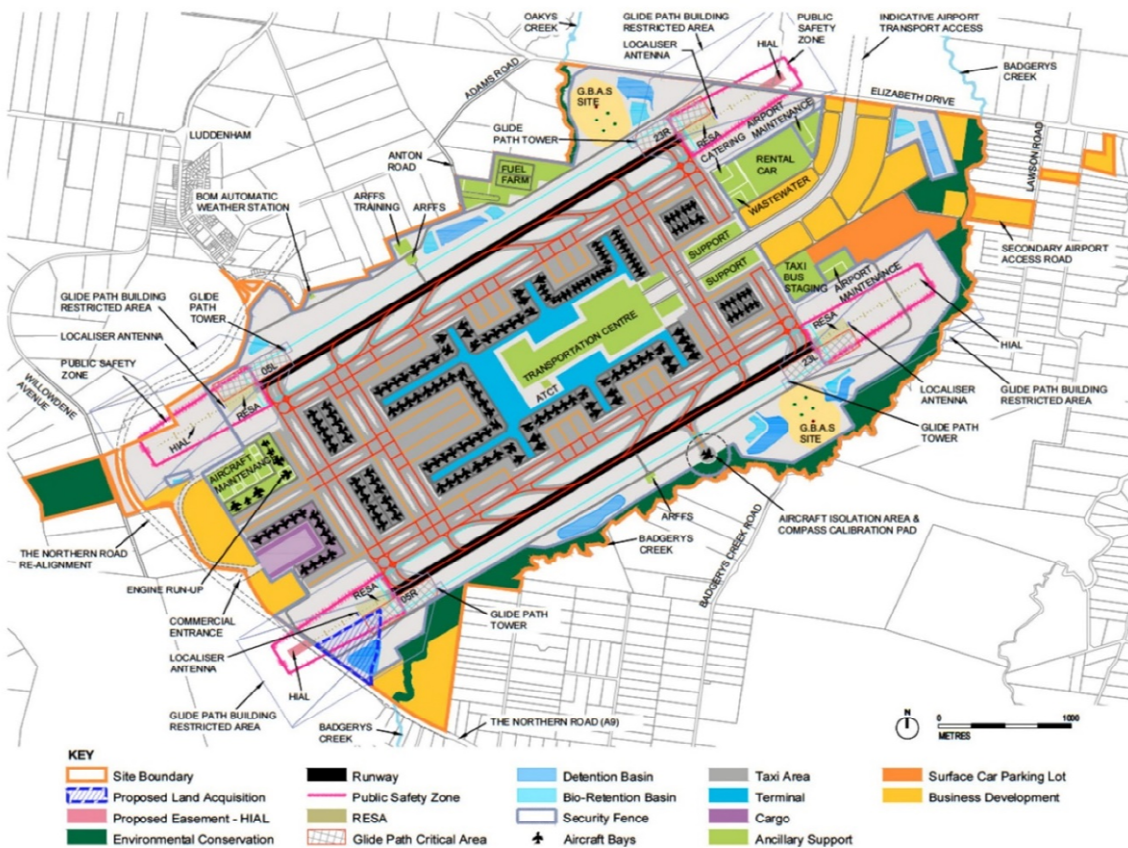
¹ Transport for NSW WSIP page <https://www.rms.nsw.gov.au/projects/infrastructure-plan/index.html>

Attachment C. The amendments created an instrument known as the 'Airport Plan', which would describe the concept design (see pictures below) for the Airport and the specific proposed development for Stage 1 of the Airport.

Indicative Airport Layout (Stage1)



Indicative Airport Layout (Long Term)



The Airport Plan would also form the basis for the assessment of the proposal in accordance with *the Environment Protection, Biodiversity Conservation Act (Cth)*. The draft of the Airport Plan and the Environmental Impact Statement (EIS) were released for public consultation between 19 October 2015 and 18 December 2015. The Airport Plan is at **Attachment D** and the EIS at **Attachment E**.

On 15 September 2016, the Minister for Urban Infrastructure announced the finalisation of the EIS, which was presented to the then Minister for the Environment and Energy, for consideration. The Minister for Environment and Energy considered the Airport Plan against the findings of the EIS and on 11 November 2016, advised the environmental conditions to be placed on the then proposed Western Sydney Airport. The Minister for Urban Infrastructure determined the Airport Plan on 5 December 2016, providing the authorisation to allow the construction and operation of Stage 1 of the Airport.

In parallel with the development of the Airport Plan, the WSU also prepared the Business Case for Stage 1 of the Airport development (a summary of the Business Case is at **Attachment F**). The Business Case was submitted to Infrastructure Australia (IA) for review, and IA assessed the project as a high priority project. IA's evaluation report of 21 October 2016 is at **Attachment G**.

On 20 December 2016, in accordance with the RoFR obligations, the Australian Government offered a proposal to SCAC to develop Stage 1 of the Airport. In May 2017, SCAC advised it would not be accepting the offer, and the Australian Government announced it would deliver the Airport through a \$5.3 billion equity investment in a new Commonwealth Company, with operations commencing by 2026.

WSA Co was established as a Commonwealth-owned company under the *Corporations Act 2001* on 7 August 2017 and was subsequently prescribed as a Government Business Enterprise in accordance with Section 72 of the *Public Governance, Performance and Accountability Act 2013* in a notice tabled in the Senate on 4 September 2017 (**Attachment H**). The company has an independent Board and Chairperson who are governed by a Company Constitution, Commercial Freedoms Framework and Statement of Expectations from the two Shareholder Ministers, the Minister for Finance and the Minister for Communications, Urban Infrastructure, Cities and the Arts. The Statement of Expectations is at **Attachment I**.

On 5 October 2017, the Commonwealth of Australia and WSA Co executed the Western Sydney Airport Project Deed, which sets out the role and responsibilities of the parties and under which WSA Co is fully responsible for the development and operation of the Airport. As counterparty to the Deed, the Department is responsible for ensuring that the Airport is developed and delivered in accordance with regulatory and statutory requirements as well as the approved Airport Plan and other specifications. On 17 May 2018, the Commonwealth issued WSA Co a lease for the Airport site for an initial 50-year period, with an option to renew the lease for a further 49 years.

The Commonwealth has a range of counterparty responsibilities under the Project Deed. These include the development and approval of the airspace design for the Airport and the procurement of biodiversity offsets required for the Airport works. Other obligations include a small number of land acquisitions and the relocation of structures like high-voltage powerlines, cemeteries and heritage sites.

On 2 June 2020, the Australian and NSW governments announced the development of the \$11 billion jointly funded Sydney Metro – Western Sydney Airport (SMWSA) rail line. This announcement is at **Attachment J** and additional information on the SMWSA rail link can be found on the Sydney Metro Website². The rail line will be delivered by Sydney Metro and connect the Airport and the proposed Western Parkland City to the Greater Sydney rail network via St Marys station, see the Western Parkland City Authority website for further information³.

The role of the Department in relation to the remaining planning, construction and management of the Airport project is as follows:

- Support the Shareholder Ministers in their responsibilities for the operation of WSA Co as a GBE and ensure it develops the Airport within the \$5.3 billion equity cap.
- Manage the Project Deed with WSA Co, on behalf of the Commonwealth, to ensure the Airport works are completed in accordance with the required scope, schedule and regulatory requirements.

² Information on the SMWSA rail link, Sydney Metro Website <https://www.sydneymetro.info/westernsydneyairportline>

³ Western Parkland City Authority website, <https://wpc.a.gov.au/western-parkland-city>

- Fulfil the Commonwealth's regulatory responsibilities for the planning and environmental regulation of the Airport development and operation.
- Complete the Commonwealth's obligations under the Project Deed, including the development of the airspace design and procurement of the biodiversity offsets.
- Represent the Commonwealth on the WSIP and Sydney Metro – Western Sydney Airport (SMWSA) rail project to ensure these transport connections are completed on time and to manage their interfaces with the Airport development.

Response to terms of reference

a. Probity planning and management, risk assessment frameworks and management

Early in the planning for the Airport project, the Department engaged the services of a specialist risk assessment adviser to develop a risk management plan and risk register for the project.

The risk management plan has been developed in accordance with the Department's own risk management framework and the Australian Standards for risk management. This plan has been updated as the project has evolved to capture and address emerging risks.

The assessment and monitoring of risk has featured prominently in the Department's monthly governance reports and meetings throughout the life of the project. Risk is also a key feature of the Department's business planning and annual reporting processes.

Similarly, WSA Co has developed a risk management framework for the delivery and operation of the Airport. The monitoring and reporting of risk also features prominently in WSA Co's monthly progress reports and in its Annual Reports. A summary of WSA Co's risk management approach can be found in its 2020-21 Corporate Plan at [Attachment K](#) and 2019-20 Annual Report at [Attachment L](#).

A key risk for the Department and WSA Co's management of the delivery of the Airport is probity.

The Department engaged the services of an independent probity advisor to develop a probity management plan for its role in the delivery of the project and seeks ongoing advice and services of a probity advisor for delivery activities involving probity risks as the project continues.

WSA Co similarly engaged the services of an independent probity advisor to develop its probity plan and provide probity advice throughout the delivery of the project.

b. Land acquisition and related leases, including transactions related to the Leppington Triangle

The Airport Plan (at [Attachment D](#)) includes a concept design (see pictures on page 2 of this submission) with indicative Airport layouts and land use areas for the initial and ultimate stages of the Airport, estimated air traffic forecasts and noise contours. While most of the land required for the Airport was acquired in the 1980s and 1990s, certain acquisitions and disposals of land and other interests are required to facilitate the development of the Airport in accordance with the Airport Plan. Some of the acquisitions include the portion of The Northern Road transecting the Airport site, the triangular portion of land in the south of the site (known as the Leppington Triangle) and an easement for High Intensity Approach Lighting. Decisions relating to acquisitions and disposals of land and other interests are governed by the *Lands Acquisition Act (Cth) 1989*.

On 21 September 2020, the Australian National Audit Office (ANAO) tabled a report on the Commonwealth's July 2018 acquisition of the Leppington Triangle. The Department has accepted the report's recommendations and is taking action to address shortcomings in processes and decision-making identified by the ANAO. The ANAO's report can be found at [Attachment M](#).

Evidence provided to the Senate Rural and Regional Affairs and Transport Legislation Committee in October and November 2020, included that a number of independent investigation and review processes have been initiated to examine the circumstances and events related to the Leppington Triangle transaction in more detail. At the time of this submission these processes are ongoing. The Australian Federal Police is also conducting a separate ongoing investigation process and has advised the Department that any material that may prejudice this investigation should not be released while the investigation is underway.

c. The role and performance of WSA Co Limited

In addition to the description of WSA Co's role provided in the earlier section 'Overview of project to date', further details of WSA Co's role and performance to date can be found in the Corporate Plans and Annual Reports it has published on its website⁴.

The ANAO undertook a performance audit of WSA Co's procurement framework and procurement activities in 2019. The audit report, at **Attachment N**, found that WSA Co's procurement framework and procurement activities were largely achieving value for money. The audit found that while WSA Co was slow to develop a procurement framework, with significant procurement activity undertaken before a framework was in place, it now has procedures and systems that support compliance with its procurement framework, having identified and addressed earlier issues.

d. Site preparation, including the realignment of the Northern Road

The Airport encompasses nearly 1,800 hectares of undulating terrain. Preparation of the site involves around 25 million cubic metres of earthworks to level the site, the relocation of high-voltage powerlines, cemeteries and heritage sites. Works are well underway with powerlines undergrounded, cemeteries relocated and 11.9 million cubic metres of soil – almost the halfway-mark of earthworks on the site - moved to date. Aerial shots (below and over page) of the site taken in March 2020 and January 2021 show the progress of works on the site. A number of minor roads within the Badgerys Creek site were closed or realigned as part of these early works. The early realignment of Badgerys Creek Road minimises the impact on traffic flow around the site while the Airport is being constructed. A significant amount of high quality sandstone spoil from Sydney Metro tunnelling sites at Chatswood and Marrickville has been stockpiled on site for reuse as fill material. This has provided significant savings for both the Airport and Sydney Metro projects.

Aerial shot of the site taken in March 2020



⁴ Western Sydney Airport corporate website: <https://westernsydney.com.au/about/documents-reports>

Aerial shot of the site taken in January 2021



As part of the WSIP, funding was provided for major upgrade and realignment of The Northern Road between the Old Northern Road, Narellan and Littlefields Road, Luddenham, and to construct the M12 Motorway. The M12 will be a new 16-kilometre motorway with two lanes in each direction, a central median allowing future expansion to six lanes, and connecting the Airport to the M7 Motorway and The Northern Road.

The Northern Road is being delivered in six stages. The Northern Road Stage 4 between Mersey Road, Bringelly and Eaton Road, Luddenham runs along the western side of the Western Sydney International Airport.

The NSW Government began planning for Stage 4 of The Northern Road in early 2015 with public consultation commencing in July 2015. The preferred route was announced and a Preferred Route Options Report (**Attachment O**) was released in November 2015. Works commenced in November 2018. The road was completed and opened for traffic in September 2020. The upgrading of this section of The Northern Road has increased the capacity of the road from 1,000 vehicles per hour to 3,000⁵. It has also removed the heavy traffic flows from the Luddenham township. Additional information on The Northern Road upgrade is available on the NSW Government, Planning and Environment website⁶ and the NSW Government, Transport for New South Wales website⁷.

⁵ TNR Stage 4 Options Identification Report: <https://www.rms.nsw.gov.au/projects/01documents/the-northern-road/the-northern-road-upgrade-stage-4-options-identification-report.pdf>

⁶ NSW Government, Planning and Environment website: <http://majorprojects.planning.nsw.gov.au/page/development-categories/transport--communications--energy--water/roads/>

⁷ the NSW Government, Transport for New South Wales website: <https://www.rms.nsw.gov.au/projects/the-northern-road/index.html>

The Northern Road bypass of Western Sydney International (Nancy-Bird Walton) Airport Site



The Northern Road Luddenham shops access



e. Environment and heritage management

In accordance with the Airport Plan and the EIS (described earlier in this submission and at **Attachment D** and **Attachment E** respectively), as Airport operator, WSA Co is required to develop and maintain several Construction Environmental Management Plans (CEMPs) for each package of works prior to the works commencing. The plans set out how the construction works will be undertaken in a way that complies with the EIS and Airport Plan. These plans are approved by the Department as the regulator for the Airport and are updated as the project progresses to reflect new phases of work. These plans are available on WSA Co's website⁸. The Department is assisted in its regulatory role by the Commonwealth-appointed Airport Environment Officer (AEO), who maintains a presence on the site to confirm that WSA Co is conducting the works in line with the CEMPs.

The Airport site at Badgerys Creek has significant Aboriginal and European heritage value. It is important that this heritage and historical value is retained as much as possible throughout the Airport's development. With the assistance of the local Darug community, a number of sites with cultural heritage value have been identified and strategies have been developed to record them and preserve associated artefacts. Further information on Aboriginal and European heritage on the Airport site can be accessed through the Department's website.^{9 10}

As part of the Commonwealth's obligations under the Project Deed, it is responsible for procuring biodiversity offsets for the Airport works. The Biodiversity Offset Delivery Plan (BODP) provides the framework to implement a diverse range of mechanisms to offset and reduce the impacts on protected species, ecosystems and biodiversity values associated with the construction and development of the Airport. The BODP was approved by the former Department of the Environment and Energy on 24 August 2018 and was published on 20 September 2018 and is available at **Attachment P**. The BODP built upon the assessment undertaken in the EIS and was required to be approved prior to the commencement of main construction works.

The then Minister for Cities, Urban Infrastructure and Population issued a media release on 20 September 2018 stating that approximately \$200 million had been committed by the Australian Government to implementing the BODP (see **Attachment Q**). Of the 13 biodiversity offset types required, nine are complete; two are greater than 50 per cent complete; and two are less than 7 per cent complete and are currently being pursued. A range of mechanisms are being implemented to secure the remaining rare biodiversity offsets.

The Department is cognisant of aligning with the strategic whole-of-NSW approach to biodiversity conservation and planning and is working with the NSW Government, including the NSW Department of Planning, Industry and Environment; the NSW Biodiversity Conservation Trust; NSW Environment, Energy and Science; and the Greater Sydney Local Land Service.

The Department has entered into an agreement with Greening Australia to contribute \$10 million in funding to the Cumberland Seed Hub program in Western Sydney. The program will produce a reliable source of native seed for ecological restoration work in Western Sydney's Cumberland Plain, specifically the threatened vegetation communities and species associated with Cumberland Plain Woodland. The seed supply program is presented in the BODP as an 'other compensatory measure', contributing to the offset requirement for Cumberland Plain Woodland, *Pimelea spicata* and for plants, animals and their habitats, by facilitating ecological restoration of these species and their habitats at offset sites and other lands across Western Sydney.

f. Community engagement

The Department and WSA Co are committed to working with all community members and partners throughout the construction process and as the Airport becomes operational. This engagement began with community members being invited to have their say and make submissions on the draft EIS and draft Airport Plan during the public exhibition period as outlined in the 'Overview of the project to date'. A Submissions Report (**Attachment R**) was prepared to address the submissions received and provide a summary of opportunities, issues and responses.

⁸ Western Sydney Airport corporate website: <https://westernsydney.com.au/about/documents-reports>

⁹ Aboriginal Heritage, Departmental webpage: <https://www.westernsydneyairport.gov.au/environment-heritage/heritage/aboriginal-heritage>

¹⁰ European Heritage, Departmental webpage: <https://www.westernsydneyairport.gov.au/environment-heritage/heritage/european-heritage>

Since then, the Department and WSA Co have regularly provided 'pop-up' information stalls at shopping centres and community events across the Western Sydney communities. These stalls were provided throughout the life of the project (137 sessions held, engaging with over 23,000 people) until they were temporarily put on hold due to COVID-19 restrictions.

WSA Co's on-site Experience Centre, which was opened on 2 September 2019, is also a focal point for community engagement. The Experience Centre provides an opportunity for the community to learn about the Airport and view its construction. The Centre achieved its 10,000th visitor milestone in December 2020. This and other community engagement initiatives are detailed in WSA Co's 2019-20 Annual Report.

A key stakeholder forum facilitated by the Department is the Forum On Western Sydney Airport (FOWSA). FOWSA links the community, the government and WSA Co, and provides a consultative forum for the exchange of information and ideas. FOWSA members have a responsibility to inform their communities about planning and progress of the Airport project and share information on a range of issues relating to the broader Airport development. In turn, members raise community concerns to be discussed at FOWSA. 12 FOWSA meetings have taken place to date, further information on FOWSA, including its terms of reference can be found at ([Attachment S](#)).

g. Transport links and supporting infrastructure

As outlined earlier in this submission, the Airport will be well serviced with road and rail connections when it opens in 2026, with the road and rail connections being delivered as part of the WSIP and SMWSA projects.

The WSIP will provide the M12 motorway, providing ease of access to Airport passengers and visitors to the wider Sydney motorway and road network. This program has also provided road access to the western side of the Airport, necessary for the Airport's freight transport operations.

The Airport Plan and Project Deed have made provision for two passenger rail services to the Airport. One of these is being delivered in time for the opening of the Airport – the SMWSA rail line, and the other is expected to be delivered around the time the Airport's second runway is required (forecast for the 2050s). The first rail service will connect the Western Sydney communities to the Airport, and the second service is likely to provide a more direct connection to the eastern suburbs via Parramatta. Further details of the planning for rail services to Western Sydney and the Airport can be found in the Western Sydney Rail Needs Scoping Study¹¹ that was released in March 2018, and further details on the Sydney Metro-Western Sydney Airport rail project can be found at the Sydney Metro website¹².

When the Airport opens in 2026, it is also expected to be serviced by rapid bus connections to a number of Western Sydney business centres such as Penrith, Liverpool and Campbelltown. Further details of the planning for these connections can be found on the Western Sydney City Deal website¹³.

The initial Airport development requires significant supporting infrastructure. WSA Co is responsible for working with the relevant utility authorities to develop these connections to the Airport.

Although the initial Airport development will have its aviation fuel supplied by road tankers, there are three conditions in the Airport Plan ([Attachment D](#)) relating to the supply of fuel to the Airport. Condition 26 of the Airport Plan required the Department to consider, analyse and report on options for a pipeline to supply aviation fuel to the Airport site. The Department completed this report ([Attachment T](#)) in late 2017 and published it in February 2018.

h. Training and employment

As part of the development of the Business Case and EIS for the Airport project, forecasting was undertaken of the impact of the Airport on employment in Western Sydney. An analysis of the impact of the Airport project on the Western Sydney

¹¹ Transport for NSW Website, Western Sydney Rail Needs Scoping Study: <https://www.transport.nsw.gov.au/projects/current-projects/western-sydney-rail-needs-scoping-study>

¹² Sydney Metro website: <https://www.sydneymetro.info/westernsydneyairportline>

¹³ Western Sydney City Deal website: <https://www.wscd.sydney/connectivity>

Airport Labour Market was also undertaken by Ernst and Young (EY) in 2017. The EY report¹⁴ projected that the initial construction and commissioning phase for the Airport would support over 11,300 direct and indirect ‘person years’ of employment throughout the construction phase, peaking at around 3,180 full-time equivalent direct (on-site) and indirect (flow-on) jobs during the height of construction activity. A ‘person-year’ is defined as a unit of measurement which accounts for the employment of one person in a full-time capacity for one year. The report also indicated that within five years of opening (2031), the Airport would support nearly 28,000 direct and indirect jobs and, by 2041, that would grow to around 47,000. The employment forecasting in the EIS projected a similar employment effect to that in the EY report, reaching 120,000 jobs in the long term (2063).

WSA Co has committed to a range of workforce targets, including local employment (30 per cent during construction, 50 per cent once fully operational), diversity (10 per cent by 2025, including 2.4 per cent Indigenous) and learning workers (20 per cent by 2025). As at 31 December 2020, 804 people were directly employed by WSA Co and its contractors. The company is currently exceeding all of its workforce targets, as reported by WSA Co in its monthly progress reports and shown in the table below. Further details of WSA Co’s approach to and performance against these workforce targets can be found in its Annual Report.

Initiative	Target	Share of workforce (as at 31 December 2020)
Learning employees	20%	34%
Local employment	30%	56%
Diversity	10% (2.4% Indigenous)	36%

Other projects stemming from the Airport’s development are also likely to generate significant increases in employment for Western Sydney. The Australian Government, in partnership with the NSW Government and eight Western Sydney councils, has set a jobs target for the Western Parkland City¹⁵, as part of the Western Sydney City Deal¹⁶. The initial focus will be on the Aerotropolis as a catalyst for job delivery. Over the six years of construction for the SMWSA rail project, the project is forecast to support 14,000 jobs, including 250 apprentices.

Also as part of the Western Sydney City Deal, TAFE NSW is working with the Australian Government and WSA Co to establish a ‘Skills Exchange’ near the Airport construction site. This initiative will allow workers to develop their skills while on the job for the Airport and other major projects.

i. Any related matters.

The Department does not wish to raise any other matters.

¹⁴ Western Sydney Airport Labour Market report:
https://www.westernsydneyairport.gov.au/sites/default/files/WSA_Labour_Market_Analysis.pdf
¹⁵ Western Parkland City Authority website: <https://wpca.sydney/western-parkland-city>
¹⁶ Western Sydney City Deal website: <https://www.wscd.sydney/connectivity>.

Attachments:

- A. Joint Study on aviation capacity in the Sydney region
- B. Media release 15 April 2014 - Western Sydney Airport to Deliver Jobs and Infrastructure
- C. Airports Amendment Act 2015
- D. Western Sydney Airport Plan 2016
- E. Environmental Impact Statement 2016 and relevant drafts -Volume 1 Background
Environmental Impact Statement 2016 and relevant drafts -Volume 2a Stage 1 Development
Environmental Impact Statement 2016 and relevant drafts -Volume 2b Stage 1 Development
Environmental Impact Statement 2016 and relevant drafts -Volume 3 Long term Development
Environmental Impact Statement 2016 and relevant drafts -Volume 4 EIS technical reports
- F. Western Sydney Airport Business Case Summary
- G. Infrastructure Australia Western Sydney Airport Project Evaluation Summary
- H. Public Governance, Performance and Accountability Act 2013—Notices under section 72—Commonwealth formed and acquired shares in a company—WSA Co Limited—20 August 2017
- I. Statement of Expectations
- J. Media Release 2 June 2020 - New Agreement Keeps Sydney Metro (WSA) Jobmaker Project On-Track
- K. Western Sydney Airport Corporate Plan 2020-21
- L. Western Sydney Airport Annual Report 2019-20
- M. ANAO report - Purchase of the 'Leppington Triangle' Land for the Future Development of Western Sydney Airport
- N. ANAO report - Western Sydney Airport Procurement Activities
- O. The Northern Road Preferred Route Options Report
- P. Biodiversity Offset Delivery Plan
- Q. Media release 20 September 2018 - \$200 million committed by the Australian Government to implementing the BODP
- R. EIS and Airport Plan submissions report
- S. Forum on Western Sydney Airport information - 2020 FOWSA Factsheet
Forum on Western Sydney Airport information - 2020 FOWSA Terms of Reference
- T. Airport Aviation Fuel Supply Corridor Options Report