

***GNOSS FIELD AIRPORT***

*PROPOSED EXTENSION OF RUNWAY 13/31*

***Final Environmental Impact  
Report Amendment***

***Responses to Comments on the  
Final EIR***

*State Clearinghouse No. 2008072037*

*Landrum & Brown*

*January 21, 2014*

## **INTRODUCTION**

### *California Environmental Quality Act (CEQA)*

The *State CEQA Guidelines* requires that the lead agency (Marin County) prepare and certify a Final Environmental Impact Report (EIR) that includes responses to comments on the Draft EIR before considering a project for approval. The lead agency may provide an opportunity for review of the Final EIR by the public or commenting agencies, and this review should focus on the responses to comments on the Draft EIR, in accordance with *State CEQA Guidelines* Section 15089.

The lead agency must, however, provide each public agency that commented on the Draft EIR with a copy of the lead agency's proposed response to that agency's comments at least ten days before certifying the Final EIR (see Public Resource Code Section 21092.5). Lead agencies are not required by Public Resources Code Section 21092.5 to provide precertification responses to individuals and organizations that commented on the Draft EIR, although they may choose to do so.

The Marin County *Environmental Impact Review Guidelines* do, however, provide for a minimum ten-day period for review of the Final EIR prior to any action to certify it. The County's guidelines state that the review of a Final EIR shall exclusively focus on the adequacy of the response to comments on the Draft EIR. A separate public hearing to receive testimony on the recommendation to certify or certification of a Final EIR shall not be required. Written comments received on the Final EIR response to comments within the review period deadline shall be considered, together with any written or oral response from staff or the EIR preparer, at the time action is taken by the recommending body and by the decision making body prior to certifying the Final EIR.

### *Marin County CEQA Compliance*

Marin County did prepare and on December 9, 2011 circulated the *Gross Field Airport Proposed Extension of Runway 13/31 Draft Environmental Impact Report*. A Notice of Completion of the Draft EIR was published and began a 60-day review and comment period. During the public review period from December 9, 2011 to February 6, 2012 comments on the Draft EIR were solicited from governmental agencies and the public. Concurrent with the distribution of the Draft EIR; the Federal Aviation Administration (FAA) distributed a separate Draft EIS for public review and comment. The Marin County Board of Supervisors and the Federal Aviation Administration conducted a joint public hearing on January 10, 2012 to receive governmental agency and public comment on the Draft EIR and a Draft EIS.

During the review period Marin County received comment letters on the Draft EIR from governmental agencies, organizations and the public. In addition oral comments were received on the Draft EIR at the January 10, 2012 public hearing. Marin County and the FAA prepared individual written responses to each of the written and oral comments received during the public review period. The written and oral comments received on the Draft EIR/EIS along with the written responses

to those comments can be found in Appendix Q of the Final Environmental Impact Report.

Marin County prepared, and on November 8, 2013 circulated, the *Gross Field Airport – Proposed Extension of Runway 13/31 Final Environmental Impact Report*. Copies of the Final EIR were circulated to all public agencies that submitted comments on the Draft EIR in compliance with Public Resource Code Section 21092.5. Copies of the Final EIR were also distributed to members of the public that submitted comments on the Draft EIR. A notice of availability of the Final EIR for review was published and began an 18-day review and comment period on the Final EIR, which was to end on November 25, 2013, however, the County subsequently extended the comment period on the Final EIR to December 9, 2013.

In accordance with the Marin County *Environmental Impact Review Guidelines* summarized above, written master responses have been prepared for the major environmental issues raised in the comment letters received on the Final EIR. **The written comments received and master responses herein present amplifications, clarifications and / or additional information that in some cases may result in minor and insignificant modifications to the EIR. They do not, however, raise new or substantially more severe significant impacts or new mitigation measures or alternatives not considered in the EIR and do not require recirculation for further review and comment in accordance with *State CEQA Guidelines Section 15088.5*.** The written master responses together with the written comments received on the Responses to Comments are incorporated as a minor amendment to the Final EIR.

## **AGENCIES AND PERSONS COMMENTING**

Written comments on the *Gross Field Airport – Proposed Extension of Runway 13/31 Final Environmental Impact* were received from the following governmental agencies, organizations, and individuals:

Marin Environmental Health Services  
The Novato Fire Protection District  
Marin Conservation League  
Marin Audubon Society  
North Bay Mitigation Bank, Kent Carter (2 Letters)  
Soluri Meserve, Representing Redwood Landfill and Recycling Center  
Lawrence Bracy

One letter from:

Christopher Gilkerson & Susan Mathews  
Steve & Sharon Nebb  
Amy & Tim O'Connor  
Betsy & Duncan Ross  
Jacqueline A. Bonner  
John & Catherine Yee  
Cynthia Bunim  
Eric & Heather Gahan  
Michael & Susan Gahan

Susan & Richard Marks  
Mark & Jeannette McAlonan

## **RESPONSE TO COMMENTS RECEIVED ON FINAL EIR**

Comments received on the Final EIR focused on the following issues:

- Proposed runway length is not justified or needed;
- Shorter Runway Alternative is feasible and must be analyzed in FEIR
- The additional runway length will induce more and larger aircraft to operate at the Airport;
- Aviation Forecasts;
- Sea level rise was not discussed in detail;
- Comments regarding responsibility of mitigation for bird attractants at the Redwood Landfill;
- Comments about the preferred location of wetland mitigation; and
- Comments received from the Novato Fire District.

The responses to these comments are provided below.

### **TOPIC 1 – RUNWAY LENGTH ANALYSIS**

Commenters asserted that a 1,100-foot runway extension is longer than justified for the aviation fleet mix at DVO. Commenters stated that the required runway length for DVO was incorrectly calculated and that the purpose and need for the project on which the runway length analysis was based was unnecessarily narrow. Commenters also stated that the appropriate FAA guidance regarding determining runway length was not followed.

### **TOPIC 1 – RUNWAY LENGTH ANALYSIS RESPONSE**

Appendix D, *Runway Length Analysis* includes the FAA determination that the runway length is consistent with FAA guidance and provides the detailed methodology for how the length of the proposed runway extension was established.

FAA Order 5090.3C *Field Formulation of the National Plan of Integrated Airport Systems (NPIAS)* identifies that airport dimensional standards such as runway length and width, separation standards (distances) between runways and taxiways, surface gradients, and similar dimensions should be selected to be appropriate for the “critical aircraft” that will make “substantial use” of the airport in the planning period for improvements.

An aircraft is called the “critical aircraft” because it is the most “demanding” aircraft in terms of the physical dimensions of the airport such as the length and width of the runways and taxiways, and separation distance between runways and taxiways required for that aircraft to operate at the airport. “Substantial use” of a general aviation airport is defined as 500 or more annual itinerant operations. For DVO, the critical aircraft was determined to be the Cessna 525 business jet, and so the justified runway length for DVO was established based on the requirements of this aircraft. One commenter suggested the Cessna 525 was not the appropriate critical

aircraft because it is no longer in production. The fact that the Cessna 525 or any aircraft is no longer being produced has no bearing on whether or not it does or does not operate at a particular airport. More information regarding the selection of the Cessna 525 as the critical aircraft was included in the FEIR in Appendix D, Attachment 1, *Basis for Determination of the Critical Aircraft for DVO*.

The FEIR addressed accommodating the most demanding aircraft (i.e., the critical aircraft), which makes substantial use of DVO in hot weather and other adverse weather conditions. The proposed runway extension has not been designed to accommodate other larger aircraft with similar limitations because the FAA's guidance in FAA Order 5090.3C *Field Formulation of the National Plan of Integrated Airport Systems*, is only to support development of additional aviation facilities to accommodate aircraft that make substantial use of an airport. In conclusion, the Sponsor's determination of runway length for this project is consistent with FAA guidance regarding how an airport's primary runway should be able to accommodate the critical aircraft at that airport.

## **TOPIC 2 - SHORTER RUNWAY ALTERNATIVE**

Some commenters stated that the Final EIR failed to consider a Shorter Runway Alternative, and that a shorter runway was a reasonable alternative to the proposed project.

## **TOPIC 2- SHORTER RUNWAY ALTERNATIVE RESPONSE**

CEQA Guidelines Section 15126(a) states that an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. This section of CEQA also provides that a Lead Agency, in this case the County of Marin, is responsible for selecting a range of alternatives for examination and must publicly disclose its reasoning for selecting those alternatives.

The County of Marin in conjunction with the Federal Aviation Administration did select a range of alternatives for examination in the EIR and did publicly disclose in Chapter 6, Section 6.7 why both on-site and off-site alternatives were rejected for further analysis in the EIR. In response to comments received on the Draft EIR, the County of Marin County and FAA further explained why a shorter runway alternative was not included for examination in the EIR. The shorter runway alternative was not included for examination in the EIR because it did not meet the purpose and need for the project which was to allow existing aircraft, as represented by the critical aircraft at DVO, the Cessna 525, to operate at maximum gross take off weight under all weather conditions. The Runway Length Analysis found that a 1,100-foot extension of Runway 13/31 to a total length of 4,400 feet is required to for the Critical Aircraft to meet the requirements of FAA Order 5090.3C. Therefore, project alternatives that do not meet the purpose and need are not practicable.

Furthermore a Shorter Runway Alternative would not avoid or significantly lessen any of the significant effects of the proposed project. A shorter runway would result

in the taking of fewer wetlands and endangered species habitat, but the impact on wetlands and endangered species would remain significant and still require mitigation at the same ratios as the proposed project. Since the impact on wetlands and endangered species habitat could not be reduced to a less-than-significant level and not significant environmental benefit would occur from reducing the length of the runway extension there was no environmental basis to compromising the purpose and need of the proposed project.

### **TOPIC 3 – INDUCED DEMAND/AVIATION FORECAST**

Commenters suggest that the Aviation Forecast underestimates future aviation activity at DVO because the extension of Runway 13/31 would stimulate an increase in aircraft takeoffs and landings (operations or aviation activity) not accounted for in the forecast.

### **TOPIC 3 – INDUCED DEMAND/AVIATION FORECAST RESPONSE**

In general, forecasting general aviation demand entails combining historical activity with national and regional (local) trends, aircraft orders, and tenant/user input. General aviation demand combines several types of activity including personal, business, recreational, flight training, police/emergency services, and air taxi. Each of these types of activity is influenced differently by general economic conditions and specific items such as fuel prices. Population and business growth (or decline) in the region also influences the level of activity. Once regional demand is projected, where that demand will be served must be estimated. General aviation activity is served by a combination of commercial service airports, reliever airports, general aviation airports, heliports, and private facilities. Airport activity forecasts and airport fleet mix are not solely determined by or directly dependent upon the length of an airport's runway. While a 4,400-foot long runway could accommodate a different fleet mix than a 3,300-foot long runway; the length of the runway is only one factor that determines the types of aircraft that would use any given airport. At DVO, aviation activity is forecast to increase whether or not the runway is extended. Therefore, the length of a runway is not directly correlated to the level of aviation activity at DVO.

The Aviation Activity Forecast developed for the EIS and EIR (included as Appendix C, *Aviation Activity Forecast* to the documents) presents the forecast of aviation demand for DVO, which was developed to provide an analysis of historical activity at the Airport and as a basis for forecasting future activity levels. The forecast is "unconstrained" and as such does not take facility constraints or other outside limiting factors into consideration. In other words, for purposes of estimating future demand, the forecast assumes facilities can be provided to meet the demand. Therefore the aviation activity forecast is not dependent on the existing or future characteristics (size, runway length, aircraft fleet mix, number of hangars, etc.) of the Airport, but on other factors within the region the DVO serves.

The forecast analysis is based on historic data and the underlying socio-economic conditions of the area, as well as consideration of the role that the Airport plays in the region. The forecast follows standard FAA forecast guidance included in the

FAA's Office of Aviation Policy and Plans (APO), Forecasting Aviation Activity by Airport, dated July 2001. DVO is classified as a "Reliever Airport" by the FAA, which means that DVO is a high-capacity General Aviation (GA) airport in a metropolitan area. Reliever airports provide general aviation pilots with attractive alternatives to using congested commercial service airports and provide general aviation access to the surrounding area. DVO and other general aviation airports in the San Francisco Bay area designated as reliever airports serve to reduce congestion at San Francisco International Airport, Oakland International Airport, and San Jose International Airport. DVO exclusively serves GA and air taxi activity and does not have any scheduled commercial passenger air service. Typical GA activity includes recreational and flight training activities, business travel, news reporting, traffic observation, environmental surveys, police patrol, and emergency medical evacuations. Air taxi activity typically includes "for hire" aircraft chartered for specific trips on an on-demand basis. Air taxi operations are usually made up of larger GA aircraft, such as turboprop aircraft and an array of corporate jets.

The forecast includes an analysis of the GA demand in the geographic area that DVO serves. The number of aircraft based at DVO is forecast to increase by 1.4 percent annually from 2008 through 2027, regardless of runway length. The type of based aircraft at DVO is expected to follow national projections, which points towards a greater number of jet aircraft. In general, jet aircraft can be flown a greater distance before refueling and tend to provide more flexibility in terms of passenger/cargo loads. In addition, the market for privately owned propeller driven aircraft has been stagnant, as the ability of people to purchase aircraft has decreased. The result is that most of the growth in the GA manufacturing market has been seen in corporate ownership, which tends to choose aircraft with jet engines.

Similarly, aircraft operations at DVO are forecast to increase from 85,500 operations in 2008 to 124,300 operations in 2027 representing an average annual growth rate of 2.0 percent. This growth is consistent with the FAA Aerospace Forecast Fiscal Years 2008-2025, which was the latest data available when the aviation activity forecasts for DVO were prepared. The FAA uses estimates of fleet size, hours flown, and utilization from the General Aviation and Air Taxi Activity and Avionics Survey (GA Survey) as baseline figures upon which assumed growth rates determined from local demand were applied. As discussed above, based aircraft are expected to trend more towards jet aircraft; however based aircraft are not directly correlated to the number of operations that are flown by each aircraft type. For example, an airport that has a flight school may have two or three small single-engine piston aircraft based at the airport. But, the number of daily operations by each of those training aircraft may be four or five times the number of daily operations by a jet aircraft based at the airport. As a result, while aircraft operations are expected to increase, the operations are expected to be performed by the same or similar to the aircraft fleet that operates today and the percentage of operations by each aircraft category (single-engine piston, multi-engine piston, turbine, and helicopter) is assumed to remain unchanged throughout the forecast period.

The FAA has found that aviation activity increases and decreases as the United States and world economic activity increases and decreases. The FAA annually produces a national aerospace forecast report that forecasts aviation activity for a 20-year period<sup>1</sup>. These forecasts have found that fundamentally the demand for aviation is driven by economic activity. That is, aviation activity typically responds to economic demand rather than creates economic demand. The forecast for a specific airport, such as the DVO Aviation Activity Forecast included in Appendix C of this EIR, is influenced by the same economic factors as the national aerospace forecast.

As a public use airport, DVO is available to all aircraft that can be accommodated by its facilities. Although the Airport is classified as a B-I airport, and is designed for use by aircraft with a wingspan of less than 49 feet, and an aircraft approach speed of 91 to 120 knots, aircraft larger than the critical aircraft currently operate at the Airport and are expected to continue to do so in the future. Furthermore, these larger aircraft will likely continue to operate at DVO with or without implementation of Alternative B (Proposed Project) or Alternative D because neither alternative would result in a change to the Airport designation. Larger aircraft using DVO typically have limitations on their operating capabilities at DVO such as being limited below their full payload of passengers, cargo, or fuel, especially during takeoff, similar to the limitations on the critical aircraft for DVO, the Cessna 525.

It is possible owners or pilots who use one size of aircraft now, could choose to use larger size aircraft in the future if the proposed project is implemented. However, as FAA aerospace activity forecasting has found over many years of evaluation that aviation activity increases in response to other types of economic activity, rather than creates other economic activity, it is more likely that the aircraft fleet mix at DVO already accurately reflects the local economic demand for aviation activity, including aviation user choices regarding their preferred size of aircraft. This is because those aviation users who prefer using DVO but require larger aircraft for a specific activity can still access DVO under current conditions by reducing their payload or fuel.

#### **TOPIC 4 – AIRCRAFT OPERATIONS AND NOISE LEVELS**

Many commenters contend the runway extension would result in changes in the overall DVO aircraft fleet mix from smaller to larger aircraft, which in turn would result in an increase in aircraft noise that should be considered a significant impact on the environment, particularly in the residential communities south of the Airport.

#### **TOPIC 4 – AIRCRAFT OPERATIONS AND NOISE LEVELS RESPONSE**

As discussed under Topic Response 2 above, aviation activity at DVO is expected to increase whether or not a runway extension is constructed. The FEIR evaluated whether increases in noise under the No Action Alternative, Alternative B or Alternative D would represent a significant impact on the environment.

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<sup>1</sup> FAA Aerospace Forecasts at [www.faa.gov/about/office\\_org/headquarters\\_offices/apl/aviation\\_forecasts/](http://www.faa.gov/about/office_org/headquarters_offices/apl/aviation_forecasts/)

The determination of what noise level represents a significant noise impact on the environment has been the subject of extensive study. Based on the extensive research and evaluation, the FAA uses the 65-decibel (dB) CNEL as the threshold of significant noise impacts in urban and residential settings such as those near DVO. Marin County has chosen to use 60 CNEL as the local threshold for significant noise impacts.

The FAA uses a computer model, the Integrated Noise Model (INM), to determine what areas on or adjacent to an airport experience noise levels of 60/65 CNEL or above. The results found no noise sensitive areas, including the residential areas south of DVO, would be subjected to noise levels at or above 60 CNEL under the No Action Alternative, Alternative B, or Alternative D.

It is a common assumption that larger aircraft would be louder than smaller aircraft, but the reality is that this assumption is not always true. There are a number of factors that affect the noise level produced by an aircraft, including engine type (jet vs. propeller), age of the engine, shape of the airframe/wings, altitude, and distance from the receptor (person hearing the noise). These factors have a much greater effect on aircraft noise levels than simply the size of the aircraft.

In the previous section, it was stated that the *critical aircraft* at DVO is the Cessna 525, which falls in the FAA's B-I design category. Although this is the design aircraft for planning purposes, it is certainly not the only aircraft that operates at DVO; nor is it the largest. Aircraft in larger design categories do operate at the Airport today; however, they are restricted in their ability to operate efficiently or to certain destinations due to the current length of the existing runway, as well as the runway width, pavement strength, and runway to taxiway separation. All of these play a part in a pilot's decision of where to operate an aircraft. Additional factors that pilots consider are the Airport's availability of services and parking options and the pilot's/passengers' need to access a particular area.

While there were concerns expressed about additional noise generated by the proposed project, the environmental analysis found that the project would not result in a significant increase in noise primarily because the closest residential areas are located far outside the 60 CNEL noise contour, south of the Airport. In fact, there would be noise benefits for the residential areas to the south of the Airport associated with the runway extension to the north. Specifically, the extension to the north would allow aircraft to gain altitude quicker when departing to the south, which would allow them to either be higher when approaching noise sensitive areas to the south of the Airport, or to turn sooner to avoid the radio towers to the east.

## **TOPIC 5 – SEA LEVEL RISE**

Commenters suggested that sea level rise was not or was not completely addressed in the FEIR.

## **TOPIC 5 – SEA LEVEL RISE RESPONSE**

Sea level rise was addressed in the FEIR in Section 4.20, *Floodplains*. Although sea level rise is anticipated at some unknown time in the future the impact analysis found that the Proposed Project would not contribute to sea level rise and that the land area east and south of the airport property was already protected by existing levees along the Petaluma River and Black John Slough. In addition, the existing airport and the proposed runway extension are and will be protected by a series of levees around the airport itself. The analysis also recommends that Marin County should consider addressing the impacts of sea level rise on the Airport. The following section is reproduced from the FEIR:

**Impact 4.20-2: The Proposed Project will not result in an impact on sea level rise, but is located within an area that could be subject to sea level rise. (Less-Than-Significant)**

The Proposed Project would include development within an area identified as being subject to sea level rise. The project would not worsen conditions in the area if sea level rise does occur as projected. As such, implementation of the project would not result in an impact.

Based on the available data and projections, it is difficult to determine the impact sea level rise would have on the Airport given the uncertainty of when and how quickly sea level rise will occur, the effectiveness of the current levees, and the potential measures that BCDC, Marin County, and other organizations may employ to reduce the impact of sea level rise in the future. Because the effects of sea level rise in the vicinity of Gness Field are currently speculative the extent of impact on the airport is unknown. Accordingly no mitigation is required. However, it is recommended that Marin County consider revising the Countywide Plan to include the following policies:

**Anticipate Climate Change Impacts, including Sea Level Rise.** Recent predictions of sea level rise for the San Francisco Bay region by BCDC and USGS based on climate models and hydrodynamic modeling of the San Francisco Bay Estuary indicate 16 inches of rise by mid-century and 55 inches by 2100. Cooperate with the U.S. Geological Survey, the San Francisco Bay Conservation and Development Commission, the California Landscape Cooperative's Climate Commons project and other monitoring agencies to track bay and ocean levels and share baseline topographic and resource data obtained by the County in implementing its own projects to enhance hydrodynamic and ecosystem modeling efforts and assessment of regional climate change impacts. Use official estimates for mean sea level rise and topographic data for environmental review. Environmental review for development applications and County infrastructure should incorporate official mid-century sea level rise estimates, and require adaptive strategies for end-of-century sea level rise for any such project with expected lifetimes beyond 2050.

**Plan for Climate Change Impacts, including Sea Level Rise.** Consider sea level rise in future countywide and community plan efforts. Apply for membership in the National Flood Insurance Program's (NFIP) Community Rating System (CRS), and as appropriate through revisions to the Marin

County Code, obtain reductions in flood insurance rates offered by the NFIP to community residents. Cooperate with FEMA in its efforts to comply with recent congressional mandates to incorporate predictions of sea level rise into its Flood Insurance Studies and FIRM. For development of watershed management plans and flood control infrastructure consider official mid-century and end-of-century sea level rise estimates in hydraulic/hydrodynamic modeling, as well as climate adaptation strategies, including; avoidance/planned retreat, enhance levees, setback levees to accommodate habitat transition zones, buffer zones and beaches, expanded tidal prisms for enhanced natural scouring of channel sediments, raising and floodproofing structure, provision for additional floodwater pumping stations, and inland detention basin to reduce riverine peak discharges. Participate in the Bay Area Climate & Energy Resilience Project and its March 2013 Proposed 12-Month Action Plan, developed by the Bay Area Joint Policy Committee of the Association of Bay Area Governments. Revise the Marin County Hydrology manual to, at a minimum, incorporate use of updated rainfall frequency data from NOAA's Atlas 14 Volume 6, Vers. 2.1 California (rev. 2012).

## **TOPIC 6 – REDWOOD LANDFILL**

Redwood Landfill and Recycling Center has submitted a letter in response to the Final EIR contending that additional mitigation measures are needed because the proposed project will decrease the distance between Gness Field and Redwood Landfill and would result in flights that are lower in altitude over the landfill. The comment also notes that a 2% increase in airport activity is anticipated by 2027. The letter contends that the Final EIR must analyze the changes that will occur as a result of the runway extension and whether or not the runway extension results in new or more substantially severe land use and other impacts and if so mitigation must be required. The letter also contends that the bird control mitigation measures contained in Redwood Landfills operating permit issued by the Local Enforcement Agency (LEA) were formulated based on the conditions existing at Gness Field at the time of the preparation of the Redwood Landfills EIR and did not take into consideration the proposed extension of the runway and the forecast increase in aviation activity through 2027. Redwood Landfill requests that a new mitigation measure be included in the Final EIR requiring an evaluation every three years as to whether or not additional bird control measures become necessary as a result of the runway extension project and that Gness Field take responsibility for the additional bird control measures or reimburse Redwood for the additional costs associated with changes in its bird control program.

## **TOPIC 6 – REDWOOD LANDFILL RESPONSE**

The Final EIR for the Proposed Extension of Runway 13/31 contains a detailed analysis of the potential impacts of the proposed runway extension on Redwood Landfill operations (See Impact 4.2-4 starting on page 4.2-11 of the

Gross Field Final EIR). The impact analysis found that aircraft approach and departure routes over the landfill will not change significantly and that the small projected change in aircraft elevation over the landfill during takeoffs and landings to the north will not result in a significant change in the risk of bird strikes. The EIR found that current bird control measures included in Redwood Landfill's operating permit adequately mitigate bird activity at the landfill and therefore the impact of the proposed runway extension is less-than-significant and no new mitigation measures are required.

Redwood Landfills contends that extension of the runway and projected growth in aviation activity at Gross Field was not part of the Landfill's EIR Baseline. However, CEQA requires that project EIR's, like Redwood Landfill's EIR, must analyze the cumulative impacts of a proposed project with all proposed and foreseeable future projects. At the time of preparation of Redwood Landfills 2008 EIR, Marin County's Airport Land Use Plan included a plan to extend Runway 13/31 1,000 feet north and the aviation forecast at the time included a projected increase in aviation activity of 2% a year. Therefore the proposed extension of the runway and the aviation forecast does not constitute new information that could not have been known at the time the EIR was under preparation for Redwood Landfill's Operating Permit.

Furthermore the contention that the runway extension and projected increase in activity at Gross Field will result in the need for additional bird control measures appears to be inconsistent with the findings of Redwood Landfill's own EIR. The Final EIR for Redwood Landfill's operating permit found that the working face of the landfill and the composting area were bird attractants and mitigation contained in the Landfills Final EIR required measures be taken at Redwood Landfill to discourage and disperse birds at the landfill.

Given the land use and potential bird strike impact analysis in the Gross Field Final EIR there is no basis in fact to require the inclusion of additional bird strike mitigation in the Final EIR for the Proposed Extension of Runway 13/31.

## **TOPIC 7 – WETLAND MITIGATION**

The Marin Audubon Society questioned the reasons airports in Sonoma and Napa Counties were rejected as alternative locations. Marin Audubon also expressed an opinion that wetland mitigation required for the Proposed Project should be located within Marin County and close to the project site.

## **TOPIC 7 – WETLAND MITIGATION RESPONSE**

The reasons Marin County and the FAA rejected alternative airport locations for the proposed project are detailed in Chapter 6, Section 6.7 of the Final EIR as required by CEQA Guidelines Section 15126(a). Wetland Mitigation Measures 4.5-1 and 4.19-1 and Endangered Species Habitat Mitigation Measures 4.5-2(a) and 4.5-2(c)

all allow, but do not require, wetland and endangered species mitigation to be located in Marin County. Furthermore, the regulatory framework discussion in Section 4.5.1.1 spells out Marin County's policies relative to the ratios and location of wetland and endangered species habitat mitigation areas. The mitigation measures contained in the Final EIR require Marin County to develop a wetland and endangered species mitigation plan in conjunction with the California Department of Fish and Wildlife and the US Fish and Wildlife Service

## **TOPIC 8 – NOVATO FIRE DISTRICT**

The Novato Fire district submitted comments regarding the various requirements from the FAA and the National Fire Protection Association (NFPA) that relate to airport operations.

## **TOPIC 8 – NOVATO FIRE DISTRICT RESPONSE**

The Final EIR found that the proposed project would not result in a significant impact on fire protection and suppression service or medical emergency response. Therefore no mitigation is required. The Proposed Project would in fact enhance safety over the current conditions. The proposed 1,100-foot extension of runway 13/31 and the provision of runway safety areas that comply with current FAA guidelines for B-1 airports should reduce the risk of an aviation accident at Gness Field by providing a longer runway for aircraft take offs and landings and a longer and wider runway safety area at both the north and south end of the runway.

While nothing can completely eliminate the possibility of an aircraft accident at an airport, additional runway length does provide an additional margin of error for pilots when they are landing and taking off. Second, DVO currently does not comply with FAA standards for Runway Safety Area (RSA), which is required in part to provide emergency services a suitable location for parking equipment in the event of an emergency. The Proposed Project would provide RSAs that meet current FAA standards and thereby would enhance safety at the Airport.

Marin County has met with the Novato Fire District and they have agreed to work together to address any outstanding issues related to access and response times for both the existing and proposed airfield. These are important issues, but they have no environmental impacts.

## Brady, Reuel

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**From:** Janofsky, Mark  
**Sent:** Friday, November 15, 2013 9:10 AM  
**To:** gnossfieldcomments  
**Cc:** Ng, Rebecca  
**Subject:** FEIR For the Gness Field Airport Proposed Runway Expansion

Dear Mr. Goralka:

Marin County Solid Waste Local Enforcement Agency (LEA) staff has reviewed those sections of the Final EIR for the proposed Gness Field Runway Expansion which pertain to the proximity of the airport to Redwood Landfill and offers the following comments:

Page 4.12-12, paragraph 3: "RLI operates under a Solid Waste Facility Permit # 21-AA-0001, issued by the LEA on December 8, 2008, with the concurrence of the State of California Integrated Waste Management Board."

The Solid Waste Facilities Permit was issued on December 18, 2008. At the time of issuance, the aforementioned state agency was called the California Integrated Waste Management Board. Since then, the name of the agency has been changed to the California Department of Resources Recycling and Recovery (CalRecycle).

Page 4.12-12, paragraph 4: "As part of the application for a revised Solid Waste Facilities Permit, RLI underwent extensive review including the preparation of a full scope Environmental Impact Report (EIR), which was certified by the LEA on December 18, 2008.

The EIR was certified on June 10, 2008. This and the previous comment were noted in a letter submitted by the LEA dated February 6, 2012.

Page 4.12-13, paragraph 3: "In addition, the increased amount of light that would be needed to accommodate more frequent nighttime operations at the working face could potentially interfere with aircraft operations at DVO."

It should be noted that the original project analyzed in the 2005 EIR proposed a significant increase in the daily tonnage of waste received at RLI. The project applicant, RLI, subsequently agreed to the Mitigated Alternative, which permitted an increase in the final capacity of the landfill, but no increase in daily tonnage. Consequently, there was/is no reason for a larger working face.

Page 4.2-14, paragraph 6: "**Marin County** previously authorized the continued operation of RLI near DVO, but in so doing, identified mitigation measures in the MMRP to minimize the attractiveness of the area to wildlife, especially birds, so as to avoid creation of a wildlife aircraft strike hazard at RLI and to prevent RLI from becoming an incompatible land use. The **County's** permit issued to RLI requires mitigation measures including ongoing management efforts to prevent or minimize bird attractants. If deemed ineffective over time, the mitigation measures will change per **Marin County's** permit requirements."

These references to "Marin County" or "The County's" should be changed to "The LEA" or "The LEA's."

LEA staff appreciates the opportunity to comment on the Final EIR. If you have any questions or require additional information, please do not hesitate to contact me at (415) 473-6790.

Sincerely,  
Mark Janofsky, R.E.H.S.

**Brady, Reuel**

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**From:** Bill Tyler <btyler@novatofire.org>  
**Sent:** Friday, November 22, 2013 4:26 PM  
**To:** gnossfieldcomments  
**Cc:** 'bgoralka@marincounty.org'  
**Subject:** Written comments gnoss field EIR SCH#2008072037  
**Attachments:** Additional comments to EIR MCAirport proposed extension of runway 13-31.pdf

Dear Bob et al:

I have included the attached written comments that were originally submitted to Barry Franklin on August 29, 2008, from the Novato Fire District. The attachment also include a copy of an email I received back from Mr. Franklin indicating that the comments would be incorporated into the EIS/EIR analysis.

When I reviewed the FEIR I did not see our original comments included. Can you please contact me directly to discuss.

Thank you,

B/C Bill Tyler  
Novato Fire District  
415-878-2620 direct



# Novato Fire Protection District

[www.novatofire.org](http://www.novatofire.org)

95 Rowland Way Novato, CA 94945  
(415) 878-2690 Fax (415) 878-2660

---

Mr. Barry Franklin  
Federal Aviation Administration  
Western Pacific Region  
San Francisco Airport District Office  
831 Mitten Road, Room 210  
Burlingame, Ca. 94040-1303

Re: Marin County Airport, Gness Field Environmental Impact Statement and concurrent Environmental Impact Report for the proposed extension of runway 13/31.

Dear Mr. Franklin:

The Novato Fire Protection District after participating in the site visit walk and Agency Scoping Meeting Discussion on August 14, 2008 has reviewed the documents presented in the discussion outline and based on the back ground, purpose, and need statements has the following comments:

1. The Fire District acknowledges that the documents presented indicate that the current runway length of 3,300 feet limits the ability of current Gness Field Airport tenants to operate aircraft at optimum weights for maximum efficiency and has documented the need for runway improvements to serve existing and anticipated aircraft and activity levels, as well as current and future changes in small aircraft design.
2. The Fire District acknowledges that the airport has identified a need to comply with FAA standards for runway safety areas and other FAA guidelines for the layout of runways including areas that are specifically designed to enhance safety of air travel including but not limited to Emergency Vehicle Access and Runway Safety Areas (RSA) that extend beyond each end of the runway and that these areas must be graded, free of obstructions, and capable of supporting the weight of the aircraft and emergency equipment in the event that an aircraft rolls beyond the end of the runway.
3. The Fire District acknowledges that just as the airport has identified a need to comply with FAA standards and guidelines for runways, there is also the need to comply with FAA standards and FAA Advisory Circulars

for design standards for an aircraft rescue and firefighting facility and other related emergency operation guidelines including but not limited to:

- FAA Advisory Circular 150/5220-17A, *Design Standards for Aircraft Rescue and Fire Fighting Facility*
  - FAA Advisory Circular 150/5200-12A, *Fire department Responsibility in protecting evidence at the scene of an aircraft Accident*
  - FAA Advisory Circular 150/5200-15C, *Aircraft Fire Protection and Rescue Procedures*
  - FAA Advisory Circular 150/5200-18A, *Airport Safety and Self Inspection*
  - FAA Advisory Circular 150/5200-21A, *Aircraft Emergency Rescue Information*
  - FAA Advisory Circular 150/5210-2A, *Airport Emergency Medical Facilities and Services*
  - FAA Advisory Circular 150/5210-6-C, *Aircraft Fire and Rescue Facilities and extinguishing agents*
  - FAA Advisory Circular 150/5210-13 *Water Rescue Plans, Facilities, and Equipment*
  - FAA Advisory Circular 150/5210-14 *Airport Fire and rescue Personnel Protective Clothing*
  - FAA Advisory Circular 150/5210-15 *Airport Rescue and Fire Fighting Station Building Design*
  - FAA Advisory Circular 150/5210-78 *Airport Fire and Rescue Communications*
  - FAA Advisory Circular 150/5220-4A *Water supply Systems for Aircraft Fire and Rescue Protection*
  - FAA Advisory Circular 150/5230-4 *Aircraft Fuel storage, Handling and Dispensing on Airports*
  - FAA Advisory Circular 150/5280-3 *Fire Fighting Exemptions Under the 1976 Amendment to the Federal Aviation Act*
- National Fire Protection Association (NFPA) Standards including but not limited to guidelines related to aircraft rescue and firefighting operations including but not limited to:
    - NFPA 402, *Standard for Aircraft Rescue and Fire Fighting Operations.*
    - NFPA 403, *Standard for Aircraft Rescue and Fire Fighting Services at Airports.*
    - NFPA 405, *Recurring Proficiency of Fire Fighters.*
    - NFPA 407, *Standard for Aircraft Fuel Servicing.*
    - NFPA 414, *Standard for Aircraft Rescue and Fire Fighting Vehicles*

- NFPA 424, *Guide for airport/community emergency planning*
- NFPA 1003, *Standard for Airport Fire Fighter Professional Qualifications*
- NFPA 1500, *Guide for Fire department Occupational Health and Safety Program*

- 2007 California Fire Code Chapter 11 et. al. which specifically addresses fire and life safety requirements for Aviation Facilities; and
- ICAO Airport Service Manual, Part 1 *Rescue and Fire Fighting*, and 7A, *Airport Emergency Planning*

4. The Fire District therefore has identified a need for:

- A full FAA, NFPA, California Fire Code, and ICAO code, standard, manual, and/or guideline analysis to be performed by a mutually agreed upon expert/consultant in order to better identify and address the existing capabilities and possible deficiencies that may have not yet been identified at the time of the presentation and Agency Scoping Meeting Discussion; and
- A Fire Operations Response needs assessment done showing current operation and response service for existing and anticipated aircraft and activities level, as well as current and future changes related to the proposed runway extension.

5. Once this analysis is completed, reviewed, and accepted; then the Novato Fire District reserves the right to make additional comments and conditions on this proposed runway extension project.

Respectfully submitted,



Capt. Bill Tyler, Acting Fire Marshal  
 Novato Fire Protection District  
 415-878-2621

**Bill Tyler**

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**From:** Barry.Franklin@faa.gov  
**Sent:** Tuesday, September 02, 2008 10:19 AM  
**To:** Tyler, Bill  
**Subject:** Re: Marin County Airport, Gness Field EIR-EIS comments from Novato Fire District

Mr. Tyler; I got the email and fax. I will pass onto our consultant for review and incorporation into the EIS/EIR analysis.

Barry Franklin  
Federal Aviation Administration  
San Francisco Airports District Office  
Environmental Protection Specialist  
831 Mitten Road Room 210  
Burlingame, CA 94010  
(650) 876-2778 ext. 614 - Voice  
(650) 876-2733 - Fax  
[barry.franklin@faa.gov](mailto:barry.franklin@faa.gov)

"Tyler, Bill"  
<[btyler@novatofire.org](mailto:btyler@novatofire.org)>  
To  
Barry Franklin/AWP/FAA@FAA  
08/29/2008 04:38 PM  
cc  
Subject  
Marin County Airport, Gness Field  
EIR-EIS comments from Novato Fire  
District

Mr. Franklin:

Attached are the Novato Fire District comments for the EIR-EIS on the Marin County Airport, Gness Field proposed runway 13/31 extension project. I have also faxed and mailed a hard copy to your office today.

If you have any questions I may be reached directly at 415-878-2621.

Sincerely,

## Brady, Reuel

---

**From:** MCL <mcl@marinconservationleague.org>  
**Sent:** Monday, December 09, 2013 3:25 PM  
**To:** gnossfieldcomments  
**Subject:** Gnoss Field Runway Expansion FEIR comments  
**Attachments:** adv\_lut\_gnoss-field-runway-feir\_mcl\_2013.12.09.pdf



Protecting Marin Since 1934

December 9, 2013

Mr. Bob Goralka, Principal Civil Engineer  
County of Marin  
Public Works Department  
3501 Civic Center Drive, Suite 304  
San Rafael, CA 94903

### Re: Gnoss Field Final EIR

Dear Mr. Goralka:

The Marin Conservation League (MCL) appreciates the opportunity to comment on the Final EIR for the Gnoss Field extension of Runway 13/31. We regret that the Final EIS is not available for review at the same time. It is our hope that the public will be able to review the EIS before a Record of Decision is filed.

The issues we raised in our comment letter on the Draft EIR (Feb. 2012) were addressed in the Final EIR in varying degrees of adequacy. We appreciate the addition of a discussion of sea level rise. We are concerned, however, that the county's only strategies to address this issue will be to work with regional efforts to monitor sea level rise rather than address alternatives to protect the construction proposed. The illustration denoting the potential areas of inundation shows DVO (Gnoss Field) totally inundated. Is it prudent to continue to expand a facility that will be under water before the century is out?

The lack of information about the potential change in DVO fleet with a 4400 foot runway was disturbing. MCL, EPA, Marin Audubon and many others requested that additional planes capable of landing at an extended runway be identified and the impacts be evaluated and mitigated where needed. A neighbor of Gnoss with experience in airplanes/airports provided a list with potential noise impacts. Providing demand forecast, as requested by the EPA, would have addressed our concerns. Larger planes could require additional services and capacity levels, i.e. fuel, parking, hangers, etc.

Identifying local mitigation opportunities for wetland loss, instead of looking to far distant mitigation sites, is an improvement and was appreciated. We will continue to monitor required mitigation for wetland and habitat losses for listed species. The mitigations for the salt marsh harvest mice and burrowing owls seem fragile, but hopefully beneficial to the targeted species.

The lack of analysis of a shorter runway extension than Alternative B (or D) prevented reviewers from evaluating the merits of this alternative. Because the 'critical aircraft', the Cessna 525 requires the 1100 foot extension for fully loaded use in warm weather, and there is only one such aircraft in the DVO fleet, it opens the door for significant changes to the fleet. Although not quantified, the potential for a wider variety of aircraft could impact noise levels, air quality and water quality. A shorter extension of the runway would reduce the amount of wetland mitigation needed.

Thank you for extending the length of time to review the voluminous documents associated with this FEIR.

Sincerely,

A handwritten signature in cursive script that reads "Jon Elam". The signature is written in dark ink and is positioned to the left of the typed contact information.

Jon Elam, President  
Marin Conservation League  
175 N. Redwood Dr., Ste. 135  
San Rafael, CA 94903  
415-485-6257

Mr. Bob Goralka, Principal Civil Engineer  
County of Marin, Public Works Department  
3501 Civic Center Drive, Suite 304  
San Rafael, CA 94903



Protecting Marin Since 1934

December 9, 2013

**Re: Gness Field Final EIR**

Dear Mr. Goralka:

The Marin Conservation League (MCL) appreciates the opportunity to comment on the Final EIR for the Gness Field extension of Runway 13/31. We regret that the Final EIS is not available for review at the same time. It is our hope that the public will be able to review the EIS before a Record of Decision is filed.

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Thank you for extending the length of time to review the voluminous documents associated with this FEIR.

Sincerely,

A handwritten signature in dark ink that reads "Jon Elam".

Jon Elam, President

PHONE: 415.485.6257  
FAX: 415.485.6259

EMAIL: [mcl@marinconservationleague.org](mailto:mcl@marinconservationleague.org)  
WEB: [marinconservationleague.org](http://marinconservationleague.org)

ADDRESS: 175 N. Redwood Dr., Ste. 135  
San Rafael, CA 94903-1977

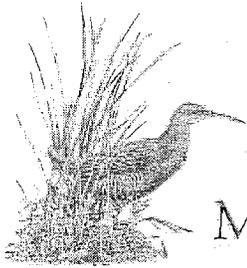


## Brady, Reuel

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**From:** Barbara Salzman <BSalzman@att.net>  
**Sent:** Sunday, November 24, 2013 3:23 PM  
**To:** gnossfieldcomments  
**Subject:** Gness Field FEIR  
**Attachments:** Gness Field FEIR.pdf

Marin Audubon Society's comments on the Final EIR for Gness Field are attached.  
If there are any questions or problems, please call (924-6057) or email me Thank you Barbara Salzman



## Marin Audubon Society

P.O. Box 599 | MILL VALLEY, CA 94942-0599 | MARINAUDUBON.ORG

November 24, 2013

Bob Goralka, Principal Civil Engineer  
County of Marin  
Public Works Department  
3501 Civic Center Drive, Suite 304  
San Rafael, CA 94903

Re: COMMENTS ON GNOSS FIELD FEIR

Dear Mr. Goralka:

The Marin Audubon Society appreciates your consideration of our comments on the Final Environmental Impact Report for the Gness Field Airport. Thank you for responding to our and the other comments on the Draft EIR/DEIS. We have the following questions about responses to comments:

Response 2.4 regarding compliance, or lack thereof, with FAA regulations discussed on page Q-23. When did the requirements discussed in the response come into effect? In other words how long has the Gness Field airport been out of compliance?

Response 2.6 Simply because the County has not indicated intention of applying for a Part 139 certificate, does not mean they are not thinking of it or would not apply. With the proposed improved runway length wouldn't it be more likely that a Part 39 certificate would be granted?

Response 3.1 and 3.4 concerning project alternatives, combining with Petaluma was considered; how about combining with the Napa airport? Could critical aircraft, Cessna 525, land at the Napa airport during hot weather or other adverse weather conditions?

Response 3.13 reports that the Petaluma airport was considered as an alternative but that it was rejected as imprudent and impractical because it was evaluated as having longer commute distance and, therefore, higher air emissions. How much longer would the commute be to locations south of Gness; or how far is the Petaluma airport from Gness? What would be the increase in emissions resulting from the specific increased distance?

Induced impacts from increased demand – Master Response 4 (p. Q-43) indicates that aircraft larger than the critical aircraft currently operate at Gness with the existing restrictions and would likely continue to do so whether or not the project is built. It seems, likely, however, that there would be increased use by critical or larger aircraft if

the project is constructed because restrictions would be lifted. This should be identified as a significant growth inducing impact and mitigation measures should be required. One mitigation measure should be restricting the number and types of planes that can land at the airport.

Response 12.11 The Detailed Study Area shown on Exhibit 4.1-3 shows an area in yellow south of the current runway. This area which should be considered habitat for Clapper Rail, Black Rail and Salt Marsh Harvest Mouse.

Comment 13.11 concerns mitigation for wetland losses. The response speaks to the USFWS San Pablo Recovery Unit as extending from Gallinas Creek to Mare Island. This is a very large area and, while it may suffice if there were no locations nearby within Marin County, there certainly are locations within Marin and very close to the project site. Also, the San Francisco Bay Joint Venture does not do restoration projects nor does it involve itself with mitigation projects.

We strongly object to using a mitigation bank or site out of northern Marin County such as sites in the National Wildlife Refuge. To do so is unnecessary, not in the interest of the species that use the wetlands currently, and would be in conflict with Countywide Plan policies.

The mitigation, other than for the ditch habitat that should be replaced on-site, should be located on one of the sites near the runway to provide for species that will lose habitat to benefit from the new habitats. To do otherwise, would also conflict with Marin Countywide Plan policy BIO-3.d. "The mitigation site should be close to the site of loss so that the mitigation wetland would provide habitat for the species that use the existing wetland."

The closest possible sites would be the privately-owned lands to west, south or the southeast of the runway, the area to the south, owned by Trevor Hamm et al, along the Novato Canal, which is actually Black John Slough that has been channelized. In addition, the lands owned by Bill Wright, particularly at the end of the peninsula that extends to the Petaluma River would also be a suitable site. The eastern end of the property was recently proposed as a mitigation bank. Instead of a bank, considering the mitigation acreage that is being required by the US Fish and Wildlife Service. (38.3 to 52.7 acres) the entire eastern end, an even larger area that was proposed for the bank, of this site would be needed. This would be a suitable area for mitigation. Simply buying credits from a bank should not be acceptable. Lands further to the west, along Black John Slough would also be suitable, and the lands shown in pink on figure 4.2.2, could also be evaluated for wetland mitigation particularly for seasonal wetland losses.

We note that CWP policies also call for setbacks and for detailed review of the adequacy of a proposed mitigation plans part of environmental review of the proposed development project to allow for a thorough evaluation...." (Policy BIO-3.e). This means that proposed mitigation should be presented and discussed in this DEIR, instead of the list of possibilities that are presented now.

Comment 14.3 This FEIR has been separated out as a CEQA document not a NEPA document. The restriction stated by CEQ, "it is not currently useful for the NEPA document to link specific climatological changes of the impacts thereof..." Therefore, this restriction should not apply, and potential impacts of sea level rise should be addressed in this EIR.

Section 4.20 floodplain discussion – Shouldn't the airport want to begin to address impacts of climate change on their runway before the seas rises to the top of their levees?

Response 19.2 did not answer the question clearly. It appears that the airport safety record is exemplary and accidents have occurred only due to mechanical failure, blown tires, collisions due to crosswinds, etc. but these have been only minor mishaps. So why is this big project necessary for safety? How many accidents have there actually been in last 10 years? The answer to this question should be not provided but is not.

Thank you for your attention to our comments and questions.

Sincerely,

  
Barbara Salzman, Co-chair  
Conservation Committee

  
Phil Peterson, Co-chair  
Conservation Committee

**Brady, Reuel**

---

**From:** kent@carterecosvc.com on behalf of Kent Carter <kent@northbaymitigationbank.com>  
**Sent:** Monday, December 09, 2013 3:59 PM  
**To:** gnossfieldcomments  
**Cc:** Kent Carter  
**Subject:** Public Comment: Gness Field Extension 13/31- North Bay Mitigation Bank  
**Attachments:** NBMB\_Gness 13\_31 extension Public Comment.pdf

Mr Goralka,

Please find the attached public comment for Gness Field Runway Extension 13/31 project. Thank you for the opportunity to comment. At your convenience please confirm receipt of the attached comment.

Regards,

Kent

--

Kent Carter

North Bay Mitigation & Conservation Bank

cell: (415) 971-7985

email: [kent@northbaymitigationbank.com](mailto:kent@northbaymitigationbank.com)

December 9, 2013

Marin County Public Works Department  
3501 Civic Center Drive, Suite 304  
San Rafael, CA 94903

Attention: Bob Goralka, Principal Civil Engineer

Re: Public Notice for the Gness Field, Proposed Extension of Runway 13/31

Mr. Goralka,

Thank you for the opportunity to comment on public notice for the Gness Field, proposed extension of runway 13/31 project. We would like to inform the Marin County Public Works Department that we are in the process of entitling a mitigation bank (North Bay Mitigation Bank) in Marin County that can provide mitigation for potential impacts to jurisdictional (404 and 401 of the Clean Water Act and, 1602 of the Fish and Game Code) aquatic associated with this project. Although the bank is not yet approved we anticipate that the signatory agencies including, United States Environmental Protection Agency, Army Corps of Engineers, United States Fish and Wildlife Service, San Francisco Regional Water Quality Control Board, and California Department of Fish and Wildlife will approve the bank between the last quarter of 2014 and first quarter of 2015.

We understand that this bank will not be approved in 2013 but wanted to inform the County and the Applicant of this mitigation bank alternative. I have attached a map of the proposed bank.

Thank you for considering our comments.

Regards,



Kent Carter  
North Bay Mitigation Bank  
cell: 415-971-7985  
email: [kent@northbaymitigationbank.com](mailto:kent@northbaymitigationbank.com)

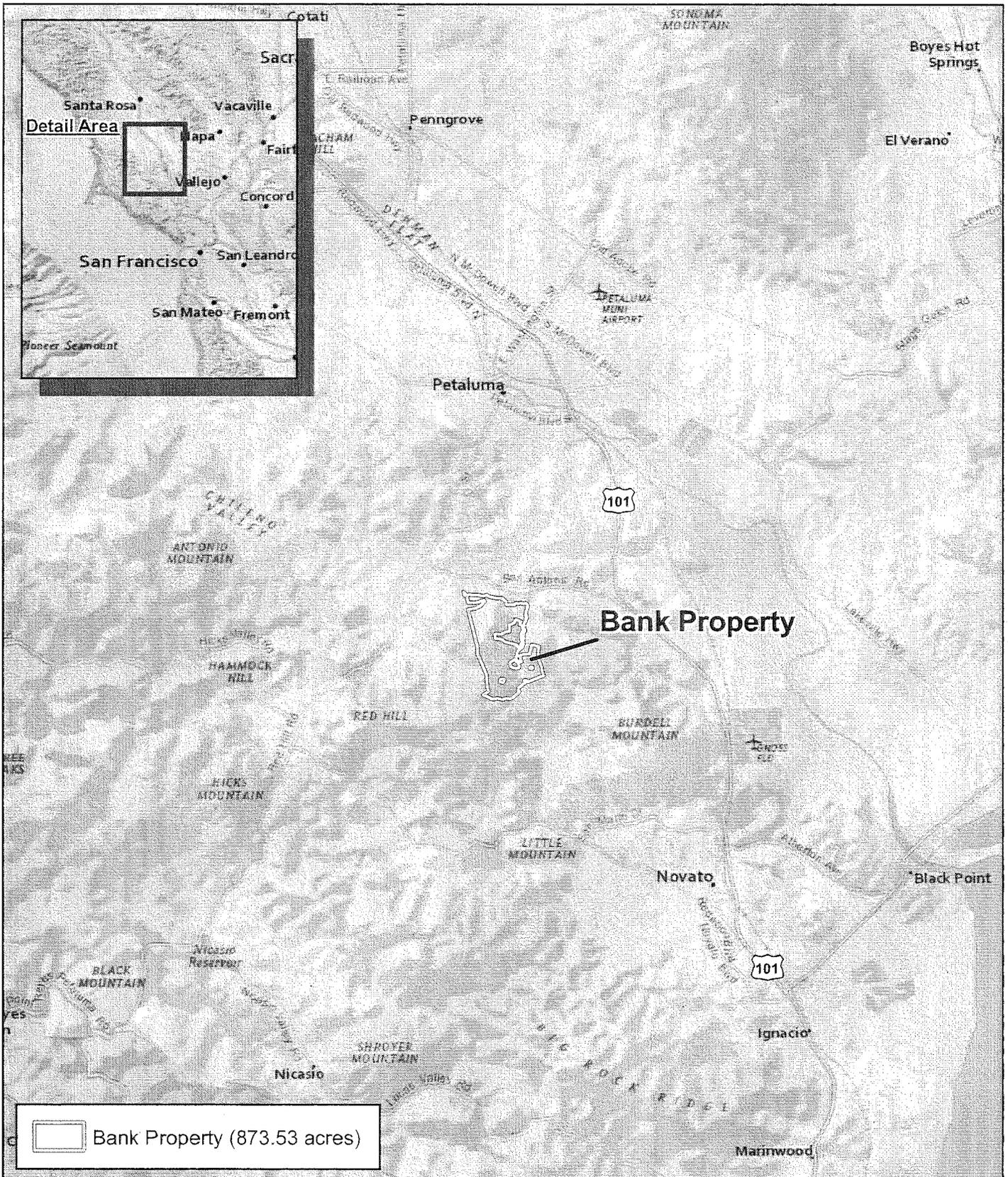
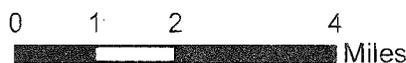


Figure 1. Location Map of Bank Property

North Bay Mitigation Bank  
Marin County, California



Map Date: July 2013  
Map By: Michael Rochelle  
Base Source: National Geographic

## Brady, Reuel

---

**From:** Mae Empleo <mae@semlawyers.com>  
**Sent:** Tuesday, November 26, 2013 1:19 PM  
**To:** gnossfieldcomments  
**Cc:** Osha Meserve  
**Subject:** Redwood Landfill & Recycling Center's Comments re: the FEIR for the Marin County Airport Gness Field Proposed Extension of Runway 13/31  
**Attachments:** Gness Field FEIR Comments 11.25.13.pdf

Dear Mr. Goralka,

We attempted to email this letter to you yesterday; however, the email was undelivered due to a typo in the email address.

Attached please find the comment letter prepared by Osha R. Meserve. This letter is written on behalf of the Redwood Landfill and Recycling Center regarding the Final Environmental Impact Report for the Marin County Airport Gness Field Proposed Extension of Runway 13/31. A hard copy of this letter will follow by mail. Should you have questions, please do not hesitate to contact our office.

Sincerely,

Mae Ryan Empleo  
(916) 455-7300

---

**From:** Mae Empleo [<mailto:mae@semlawyers.com>]  
**Sent:** Monday, November 25, 2013 3:51 PM  
**To:** 'gnossfieldcomments@marincouty.org'  
**Cc:** Osha Meserve; 'RN@g.co.marin.ca.us'; 'mjanofsky@co.marin.ca.us'; 'DNorth1@wm.com'  
**Subject:** Redwood Landfill & Recycling Center's Comments re: the FEIR for the Marin County Airport Gness Field Proposed Extension of Runway 13/31

Dear Mr. Goralka,

Attached please find the comment letter prepared by Osha R. Meserve. This letter is written on behalf of the Redwood Landfill and Recycling Center regarding the Final Environmental Impact Report for the Marin County Airport Gness Field Proposed Extension of Runway 13/31. A hard copy of this letter will follow by mail. Should you have questions, please do not hesitate to contact our office.

Sincerely,

Mae Ryan Empleo  
Legal Assistant  
*Soluri Meserve, A Law Corporation*  
1010 F Street, Suite 100  
Sacramento, CA 95814

☎ tel: 916.455.7300 ▪ 📠 fax: 916.244.7300 ▪ 📱 mobile: 559.361.5363 ▪ ✉ email: [mae@semlawyers.com](mailto:mae@semlawyers.com)

This email and any attachments thereto may contain private, confidential, and privileged material for the sole use of the intended recipient.



tel: 916.455.7300 · fax: 916.244.7300  
1010 F Street, Suite 100 · Sacramento, CA 95814

November 25, 2013

**SENT VIA U.S. MAIL & EMAIL (gnossfieldcomments@marincounty.org)**

Marin County Public Works Department  
Attention: Bob Goralka, Principal Civil Engineer  
3501 Civic Center Drive, Suite 304  
San Rafael, CA 94903

**RE: Comments on FEIR for Marin County Airport Gness Field Proposed  
Extension of Runway 13/31**

Dear Mr. Goralka:

This letter is written on behalf of the Redwood Landfill and Recycling Center (“Redwood”) regarding the Final Environmental Impact Report (“FEIR”) for the Marin County Airport Gness Field Proposed Extension of Runway 13/31 (“Runway Extension project”).

In August 2008, Redwood provided comments on the Notice of Preparation, and in February 2012, Redwood provided comments on the Draft EIR/EIS. While the FEIR responds to some of the technical concerns stated in these comment letters, the FEIR’s approach to additional mitigation responsibility if the Runway Extension project increase bird strike hazards is still inadequate. As explained below, should any additional bird control measures be necessary due to operational changes at Gness Field, Gness Field bears responsibility for those additional bird control measures, not Redwood. The FEIR unfortunately takes the opposite approach.

According to the FEIR, the Runway Extension project would both decrease the distance between Gness Field and Redwood, and would result in flights that are lower in altitude over Redwood. (FEIR, p. 4.2-12.) Additionally, a two percent increase in use of the Gness Field Airport is anticipated by 2027. (FEIR, Appendix c, p. 11, Table 4 (Aircraft Operations Forecast).) Yet the FEIR relies solely on mitigation to be implemented by Redwood to address potential increases in bird strike hazards caused by the Runway Extension project.

Specifically, the FEIR relies on Mitigation Measure 3.6.2d “to prevent [Redwood] from becoming an incompatible land use.” (FEIR, p. 4.2-12; see also FEIR, Appendix Q, p. Q-40 (Response to Comment 5.2).) This mitigation measure, however, related to Gness Field Airport as it existed at that time and does not include a duty to mitigate for

future impacts caused by changes at Gness Field Airport. According to Mitigation Measure 3.6.2d:

If bird activity at the landfill, including the areas outside the permitted landfill footprint proposed for composting, *increases as a result of the project*, as determined by the LEA during regular site inspections, RLI shall adjust its existing bird control program as necessary to ensure that the facility does not pose a bird hazard to aircraft. RLI shall modify as necessary the demonstration required in 40 CFR Part 258, § 258.10 (a) and 27 CCR, § 20270(a) (that the landfill does not pose a bird hazard to aircraft).

(Mitigation Monitoring and Reporting Program for Redwood (2008, 2013), italics and underline added.) It is notable that the “project” referenced in Mitigation Measure 3.6.2d refers to the Solid Waste Facility permit revision and subsequent changes *at Redwood*. The Gness Field Airport FEIR apparently misinterprets Mitigation Measure 3.6.2d to mean that Redwood will be responsible for mitigating increased bird strike impacts caused by the Runway Extension project. This is incorrect.

The FEIR for *the Runway Extension project* must analyze whether the changes that will occur as a result of *the Runway Extension project* will cause new or substantially more severe Land Use and other impacts. (CEQA Guidelines, § 15126.2, subd. (a).) If so, mitigation must be required of *the Runway Extension project* unless such measures are infeasible. (Pub. Resources Code, § 21002; CEQA Guidelines, § 15126.6.) To the extent Redwood’s adopted Mitigation Measure 3.6.2d applies, it only pertains to impacts that occur as a result of *changes in operations at Redwood*, not those changes contemplated *by the Runway Extension project*.

The Gness Field FEIR’s response to Redwood’s February 2013 comments regarding the environmental baseline used in the Gness Field Draft EIR/EIS indicates that the treatment of impacts caused by the Runway Extension project stem from an incorrect understanding of baseline. In our prior comments, we noted that the existing permitted conditions at Redwood are the appropriate baseline against which the effects of the Runway Extension project should be analyzed. (CEQA Guidelines, § 15125.) Yet, the response to this comment states that:

Mr. Bob Goralka  
November 25, 2013  
Page 3 of 4

It is acknowledged that the RLI operations under the 2008 permit are part of the baseline. There is no additional mitigation (wildlife attractant measures) required beyond what is required in RLI's operating permit [sic].<sup>1</sup>

(FEIR, Appendix Q, p. Q-68, Response to Comment 23.8.) Reliance on Redwood's Mitigation Measure 3.6.2d to provide mitigation for an impact caused by the Runway Expansion project *in the future, from the Runway Expansion project*, clearly reflects confusion regarding both baseline conditions as well as a project's duty to mitigate the impacts *caused by the Runway Extension project*.

Thus, the Runway Expansion project should include the following (or similar) statement as part of the project description or in a mitigation measure:

Redwood has agreed to provide a description of its bird control program to Gness Field. Gness Field will coordinate with Redwood and the LEA every three (3) years or more frequently as needed to assess the ongoing effectiveness of the bird control program.

Should the LEA determine that additional bird control measures become necessary as a result of the Runway Expansion project to ensure aviation safety subsequent to the Runway Expansion project, Gness Field shall: (1) take responsibility for such additional bird control measures; or (2) reimburse Redwood for any additional costs associated with changes to its bird control program.

This approach would ensure that Gness Field takes responsibility for bird control safety impacts caused by the Runway Expansion project rather than inappropriately foisting that responsibility on Redwood. It would also prevent new or substantially more severe Land Use impacts resulting from the Runway Extension project from going unmitigated in contravention to the requirements of the California Environmental Quality Act (Pub. Resources Code, §§ 21000 et seq.).

\* \* \*

We would like to meet with you to discuss these comments and suggestions prior to the Board of Supervisors meeting now scheduled for February 11, 2014. Please contact me or Dan North, Redwood's District Manager, at (415) 408-9054 to arrange this

---

<sup>1</sup> This should be a reference to the adopted Mitigation Monitoring and Reporting Program, not Redwood's operating permit.

Mr. Bob Goralka  
November 25, 2013  
Page 4 of 4

meeting so that we can discuss what will be required to ensure that the Runway Extension project's Land Use compatibility impacts are properly addressed.

Very truly yours,

**SOLURI MESERVE**  
A Law Corporation

By:   
Osha R. Meserve

cc: Rebecca Ng, Deputy Director, Marin County Environmental Health Services,  
[RNg@co.marin.ca.us](mailto:RNg@co.marin.ca.us)  
Mark Janofsky, Senior Environmental Health Specialist, Marin County  
Environmental Health Services, [mjanofsky@co.marin.ca.us](mailto:mjanofsky@co.marin.ca.us)  
Dan North, District Manager, Redwood Landfill and Recycling Center,  
[DNorth1@wm.com](mailto:DNorth1@wm.com)

## Brady, Reuel

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**From:** DeMartini, Sharon  
**Sent:** Monday, December 09, 2013 2:48 PM  
**To:** Brady, Reuel; Goralka, Robert; gnossfieldcomments  
**Subject:** Letter re: Gness Field  
**Attachments:** 201312091440.pdf

Hi there,

A gentleman came into our office today with this letter and he wanted to be sure you got it today before 4 p.m.!

I've sent it to all 3 email address to make sure I've covered all the bases ☺

The original is in the mailbox in 304.

Thanks

Sharon DeMartini  
Executive Assistant to Director  
County of Marin Public Works Department  
3501 Civic Center Drive, Room 304  
San Rafael, CA 94903  
(415) 473-6523  
[sdemartini@marincounty.org](mailto:sdemartini@marincounty.org)

12/9/2013  
331 SCHOOL RD  
NOVATO, CA 94945

PRINCIPAL CIVIL ENGINEER, BOB GORALKA  
MARIN PUBLIC WORKS DEPT.  
SAN RAFAEL, CA

MR. BOB GORALKA:

THE GROSS FIELD RUNWAY AT ITS PRESENT LENGTH IS A MODERATE COUNTY AIRPORT ADEQUATELY SERVING LOCAL USERS. EXPANDED DEVELOPMENT WOULD ATTRACT CORPORATE BUSINESS JETS AND ADDITIONAL ROADWAY TRAFFIC CONGESTION.

IN ADDITION, NO MATTER THE DEVELOPMENT OF EXPANDED RUNWAY LENGTH AND DIRECTION, CROSSWINDS WOULD STILL CREATE AN EXISTING SAFETY PROBLEM AT GROSS FIELD.

NOISE INTERPRETATIONS ARE QUITE OFTEN ARBITRARY, I.E., AIRCRAFT NOISE IN A DENSE URBAN AREA EXPOSED TO HEAVY TRAFFIC, ETC., WOULD NOT CAUSE AS MUCH CONCERN AS AIRCRAFT NOISE IN A SEMIRURAL RURAL AREA SUCH AS THE SURROUNDING SEMI RURAL/RURAL AREA AT GROSS FIELD. THE FACT IS THAT AIRCRAFT NOISE DECREASES THE RESIDENTIAL PROPERTY VALUES NEAR THE NOISEY AIRPORT. GROSS FIELD IS LOCATED IN THE LARGEST AND MOST ACTIVE BIRD FLY-WAY IN THE BAY AREA, I.E., THE PACIFIC FLY-WAY. A BIRD DRAWN INTO AN AIRCRAFT ENGINE COULD CAUSE A PLAN CRASH.

Charlene L. Bracy

**Brady, Reuel**

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**From:** Gilkerson <gilkerson1000@msn.com>  
**Sent:** Monday, December 09, 2013 3:28 PM  
**To:** gnossfieldcomments  
**Subject:** Gness Field EIR Comments  
**Attachments:** Gness Field EIR comment letter.docx

Dear Mr. Goralka, we are submitting the attached comments on behalf of all of the signed parties. Thank you very much for your consideration.

Christopher Gilkerson

December 9, 2013

Mr. Bob Goralka  
Principal Civil Engineer  
3501 Civic Center Drive, Suite 304  
San Rafael, CA 94903  
[gnessfieldcomments@marincounty.org](mailto:gnessfieldcomments@marincounty.org)

**Re: Final Environmental Impact Report for the Marin County Airport - Gness Field**

*By Email*

Dear Mr. Goralka and Marin County Board of Supervisors:

We are residents of Marin who live just south of Gness Field. Many of us commented on the Draft Environmental Impact Report in February 2012.<sup>1</sup> Unfortunately, although nearly two years passed since we commented on the draft EIR, the County's consultant did very little to respond to our concerns and the deficiencies we pointed out then. Because the Final Environmental Impact Report either failed to address our prior comments or inadequately addressed them, we incorporate by reference those prior comment letters on the draft EIR and do not repeat all of the points made in those prior letters.<sup>2</sup> Beginning on page 2 of this letter, we summarize the particular deficiencies in the final EIR.

Marin County, meaning the Board of Supervisors, is the sponsor for the Gness Field runway extension project. We are disappointed that the Board of Supervisors ignored our petition two years ago and did not instruct the environmental consultant who works for the County to address directly our comments and concerns. Instead, the consultant found ways to evade our comments. But it is not too late. For the reasons indicated below, the Board of Supervisors should not certify the FEIR as adequate and complete at this time and instead should instruct the consultant to amend the FEIR to include full consideration of three items:

- (1) A shorter runway extension alternative of up to 500 feet, which would be consistent with the FAA's own methodology for calculating necessary runway lengths and an environmentally superior alternative that would save valuable wetlands (potentially 7 or more acres) and habitat for two endangered species, the California Clapper Rail and the Salt Marsh Harvest Mouse, while still meeting most or all of the stated purposes of the project;

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<sup>1</sup> The FEIR was issued around November 7, 2013, initially only allowing 18 days to comment. We appreciate the intervention that resulted in extending the comment period until December 9.

<sup>2</sup> "Objections raised in the comments must be addressed in detail giving reasons why specific comments and suggestions were not accepted. There must be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice." CEQA Guidelines 15088(c). The FEIR fails to meet this requirement.

- (2) The additional jets that would be able to use Gness Field if the current proposed project to extend the runway 1,100 feet (Alternative B) moves ahead;
- (3) The potential overflight and noise impacts on the neighborhoods to the south of Gness Field from the change in fleet mix that could result under Alternative B;

## **Key FEIR Deficiencies**

### Lack of Clear Articulation of the Purpose of the Runway Extension, and Selection of the “Critical Aircraft”

In its response to comments, the FEIR states that “reference to possible benefits to other aircraft have been removed from the final EIR.” (Q-18)<sup>3</sup> The draft EIR had stated the project was broader and intended to “allow the Airport to accommodate existing aviation traffic and passenger demand, as well as demand for the foreseeable future.” (3-11) There is no reasoned explanation for this amendment to the Project’s purpose, leading to an inference that it was to avoid considering: evidence in the FEIR record which shows the airport is already perfectly sufficient for 98% or more of all flights that originate or end at Gness; other impacts related to a possible change in fleet mix with an 1,100 foot runway extension; growth inducing or other potential impacts given that a runway extension is the first step necessary to expand airport operations consistent with the Gness Field Airport Master Plan.

The FEIR now states that the only purpose of this multi-million dollar project is to expand the runway a full 1,100 feet to enable a single model of corporate business jet no longer in production, the Cessna 525 Citation CJ1+, to take-off with a maximum payload (a full gas tank and every seat full) on an 86 degree day. (3-11, and Appendix D) There are insufficient facts, and no reasonable assumptions based on facts, to support why this particular business jet was selected as the “critical aircraft.”<sup>4</sup> Even if properly selected as the critical aircraft, there is no evidence – which would be easily attainable – about how many flights during the course of a year are actually impacted by not being able to take-off with a full tank of gas.

If the County believes the Project to extend the runway has any other purpose, then the FEIR now omits information necessary for an informed discussion and decision, as required by CEQA.

### Miscalculation of the Necessary Runway Length for Take-Off with Maximum Payload

Even assuming selection of the Cessna 525 was proper, the FEIR’s response to comments and the changes to Appendix D still show fundamental flaws in the FEIR’s calculation of the necessary runway length.

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<sup>3</sup> All references are to FEIR pages, unless otherwise noted.

<sup>4</sup> There was no survey of Gness Field users or data from the last 5 years to help determine the critical aircraft. Instead, the FEIR relies on incomplete radar data and conversations at an informal meeting back in 2008 with 10 self-selected business owners who have an understandable interest in expanding operations at Gness Field. See Appendix D and Attachment 2.

Using the same method selected by the FEIR, the “Airport Planning Manual” approach which relies on the critical aircraft’s flight planning guide, we used the publicly available *Citation CJI (Cessna 525) Flight Planning Guide* (Feb. 2008) to calculate runway length. In that Guide at page 5 for “Takeoff Performance –Takeoff Field Length,” the necessary runway length for maximum takeoff weight is 3,786 feet on an 82 degree day.<sup>5</sup> As the FEIR points out, 82 degrees is the proper temperature to use under FAA regulations because it is the mean daily average temperature of the hottest month at Gness Field. This results in a 486 foot runway extension.

The FEIR erroneously tacks on an additional 614 feet by doing three unsupportable things:

- It uses the Cessna 525 Airplane Flight Manual<sup>6</sup> chart for a wet runway AND looks at runway length necessary at the mean daily maximum temperature of the hottest month (presumably July or August). These assumptions cannot be supported by facts: There virtually are no wet days at Gness Field in the months of July and August, as everyone in Marin County knows.<sup>7</sup> It is improper to bootstrap wet conditions onto hottest day, as the two never occur simultaneously at Gness Field.
- It then rounds-up to 86 degrees from the actual mean daily maximum temperature of 82 degrees Fahrenheit. Faced without a basis for arbitrarily increasing the temperature as our prior comment letter pointed out, the consultant talked to a “Sr. Customer Engineer” at Cessna who blessed rounding-up to make sure the runway did not end up too short. (D-7) This is an unsubstantiated opinion that cannot replace simple math (i.e., simple facts) of interpolating between the 77 and 86 degree Fahrenheit designations in the chart to arrive at the appropriate runway length for 82 degrees.
- After making the above two errors, it then rounds-up another 10 feet to arrive at 4,400. Perhaps coincidentally, this equals the 1,100 runway extension that certain Project proponents have wanted for decades.<sup>8</sup>

#### Failure to Consider a Reasonable Alternative of a Shorter Runway Extension

Under CEQA, a public agency such as the Board of Supervisors should not approve a project as proposed if there are feasible alternatives available that would substantially lessen the significant

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<sup>5</sup> This is a simple math interpolation between the 77 and 86 degree designations in the chart.

<sup>6</sup> We could not find a publicly available copy of the Airplane Flight Manual the FEIR relies on.

<sup>7</sup> It is also inconsistent with the methodology on the prior page 6 of Appendix D, which uses a “dry runway” as the assumption for the necessary landing distance (which is only 2,690 feet, even assuming an 86 degree Fahrenheit day).

<sup>8</sup> The FEIR’s Appendix D substantially change the method for calculating the necessary distance compared to the draft EIR’s Appendix D, without giving reasons why. In the draft EIR, the runway length analysis (Table 3) concluded that the takeoff length for a hot day at 86 degrees (more than the prescribed 82 degrees) was 3,990 feet. Although the draft EIR concluded that “a runway length of 4,000 feet would accommodate all aircraft in the fleet including the critical aircraft” at Gness, the draft EIR added over 400 feet based on anecdotes from a handful of pilots that a total of 4,400 would address their concerns.

effects the project would have on the environment and community. In weighing the alternatives, a public agency has an obligation to balance a variety of public objectives. Fundamentally, an FEIR must “describe reasonable alternatives to the project.” CEQA Guidelines 15121(a).

“The statement of objectives should include the underlying purpose of the project” and should “help the lead agency develop a reasonable range of alternatives to evaluate.” CEQA Guidelines 15124(b). The purpose Marin County has indicated in the FEIR is to enable a single type of corporate jet, the Cessna C25, to carry a maximum payload (a full tank of gas and the maximum number of passengers) on a very hot day.

The FEIR itself indicates a viable alternative. FAA Advisory Circular 150/5325-4B (the “AC”) which the FEIR relies on provides two valid methods for determining runway length for the “critical aircraft.” The first uses a “runway length curves” method, under which the necessary runway length for a B-1 small aircraft such as the Cessna 525 under hot day conditions of 82 degrees Fahrenheit at sea-level should be 3,500 feet total, or a 200 foot extension. Although Marin County’s consultant chose the other method (analyzed above), the runway length curves method is fully compliant with FAA regulations and, by definition is a reasonable and feasible alternative that would meet all or most of the stated objectives of the Project.<sup>9</sup>

The FEIR improperly excludes this clearly feasible alternative of a runway extension of 200-500. An FEIR “must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation.” CEQA Guidelines at 15126.6(a).

“Discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.” CEQA Guidelines 15126.6(b). “The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects.” CEQA Guidelines 15126.6(c). In this case, a shorter runway extension would meet most if not all of the Project’s objectives, create fewer negative impacts on the environment, and would be less costly. It would be the environmentally superior alternative because it would destroy substantially less wetlands than Alternative B and would not result in the likely noise impacts discussed below.

Moreover, a runway extension of 500 feet would meet the objectives of the 1989 Marin County Airport Master Plan (at 4.3) and Marin County’s public statements that it intends to keep Gness Field classified as a B-1 airport for smaller aircraft. The Master Plan indicates that a runway of 3,800 feet total would be “appropriate” for aircraft with 10 seats or less, while a runway of 4,400 feet total would be appropriate for aircraft with 10 seats or more – which would be inconsistent with the FEIR’s description of the overall Project to maintain Gness as a B-1 airport.

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<sup>9</sup> Because there is inadequate data in the FEIR Appendix D for selecting the Cessna 525 as the critical aircraft when such data would be easily obtainable, the FEIR should have placed more reliance on this runway lengths curves analysis for determining runway length. In the very least, it should have been fully analyzed as an alternative to the Project.

Assuming a Runway Extension of 1,100 feet, Failure to Consider Changes to Fleet Mix and Impact on Noise

The FEIR states that runway length is an important factor in a pilot's decision where to operate an aircraft. (Q-14) It also admits that "a 4,400 foot-long runway could accommodate a different fleet mix than a 3,300 foot-long runway. (Q-7) But it then refuses to forecast what the different fleet mix might be and therefore dodges performing any noise or other impact analysis on larger jets that could begin to use the airport.

In doing so the FEIR ignores substantial evidence in the record that some current airport users would upgrade their planes and begin using larger jets, and the reasonable assumption based on that evidence that Gness could attract larger jets servicing corporate executives in Marin and Sonoma Counties currently using other airports. Appendix D in the draft FEIR, for example, included a tenant letter from the Kelleher Corporation which states that "with the proposal for adding additional length to Gness Field, the concept of the Kelleher Corporation acquiring a larger Gness field-based aircraft is once again possible." Sunset Aviation stated that they would add a Lear Jet to the fleet if the runway was extended to 4,400 feet.<sup>10</sup> As the USEPA pointed out in its comment letter dated February 6, 2012, "this clearly shows that a reasonable response to a longer runway is a change in fleet mix proportions toward larger aircraft." Increased and different jet traffic is not a speculative concern – it is supported by evidence in the record.

The February 6, 2012 letter from Steven and Sharon Nebb included a table of additional jets, including a Lear Jet, which would be able to use Gness Field if the runway extends to 4,400 feet. These jets are, in some cases, more than twice the weight of the Cessna 525 with considerably higher noise-levels on approach, some as high as 100 dBAs or decibels. The obvious concern is that larger, heavier jets will not be able to comply with the voluntary Gness Field Noise Abatement Procedures, because they will need to make their approach from the south for the runway further out over our neighborhoods, which therefore will increase noise disturbances.

We are greatly troubled by the FEIR's dismissal of our concerns about noise. In addition to safety hazards, under CEQA Guidelines for airport projects the most critical issue to address is noise. CEQA Guidelines 15154.

The FEIR claims that the noise is not caused by the airport's operations but, instead results from pilots' failure to comply with the voluntary Noise Abatement Procedures. (Q-35) Gness Field has documented dozens of noise complaints in the last year alone, and the FEIR does not address the potential impact of increased noise disturbances resulting from a 4,400 foot runway that likely would attract larger and louder jet traffic. A revised noise forecast would not be a "worst case scenario" as the FEIR argues (Q-33), but rather a reasonable and necessary assessment to analyze potential impacts on the environment and local communities as required by CEQA.

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<sup>10</sup> Without explanation, these letters were removed from FEIR Appendix D. Although those letters may be inconvenient to the consultant, it cannot pretend this evidence is not already in the record.

Other Reasons why the FEIR is not complete and is inadequate

- Gness Field would never be built today in its sub-optimal location, in very close proximity to the Redwood Landfill, wetlands, and a waste water treatment facility. FAA Advisory Circular 150/5200-33B makes it clear that it is undesirable to build or expand an airport near wetlands, landfills, and/or water treatment facilities; Gness is located on or near all of these undesirable areas. In this circular, the FAA recommends a separation distance of “10,000 feet.” The Gness runway extension would not meet this recommendation. The FEIR does not explain considerations that would override this concern.
- FAA Advisory Circular 150/5200-33B states that “Airports that have received Federal grant-in-aid assistance must use these standards.” This advisory circular, Hazardous Wildlife Attractants on or Near Airports states that close proximity to airports can cause an increase in aviation related accidents. The advisory circular provides guidance and mitigation recommendations in order to minimize the environmental impact and further promote safety in aviation. There is no reference to this advisory circular in the FEIR and no consideration is given to the impacts that these land uses might have on the runway extension.
- The wetlands and wildlife mitigation analyses are incomplete and lead to erroneous conclusions.
- There is no analysis about the impact of Global Warming and current predictions of sea-level rise on the Project and Gness Field, which is located at sea-level in a flood plain.

Conclusion

The Board of Supervisors must certify that FEIR “has been completed in compliance with CEQA” and that it “reflects [it’s] independent judgment and analysis.” CEQA Guidelines 15090(3). We respectfully request that you address the above issues before certifying the FEIR as complete and before making a determination whether to approve the runway extension Project.

If you have any questions, please feel free to contact us at 415-209-9616.

Very truly yours,

Christopher Gilkerson & Susan Mathews, 220 Saddle Wood Dr.  
Steve & Sharon Nebb, 215 Saddle Wood Dr.  
Amy & Tim O’Connor, 681 Albatross Dr.  
Betsy & Duncan Ross, 190 Saddle Wood Dr.  
Jacqueline A. Bonner, 170 Saddle Wood Dr.  
John & Catherine Yee, 100 Saddle Wood Dr.  
Cynthia Bunim, 30 Oak Shade Lane

Eric & Heather Gahan, 225 Saddle Wood Dr.  
Michael & Susan Parnes, 120 Saddle Wood Dr.  
Susan & Richard Markx, 130 Saddle Wood Dr.  
Mark and Jeannette McAlonan, 150 Oak Shade Lane

U.S. Department of Homeland Security  
FEMA Region IX  
1111 Broadway, Suite 1200  
Oakland, CA. 94607-4052



FEMA

November 12, 2013

Bob Goralka, Principal Civil Engineer  
County of Marin, Public Works Department  
3501 Civic Center Drive, Suite 304  
San Rafael, California 94903

Dear Mr. Goralka:

This is in response to your request for comments on the Notice of Availability and Notice of Public Hearing Final Environmental Impact Report for the Marin County Airport – Gness Field, Proposed Extension of Runway 13/31.

Please review the current effective countywide Flood Insurance Rate Maps (FIRMs) for the County of Marin (Community Number 060173) and City of Novato (Community Number 060178), Maps revised May 4, 2009. Please note that the City of Novato, Marin County, California is a participant in the National Flood Insurance Program (NFIP). The minimum, basic NFIP floodplain management building requirements are described in Vol. 44 Code of Federal Regulations (44 CFR), Sections 59 through 65.

A summary of these NFIP floodplain management building requirements are as follows:

- All buildings constructed within a riverine floodplain, (i.e., Flood Zones A, AO, AH, AE, and A1 through A30 as delineated on the FIRM), must be elevated so that the lowest floor is at or above the Base Flood Elevation level in accordance with the effective Flood Insurance Rate Map.
- If the area of construction is located within a Regulatory Floodway as delineated on the FIRM, any *development* must not increase base flood elevation levels. **The term *development* means any man-made change to improved or unimproved real estate, including but not limited to buildings, other structures, mining, dredging, filling, grading, paving, excavation or drilling operations, and storage of equipment or materials.** A hydrologic and hydraulic analysis must be performed *prior* to the start of development, and must demonstrate that the development would not cause any rise in base flood levels. No rise is permitted within regulatory floodways.

Bob Goralka, Principal Civil Engineer

Page 2

November 12, 2013

- All buildings constructed within a coastal high hazard area, (any of the "V" Flood Zones as delineated on the FIRM), must be elevated on pilings and columns, so that the lowest horizontal structural member, (excluding the pilings and columns), is elevated to or above the base flood elevation level. In addition, the posts and pilings foundation and the structure attached thereto, is anchored to resist flotation, collapse and lateral movement due to the effects of wind and water loads acting simultaneously on all building components.
- Upon completion of any development that changes existing Special Flood Hazard Areas, the NFIP directs all participating communities to submit the appropriate hydrologic and hydraulic data to FEMA for a FIRM revision. In accordance with 44 CFR, Section 65.3, as soon as practicable, but not later than six months after such data becomes available, a community shall notify FEMA of the changes by submitting technical data for a flood map revision. To obtain copies of FEMA's Flood Map Revision Application Packages, please refer to the FEMA website at <http://www.fema.gov/business/nfip/forms.shtm>.

**Please Note:**

Many NFIP participating communities have adopted floodplain management building requirements which are more restrictive than the minimum federal standards described in 44 CFR. Please contact the local community's floodplain manager for more information on local floodplain management building requirements. The City of Novato floodplain manager can be reached by calling Jason Nutt, Public Works, Director, at (415) 899-8963. The Marin County floodplain manager can be reached by calling Roger Leventhal, P.E., Associate Engineer, at (415) 473-3249.

If you have any questions or concerns, please do not hesitate to call Michael Hornick of the Mitigation staff at (510) 627-7260.

Sincerely,



Gregor Blackburn, CFM, Branch Chief  
Floodplain Management and Insurance Branch

cc:

Jason Nutt, Director, Department of Public Works, City of Novato

Roger Leventhal, P. E., Associate Engineer, Marin County Flood Control & Water Conservation District

Ray Lee, WREA, State of California, Department of Water Resources, Central District

Michael Hornick, NFIP Planner, DHS/FEMA Region IX

Alessandro Amaglio, Environmental Officer, DHS/FEMA Region IX

**Brady, Reuel**

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**From:** Koop, Kenneth M LTC USARMY NG CAARNG (US) <kenneth.m.koop.mil@mail.mil>  
**Sent:** Monday, November 18, 2013 10:33 AM  
**To:** gnossfieldcomments  
**Subject:** California National Guard review of the Gness Field FEIR (UNCLASSIFIED)

Classification: UNCLASSIFIED  
Caveats: NONE

Mr. Goralka

Thank you for the opportunity to review the Gness Field Final EIR. The California National Guard has no comment on the FEIR.

Lieutenant Colonel Kenneth Koop  
Deputy Director  
Environmental Programs  
California Military Department  
[Kenneth.m.koop.mil@mail.mil](mailto:Kenneth.m.koop.mil@mail.mil)  
916-369-4331

Classification: UNCLASSIFIED  
Caveats: NONE