APPENDIX P
COMMENTS RECEIVED ON DRAFT EIS/EIR

HOW TO USE APPENDIX P, *COMMENTS RECEIVED ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT (EIS) AND DRAFT ENVIRONMENTAL IMPACT REPORT (EIR)* AND APPENDIX Q, *RESPONSE TO COMMENTS*

All comments received during the official comment period are provided in this Appendix P. All responses to comments are provided in Appendix Q.

Within each comment letter or oral statement from the public hearing, brackets are used to identify the specific items commented on within each comment letter or oral statement. The bracketed comments in each letter are labeled by number to provide an identifier for each comment. Comments were organized into 26 topical categories as follows:

Comment Topic	Description
1	Purpose and Need
2	Aviation Forecast
3	Alternatives
4	Noise
5	Land Use
6	Socioeconomic
7	Secondary
8	Air Quality
9	Water Quality
10	Section 4(f)
11	Historic
12	Fish, Wildlife, and Plants
13	Wetlands
14	Floodplains
15	Energy/Public Services
16	Light
17	Redwood Landfill
18	Construction
19	Safety
20	Runway Performance/Wind
21	Transportation
22	Cumulative
23	General
24	Support of Project
25	No Comment
26	Soils

For all comments the first digit is the Comment Topic. The second digit behind the decimal is the specific comment within that topic. Each comment submitted was reviewed, summarized, and identified with a Comment Topic from one of the categories above.

For example Comment 2.1 was "The runway extension = larger/more aircraft at DVO." This issue was commented on by several individuals and organizations including in written comments by USEPA, Marin Audubon Society, Marin Conservation League, Black Point Improvement Club, Bonner, Dunadio, Gilkerson, Gilkerson and Nebb families, Levy, Pack, Silveira family, Weber and Ross, Weber, in the public hearing by Knecht for Gnoss Field Community Association, Wells, Gilkerskon, Pack, Bracey, Nebb, Spofford, and Capretta. In every letter/comment this specific comment is identified as Comment 2.1 and is addressed in Appendix Q *Responses to Comments* in the response to Comment 2.1

Comment letters and oral comments in this appendix appear in the following order:

Federal agency comments
State agency comments
Local agency comments
Organizations
Individuals
Transcript of January 10, 2012 on Public Hearing

This appendix includes agency, organization and individual comments that were received during the public comment period on the Draft Environmental Impact Statement and the Draft Environmental Impact Report. The public comment period extended from December 9, 2011 to February 6, 2012 and including a public hearing to receive comments on January 10, 2012. During the public comment period a total of 169 separate comment letters and oral comments were received, but the total number of commenters was less than 169 as some commenters who submitted written comments also provided oral comments at the public hearing and/or submitted or cosigned more than one written comment letter. Comments were received from Federal, State, and local agencies, organizations, and individuals.

Readers interested in all responses to public comments can review Appendix Q *Response to Comments* in its entirety. Readers only interested in responses to specific comment letters or statements can use the listing below to review the Appendix Q *Response to Comments* for responses to all comments received from a specific commenter in the order they were made in the commenter's letter.

Name	Organization (if any)	Date	Comment Numbers
Kathleen Martyn Goforth	U.S. Environmental Protection Agency	2/6/2012	3.1, 3.2, 3.7, 1.1, 3.2, 3.2, 1.3, 13.1, 13.2, 3.2, 13.3, 13.2, 14.3, 3.2, 14.3, 19.1, 5.1, 19.1, 5.1, 7.1, 7.1, 2.1, 7.1, 4.2, 3.4, 3.5
Gregor Blackburn	Federal Emergency Management Agency (FEMA)	12/21/2011	14.1, 14.2, 14.9, 14.10, 14.11,
Gary Arnold	California Department of Transportation (CDOT)	12/19/2011	21.1, 21.2, 21.3, 21.3
Carl Wilcox	California Department of Fish and Game	1/9/2012	23.1, 12.1, 12.2, 12.3, 3.6, 12.4, 12.5, 5.1, 12.7, 12.8, 12.8, 12.9, 13.5, 13.6, 13.7, 13.8, 13.9, 13.10, 14.4, 14.5, 14.6, 14.7
LTC Kenneth M. Koop	California Air National Guard (CANG)	1/12/2012	No Comments
Mark Janofsky	County of Marin (MARIN)	2/6/2012	5.1, 5.2, 5.3, 17.1, 17.2, 17.1, 17.3, 17.4, 17.5, 5.4, 17.1, 17.4, 17.5, 17.3, 17.6, 17.7, 17.8, 17.7, 9.2, 17.2, 17.1, 17.7, 17.1, 17.1, 17.9, 17.6, 17.7, 17.8
Osha R. Merserve	RLI	2/6/2012	23.4, 23.8, 5.2, 5.2, 5.2, 5.9, 17.5, 17.7, 17.7, 17.10
Chris DeGabriele	North Marin Water District (NMWD)	12/6/2011	9.1
Elizabeth Dunn	City of Novato	2/6/2012	4.3, 4.4, 6.1, 6.2, 6.3, 22.1, 19.2, 23.2
Robert Patterson	City of Petaluma	2/3/2012	4.1
Susan Stompe	Marin Conservation League (MCL)	2/6/2012	2.1, 13.2, 13.11, 14.3, 14.3, 14.8, 4.3, 4.5, 9.3, 9.4, 13.11, 2.1, 4.2, 4.5, 10.1, 19.3
Barbara Salzman and Phil Peterson	Marin Audubon Society (MAS)	2/6/2012	23.3, 3.7, 3.6, 5.5, 2.2, 2.3, 19.2, 20.2, 2.4, 20.6, 26.1, 4.6, 5.1, 5.6, 12.10, 10.2, 13.3, 13.12, 12.6, 13.13, 13.11, 13.11, 13.14, 13.15, 3.8, 2.1, 2.3, 2.5, 13.7, 5.7, 13.2, 26.2, 26.2, 26.2, 26.2, 13.16, 12.11, 13.12, 13.15, 13.11, 13.11, 13.17, 13.11, 13.12, 12.12, 1311, 12.13, 13.3, 18.1, 4.7, 13.11
Board of Directors	Gnoss Field Community Association (GFCA)	2/4/2012	24, 4.18, 4.18, 2.6, 2.6, 20.13, 2.1, 2.1, 22.2, 2.1, 2.1, 2.6, 4.18, 19.4, 4.20, 4.18,
C. Henry Barner	Black Point Improvement Club (BPIC)	1/4/2012	2.3, 23.5, 2.1, 23.6, 4.5
Wright Bass	Bass	1/10/2012	4.10, 20.5, 4.11, 4.12, 19.4, 16.1, 19.4
Jacqueline A. Bonner	Bonner	2/6/2012	4.5, 3.9, 3.10, 2.1, 3.2

Name	Organization (if any)	Date	Comment Numbers
David Donadio	Donadio	1/10/2012	2.1, 4.8, 4.5
Jim Duckworth	Duckworth	2/3/2012	24, 19.4, 19.4, 20.4, 19.4, 4.9, 4.9, 24
Christopher Gilkerson	Gilkerson	2/6/2012	1.6, 1.4, 20.1, 3.3, 2.1, 4.14, 4.8/4.13, 4.5/4.15, 1.6, 20.1, 1.3, 1.8, 20.8, 20.11, 20.10, 20.9, 20.8, 20.10, 20.12, 3.9, 3.2, 3.3, 2.1/2.2, 4.2a, 4.2, 4.14, 4.5/4.15, 4.21, 5.1/5.6, 13.19, 3.2, 3.2, 3.12, 3.13, 14.3, 14.3, 23.4
Dr. Richard Levy	Levy	2/6/2012	4.5, 16.2, 2.1, 1.5, 3.2, 4.13, 4.5, 3.3, 2.1, 20.1, 22.2
Edward A. Mainland	Mainland	2/5/2012	14.3
Rod Mehrten	Mehrten	1/22/2012	24
Steven Nebb	Nebb		3.2, 20.9, 2.1, 2.1, 20.8, 1.3, 1.7, 20.9, 3.3, 20.9, 20.10, 20.8, 20.12, 3.2, 3.5, 4.17
Robert Pack	Pack		1.3, 2.1, 19.5, 19.5, 1.3, 20.7, 19.6, 1.3, 1.4, 3.11
Charles Roell	Roell	1/10/2012	20.4, 4.9, 19.4
Barbara Rozen	Rozen	1/7/2012	13.18, 12.4, 10.3
Anthony and Lorraine Silveira	Silveira Ranches	2/3/2012	4.16, 2.1, 5.8, 23.7
Jeannette Weber, Duncan and Betsy Ross, Leslie Weber	Ross/Weber	2/6/2012	2.1, 1.5, 3.2, 4.13, 4.5, 3.3, 2.1, 20.1, 22.2
Leslie and Chris Weber	Weber	2/6/2012	20.8, 3.3, 3.2, 3.3, 2.1, 2.1, 4.8, 3.10, 4.2, 23.4, 4.2
Joyce B. Wells	Wells	1/12/2012	19.4
Steven Knecht	Gnoss Field Community Association (GFCA)	1/10/2012	24, 4.18, 4.19, 22.2, 2.6, 2.7, 2.1, 19.4
Susan Stompe	Stompe	1/10/2012	20.3, 2.1, 13.20, 14.3
Joyce Wells	Wells	1/10/2012	19.4
Jackie Bonner	Bonner	1/10/2012	1.5, 4.5, 4.13, 4.8, 3.3, 2.1, 20.1, 22.3
Christopher Gilkerson	Gilkerson	1/10/2012	1.6, 1.4, 20.1, 3.2, 3.3, 2.1, 4.14, 2.1/2.2,
Rob Pack	Pack	1/10/2012	1.3, 1.4, 19.5, 2.1, 1.2
Clarence Bracey	Bracey	1/10/2012	4.8, 4.13, 5.10, 5.1, 2.1, 4.8
Steven Nebb	Nebb	1/10/2012	1.5, 20.9, 20.9, 3.3, 20.11, 20.10, 20.1, 1.3, 1.7,2.1, 4.8

Name	Organization (if any)	Date	Comment Numbers
Bob Spofford	Spofford	1/10/2012	2.1, 23.9
Patricia Capretta	Capretta	1/10/2012	2.1, 19.7, 4.5
Dr. Richard Levy	Levy	1/10/2012	4.5, 16.2
Rich Elb	Elb	1/10/2012	4.5, 19.4, 4.19
Kirk Heiser	Heiser	1/10/2012	4.22, 19.4, 4.9

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USEPA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

February 6, 2012

Mr. Doug Pomeroy
Federal Aviation Administration
San Francisco Airports District Office
1000 Marina Boulevard, Suite 220
Brisbane, California 94005-1835

Subject: Draft Environmental Impact Statement (DEIS), Gnoss Field Airport Proposed Extension of Runway 13/31, Marin County, California (CEQ # 20110410)

Dear Mr. Pomeroy:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act. Our detailed comments are enclosed.

The project proposes to extend the runway at Gnoss Field to accommodate a small percentage of corporate jets that are restricted from operating at maximum gross takeoff weight under hot weather and other adverse weather conditions. Approximately 12 acres of wetlands would be filled and 23 acres of wildlife habitat lost. Based on our review, we have rated the DEIS's proposed actions as Environmental Concerns – Insufficient Information (EC-2) (see enclosed "Summary of Rating Definitions").

3.1 The project will require a Clean Water Act Section 404 permit, and we are concerned that, because the project purpose was narrowly defined, practicable alternatives that would have fewer adverse impacts on the aquatic ecosystem were not evaluated (40 CFR 230.10(a)). We recommend that FAA consider and

3.2 evaluate a modified preferred alternative that would include a shorter runway extension. This modified alternative would reduce impacts to wetlands, wildlife habitat, and the floodplain. This additional consideration would also address the NEPA requirement to rigorously explore and objectively evaluate all reasonable alternatives, as well as the alternatives analysis requirement of the Executive Order on Floodplain Management.

EPA appreciates the opportunity to review this DEIS. When the Final EIS is released for public review, please send one copy to the address above (mail code: CED-2). If you have any questions, please contact me at (415) 972-3521, or contact Karen Vitulano, the lead reviewer for this project, at 415-947-4178 or vitulano.karen@epa.gov.

Sincerely,

for Kathleen Martyn Goforth, Manager
Environmental Review Office

Enclosure: Summary of EPA Rating Definitions
EPA's Detailed Comments

SUMMARY OF EPA RATING DEFINITIONS*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

ADEQUACY OF THE IMPACT STATEMENT

Category "1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category "2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category "3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment.

Wetlands – Compliance with Clean Water Act Section 404

Alternatives analysis under Section 404(b)(1)

3.7 The DEIS integrates the requirements for the Clean Water Act Section 404 permit into the NEPA process and we commend FAA for this integrated approach. It is important that the preferred NEPA alternative correspond with the least environmentally damaging practicable alternative (LEDPA) under CWA Section 404 because, as the DEIS notes, the LEDPA is the only alternative that the Army Corps of Engineers will permit. The DEIS states that Alternative B is the LEDPA (p. 5.10-11).

1.1 We are concerned that all practicable alternatives were not evaluated because the project purpose was narrowly defined. The project sponsor's stated purpose is to allow existing aircraft at DVO to operate at maximum gross takeoff weight under hot weather and other adverse weather conditions (p. 2-1). Elsewhere in the DEIS, the identified purpose is to provide the necessary runway length for existing users to more efficiently use the airport (p. 5.11-5). The alternatives analysis required under CWA Section 404 must comply with the Federal Guidelines for Specification of Disposal Sites for Dredged or Fill Materials (40 CFR 230) (Guidelines). The Guidelines require that there exist no practicable 3.2 alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem (40 CFR 230.10(a)). Alternatives that would increase efficiency without extending the runway at DVO by 1,100 feet were not evaluated, including shorter runway extensions that would avoid fill of valuable wetlands.

3.2 *Recommendation:* We recommend that FAA consider and evaluate in the Final EIS a modified preferred alternative that would include a shorter runway extension. We note that an extension to 3,700 feet would accommodate all B-I aircraft landings (DVO is a B-1 airport) in all adverse weather conditions, and would provide additional runway for take-offs for some business jets in hot day conditions, thereby improving efficiency for these aircraft.

1.3 Additionally, the Final EIS should revise the statement that the current runway available at DVO is "insufficient to serve a majority of the airport's fleet mix under most conditions"[1]. We recommend adding the actual number of each type of aircraft utilizing DVO that are listed in Figures 3 and 4, and in the evaluation of the alternatives, identify the number and percentage of these aircraft flights that would benefit from the extension. This information is important for the decision-maker who must evaluate the trade-offs of flights benefiting from the proposed action[2] against its environmental costs (loss of 12 acres of wetlands, 23 acres of wildlife habitat, and possible increased noise impacts to residents).

Compensatory mitigation

13.1 The DEIS identifies potential mitigation alternatives as (1) use of the SF Bay National Wildlife Refuge, (2) offsite restoration on a private nearby parcel, or (3) offsite restoration through the SF Bay Joint Venture (p. 5.10-13-14). None of these opportunities are currently approved CWA 404 mitigation banks or in lieu fee programs. Therefore the airport will not be able to "purchase credits" as stated in the DEIS. The sites listed may be suitable for mitigation, but a mitigation proposal containing all the elements listed at §230.94 of the 2008 Mitigation Rule will need to be submitted to the Corps and EPA for review and approval.

[1] Based on Figures 3 and 4 in Appendix D, this does not appear to be true.
[2] A small percentage of flights (hot days only for 8% of aircraft) -Appendix D, p. 9

13.2 The DEIS states that a 1:1 mitigation ratio for replacing lost wetland acreage would be utilized (p. 5.10-13). The final mitigation ratio will be determined by the Corps and, depending on the specific proposal, may need to be higher than 1:1 to ensure no net loss of wetland acreage and function. The Draft Environmental Impact Report cites the Marin Countywide Plan Policy BIO-3.2 which requires, where avoidance of wetlands is not possible, that wetlands be mitigated at a minimum of 3:1 replacement ratio for off-site mitigation (DEIR, p. 4.19-11).

3.2 *Recommendation:* Further explore the avoidance of wetlands fill by evaluating a shorter runway
13.3 extension alternative or explain why it is not practicable. We recommend that a conceptual
13.2 mitigation proposal be included in the FEIS. Commit to at least a 3:1 mitigation ratio for replacement of lost wetland acreage as required by the Marin Countywide Plan Policy BIO-3.2.

Floodplain/Climate Change Effects

14.3 Executive Order 11998 directs federal agencies to preserve floodplain natural and beneficial values, requiring an analysis of practicable alternatives to locating in the base floodplain. The proposed project is located entirely within the 100-year floodplain with additional hazard associated with storm waves (Exhibit 5.11-1) and would result in a floodplain loss of 13 acres (an additional 13 acres of land being protected by a levee) (p. 5.11-6). The DEIS concludes that there would be no adverse impacts on natural and beneficial floodplain values (p. 5.11-6). Increased flooding potential due to climate change effects do not appear to have been considered in the analysis; however, nor are there indications that sea level rise is begin considered in project planning (i.e. climate change adaptation). The airport site elevation is close to sea level (p. 4-9).

3.2 *Recommendations:* The FEIS should identify why a shorter extension that substantially meets the purpose and need and impacts floodplain values to a lesser degree is not practicable.

14.3 Assess potential climate change effects, including increased flooding and sea level rise, on the project. Identify whether project features are needed to adapt to a changing climate, and if so, what these features are (e.g. higher levees) and what impacts from these project features would be. Because of an increased potential for flooding from climate change, it is appropriate to pursue an approach that ensures floodplains are preserved as much as possible.

Bird-aircraft strike/impacts to pilot safety

19.1 The DEIS does not discuss pilot safety and there is no health and safety chapter in the DEIS. The CEQ regulations direct agencies to consider the degree to which the proposed action affects public health or safety (40 CFR 1508.27(b) 2). This is important for this project because the DEIS states that the 5.1 proposed action could be inconsistent with FAA bird-strike hazard mitigation guidance (p. 3-16) because the runway would be extended closer to the landfill northeast of the airport which is a bird-attractant, but no further discussion of this issue is included.

19.1 *Recommendation:* We recommend that the FEIS include an assessment of potential impacts to
5.1 pilot and public safety. Discuss the FAA bird-strike hazard mitigation guidance in the context of the project and any increased risk of bird strikes from extending the runway closer to the landfill.

Noise impacts from growth inducement

7.1 The analyses in the DEIS does not consider the increased demand for B-II and other larger jets that a runway extension could cause. The DEIS states that the proposed runway extension would not change the operating levels or fleet mix at DVO (p. 5.1-4, 6). The rationale for this assumption is that the runway to taxiway separation would remain the same and that this presents a limitation to larger planes operating at DVO (p. 5.4-1). This statement does not address the likely increase in *proportion* of business jets that currently use DVO (and currently experience weight limitations) that could occur with the proposed extension. Removing the limitations that the larger jets experience would incentivize a greater use of these jets at DVO. This is confirmed in a tenant letter from the Kelleher Corporation, included in Appendix D, that states that "the future plans for aircraft upgrades would be completely dependent upon a longer runway", and "with the proposal of adding additional length to Gnoss Field runway, the concept of the Kelleher Corporation acquiring a larger Gnoss field-based aircraft is once again possible". This clearly shows that a reasonable response to a longer runway is a change in fleet mix proportions towards larger aircraft. In addition, a local newspaper article online[3] quotes a former DVO tenant saying that the "extension would also open the airport to some jet aircraft, such as the Learjet and Beechjet lines, that require longer runways"[4]. This also points to an expected change in fleet mix proportion.

7.1 This change is a growth-inducing effect that may result in additional impacts, yet it was not evaluated in any of the analyses in the DEIS. A recent court case affirmed that the Department of Transportation must evaluate actions that improve the efficiency of an airport as growth-inducing effects falling under the purview of 40 C.F.R. § 1508.8(b)[5]. This is especially relevant to noise impacts, about which many residents at the public hearing expressed concerns.

2.1 7.1 4.2 *Recommendation:* Conduct a demand forecast based on the longer runway proposed for the alternatives. Utilizing this information, evaluate the indirect effects on environmental resources and communities from the increased demand. Update the noise impact assessment to reflect any anticipated increases in aircraft size or in the proportion of larger aircraft currently using DVO.

Evaluation of Off-site Alternatives - use of other airports

3.4 • In the discussion of the use of other airports for evaluating off-site alternatives, the DEIS compares other airport runways to "the stated need of 4,400 ft"(p. 3-4, 3-7, 3-8, 3-9, 3-10). Because the additional 400 feet identified for Gnoss is site-specific, this discussion should evaluated these other airports in term of 4,000 ft, not 4,400.

3.5 • This discussion repeatedly states that the primary population served by DVO is located south of DVO (p. 3-4, 3-7, 3-8, 3-9). The FEIS should include data to support this, especially since the evaluation cites commute emissions by car as a factor for dismissing these alternatives. If possible, the FEIS should provide the locations of the populations utilizing the aircraft that are currently experiencing limitation (for which the project is proposed to benefit). Since this user group is less than 10% of the users of DVO, a survey should be possible.

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[3] See http://www.marinij.com/novato/ci_19452505

[4] He continues: "A lot of operators use 4,000 feet as a minimum (runway length) for certain classes of airplanes," said Drohan, who was previously head of Sunset Aviation, a former charter operation that once kept up to 15 planes at Gnoss Field.

[5] Barnes v. U.S. Dept. of Transportation, 655 F.3d 1124 (9th Cir. 2011). While this case involved the addition of a new runway, a longer runway that could increase demand would have similar induced growth effects.

Federal Emergency Management Agency
FEMA

RECEIVED
DEC 27 2011
Marin County
Department of Public Works

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

FEMA

December 21, 2011

Mr. Doug Pomeroy
U. S. Department of Transportation
Federal Aviation Administration
San Francisco Airport District Office
1000 Marina Boulevard
Brisbane, California 94005-1835

Dear Mr. Pomeroy:

This is in response to your request for comments on Gnoss Field Airport Proposed Extension of Runway 13/31 Draft Environmental Impact Statement and Draft Environmental Impact Report.

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:

14.1
- 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.

14.2
- 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.

14.9
- 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.

14.10
- 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:

14.11 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 Novato floodplain manager can be reached by calling Glenn Young, City Engineer, at (415) 899-8949. The Marin County floodplain manager can be reached by calling Berenice Davidson, Associate Civil Engineer, at (415) 499-3770.

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:
Glenn Young, City Engineer, City of Novato
Berenice Davidson, Associate Civil Engineer, Marin County
Ray Lee, WREA, State of California, Department of Water Resources, North Central Region Office
Michael Hornick, Floodplanner, CFM, DHS/FEMA Region IX
Alessandro Amaglio, Environmental Officer, DHS/FEMA Region IX

California Department of Transportation

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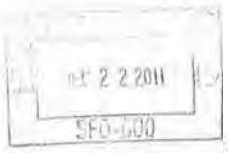

December 19, 2011

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Mr. Doug Pomeroy
Federal Aviation Administration
San Francisco Airports District Office
1000 Marina Boulevard, Suite 220
Brisbane, CA 94005-1835

Dear Mr. Pomeroy:

Marin County Airport-Gnoss Field-Extension of Runway 13/31 – Draft Environmental Impact Report (DEIR)

Thank you for including the California Department of Transportation (Department) in the environmental review process for the proposed project. The Department is particularly concerned with the need "to minimize any potential traffic conflicts" at the US Highway (US) 101/Atherton Avenue interchange during project construction.

Transportation Management Plan

21.1 If it is determined that traffic restrictions and detours are needed, a Transportation Management Plan (TMP) or construction traffic impact study may be required of the developer for approval by the Department for restrictions impacting US-101 prior to construction. The Department recommends that such plans be prepared in accordance with the Department's *Manual of Traffic Controls for Construction and Maintenance Work Zones*, for which further information is available on the following website: http://www.dot.ca.gov/hq/traffops/signtech/signdel/trafficmanual.htm. For further TMP assistance, please contact Raoul Maltez at (510) 286-4647.

21.2 The Department looks forward to coordinating with the lead agency to provide passage for the traveling public including pedestrians and bicyclists through the construction work, as well as to provide safeguard for the workers.

Transportation Permit

21.3 Project work that requires movement of oversized or excessive load vehicles on State roadways, such as on US-101, requires a transportation permit issued by the Department. Further information is available on the following website: http://www.dot.ca.gov/hq/traffops/developserv/permits/applications/index.html. To apply, a

21.3 completed transportation permit application with the determined specific route(s) for the shipper to follow from origin to destination must be submitted to the address below.

Office of Transportation Permits
California DOT Headquarters
P.O. Box 942874
Sacramento, CA 94274-0001

Should you require further information or have any questions regarding this letter, please contact Connery Cepeda of my staff at (510) 286-5535.

Sincerely,

GARY ARNOLD
District Branch Chief
Local Development – Intergovernmental Review

c: Scott Morgan (State Clearinghouse)
John Roberto (Marin County)

"Caltrans improves mobility across California"

California Department of Fish and Game

State of California – The Natural Resources Agency
DEPARTMENT OF FISH AND GAME
Bay Delta Region
7329 Silverado Trail
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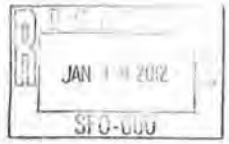
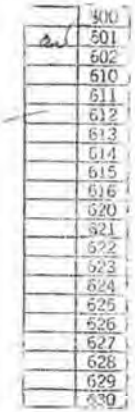
www.dfg.ca.gov

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director





January 9, 2012

Mr. John Roberto
County of Marin
3501 Civic Center Drive, Room #308
San Rafael, CA 94903

Dear Mr. Roberto:

Subject: Marin County Airport – Gnoss Field, Extension of Runway 13/31, Draft Environmental Impact Report, SCH #2008072037, Marin County

The Department of Fish and Game (DFG) has reviewed the draft Environmental Impact Report (EIR) for the Marin County Airport – Gnoss Field, Extension of Runway 13/31 (Project). DFG is providing comments on the draft EIR as a Trustee Agency and Responsible Agency. As Trustee for the State's fish and wildlife resources, DFG has jurisdiction over the conservation, protection, and management of the fish, wildlife, native plants, and the habitat necessary for biologically sustainable populations of such species for the benefit and use by the people of California.

DFG is also providing comments as an adjacent land owner of the Burdell Unit of the Petaluma Marsh Wildlife Area.

The Project proposes to extend runway 13/31 from its current length of 3,300 feet to a total length of 4,400 feet with Runway Safety Areas (RSAs) that meet current Federal Aviation Administration (FAA) guidelines. The Project will also extend the corresponding taxiway to the full length of the runway, realign the drainage channels to drain the extended runway and taxiway, extend levees to protect the area from flooding, and re-program the Navigational Aids that pilots use to land at the airport to reflect the extended runway.

The Project site is located within an area of reclaimed tidal marshlands that was part of the formerly extensive marshes present around the San Pablo Bay. The Project area is adjacent to and lies within the original flood plain of the Petaluma River. The area is surrounded by levees and a DFG pump is used in the wet season to keep the area, including the airport, from flooding. Two major biological communities occur within the immediate vicinity of the Project area: annual grassland and high brackish marsh vegetation. These habitat communities support various special-status species including fully protected species.

Conserving California's Wildlife Since 1870

General Comments

23.1 The draft EIR does not appear to include complete contact information for the Lead Agency representative(s). The draft EIR did not present the current status of state listed species that use the habitat on-site. It should be clearly stated and analyzed throughout the document that the California clapper rail and salt marsh harvest mouse are fully protected species protected under Fish and Game Code Sections 3511 and 4700.

12.1

12.2 Similarly, page 4.5-32 states that a white-tailed kite was observed foraging in the Detailed Study Area. A discussion of this fully protected species should be included in the EIR and the Project design and mitigation measures should be revised to avoid all impacts to this species.

12.3 Please be advised that under law DFG cannot authorize take of a fully protected species. "Take" means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill. Therefore, the Project should avoid any actions that may result in take of these species. Appropriate mitigation measures to ensure complete take avoidance of these fully protected species must be implemented.

3.6 Maps and/or figures should be included that show the proposed relocation of all drainage channels. The draft EIR states that the replacement "ditch/canal system would extend around the new runway and taxiway extensions and would serve the same hydrologic function as the existing ditch/canal, which is to collect surface water and to transport it west to east across the site towards the Petaluma River." There are no figures that identify the location of the new channel(s).

Wildlife Resources

The draft EIR did not adequately address and analyze potential impacts to migratory wildlife corridors, page 4.5-17 identified the following significance criteria:

12.4

> *"Interfere substantially with the movement of any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites."*

Impacts associated with this significance criterion were not fully addressed. The presence of the nearby DFG Wildlife Area and adjacent open space habitat should be discussed and impacts should be analyzed and disclosed. The extension of the runway by 1,100 feet has the potential to create more wildlife conflicts as native resident and/or migratory species move through the area.

12.5

5.1 Impacts associated with current and future bird strike incidents should also be disclosed. The proximity of the airport to the surrounding habitat areas and the forecasted increase in airport use, (Appendix C, Aviation Activity Forecast) will likely result in greater bird strike incidents. This impact should be disclosed in the EIR.

13.2 Consistent with Marin Countywide Policy BIO-3.2, DFG recommends that wetland impacts (11.83 acres) and their associated habitat potential for California clapper rail and salt marsh harvest mouse be mitigated off-site at a 3:1 ratio (created/preserved:impacted). The draft

13.4 EIR also identifies 16.05 acres of temporary impact area that will result from construction staging. Since construction will take place over an estimated two-year period, DFG considers this a *semi-permanent* impact and requests that mitigation be proposed for this impacted area.

12.6 Since burrowing owls, a California Species of Concern, have been documented on-site, protocol level breeding season surveys should be conducted a season before any projected related activities occur. This protocol survey will be used to established baseline site data for mitigation purposes and to guide future pre-construction surveys.

12.6 The California Burrowing Owl Consortium (Consortium) survey protocol specifies a multi-phase approach, which is recommended in order to adequately evaluate burrowing owl use of an area and to inform the California Environmental Quality Act (CEQA) process. Phase 1 of the protocol begins with a habitat assessment that recognizes that burrows are the essential component of burrowing owl habitat and that burrowing owls may use man-made structures as burrows. If suitable habitat [appropriate vegetation and burrow(s) or burrow surrogate(s)] is present, then a Phase 2 intensive burrow survey is necessary even if owl sign is not present during the habitat assessment phase. Owl sign includes molted feathers, cast pellets, prey remains, egg shell fragments or excrement at or near burrow entrance or perch site. During the intensive burrow survey phase, burrow concentration areas should be mapped. Phase 3 of the protocol requires four survey visits whether or not owl sign is observed during Phase 2. For this project, DFG recommends that the Consortium survey protocol for breeding season surveys be adhered to (four survey visits spread evenly (roughly every three weeks) during the peak of the breeding season, from April 15 to July 15). The habitat assessment, intensive burrow surveys and burrowing owl surveys should include the area within 150 meters of the Project boundaries (approximately 500 feet).

12.6 Pre-construction surveys (usually initiated during the non-breeding season) are necessary for assessing owl presence at a site within a short time period before site modification is scheduled to begin. The pre-construction surveys are intended to document if colonizing owls have recently moved onto the site, or if burrow locations of resident owls have changed, or if young of the year are still present and have not yet fledged or dispersed. Because any one or all of these events may have occurred on-site since the breeding season (protocol) surveys were completed, it is important to also complete the pre-construction surveys in order to avoid direct take of owls or their nests and to design proper minimization and mitigation measures (e.g., document number and reproductive status of resident owls and location of satellite burrows, establish buffer zones and equipment/personnel travel routes and work/storage areas).

12.6 Initial pre-construction surveys should be conducted outside of the owl breeding season (from February 1 to August 31) but as close as possible to the date that ground-disturbing activities will begin, to avoid the problem of waiting until March or April when the project would be delayed if owls are detected.

12.6 The number of pre-construction surveys necessary to accurately detect current owl presence and owl locations will be driven by a number of interacting criteria such as: 1) the time period that has elapsed since the last breeding survey was completed; 2) height and density of vegetation that may obscure owl presence; 3) topographical conditions that may obscure owl presence; 4) time of year (e.g., in the winter owls are more cryptic and spend more time in their burrows); 5) time of day and weather conditions when surveys are conducted; 6) long-term history of owl use at the site; 7) size of the parcel and degree of coverage by walking or by intensive observations via spotting scope, and 8) tolerance of owls to human presence. Generally, at a minimum, four survey visits on at least four separate days will be necessary, especially given the cryptic nature of this species during the non-breeding season.

12.6 Biologists conducting pre-construction surveys should expend enough effort, based on the above criteria, to assure with a high degree of certainty that take of owls will not occur once site modification and grading activities begin. The full extent of pre-construction survey effort must be described and mapped in detail (e.g., dates, time periods, area(s) covered, and methods employed) in a biological report. Current vegetation and topographical conditions and their corresponding effect on visibility should also be described. The report should be submitted to DFG for review.

12.7 DFG recommends including the following changes to proposed Mitigation Measure 4.5-3; as shown in strikeout and underline format:

> **Mitigation Measure 4.5-3**: <u>If burrowing owls are identified during surveys, compensate for permanent impacts to nesting, occupied and satellite burrows and burrowing owl habitat such that the habitat acres, number of burrows and burrowing owls impacted are replaced. Compensatory habitat should be 1) provided by permanent conservation of similar vegetation communities that provide for burrowing owl nesting, foraging, wintering, and dispersal habitat (i.e., during breeding and non-breeding seasons) comparable to or better than those of the impact area, 2) of sufficiently large acreage and/or connected to other conserved areas to help ensure site viability, and 3) permanently protected through fee title acquisition deeded to a non-profit conservation organization or public agency with a conservation mission, and a conservation easement assigned to a third party (non-profit or agency) for the purpose of conserving natural habitat and prohibiting activities incompatible with burrowing owl use. Additionally we recommend a mitigation land management plan be developed and implemented to address long-term ecological sustainability and maintenance of the site for burrowing owls and to fund management through the establishment of a long-term funding mechanism such as a non-wasting endowment.</u> ~~Marin County shall abide by~~

~~CDFG's recommendation that at least 6.5 acres of foraging habitat for burrowing owl to be preserved and protected in perpetuity for each active burrow that would be impacted by project activities.~~ The mitigation area shall be approved by CDFG.

In order to determine the presence and location(s) of active burrows prior to construction, a pre-construction clearance survey shall be conducted no more than 30 days prior to the onset of construction. The time lapse between surveys and site disturbance should be as short as possible and will be determined by DFG based on specific project conditions but generally should not exceed 7 days. Additional surveys are necessary when the initial disturbance is followed by periods of inactivity or the development is phased spatially and/or temporally over the project area. Burrowing owls can be present during all times of the year in California, so this survey shall be completed even if the initiation of construction is outside of the typical February 1 to August 31 migratory bird breeding season. If active owl burrows are located during the pre-construction survey, a 250-foot buffer zone, or as determined appropriate by a qualified biologist in consultation with CDFG, shall would be established around each burrow, ~~with an active nest until the young have fledged and are able to exit the burrow~~. Any occupied burrows should not be disturbed during the nesting season (February 1 through August 31) unless a qualified biologist approved by CDFG verifies through non-invasive methods that either: a) the birds have not begun egg laying and incubation; or b) that juveniles from the occupied burrows are foraging independently and are capable of independent survival. ~~In the case of occupied burrows without active nesting, active burrows after the young have fledged, or if development commences after the breeding season (typically February 1 to August 31), passive relocation of the birds should be performed. Passive relocation involves installing a one-way door at the burrow entrance, which encourages the owls to move from the occupied burrow.~~ CDFG does not recommend any burrow closure when it can be avoided. CDFG should be consulted prior to any proposed burrow closure ~~for current guidelines and methods for passive relocation of any owls found on the site~~.

12.7

DFG recommends including the following changes to proposed Mitigation Measure 4.5-4; as shown in strikeout and underline format:

> **Mitigation Measure 4.5-4**: In order to minimize potential impacts to nesting birds' vegetation, removal shall be scheduled, to the greatest extent possible, during non-nesting seasons (September 1 to January 31). If vegetation removal has to occur during the typical nesting season (February 1 to August 31), special precautions for identifying species and nests should be taken. ~~A wildlife specialist shall conduct a pre-construction survey for nesting birds if vegetation removal is scheduled close to the nesting season~~. A focused survey for active bird nests shall be conducted by a qualified biologist within 15 days prior to vegetation clearing. If an area identified for clearance has not been surveyed within the past 15 days, then a new survey shall be conducted. If nests are observed, the ~~wildlife specialists~~ qualified biologist shall determine appropriate buffer distances in consultation with CDFG. ~~provide~~

12.8

> ~~recommendation as to how the nests can be relocated without harm to the birds.~~ If nests cannot be ~~relocated~~ avoided, construction activity shall be prohibited in the vicinity of the nest until the fledglings are gone and there are no attempts to re-nest.

12.8

Fish and Game Code § 3503.5 states it is unlawful to take, possess, or destroy any birds in the orders of Falconiformes or Strigiformes (birds-of-prey or raptors) or take, possess, or destroy the nest or eggs of any such bird. Fish and Game Code § 3503 states that is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird.

Hydrologic Resources

There appears to be a discrepancy in the level of impact to aquatic habitat. The Biological Assessment (BA) that was prepared in support of the environmental documentation identifies 2.38 acres of aquatic habitat permanently impacted (Appendix I). Section 4.5 of the draft EIR identifies permanent impacts to 0.15 acres to depressional seasonal wetlands, 0.59 acres of perennial drainage, and 1.57 acres of ditch/canal. No combination of these three aquatic habitat types identified in the draft EIR is consistent with the BA. This discrepancy needs to be clarified and the level of impact needs to be clearly disclosed.

12.9
13.5

The Project should be designed to include compensatory mitigation to offset all losses to waterways, including linear and area measurements. The draft EIR states that the new "ditch/canal would result in an increase in overall length but would result in a net decrease in area." The draft EIR does not include a summary of measurements, including length and areas, or include any figures or images to support this statement. Figures and charts should be prepared to summarize the existing and proposed drainage features on-site.

13.6
13.7

The draft EIR states that impacts to jurisdictional ditch/canal will be 'replaced in kind' on-site in an amount that would be at a minimum of 2:1. It is not clear which agencies jurisdictional area is being replaced at a 2:1 ratio. DFG does not consider the construction of 0.77 acres of drainage ditch around the north end of the runway to be 'in kind'. Both linear and area impacts should be mitigated for the 2.38 acres of impacted aquatic habitat.

13.8
13.9

The Project is proposing to relocate the on-site drainage channel and ditch. For any activity that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of a river or stream, or use material from a streambed, DFG may require a Lake and Streambed Alteration Agreement (LSAA), pursuant to Section 1600 et seq. of the Fish and Game Code, with the applicant. Issuance of an LSAA is subject to CEQA. DFG, as a responsible agency under CEQA, will consider the CEQA document for the Project. The CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for completion of the agreement. To obtain information about the LSAA notification process, please access our website at http://www.dfg.ca.gov/habcon/1600/; or to request a notification package, contact the Lake and Streambed Alteration Program at (707) 944-5520.

13.10

14.4 The proposed Project will increase the area of non-permeable ground within the airport footprint. The localized hydrology in the project area will be altered, creating greater overland flows from precipitation across the site. The BA states that "this physical situation will presumably result in longer standing wetlands from the cut-off of localized downslope hydrology. The physical alteration of the landscape would predicate the need to increase ditch capacity or increase the pump duration times during winter periods when precipitation is removed from the site." Since the constructed drainage ditch will have less capacity, the pump will need to be operated for a greater amount of time. The impacts associated with the increase in pump operation should be analyzed and mitigation should be proposed.

14.5 The pump is operated and paid for by DFG. All pumping costs needed to reduce the flood threat to the airport, should be agreed to between the airport and DFG to address pumping costs, maintenance and replacement costs of the pumps.

14.6 Additionally, the draft EIR does not include a discussion of levee roads and/or routes that currently provide access to DFG's pump station that is used to prevent the area from flooding. This Project could restrict vehicle access to the pump station. Without direct vehicle access to the pump station, property damage from flooding could result in an emergency situation. An improved and dedicated direct access route should be created as part of this Project. Levee maintenance and repair should also be included as mitigation.

14.7 DFG believes that a meeting between the two entities should take place to resolve access issues, pumping costs, and levee maintenance.

If you have any questions, please contact Mr. Timothy S. Dodson, Environmental Scientist, at (707) 944-5513 or by email at tdodson@dfg.ca.gov; or Mr. Scott Wilson, Environmental Program Manager, at (707) 944-5584.

Sincerely,

Scott Wilson FOR

Carl Wilcox
Regional Manager
Bay Delta Region

cc: State Clearinghouse

California Air National Guard
CANG

RE: e-mail confirming that the California Air National Guard has no comments on the Gnoss Field Airport Runway Extension Draft EIS/EIR
Koop, Kenneth M LTC NGCA to Douglas Pomeroy 01/12/2012 01:54 PM

25 Doug, thanks for the quick response. We (the California National Guard) have reviewed the Draft Environmental Impact Statement/Environmental Impact Report, Gnoss Field Airport, Proposed Extension of Runway 13/31, and have no comments.

LTC Kenneth M. Koop
Deputy Director
Environmental Programs
California National Guard
kenneth.koop@us.army.mil
916-369-4331

and

Operations Officer
100th Troop Command
California Army National Guard

-----Original Message-----
From: Douglas.Pomeroy@faa.gov [mailto:Douglas.Pomeroy@faa.gov]
Sent: Thursday, January 12, 2012 1:51 PM
To: Koop, Kenneth M LTC NGCA
Subject: e-mail confirming that the California Air National Guard has no comments on the Gnoss Field Airport Runway Extension Draft EIS/EIR

Lt. Col Kenneth Koop
California Air National Guard
916-369-4331

Hi Lt Col. Koop,

Thank you for your telephone message today advising me that the California Air National Guard has no comments on the Draft Environmental Impact Statement/Environmental Impact Report, Gnoss Field Airport, Proposed Extension of Runway 13/31.

I would appreciate a return e-mail confirming your telephone message. Thank you for taking the time to review the documents.

Doug Pomeroy
Environmental Protection Specialist

NEW ADDRESS and TELEPHONE
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San Francisco Airports District Office
1000 Marina Boulevard, Suite 220
Brisbane, CA 94005-1835
Telephone 650 - 827 - 7612; FAX 650 - 872 - 1430

County of Marin

COUNTY OF MARIN
COMMUNITY DEVELOPMENT AGENCY MARIN

Environmental Health Services
3501 Civic Center Drive, Rm 236
San Rafael, CA 94903
(415) 499-6907 FAX (415) 507-4120
www.co.marin.ca.us/ehs

February 6, 2012

Via U.S. Mail and Fax: (650) 872-1430

Mr. Doug Pomeroy
U.S. Department of Transportation
Federal Aviation Administration
San Francisco Airports District Office
1000 Marina Blvd., Suite 220
Brisbane, CA 94005-1835

RE: Comments on Gnoss Field Draft EIS, EIR

Dear Mr. Pomeroy:

Marin County Environmental Health Services, the solid waste Local Enforcement Agency, has reviewed the Draft Environmental Impact Statement/Environmental Impact Report for the proposed extension of Runway 13/31 at Gnoss Field Airport. We have comments and corrections that would improve the accuracy of the document. These comments and corrections follow.

5.1 More importantly, it is noted that no mitigation for impacts of increased bird strikes are included.

5.2 Redwood Landfill (RLI) has operated in its location since 1958. Due to its operation and its proximity to an adjacent airport (i.e. Gnoss Field), RLI is required to take measures to minimize the bird population. Since Gnoss Field is proposing the runway extension that would bring it closer to RLI's southern property line and operations, which would result in aircraft flying at lower elevations, it is unreasonable to expect RLI to bear all responsibility for the mitigation of increased bird strikes. Mitigation measures to be taken by Gnoss Field should be included in the EIS/EIR.

Environmental Impact Statement

5.3 1) Page 4-25, first paragraph, third sentence: "Marin County has avigation easements on some properties to the north and south of the Airport to prevent the construction of structures that would inhibit the takeoff and landing of aircraft at the Airport. Should be navigation.

17.1 2) Page 4-25, second paragraph, first sentence: "Redwood Landfill, a 450-acre site owned by Waste Management, is located approximately one-half mile northwest of DVO, directly east of Highway 101. RLI is a 420-acre site.

17.2 3) Page 5.17-14, last paragraph, second to last sentence: "Marin County contracts with Waste Management Incorporated (WMI) for solid waste collection and diversion." It is presumed that this reference pertains to solid waste collection and diversion at DVO, specifically. Solid waste collection at DVO is provided by Novato Disposal, not WMI. In fact, WMI no longer provides collection service anywhere in Marin County.

17.1 4) Page 5.17-15, first paragraph, second sentence: "The RLI is a 450-acre site owned by WMI and located at 8950 Redwood Highway. Please refer to comment 2).

17.3 5) Page 5.17-15, first paragraph, sixth sentence: "The current permitted maximum height for the landfill is 160 feet, which nearly doubles its current capacity." The permitted maximum height for the landfill is 122 feet at the north peak, and 166 feet at the south peak. The most recent aerial survey of the landfill was conducted on April 22, 2011. At that time, there were an estimated 18,288,000 tons of material (waste and cover) in place. The permitted maximum capacity of the landfill is 26,077,000 tons, inclusive of waste and cover. The remaining capacity does not, therefore, even come close to being double the current capacity.

17.4 6) Page 6-4, third paragraph, first sentence: "The Redwood Landfill (RLI) is located approximately 1.5 miles north/northwest of DVO along Highway 101." RLI is located approximately 3,000 feet north/northwest of DVO along Highway 101.

17.5 7) Page 6-4, first paragraph, second sentence: "This project would include the following activities: " The referenced project was approved when RLI's Solid Waste Facility Permit was revised in December 2008 and is currently being implemented.

Environmental Impact Report

5.4 1)Page 2-23, Table 2-2, Environmental Impact 4.2-4, third Mitigation Measure: "If bird activity at the landfill, including areas outside the permitted landfill footprint proposed for composting, increases as a result of the project, as determined by the Law Enforcement Agency....." This is a reference to Marin County Environmental Health Services, the solid waste Local Enforcement Agency.

17.1 2) Page 4.2-1, Existing Land Uses, fourth paragraph: "Redwood Landfill, a 450-acre site owned by Waste Management, Incorporated is located approximately one-half mile northwest of DVO, directly east of Highway 101." RLI is 420 acres.

17.4 3) Page 4.2-11, second paragraph, first sentence: "The Redwood Landfill is located approximately 1.5 miles north/northwest of DVO along Highway 101." RLI's southern boundary is located approximately 3,000 feet north of DVO.

17.5 4) Page 4.2-11, second paragraph, second sentence: "This project would include the following activities:" The referenced project was approved when RLI's Solid Waste Facility Permit was revised in December 2008, and is currently being implemented.

17.3 5) Page 4.2-11, main paragraph, fifth sentence: "The current operating elevation at the RLI landfill is approximately 86-88 feet, with permitted maximum landfill height at 160 feet." The permitted maximum height of the landfill is 122 feet at the north peak, and 166 feet at the south peak.

17.6 6) Page 4.2-12, third paragraph, second sentence: "As owner and operator of the DVO, Marin County also has the authority to direct the landfill to undertake additional management measures if the existing measures at the landfill prove insufficient in preventing the area from becoming an attractant to birds." In 1992, Marin County Environmental Health Services was designated by the CA Integrated Waste Management Board (CIWMB) as the solid waste Local Enforcement Agency (LEA). Although it is an administrative department within the Marin County Government, the LEA is governed by the state agency charged by the legislature to carry out the Integrated Waste Management Act, the Department of Resources, Recycling and Recovery (CalRecycle), formerly the CIWMB. The LEA, which permits and inspects RLI, serves as the designated representative of CalRecycle, not the County of Marin. The County of Marin does not have the authority over solid waste facility permit conditions and/or solid waste management.

17.7 7) Page 4.2-12, fourth paragraph: "RLI operates under the Solid Waste Facilities Permit #21-AA-0001, issued by Marin County on December 8, 2008, with concurrence by the State Integrated Waste Management Board. This permit speaks to the size of the working face and addresses the measures the landfill must implement in order to control birds attracted to the face." The Solid Waste Facilities Permit was issued by the LEA, not Marin County, on December 18, 2008. The permit does not directly address the size of the working face. RLI's Joint Technical Document, which describes operating practices at the facility, states that minimizing the size of the working face is one of the operational controls in RLI's vector and bird control management plan. The references to bird control measures are contained in Mitigation Measures 3.6.2a and 3.6.2.d of the November 17, 2008 Mitigation Monitoring and Report Program, which is incorporated into the Solid Waste Facilities Permit as LEA Condition D.

17.8 8) Page 4.2-12, fifth paragraph, first sentence: "As part of the application for a new Solid Waste Facilities Permit, RLI underwent extensive environmental review including the preparation of a full scope Environmental Impact Report (EIR), which was certified by Marin County on December 18, 2008 before issuing the Solid Waste Facilities Permit." RLI applied for a revised Solid Waste Facilities Permit, not a new permit. The EIR was certified on June 10, 2008 by the LEA, not Marin County.

17.7 9) Page 4.2-13, third paragraph, second, third and fourth sentences: "Given that the area of the working face of the landfill would be larger as a result of the RLI expansion project, it could result in increased bird activity at RLI and an associated risk of bird/aircraft strikes. The proposed increase in composting operations, especially the addition of food as a composting feedstock, also could increase bird activity at the RLI site and contribute to increased rise of bird/aircraft strikes. In addition, the increased amount of light that would be needed to accommodate the larger working face could potentially interfere with nighttime aircraft operations at DVO." The Mitigated Alternative that was approved by the LEA when RLI's Solid Waste Facilities Permit was revised did not include a lateral expansion of the landfill, or an increase in daily waste receipts. Consequently, there is no reason to assume that the working face will be larger. Under the Mitigated Alternative, food waste was approved as a feedstock for the composting operation, but the volume of material accepted for composting did not increase.

9.2 10) Page 4.4-19, last paragraph: "This project has the potential to impact ground water quality. The impacts, can, however, be mitigated to less-than-significant by utilizing a continuous landfill gas monitoring and alarm system at designated areas, revising the landfill's water quality monitoring and gas control monitoring programs as necessary, and preparing a final Closure and Post-Closure Maintenance Plan that demonstrates that waste would remain isolated and prevent groundwater degradation." LEA staff has never heard of a continuous landfill gas monitoring and alarm system being utilized to protect ground water quality. When provided at landfills, including closed disposal sites, they are used to detect the accumulation of landfill gas in occupied structures, such as offices.

17.2 11) Page 4.13-3, last paragraph, second sentence: "Marin County contracts with Waste Management Incorporated (WMI) for solid waste collection and diversion." Marin County contracts with Novato Disposal (North Bay Corporation) for solid waste collection and diversion at DVO.

17.1 12) Page 4.13-4, first paragraph, second sentence: "The RLI is a 450-acre property owned by WMI and located at 8950 Redwood Highway." The RLI is a 420-acre property.

17.7 13) Page 4.13-4, first paragraph, fifth sentence: "The currently permitted maximum height for the landfill is 160 feet, which nearly doubles its current capacity." The maximum permitted height is 122 feet at the north peak, and 166 feet at the south peak. The most recent aerial survey of the landfill was conducted on April 22, 2011. At that time, there were an estimated 18,288,000 tons of material (waste and cover) in place. The permitted maximum capacity is 26,077,000 tons, inclusive of waste and cover, including final cover. The remaining capacity does not, therefore, even approach being double the current capacity.

17.1 14) Page 4.16-4, first paragraph, first sentence: "As previously discussed in Section 4.2, *Land Use and Planning*, the Redwood Landfill and Recycling Center (RLI), a 450-acre site owned by

17.1 Waste Management, is located approximately one-half mile northwest of DVO, directly east of U.S. Highway 101." Please refer to comment 11).

17.9 15) Page 4.16-11, last highlighted sentence: "A propane gas-fired cannon may be used in conjunction with the pyrotechnic devices. The cannon emits a loud blast that discourages gulls from approaching the active face of the landfill." The propane gas-fired cannon is no longer being used at RLI.

17.6 16) Page 4.16-11, third paragraph: "RLIs adaptive bird management plan is required by Marin County, California, through its permitting authority over the RLI. As owner and operator of DVO, Marin County also has the authority to direct the landfill to undertake additional management measures if the existing measures at the landfill prove insufficient in preventing the area from becoming an attractant to birds." Please refer to comment 6).

17.7 17) Page 4.16-11, fourth paragraph: "RLI operates under the Solid Waste Facilities Permit #21-AA-0001, issued by Marin County on December 8, 2008, with concurrence by the State of California Integrated Waste Management Board. This permit speaks to the size of the working face and addresses measures the landfill must implement in order to control birds attracted to the face." Please refer to comment 7).

17.8 18) Page 4.16-11, fifth paragraph: "As part of the application for a new Solid Waste Facilities Permit, RLI underwent extensive environmental review including the preparation of a full scope EIR, which was certified by Marin County on December 18, 2008 before issuing the Solid Waste Facilities Permit." Please refer to comment 8).

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

Sincerely,

Mark Janofsky, R.E.H.S.

cc: Rebecca Ng, Deputy Director, Community Development Agency
Michael Frost, Deputy Director, Department of Public Works
Osha Meserve, Soluri Meserve
Jessica Jones, District Manager, Redwood Landfill

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RL1

SOLURI MESERVE
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1010 F Street, Suite 100 · Sacramento, CA 95814

February 6, 2012

VIA U.S. Mail and Facsimile: (650)872-1430

Mr. Doug Pomeroy
FAA San Francisco Airports District Office
1000 Marina Boulevard, Suite 220
Brisbane, California 94005-1835

RE: Comments on DEIR/DEIS for Gnoss Field Airport's Proposed Extension of Runway 13/31

Dear Mr. Pomeroy:

This letter is written on behalf of the Redwood Landfill and Recycling Center ("Redwood") regarding the Draft Environmental Impact Report ("DEIR") and Draft Environmental Impact Statement ("DEIS") for the Marin County Airport Gnoss Field Proposed Extension of Runway 13/31 ("Runway Extension project").

Background

On August 29, 2008, Redwood provided comments on the Notice of Preparation ("NOP") for the DEIR/DEIS. In those comments, Redwood provided notification that the EIR for revisions to Redwood's Solid Waste Facility ("SWF") permit had been certified in June 2008 and that issuance of a SWF permit consistent with the project alternative referred to as the Mitigated Alternative was expected in December 2008. The letter also requested that:

23.4

> the environmental review document for the Runway Extension project carefully analyze compatibility Redwood's existing operations. While Redwood currently undertakes an effective Bird Control Program, changes in operation at Gnoss Field (such as changes in flight patterns) could create safety and other concerns that may not be adequately addressed by Redwood's current Bird Control Program. Should the Runway Extension project result in the need for any additional bird control measures, Gnoss Field must take full responsibility for ensuring that such additional measures are implemented.

As anticipated, a revised SWF permit consistent with the Mitigated Alternative was issued by the Local Enforcement Agency ("LEA") for Marin County on December 18, 2008. (See Exhibit A.) The Mitigation Measures 3.6.2a-d, which were provided as an attachment to the NOP comment letter, were also adopted at the time of the SWF permit issuance. (See Exhibit B.)

While the current DEIR/DEIS does discuss potential for land use incompatibilities with Redwood's operations, the DEIR/DEIS contains several inaccuracies regarding Redwood's current operations under the 2008 revised SWF permit and fails to provide adequate mitigation for impacts caused by the runway expansion project. These comments clarify Redwood's permitted operations and provide information necessary to correct the DEIR/DEIS so that it may accurately discuss this potential land use compatibility impact.

Environmental Setting and Responsibility for Mitigation

23.8

Redwood's operations under the 2008 SWF permit are part of the environmental baseline against which the impacts of the runway expansion project must be measured. Under CEQA Guidelines section15125, subdivision (a), the environmental baseline is normally those conditions that existed at the time the NOP is published. "In assessing the impact of a proposed project on the environment, the Lead Agency should normally limit its examination to changes in the existing physical conditions in the affected area as they exist at the time the [NOP] is published. (CEQA Guidelines, 15126.2, subd. (a).)

5.2

Here, the revised SWF permit has been in place for nearly three years by the time the DEIR/DEIS was released for public review in December 2011. The existing permitted conditions at Redwood are therefore the appropriate baseline against which the effects of the runway project should be analyzed. The proposed project would result in the north end of the runway being located 1,100 feet closer, making the runway 2,500 feet from the southern edge of the Redwood. Aircraft would also fly about 25-50 feet lower over Redwood than existing conditions. (DEIR, p. 4.2-14.) To the extent these changes result in additional bird strikes or other related hazards, those impacts are caused by the runway expansion, not Redwood's operations under the 2008 SWF permit. As a result, the responsibility for mitigation of any increased risk of gull strikes rests with the airport expansion project, not Redwood. (See CEQA Guidelines, 15126.4, subd. (a).)

5.2

The DEIR/DEIS notes that Redwood's SWF permit "requires mitigation measures including ongoing management efforts to prevent minimize bird attractants. If deemed ineffective over time, the mitigation measures will change per Marin County's [sic] permit requirements." (DEIR, p. 4.2-14.) With respect to cumulative impacts, the DEIR concludes that "mitigation included in the Redwood Landfill EIR ensures that no land use

5.2 conflicts between the RLI and DVO will occur." (DEIR, p. 4.2-17.) This approach is incorrect, as the existing setting includes Redwood's current operations. Moreover, the DEIR/DEIS places the burden of impacts caused by the airport's Runway Extension project on Redwood rather than requiring mitigation to be carried out by the project currently under review (the Runway Extension project).

5.9 As required by Mitigation Measures 3.6.2a-d and as also described in Redwood's Joint Technical Document, Redwood certainly intends to continue its bird control program. Redwood also understands and appreciates the utility of the Runway Extension project for the County. But Redwood cannot take on additional bird control costs that would not occur but for the airport Runway Extension project. Redwood therefore suggests the addition of a mitigation measure for the project as follows:

> Should the LEA determine that additional bird control measures are necessary to ensure the safety of the airport operations in the future, the airport shall take responsibility for the cost of such additional bird control measures.

Such a mitigation measure would ensure that Redwood is not unfairly burdened with the responsibility to undertake additional bird control measures as a result of the Runway Extension project.

Clarifications to Analysis in Text

Redwood suggests that the following clarifications and corrections be made the in the Final EIR/EIS:

Description of Redwood's Operations

17.5 The description of Redwood's operations should track the 2008 SWF permit. (See Exhibit A.) The operations described on page 4.2-11 of the DEIR/DEIS is written as though the SWF permit for the Mitigated Alternative has not yet been approved. Moreover, it is only necessary to discuss those aspects of the 2008 SWF permit that relate to the impact being analyzed – land use inconsistencies from extending the runway closer to Redwood.

17.7 The LEA is the Permitting Entity for Purposes of the Details of Redwood's Operations

The DEIR/DEIS repeatedly refers to the "County" with respect to the permitting of Redwood. (DEIR, pp. 4.2-11 to 4.2-14.) While the County did issue a Conditional Use Permit to Redwood in 1958, the details of Redwood's operations are governed by a

17.7 SWF permit, as discussed above. The Marin County Environmental Health Services, a division of the Marin County Community Development Department, was designated as the LEA in 1992. With oversight by the California Department of Recycling and Resource Recovery ("CalRecycle") the LEA has sole SWF permitting authority over Redwood. Thus, the references to "Marin County" with respect to the permitting of Redwood's operations should be changed to "the LEA."

The 2008 SWF Permit Revision did not Increase the Potential for Bird Strikes or Interference with Aircraft Operations

17.10 The discussion in the DEIR erroneously refers to a lateral expansion, an increase in the working face of the landfill, an increase in composting operations and increased nighttime activity. (DEIR, p. 4.2-13.) None of these activities were permitted in the 2008 SWF permit. Some of these activities, however, were analyzed in Redwood's EIR as part of the proposed project, which was ultimately not approved by the LEA in favor of the Mitigated Alternative. This discussion should be corrected to reflect currently permitted operations.

* * *

Thank you for considering these comments. Please contact me or Jessica Jones, Redwood's District Manager (415) 408-9054, should you have any questions or require any assistance in ensuring that the Final EIR/EIS accurately addresses the land use compatibility concerns raised by the Runway Extension project.

Very truly yours,

SOLURI MESERVE
A Law Corporation

By: Osha R. Meserve
Osha R. Meserve

Attachments:

Exhibit A: SWF Permit
Exhibit B: Mitigation Measures 3.6.2a-d

cc: Rebecca Ng, Marin County Supervising Environmental Health Specialist

EXHIBIT A

SOLID WASTE FACILITY PERMIT

Facility Number: 21-AA-0001

1. Name & Street Address of Facility	2. Name & Mailing Address of Operator	3. Name & Mailing Address of Owner
Redwood Landfill 8950 Redwood Highway Novato, CA 94945	Redwood Landfill, Inc. P.O. Box 793 Novato, CA 94948	Redwood Landfill, Inc. P.O. Box 793 Novato, CA 94948

4. Specifications:

a. Permitted Operations: X Solid Waste Disposal Site X Composable Material Handling Facility

b. Permitted Hours of Operation:

Public: M – F, 7:00 am – 3:00 pm and Sat, 8:00 am – 3:30 pm
Commercial Haulers: M – F, 12:00 am – 3:00 pm and Sat, 12:00 am – 3:30 pm
(except Sludge Haulers) Memorial Day, July 4, Labor Day, Thanksgiving Day except Sun, 12 am – 12 pm
Closed to public and commercial haulers: Sundays, New Year's Day, Christmas Day
Sludge Haulers: M – Sun, 24 hours per day except New Year's Day and Christmas Day
Landfill Operations: 24 hours per day except New Year's Day and Christmas Day

Permitted Maximum Tonnage: 2,310 tpd Total Material Permitted to be Received per Day - See 16.K. and 16.U.

1,390 tpd Total Waste for Disposal
170 tpd Total Materials for Composting
400 tpd Total Materials for Recycling
350 tpd Total Cover Materials

c. Permitted Traffic Volume:

662 Total Daily Vehicles Entering Site of which 50 Vehicles are Employees, Visitors, Deliveries

d. Key Design Parameters (Detailed parameters are shown on site plans bearing EA and CIWMB validations):

	Total	Disposal	Transfer/Processing	Composting	Transformation
Permitted Area (in Acres)	420	222.5		7	
Total Capacity (w/ cover & cap)		26,077,000 cy		60,000 cy	
Maximum Elevation (Ft. MSL)		122' North Peak 166' South Peak			
Maximum Depth (Ft. BGS)		20'			
Estimated Closure Date		July 2024			

Upon a significant change in design or operation from that described herein, this permit is subject to revocation or suspension. The attached permit findings and conditions are integral parts of this permit and supersede the conditions of any previously issued solid waste facility permit.

5. Approval:	6. Enforcement Agency Name and Address:
PDSmith Philip D. Smith, Local Enforcement Agency	Marin County Environmental Health Services 3501 Civic Center Drive, Room 236 San Rafael, CA 94903
7. Received by CIWMB: November 18, 2008	8. CIWMB Concurrence Date: DEC 16 2008
9. Permit Review Due Date: December 18, 2013	10. Permit Issued Date: December 18, 2008

1

SOLID WASTE FACILITY PERMIT

Facility Number: 21-AA-0001

11. Legal Description: APN 125-16-13

Section 30 T4N R6W diablo Meridian - PARCEL ONE, as shown upon that certain parcel map entitled "Parcel Map of Redwood Landfill", filed for record August 25, 2003 in Volume 2003 of Maps, at page 197, Marin County Records. EXCEPTING any portion of the described property within the natural bed of San Antonio Creek and in the natural bed of any tidal slough below the elevation of ordinary high tide where it was located prior to any artificial changes.

The legal description of this facility is contained on page 2-1 of the Joint Technical Document/Report of Disposal Site Information dated August 2008.

12. Findings

a. This permit is consistent with the Marin County Integrated Waste Management Plan, which was approved by the CIWMB in April 1998.

b. This permit is consistent with standards adopted by the California Integrated Waste Management Board (CIWMB) pursuant to Public Resources Code, Section 44010.

c. The design and operation of the facility is consistent with the State Minimum Standards for Solid Waste Handling and Disposal as determined by the enforcement agency, pursuant to Public Resources Code, Section 44009.

d. The **Novato Fire Protection District** has determined that the facility is in conformance with applicable fire standards pursuant to Public Resources Code, Section 44151.

e. A Final Environmental Impact Report was filed with the State Clearinghouse (SCH #1991033042) and certified by the Marin County Environmental Health Services on June 10, 2008. The Redwood Landfill 1999 Revised Solid Waste Facility Permit Final EIR describes and supports the design and operation, which will be authorized by the issuance of this permit.

f. The owner/operator has agreed to comply with the mitigation measures as described in the Mitigation Monitoring and Report Program dated November 17, 2008. The LEA will monitor compliance with the Mitigation Measures/Conditions of Approval and take appropriate action on subjects within its jurisdiction. The LEA will also consult with other responsible agencies designated in the MMRP as needed on enforcement issues outside of its jurisdiction.

13. Prohibitions:

The permittee is prohibited from accepting the following wastes:

Hazardous, radioactive, medical (as defined in Chapter 6.1, Division 20 of the Health and Safety Code), treated wood (as defined in Chapter 6.5, Division 20 of the Health and Safety Code), high liquid content waste, designated, or other wastes requiring special treatment or handling, except as noted below or identified in the Joint Technical Document/Report of Disposal Site Information and approved amendments thereto and as approved by the enforcement agency and other federal, state and local agencies.

The permittee may accept the following non-hazardous wastes with high liquid content that meet waste acceptance criteria in the RWQCBWaste Discharge Requirements:

- Dewatered sludge (containing at least 20 percent solids by weight);
- Grit and grease from municipal wastewater treatment plants;
- Holding tank pumpings from food processing facilities;
- Storm drain cleanings;
- Dredged sediments.

The permittee may accept the following wastes that require special handling:

- Minimally petroleum-contaminated non-hazardous soil (as defined by the Regional Water Quality Control Board);
- Non-friable asbestos containing less than one percent (1%) friable asbestos content.

SOLID WASTE FACILITY PERMIT

Facility Number: 21-AA-0001

14. The following documents describe and/or restrict the operation of this facility:

Document	Date	Document	Date
Complete SWFP Application	Oct 23, 2008	CEQA Findings	Nov 17, 2008
JTD/ Report of Disposal Site Information as Amended	Aug 2008	Mitigation Monitoring and Report Program	Nov 17, 2008
Waste Discharge Requirements Order No. 95-110	May 24, 1995	Preliminary Closure & Postclosure Maintenance Plan	Sept 2008
Conditional Use Permit	March 1958	Closure Financial Assurance Documentation	Oct 2008
Final Environmental Impact Report (SCH #1991033042)	June 10, 2008	Operating Liability Certification	Dec 13, 2007
Marin County Haz Waste & Haz Materials Mgmt Permit #60-0355	Dec 28, 2007	Army Corp of Engineers Nationwide Permit	Jan 6, 1995
BAAQMD Major Facility Review Permit, Facility #A1179	Oct 24, 2007	BAAQMD Permit to Operate #25812 (Compost)	Feb 27, 1997
Report of Composting Site Information	Aug 11, 2008	SWRCB Industrial Activities Storm Water General Permit	May 1, 1997

15. Self-Monitoring:

The owner/operator shall submit the results of all self-monitoring programs to the Local Enforcement Agency (LEA) within 30 days of the end of the reporting period *(for example, 1st quarter = January – March, the report is due by April 30, etc. Information required on an annual basis shall be submitted with the 4th quarter monitoring report, unless otherwise stated.)*

Where noted, the results need not be sent to the LEA. They shall be retained on the facility's premises for a minimum of three (3) years and made available for review upon request.

Program	Reporting Frequency
A. The areas of the site that were used for disposal.	Quarterly
B. The types and quantities of waste received each day (in tons) and separated and recycled or reused material (in tons).	Quarterly
C. The number of vehicles utilizing the facility per day of operation separated by waste type and other.	Quarterly
D. Logs and reports of all complaints regarding the facility and the operator's action(s) taken in response to the complaints.	Quarterly
E. Logs and reports of all shutdowns other than the closed days specified in this permit. (See condition 16.I.)	Quarterly
F. Logs of special or unusual occurrences and the operator's action(s) taken to correct/resolve the problem/situation. (See condition 16.J.)	As Required
G. The quantities and types of prohibited wastes (hazardous, medical, etc) found in the waste stream and the disposition of these materials.	Available Upon Request
H. Records of the random load checks conducted pursuant to condition 16.P.	Available Upon Request

15. Self-Monitoring (continued)	Reporting Frequency
I. An employee training log with dates, of training, course descriptions, etc. shall be maintained and kept current.	Available Upon Request
J. Records of the pumping of the on-site septic holding tanks.	Available Upon Request
K. The amounts of leachate applied for dust control.	Available Upon Request
L. Records of quantities and length of time materials for alternative daily cover, recycling, composting, and construction material, are stored on-site before used or removed.	Available Upon Request
M. Records of temperature readings and windrow turning.	Quarterly
N. Results of the laboratory testing for pathogen and metal concentrations per T14, sections 17868.2 and 17868.3.	Quarterly
O. Records of quantities of compost disposed at the site or another site and the reason it was disposed.	Available Upon Request
P. The types and quantities of residuals resulting from the on-site processing of recyclable material and food waste that are landfilled.	Quarterly
Q. The results of the landfill decomposition gas monitoring program.	Quarterly
R. A summary of the monitoring data submitted to the Regional Water Quality Control Board.	Semi-annually
S. An annual report indicating the amounts of tons and cubic yards of solid waste disposal capacity including cover material that was used during the preceding calendar year, and the number of cubic yards of remaining disposal capacity and map showing the areas with remaining capacity.	Annually
T. An annual monitor (or audit) report by the independent third party monitor. (See condition 16.T.)	Annually

SOLID WASTE FACILITY PERMIT

Facility Number: 21-AA-0001

16. LEA Conditions:

A. This permit supersedes previous solid waste facility permits, Nos. 21-AA-0001 and 21-AA0056.

B. This facility shall comply with all applicable State Minimum Standards for Solid Waste Handling and Disposal as specified in the California Code of Regulations (CCR), Title 27. The operator shall inspect the site at least once each day of operation for compliance with all applicable standards.

C. This facility shall comply with all applicable State Compostable Materials Handling Operations and Facilities Regulatory Requirements as specified in the California Code of Regulations (CCR), Title 14. The operator shall inspect the site at least once each day of operation for compliance with all applicable standards.

D. The owner/operator shall comply with all Mitigation Measures/Conditions of Approval contained in the Mitigation Monitoring and Report Program (MMRP) adopted by the LEA acting as the lead agency for CEQA. The operator may propose minor modifications to the Mitigation Measures/Conditions of Approval contained in the MMRP as allowed in Title 27, C.C.R. Article 3 (CIWMB-Enforcement Agency Requirements), including but not limited to Section 21665 (Processing Proposed Changes at Solid Waste Facility), and subject to the limitations contained in the California Environmental Quality Act (CEQA) with respect to changes that would necessitate supplemental environmental review [Pub. Resources Code, Section 21166, Title 14 C.C.R., Section 14000 et seq. (CEQA Guidelines), Sections 15162, 15163, 15164].

E. The operator shall comply with all enforcement orders issued by any responsible agency contained in any of the documents referenced within this permit pursuant to Public Resources Code 21081.6.

F. The operator shall maintain copies of the inspection reports and permits issued by the LEA and other regulatory agencies. The operator shall maintain copies of the Solid Waste Facilities Permit (SWFP), the Mitigation Monitoring and Report Program (MMRP), the JTD/Report of Disposal Site Information (RDSI), the Report of Composting Site Information (RCSI), and the Odor Impact Minimization Plan (OIMP) at the facility so as to be available at all times to facility personnel, LEA personnel, and other regulatory agencies.

G. Additional information regarding the facility shall be furnished upon request and within the time frame specified by the LEA.

H. During the hours of operation for all landfill activities and composting activities, an attendant or attendants shall be present at all times to supervise the loading and unloading of the waste material.

I. The operator shall notify the LEA at least 48 hours prior to scheduled shutdowns and within one hour of unscheduled shutdowns. A log of these shutdowns shall be maintained and available at all times.

J. The operator shall maintain a log of special/unusual occurrences. This log shall include, but it not limited to, fires, explosions, the discharge and disposition of hazardous or unpermitted wastes, and significant injuries, accidents or property damage. Each log entry shall be accompanied by a summary of any actions taken by the operator to mitigate the occurrence. The log shall be available to site personnel and the LEA at all times.

K. The maximum permitted daily tonnage received at the facility is **2,310 tons per day.** The tonnage of concrete, asphalt, and minimally petroleum-contaminated materials used for construction and cover will not count towards the maximum daily tonnage limit. This facility shall not receive more than this amount and shall be limited to the amounts and categories as shown on page 1. Any changes to the amounts and categories shall require a revision to this permit.

L. The maximum permitted daily tonnage received at the facility for compostable materials is restricted to **170 tons per day**. The compost operation is restricted to 60,000 cubic yards of feedstock, active compost, and finished product on site at any time. Feedstock is limited to Class B biosolids, food waste, and green/yard/wood waste.

M. This permit is subject to review by the LEA and may be suspended, revoked, or revised at any time for sufficient cause.

N. The LEA reserves the right to suspend or modify waste receiving, disposal, and handling and/or composting activities when deemed necessary due to an emergency, a potential health hazard, or the creation of a public nuisance.

O. Any change that would cause the design or operation of the facility not to conform to the terms and conditions of this permit is prohibited. Such a change may be considered a change requiring a permit modification or revision. In no case shall the operator implement any change without first submitting a written notice of the proposed change, in the form of a JTD/RDSI amendment or an RCSI amendment application, to the LEA at least 180 days in advance of the plan to implement change.

P. The operator shall maintain the LEA-approved hazardous/prohibited waste screening/exclusion program at the facility. On-site load checking shall include: inspection of random loads; regular visual inspection of wastes deposited at the facility; training of facility personnel in hazardous and prohibited waste recognition and proper hazardous waste handling procedures; recordkeeping of hazardous and prohibited wastes found. Inspection of random loads by trained personnel shall be conducted on commercial and public loads, a minimum of two loads on two days per week. A record shall be maintained on each random load check with the name of the staff conducting the check, date, time, vehicle owner/operator, license plate number or VIN number, any prohibited waste found, and disposition of the prohibited waste.

Q. The operator shall comply with requirements of applicable laws pertaining to employee health and safety, including maintaining a current Cal OSHA Injury and Illness Prevention Program on-site readily available for review by employees, the LEA and other regulatory agencies.

R. An aerial survey of the landfill shall be conducted once per calendar year. A report shall be written on the findings of the survey and submitted to the LEA once a year no later than 45 days from the survey date. The findings shall include: the volume and tons of all material in place; the volume and tons of all material placed since the last survey; the remaining capacity in volume and tons available at the landfill.

S. An independent third party shall be retained at the facility's expense to monitor the facility's compliance with all conditions of this Solid Waste Facility Permit, including the Mitigation Monitoring and Report Program (MMRP) adopted by the LEA as the lead agency for CEQA. The independent third party retained shall be subject to approval by the LEA. At a minimum, the first complete monitoring (or audit) report shall be made available to the LEA within one year of final

16. LEA Conditions (continued):

SWF permit issuance, subject to reasonable extension by the LEA based on a showing of good cause. Thereafter, monitoring (or audit) reports shall be submitted to the LEA on an annual basis. After the facility has complied with this condition for three years, the LEA shall have the discretion, within its authority to protect public health safety and the environment, to eliminate, extend, or otherwise modify this requirement in consideration of the utility of the information generated to the LEA and to the community, the expense to the facility of generating the information, and such other concerns as the LEA may deem relevant.

T. In accordance with the adopted Marin County Greenhouse Gas Reduction Plan (2006) and Marin Countywide Plan Update (2007) goals and policies, additional landfill capacity beyond the 1995 permitted capacity (to the total capacity of 26.1 mil cy) may be utilized when annual greenhouse gas emissions are reduced consistent with the 2015 benchmark contained in Mitigation Measure 3.2.5.f in the adopted MMRP. The owner/operator shall notify the LEA when the benchmark is met. Such notice shall be provided at least three (3) months prior to utilization of the additional landfill capacity.

U. The operator shall apply for additional permits needed to construct and implement a construction and demolition material resource and recovery operation (C&D operation) within the landfill property within two years of issuance of the SWFP and make every effort to complete implementation within three (3) years of SWFP issuance. The C&D operation will be regulated under a separate permit. At the time a separate permit is issued for the C&D operation, the entitlement to receive 400 tons per day of recyclable materials described in this SWFP will terminate, and the maximum tonnage received under this SWFP will revert to 1,910 tons per day.

V. The Odor Impact Minimization Plan (OIMP) shall be reviewed annually by the operator to determine if revisions are necessary. If changes to the OIMP and any operations are proposed, the changes must be submitted to the LEA at least 90 days in advance of the change.

W. All laboratory analyses of finished compost product shall be performed by a California State-certified laboratory. The results of the analyses shall be provided by the lab to the operator before the material tested is removed from the site.

X. If nuisance conditions develop with the compostable materials, immediate measures shall be taken to mitigate the problem. Records of measures taken to deal with such conditions shall be available to the LEA. If abatement cannot be achieved within 24 hours, the material shall be landfilled. Records of such disposal shall be available to the LEA.

Y. Random load checks of feedstocks, additives, and amendments for contaminants shall be conducted daily. Contaminants shall be removed prior to incorporation in a windrow. Contaminants shall be disposed of within 24 hours.

Z. As specified in Title 14, CA Code of Regulations, Chapter 3.1, Article 7, Section 17868.1, no compost shall leave the premises without meeting the metal concentration limits specified in Section 17868.2 and the pathogen reduction requirements specified in Section 17868.3. Verification of the pathogen reduction requirements shall occur prior to when compost is removed from the site.

AA. Compost that contain metals or pathogens in amounts that exceed the maximum acceptable metal concentrations and/or maximum acceptable pathogen concentrations described in Title 14, CA Code of Regulations, Chapter 3.1, Article 7, shall be designated for disposal or additional processing until it meets acceptable levels.

EXHIBIT B

To: Mr. Doug Pomeroy Page 17 of 17 2012-02-07 02:25:40 (GMT) 10012782818 From: SOLURI RESERVE

REDWOOD LANDFILL SOLID WASTE FACILITIES PERMIT REVISION
MITIGATION MONITORING AND REPORT PROGRAM
November 17, 2008

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURE/CONDITION OF APPROVAL	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFIED BY AND DATE
3.6.2 (cont.)	**3.6.2c:** To ensure that nighttime activities do not interfere with operations at Gnoss Field, lights used during nighttime landfill operations will not be colored, will be shielded and directed downward to reduce glare, and will be placed in an irregular pattern in order not to appear to be a runway. The applicant shall notify the Gnoss Field Airport prior to any change in the way lighting is used for nighttime operations.	Applicant	The project applicant shall implement this measure upon issuance of the revised SWFP. The project applicant shall notify Gnoss Field of changes to lighting prior to implementation of such changes.	Marin County EHS, Marin County ALUC	Marin County EHS, periodic inspections; and Marin County ALUC following notification of plan to revise use of lighting
	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(n) (that the landfill does not pose a bird hazard to aircraft).	Applicant	The project applicant shall implement this measure immediately upon notification of a determination by the EHS that such revision is necessary.	Marin County EHS, Marin County ALUC	Marin County EHS, Marin County ALUC, as needed

To: Mr. Doug Pomeroy Page 16 of 17 2012-02-07 02:25:40 (GMT) 10012782818 From: SOLURI RESERVE

REDWOOD LANDFILL SOLID WASTE FACILITIES PERMIT REVISION
MITIGATION MONITORING AND REPORT PROGRAM
November 17, 2008

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURE/CONDITION OF APPROVAL	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFIED BY AND DATE
3.5.10 (cont.)	**3.5.10e:** In conjunction with implementing Mitigation Measure 3.5.5a and 3.5.5b, above, water contacting ADC shall be considered, and managed as, contact water. Thus, water contacting ADC shall be managed separately from non-contact water and retained onsite.	Applicant	The project applicant shall implement this measure upon issuance of the revised SWFP.	Marin County EHS, RWQCB	Marin County EHS and RWQCB, continuing periodic inspections
Land Use					
3.6.2: Development of the proposed project could result in conflicts with operations at Gnoss Field. (LTS)	**3.6.2a:** The applicant proposes to continue their existing bird control program. Redwood Landfill's bird control program focuses on gulls, the predominant avian scavengers at the site, and consists of using pyrotechnic devices to discourage gulls from landing or circling overhead during refuse placement and compaction. The devices provide noise (bang or whistle), a flash of light, smoke, and the sound of the propellant. RLI focuses its deterrent efforts when the birds first begin to arrive in the morning (shortly after dawn) and the morning hours, having found that this results in fewer gulls approaching the site during the rest of the day. RLI also may use a gas-fired cannon, which emits a loud blast, in conjunction with the pyrotechnic devices. Redwood Landfill periodically re-evaluates and revises bird control techniques as necessary.	Applicant	The project applicant shall continue to implement this measure, consistent with other applicable mitigation measures, upon issuance of the revised SWFP.	Marin County EHS	Marin County EHS, continuing periodic inspections
	3.6.2b: The applicant proposes no change in the number or type of lights used for nighttime operations. There are no records that indicate that the existing use of lights at the landfill poses a hazard to operations at Gnoss Field.	Applicant	The project applicant shall implement this measure, consistent with other applicable mitigation measures, upon issuance of the revised SWFP.	Marin County EHS, Marin County ALUC	Marin County CDA-Planning, EHS and ALUC, periodically by EHS

North Marin Water District

NORTH MARIN
WATER DISTRICT
NMWD

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December 6, 2011

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Mr. Doug Pomeroy
US Department of Transportation
Federal Aviation Administration
San Francisco Airports District Office
1000 Marina Boulevard, Suite 220
Brisbane, CA 94005-1835

Re: Gnoss Field Airport Proposed Extension of Runway 13/31 – Draft Environmental Impact Statement and Draft Environmental Impact Report

Dear Mr. Pomeroy,

North Marin Water District has reviewed the subject Draft EIS and Draft EIR and offers the following comment:

9.1 The Proposed Project and Alternative C and D would all include construction of a 240-foot long by 120-foot wide safety area at the south end of the existing runway (Runway 31). Please be advised that this additional construction will impact an existing 8-inch diameter water line which now provides water for fire protection to hydrants on the east side of the existing runway. Construction of this safety area will require relocation and possible upsizing of said pipeline, and the County of Marin/Federal Aviation Administration must enter into an agreement with North Marin Water District to facilitate such pipeline relocation prior to the runway extension so that fire protection capability is not interrupted.

Thank you for the opportunity to comment.

Sincerely,

Chris DeGabriele
General Manager

CD/rr
T:\GM\2011 misc\gnoss field runway extension fir.doc

Cc: Michael Frank, City Manager, City of Novato
Bill Tyler, Fire Marshall, Novato Fire Protection District
Bob Beaumont, Director, Marin County Dept of Public Works
Revel Brady, Associate Civil Engineer, Marin County Dept of Public Works

City of Novato

THE CITY OF
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Denise Athas
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Pat Eklund
Councilmembers
Madeline Kellner
Eric Lucan
Jeanne MacLeamy

City Manager
Michael S. Frank

February 6, 2012

Mr. Doug Pomeroy
U.S. Department of Transportation
Federal Aviation Administration
San Francisco Airports District Office
1000 Marina Boulevard, Suite 220
Brisbane, California 94005-1835

RE: Gnoss Field Airport Proposed Extension of Runway 13/31;
Draft Environmental Impact Report (EIR) and Draft Environmental Impact Statement (EIS)

Dear Mr. Pomeroy,

Thank you for including the City of Novato in the environmental review process for the project referenced above. The City has the following comments that may pertain, as applicable, to both the EIR and the EIS:

NOISE

4.3 The measurements of noise levels for existing aviation near sensitive receptors are only minimally included for all hours of daylight. There are aircraft, particularly small jets that arrive/depart on occasion in the early mornings and late evenings on Saturday and Sunday. Even though these over or near flights may be within standardized noise limits, these "nuisance" noise events should be noted for existing aviation, as well as any expected increase in those incidents as a result of the proposed project.

4.4 Several of the exhibits within the noise impact sections identify "Noise Measurement Sites". The S12 site is identified as located at the "End of Topaz Drive". The S12 site is shown on the exhibits to be well west of the actual location it is supposed to represent. The location of S13 also should be checked as it appears well east of where it should be.

POPULATION TRENDS

The population projections for the City of Novato are shown in Table 4-5 of the EIS. The projection shows 66,400 residents by the year 2020 as reported in the 1996 Novato General Plan (nearly 16 years ago). The estimate is also shown for 2008 to be 52,737. Based on existing, proposed and recent past actual development activity in the City, it is extremely unlikely that the population of Novato will increase by 13,660 residents in the next eight years. Are these

6.1 population projections being used to support the need for the project and the anticipated increase in aviation at the airport?

The City feels obligated to respond to the employment and populations estimates in Tables 5.4-1 and 5.4-2 of the EIS for two reasons:

6.2 The annual growth rate of 2% per year seems optimistic as the City of Novato and the larger San Francisco region struggles to combat a stagnant housing and jobs climate. Housing and employment projections in the EIS to 2030 that illustrate a growing economy misstate the current economic reality. Please state the source for the annual growth so the City can review this information. For the reasons discussed above, we request that the housing and employment estimates be reduced to reflect the existing data projections for the EIS.

Secondly, the City of Novato has responded to the Association of Bay Area Governments (ABAG) regarding its proposed Initial Vision Scenario (IVS) and Alternative Vision Scenarios (AVS) as part of the One Bay Area plan, and planning process. This Sustainable Communities Strategy, which incorporates the IVS and AVS, implements Senate Bill 375, which seeks to reduce greenhouse gases through the coordination of land use and transportation efforts.

6.3 The City of Novato disagrees with the methodology, assumptions, and forecasts that have been prepared, and assigned to Novato as part of the SCS process for both housing and job projections. The City questions the assignment of up to 1600 new housing units (projected from 2010 to 2040) based upon the data forecasts of population and employment projections. Recently, a bio-engineering firm based in Novato, secured 90,000 square feet (with the option of renting an additional 40,000 sf) of office space in San Rafael. This is a loss of 350 jobs from the City of Novato to the City of San Rafael.

For these reasons discussed above, the City of Novato disagrees with the housing and employment projections in the EIS in table 5.4-1 and 5.4-2.

FORESEEABLE DEVELOPMENT PROJECTS

22.1 The City has received a letter from the applicants of the redevelopment of Fireman's Fund Campus/The Commons at Mount Burdell, that they are withdrawing the project applications. Because of the project withdrawal, we would assume that the projections and forecasts in the EIR/EIS will be reduced accordingly.

SAFTEY

19.2 Impact 4.16-5 (EIR) discusses operation of the airport with regard to any safety hazard for people residing or working in the project area. The discussion notes that the project would not result in a safety hazard if the Airport Land Use Commission follows federal regulations. There is no information demonstrating past airplane mishaps in the area and the projected increase in those incidents, and the safety hazard that may result, due to the project.

23.2 As a general comment we noticed that on various vicinity map exhibits the actual location of Bugeia Drive, which is between Atherton Avenue and the Valley Memorial Park, where it then changes name to Bahia Drive, is instead shown to run through the Valley Memorial Park property.

Thank you for your consideration of these comments. We look forward to working with the Federal Aviation Administration on this project. If you have any questions in this matter, please contact me at (415) 493-4711 or email at edunn@novato.org.

Sincerely,

Elizabeth Dunn

Elizabeth Dunn
Acting Community Development Director
Community Development Department
City of Novato
75 Rowland Way, Suite110
Novato, CA 94945-3232

Cc: Novato City Council
Michael Frank, City Manager
Sheri Hartz, City Clerk
Jason Nutt, Public Works Director

City of Petaluma

Feb 03 12 02:04p Mike Glose 7077784405 p.1

CITY OF PETALUMA

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David Glass
Mayor

Chris Albertson
Teresa Barrett
Mike Harris
Mike Healy
Gabe Kearney
Tiffany Renée
Councilmembers

February 3, 2012

U.S. Department of Transportation
Federal Aviation Administration
San Francisco Airport District Office
1000 Marina Boulevard, Suite 200
Brisbane, CA 94005-1835

RE: State Clearinghouse No. 2008072037

Dear Mr. Pomeroy:

We have reviewed the Draft EIR for the Runway Extension at Gnoss Field. The current GPS Runway 13 Approach for Gnoss Airport passes over a portion of homes in Petaluma. Reviewing the Aircraft Operations Forecast for Gnoss, has there been any consideration as to this increase in Aircraft noise these homes may experience? 4.1

Sincerely,

Robert Patterson
Airport Manager

Public Works
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Maintenance & Operations Corporation Yard
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Parks & Landscape Maintenance
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FEB 6 2012
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Mr. Doug Pomeroy
U.S. Department of Transportation
Federal Aviation Administration
San Francisco Airports District Office
1000 Marina Boulevard, Suite 220
Brisbane, CA 94005-1835

February 6, 2012

MARIN CONSERVATION LEAGUE

FEB - 7 2012

SFO-600

MCL

Re: Gnoss Field DEIS/DEIR, Marin County, California

Dear Mr. Pomeroy:

The Marin Conservation League has actively monitored major environmental issues in Marin for some 78 years and has reviewed the documents distributed to the public to evaluate the impacts of extending the existing runway at Gnoss Field by 1100 feet. We had submitted information to be covered in the EIR/EIS as part of the scoping process. We were disappointed that many of the issues we had requested are not covered in the reports.

2.1 Marin Conservation League (MCL) requested that the additional aircraft capable of using DVO with a longer runway be identified. The documents identify the current fleet based at DVO and claim it will be the future fleet after a longer runway is constructed. Letters from two current tenants state they will buy larger planes if the runway is extended. The threshold for including larger aircraft in the fleet is stated as whether 500 annual operations will occur. If a survey of current tenants was done and none was interested in larger aircraft, it was not stated. What is the largest airplane that can safely use a runway 4400 feet long and 75 feet wide?

13.2 MCL was disappointed that the EIS allows mitigation at 1:1 for the loss of wetlands, however the county standard is recognized as 2:1 in the EIR. We strongly support mitigation at least 2:1 and that all mitigation sites be located in Marin County. All the mitigation sites identified in the documents are in Sonoma County and as far away as Cullinan Ranch. Cullinan Ranch is a worthy project, but much too far away to be of any benefit for the creatures displaced by the fill for the runway extension and necessary levees.

13.11

14.3 The impact of sea level rise on the elevation planned for the runway or any subsequent adaptation that may be required was not discussed. A hundred year flood incident had some discussion, but that is a different situation than the gradual, but persistent impact of sea level rise. What is the anticipated life span of the proposed runway. The appendix in paragraph 7.3.6 identifies sea level rise potential at .4 meters by 2100. The San Francisco Bay Conservation and Development Commission (BCDC)has done important research and analysis of sea level rise in this Bay region. Using the IPCC greenhouse gas emission scenarios, in 2010 the California Climate Action Team (CAT) developed sea level rise projections (relative to sea level in 2000) for the state that range from 10 to 17 inches by 2050, 17 to 32 inches by 2070, and 31 to 69 inches at the end of the century.

14.3 BCDC policies include: "Consider project alternatives that avoid significant new development in areas that cannot be adequately protected (planning, permitting, development, and building) from flooding, wildfire and erosion due to climate change. The most risk-averse approach for minimizing the adverse effects of sea level rise and storm activities is to carefully consider new development within areas vulnerable to inundation and erosion. State agencies should generally not plan, develop, or build any new significant structure in a place where that structure will require significant protection from sea level rise, storm surges, or coastal erosion during the expected life of the structure. However, vulnerable shoreline areas containing existing development that have regionally significant economic, cultural, or social value may have to be protected, and in-fill development in these areas may be accommodated. State agencies should incorporate this policy into their decisions and other levels of government are also encouraged to do so." The EIR/EIS inadequately addressed this important issue. DVO vulnerability to sea level rise must be more thoroughly mitigated.

14.8 Some public statements have been made that Gnoss runway will perform a significant role in providing rescue service in case of a severe earthquake. A soils study should be made to determine if a rising water table would lead to a runway surface that will not support aircraft wheel loads. Determine if special construction considerations are given for ground water at the current level, what are the impacts of the future ground water levels?

4.3 The noise studies were performed, but only for one hour periods in the neighborhoods impacted by the airport noise. At least one of the one hour studies showed a heavy incidence of fly overs although the noise levels did not exceed Novato General Plan acceptable levels. This does demonstrate that the flight

4.5 paths developed to minimize impacts on the neighboring residential are not being respected. What mechanisms can be implemented to enforce adopted procedures?

Other issues we feel were not adequately addressed in the DEIS/DEIR include:

Hydrology and Water Quality

9.3 Exhibit 4.4-1 in the DEIR and Figure B-2 in the Appendices shows the flow of existing runoff from Mt. Burdell, Highway 101 and the railroad. There are additional flows from Olompali that are not illustrated. There is no discussion about how these flows will be changed with the fill for the extension. Will new channels be created? Will there be room around the north end of the extended runway and safety area for a flow diversion? If all the flow is diverted south are the existing drainage channels adequate?

9.4 Is there any testing of the flow from DVO runoff before it flows into the Petaluma River? Is there any testing of the subsurface system that the aircraft wash off areas uses or maintenance required? Are the herbicide applications along the runway recorded with the county agricultural department to assure compliance with county standards? These basic questions should have been addressed.

13.11 Mitigation for the loss of wetlands should be done onsite, if possible. There is an opportunity for wetland and brackish marsh restoration at Black John Slough, just south of the airport. This site provides an excellent opportunity immediately adjacent to DVO to address the creatures displaced by the project. There are other opportunities in the Novato Creek Basin for brackish marsh restoration, as well as the Corte Madera marshes. Mitigation should be done in Marin County.

Noise and Safety

2.1
4.2
The noise projections for DVO are based on the current fleet of planes. The disclosure of additional classes of aircraft could change that projection. If larger planes are based at DVO whether they operate more than 500 times a year should not be a criterion for including their contribution to noise.

4.5
Current technology should enable the airport management to identify planes that do not comply with the adopted flight protocols that reduce noise impacts on nearby residential areas. Enforcement of the protocols is deemed to be unrelated to the airport operations. We disagree. Airport management should take a more active role in enforcement.

10.1
The noise impact on Olompali State Historic Park will be greater with the runway 1100 feet closer. Noise and safety issues at a public facility like Olompali should have been more carefully evaluated. Olompali is a serene park of tremendous historic significance. The public uses are 99% outside, so mitigating noise is not possible. An airplane from Gnoss crashed at Olompali about 1996, which was a rare, but real safety issue. Establishing some protocols to protect Olompali (and pilot safety) should be prioritized.

19.3
Although the presence of Highway 101 and the SMART/NCRA railroad tracks are acknowledged, there was no discussion of the safety impacts of moving the runway 1100 feet closer. Any miscalculation at takeoff or landing could impact thousands of people using those public facilities. The proximity of DVO to RLI was thoroughly discussed. Are there any safety regulations by FAA about proximity to highways and railroad tracks? Can planes be required to initiate their take off as far south as possible when taking off to the northwest? This safety issue should have been addressed.

Thank you for the opportunity to comment on these documents. We look forward to receiving the Final EIR/EIS.

Yours truly,

Susan Stompe

Susan Stompe
President

Marin Audubon Society
MAS

Post-it® Fax Note 7671	Date 2/6/12	# of pages ▸ 8
To Doug Pomeroy	From B. Salzman	
Co./Dept. FAA-Student	Co. MAS	
Phone #	Phone # 415-924-6057	
Fax #	Fax #	

Marin Audubon Soc...

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February 6, 2012

Doug Pomeroy
Federal Aviation Administration
San Francisco Airports District Offices
1000 Marina Blvd., Suite 220
Brisbane, CA 94005-1835

RE: DEIS/EIR FOR GNOSS FIELD AIRPORT RUNWAY EXTENSION PROJECT

Dear Mr. Pomeroy:

The Marin Audubon Society appreciates the opportunity to comment on the Draft EIR and EIS the Gnoss Field Expansion Project. The focus of our comments is on environmental impacts, to species and wetland resources in particular, in and near the project site.

23.3 How the final project will be chosen should be stated. Will the final project alternative comply with both federal and state requirements, policies, guidance etc, or will one jurisdiction's guidance take precedent over the other?

We have the following questions and comments on specific aspects of the draft EIR and EIS. We have divided our comments for each document, although some of our issues and questions are relevant to both and there may be some overlap.

COMMENTS ON DRAFT ENVIRONMENTAL IMPACT STATEMENT

3.7 We agree that Alternative C would be the most environmentally damaging of the four alternatives because it would fill wetlands and, therefore, should not be reviewed further.

3.6 Alternative B would impact wetlands at the south end of the runway and include moving a levee. The location of the levee construction should be shown on a figure and describe the height of the new levee segment, the width of the base and top, and whether the levee work would require filling of wetlands.

5.5 Alternative B would require a lot line adjustment. What other property and other owner would this involve? Has that owner agreed to the adjustment? Why is the adjustment needed?

A Chapter of the National Audubon Society

2.2 According to the DEIS, (p-1-6) the overall operations are forecast to increase at an average annual growth rate of 2.0 percent. The percentage of operations by each aircraft category is assumed to remain unchanged. The basis for making the projected estimates for each aircraft type should be discussed. How are these conclusions made? How is it determined, for example, that multi-engine piston aircraft would decrease slightly, single-engine piston aircraft would increase slightly and turbine and helicopters be expected to increase by 2.9 percent annually?

2.3 The project sponsor's stated purpose for the project is "to allow existing aircraft at DVO to operate at Maximum Gross Take Off Weight under hot weather and other adverse conditions." 5 to 10 % of the annual take-offs are weight restricted, yet "The percentage of aircraft affected by this condition is expected to remain relatively constant in the future." (P. 2-2) We would think that the proposed improvements would make Gnoss more attractive to pilots. How accurate are growth projections for the airport operations? Have past projections generally been over or under actual operations conditions?

19.2 Safety is mentioned as a reason for the project. What is the safety record for the airport? How many accidents have there been in the airport's history, and how many accidents and of what type occur annually at Gnoss? How does this accident record compare with airports of similar size? What reduction in accidents can be expected as a result of the expansion?

20.2 The DEIS states that the proposed extension "would not attract aircraft that are notably larger (i.e commuter aircraft) due to the limitations of the strength of the runway pavement width of the runway, and the distance between the runway and the taxiway." What is the current strength of the runway pavement? Why couldn't the runway simply be resurfaced?

2.4 Are there any restrictions (e.g. FAA permits) or process requirements that would or could limit the number of aircraft landing and taking off at Gnoss?

20.6 The discussion states that the project "would allow aircraft currently using DVO to operate at full payload without being restricted by surrounding terrain or, in most cases weather conditions." All airports, even SFO and Oakland, are limited by weather conditions. Post-project, would current users be able to operate no matter how high the temperature? What other weather conditions besides hot weather would impact operations?

26.1 The descriptions of the site state that the area is "nearly flat"with meandering sloughs and drainage channels, within the original floodplain of the Petaluma River and that the lands are protected by two levee systems constructed "along the Petaluma River to reclaim the area." (P. 4-39) It should be clearly stated that the facility is built on former tidal marsh and therefore on bay mud. The nature of bay mud is such that structures and facilities built on this substrate are subject to differential settlement. At Hamilton Field settlement continued as more and more fill was placed on the runway. What is the experience with differential settlement at Gnoss? How is the preferred alternative expected to affect settlement of the runway?

4.6 Would the preferred alternative have any impact on the flight pattern of the aircraft over the marshes in the vicinity. Would planes be more like or less likely to take off and come in for
5.1 landings over the marshes? Would the preferred alternative remove or reduce the risk of bird strikes which would be a benefit to both the birds and aircraft?

5.6 On page 3-16 there is a statement that Alternative B "...could be inconsistent with FAA bird-aircraft strike hazard minimization guidelines." There is a discussion about Army Corps of Engineer's mitigation guidance on page 5.10-12, but we could not find any discussion of the FAA guidelines. The FAA guidelines should be presented and discussed.

12.10 The discussion on page 4-68 reports that man-made drainages and the brackish marsh area north of the runway are habitat for the endangered salt marsh harvest mouse (SMHM) and that endangered clapper rails could seasonally forage in areas to the south. We agree, and also note that portions of the site likely provide high-tide refugia habitat for both of these species.

10.2 Table 5.7-1 should include Marin Audubon Society property nearby/adjacent to the Petaluma River and the Bahia Community as a resource. Marin Audubon owns 60 acres which includes tidal and seasonal wetlands, and walking paths that are well used by the public.

13.3 Table 5.10-2 indicates that Alternatives B would require filling of 11.83 acres. According to the discussion on page 5.10-4, the area of wetland disturbance would be 22.93 acres. The endangered species/wetland discussion states (p. 5.9-11) states "...it is assumed that temporary impact areas would be revegetated in a way that would continue to provide habitat for upland habitat for threatened and endangered species." It cannot simply be assumed that the impacted areas would be revegetated. There must be specific requirements as to the location, plant species to be planted etc. required of the project sponsor as mitigation. Also stated in that discussion is
13.12 "for purposes of determining wetland impacts,"all wetland losses are determined to be permanent losses." Therefore, the actual area needing compensatory mitigation should be 22.93 acres not 11.83 acres.

12.6 Burrowing Owl surveys should be conducted now and again before project construction is initiated. It should be known whether and where they is roosting as well as nest. Mitigation by constructing burrows to replace any nesting or roosting burrows that would be lost or disturbed should be required.

13.13 We strongly disagree with the priority listing for mitigation. The most obvious bank site is on the California Department of Fish and Game (DFG) lands adjacent to the airport. Even if there were credits available, use of this bank would be unacceptable as the habitat is almost non-existent and the restoration efforts appear to have failed. Also, seasonal ponded wetlands such as exist on-site are the type of wetlands that would attract birds that would present the highest potential for collisions: flocking shorebirds, dabbling ducks and gulls. Also, an in-lieu fee program is also unacceptable because such fees are often not used in a timely fashion or it may take so long to identify a project that the mitigation provided is under the required acreage of both federal or

state guidelines.

13.11 USACE mitigation requirements reportedly state that "compensatory mitigation project should not be located where they will increase the risk to aviation by attracting wildlife to areas where aircraft-wildlife strikes may occur (i.e. near airports). While on-site mitigation and in-kind could attract birds, there are areas nearby that are both feasible, would not pose risk to planes and would have great environmental benefits.

13.11 Most of the off-site areas mentioned in the EIS would be unacceptable because they are in other counties, far from the site of loss. Cullinan is at the west end of Highway 101 and other sites mentioned are also some distance away in other counties. The preferred mitigation should be on-site or as close as possible to the site of loss.

13.14 The most promising and potentially beneficial mitigation option is the referenced off-site restoration by a private entity on an adjacent property. This site offers the opportunity to participate in a larger project that would both permanently protect and restore wetlands. If tidal marshes can be created instead of seasonal, the potential for use by the two aforementioned endangered species greatly increases and the potential for use by the species that are the most potential collision concern. Fully vegetated tidal marshes are used by isolated birds that move and forage and hide among the vegetation, not used by flocking shorebirds and others that prefer open areas to see predators coming. See the discussion under CONCLUSION below.

COMMENTS ON DRAFT ENVIRONMENTAL IMPACT REPORT

13.15 Although shown on the figure the description of the proposed project should state that the safety areas would also be extended to the south 240 foot X 120 foot. How much wetlands of what type would need to be filled in this area?

3.8 The status of the lands on which the cross wind-runway would have been constructed should be discussed. A second runway design extending to the northeast and southwest was planned for more than 20 years. These lands were specifically excluded by Fish and Game when they acquired the adjacent lands. The current status of this proposal should be discussed. Does the county still own this parcel? What is the potential for this design to be resurrected? Because it is not in the current expansion design, the County should consider transferring the strip to the owner of the adjacent land, the Department of Fish and Game.

2.1 Growth Inducing Impact discussion indicates that the proposed project is not intended or expected to cause unforcasted growth in the aircraft operations. We are concerned about possible growth in air traffic, not increased housing or commercial development. Even though increased air traffic may not be expected, it still could occur should the economy and/or conditions at Gnoss change. For example, this project would eliminate constraints. More small and larger planes such as business jets could be attracted to the site, particularly as other developments, such as the new Lucas project, are built in the county. This potential should be further discussed.

2.3 How are forecasts for growth projections formulated? Are they usually accurate? What is the accuracy history of past projections?

2.5 Discuss the potential for growth in the number of planes based or housed at the airport. Is there space in existing hangers and aprons for tie-downs and T-hangers? Why would the project not increase the desirability of the airport for pilots to house their planes? What limits are there on additional hangers and tie down areas being constructed? Is there a local or federal process for expanding these facilities?

13.7 Exhibit 3-2 does not show the locations where the levee would be extended. Please include more information about the levee extension (the height, width and location) and show the area of extension on a figure. Would the levee extension require filling wetlands? If so, where?

5.7 In addition to the built features, the discussion of Land Use Setting and location should address the various seasonal and tidal wetlands and other habitat areas in the vicinity of the project site. The airport is bordered on the east and south by open lands including seasonal and tidal wetlands, woodlands, agricultural lands and other open/undeveloped lands.

13.2 The discussion of compliance with the Marin CWP wetland policies on page 4.2-10 is vague. The project would only comply with the wetland policies if mitigation wetlands are created at a ratio of 3 acres restored to each 1 acre filled with no loss of functions or values on-site or close to the site of loss. Meeting these requirements is not assured at the current time. A number of the sites discussed would not comply.

26.2 Mitigation Measure 4.3-2 for Expansive Soils calls for overfilling of the site and allowing several years before establishing the final top fill elevation, as well as further investigation by an engineer of measures to further reduce this impact. We are concerned about several of the measures suggested: chemically treating the soil to reduce plasticity and expansion potential, and replacing existing expansive soil with non-expansive soil. Chemical treatment would introduce toxic substances that could leach into waterways and have adverse water quality problems. Soil replacement would require the importing of soil from offsite. Traffic and air quality impacts of this measure would need to be addressed and the location where the imported soil would come from should be examined to ensure the soil quality is acceptable. These potential impacts should be discussed in the EIR.

26.2 Mitigation Measure 4.3-3 for Expansion and Settlement of Soils would be addressed by overfilling the site and allowing several years before top filling. Similar to the mitigation above, a range of additional alternatives include several of concern: mixing soils with cement or lime and constructing the runway on piles. The potential for water quality impacts using lime or concrete and the potential impacts of noise impacts from driving piles on endangered species including fish and birds in the vicinity should be addressed.

26.2 Mitigation 4.3-4 and 4.3-5 for Liquefaction and Cyclic Softening calls for possible use of deep

26.2 soil mixing and possible structural solutions. As above, impacts of soil mixing and structural solutions need to be addressed if these activities are options.

13.16 As pointed out at 4.5.1.2 high Brackish marsh or seasonal wetlands is the major plant community and result from the placement of levees around and removal of tidal waters from tidal marsh. As shown on Exhibit 4.5-1 they exist primarily at the north end of the existing runway where the major extension would occur. These wetlands usually are fed by winter rains and raising groundwater in winter, and are dry in summer. For this reason, and contrary to the discussion at 4.5.1.2, they do not typically support such species as song sparrow, which inhabit high tidal marshes or marsh wren. They provide winter and spring foraging habitat for migratory shorebirds and dabbling ducks and some nesting, such as by killdeer which prefer open barren areas for nesting. In summer, they are foraging grounds for raptors and other grassland species.

12.11 The species list should also include California Black Rail, a threatened species, which inhabits nearby Black John slough.

13.12 The area of disturbance is described as 23.35 acres with 11.83 of those acres being permanently lost due to filling, excluding the drainage ditches which are being replaced by the project. Mitigation should be provided for the wetlands temporary lost if only by revegtating the damaged areas. See further discussion under the DEIS.

13.15 Discuss the reason for filling .33 acres of wetlands on the south end of the site, as shown as Permanent Impact Area 31 on exhibit 4.5-2.

13.11 Mitigation 4.5-1 for Wetland Acreage to be Filled. concerning potential compensatory mitigation alternatives, the discussion should state that the Marin CWP, in addition to the points mentioned above, does not provide for use of mitigation banks or in-lieu fee programs. We have no problem with mitigation wetlands being created off-site, due to the nature of the project as long as the off-site location is as close as possible to the site of loss. This policy calls for on-site or as close as possible are the preferred mitigation locations.

13.11 The EIR should discuss the lack of compliance of the potential mitigation sites at the San Pablo Bay Wildlife Refuge and other out of county locations with CWP policy BIO-3.d. which states that "mitigation should be close to the site of loss."

13.17 As discussed above, we strongly object using a mitigation bank or in lieu fee because suitable mitigation sites exist. We also note that the Regional Water Quality Control Board also does not support mitigation banks.

13.11 The San Francisco Bay Joint Venture maintains a list of projects, but does not actually do projects. Other in-county mitigation opportunities exist in Marin at the Corte Madera Ecological Reserve

13.12 Mitigation 4.5-2b to protect SMHM, calls for removal of vegetation thereby removing vegetative habitat and these lands would no longer be considered harvest mouse habitat. This appears to conflict with the discussion in the DEIS which "assumes" that these denuded lands would be revegetated. Mitigation should

12.12 be provided to compensate for temporary or permanent removal of SMHM habitat. A figure should be included showing the area of SMHM habitat. It is unclear whether this is actually the wetlands previously identified.

13.11 Mitigation 4.5-2c states that mitigation areas for the SMHM are the same as for the clapper rails and that "the mitigation for CCR will occur in tandem with the mitigation for the SMHM as they are both associated with high brackish marsh habitat." These species are both associated with high tidal marsh habitats and associated uplands. These habitat types should be provided as mitigation close to the area of loss so these endangered species can benefit.

12.13 Mitigation 4.5-2d states that Construction Impacts would be mitigated by doing the work during summer and fall dry periods. The CCR non-breeding season, and therefore the allowable work window, usually does not begin until September 1 and extends through January.

13.3 According to the discussion at 2.8.2.1 the airport sponsor must develop a Mitigation Plan for the wetlands to be lost. A mitigations plan should be prepared and presented in the Final EIR/S.

18.1 Impact/Mitigation 4.6.2.2 Temporary increase in traffic due to construction should address the additional truck traffic that would be needed to import soil should this mitigation be chosen to address expansive soils, liquefaction and settlement.

4.7 Mitigation for noise impacts needs to discuss the impact on endangered species from hammering of pilings as is possible under Mitigation

CONCLUSION

13.11 We emphasize that mitigation for wetland impacts of this project should take place as close as possible to the site of loss. The Binford Road property is the preferable location because of its proximity, availability and threat of loss if it is not acquired, and the ability to restore the needed habitat types. We have been working with the owner of this property and would welcome the opportunity to work in partnership with the Airport to ensure mitigation takes place in a manner that benefits species that use the area and that ensures the habitat functions and values are not diminished by the airport expansion. Mitigation on this site would benefit the two endangered species of concern and would greatly diminish the risk of bird-plane collisions from existing conditions.

Thank you for considering our input.

Sincerely,

Barbara Salzman, Co-Chair
Conservation Committee

Phil Peterson, Co-Chair
Conservation Committee

A Chapter of the National Audubon Society

Gnoss Field Community Association
GFCA

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GNOSS FIELD COMMUNITY ASSOCIATION

Mr. Doug Pomeroy
U.S. Department of Transportation
Federal Aviation Administration
San Francisco Airports District Office
1000 Marina Boulevard, Suite 220
Brisbane, California 94005-1835

February 4, 2012

Re: Gnoss Field Airport Proposed Runway Extension EIS and EIR

WHO WE ARE

The Gnoss Field Community Association (GFCA) is an organization of pilots and supporters of aviation in general and Gnoss Field in particular. We have more than 115 active members. None of our members owns a jet.

24 This letter is written to express our general satisfaction with the EIR/EIS (hereinafter referred to as the Report), but also to add compelling information supportive of the runway extension.

The focus of our comments will be on statements made in the Report regarding noise. We will also address how the runway extension provides environmental improvements for the local bird population and safety for aircraft operating in the area.

NOISE REDUCTION

4.18 The EIS addresses several alternatives for the runway extension. We support Alternative B which extends the runway to the northwest. As to Alternative B, the Report concludes in Chapter Five, page 5.1-9 that "...no significant noise impacts would result from implementation of Alternative B." To the extent that there would be no significant negative impacts, we are in full agreement.

To complete the noise discussion, however, the Report should report the positive impact of noise reduction. Changes in Flight Tracks as a result of the runway extension will provide significant noise reduction. Although the Report addresses Flight Tracks in Chapter 5, page 5.1-6, it misses a significant point which would seem to mandate a new analysis of decibel levels.

As noted in the Report, the runway extension adds 1100 feet on the north end of the existing runway, providing initial separation of that distance from the neighbors for runway 13 departures. While that distance will make a difference in noise, it does not tell the whole story. In fact, when aircraft depart toward the south the neighbors will be subjected to much less noise than is currently the case. Why? Because not only will takeoffs (the noisiest time for aircraft operations) start 1100 feet farther away, but also because airplanes will now be able to fly north of the KCBS towers. For current departures on runway 13, the towers restrict left turns after takeoff, forcing aircraft to "steer clear" a safe distance and, therefore, to be closer to the homes as well as the newly created marshland.

4.18 GFCA has prepared the attached Diagram, marked Exhibit A, to illustrate our point. As one can see, if it were not for the towers, aircraft departing runway 13 would be able to turn out through the area where the towers now exist. To provide a safe clearance from the towers, aircraft must fly closer to the homes, a factor contributing to noise for our neighbors.

With the proposed runway extension, aircraft will be able to turn north of the KCBS towers after departing runway 13 as depicted on the diagram. The additional distance separation from the homes is very substantial as the aircraft transition north of the towers, resulting in estimated additional separation from current Flight Paths by 3000 to 3500 feet. This information needs to be analyzed and included in the EIR/EIS.

Adding to the noise picture is the fact that aircraft will be reducing power for climb a further distance from the homes. Reduction in power means reduction in noise.

The combination of greater distance separation than the Report first assumed, and the reduction in power further from the homes, requires reconsideration of the Report's conclusion that there would be no significant noise impacts. **Indeed, both careful analysis and common sense demonstrate that current noise levels will be reduced by the runway extension, a very positive impact for our neighbors.**

POTENTIAL CHANGES IN USE

2.6 Rumors have run rampant that extending the runway would result in major changes in the type of airplanes using Gnoss, and have even included representations that we would have airlines

using Gnoss. Rumors are easy to start, and sometimes difficult to combat, but at some point in the process must be confronted with facts.

As to the airline rumor, there is no basis whatsoever to believe Gnoss could accommodate airlines. First of all, the runway, even at its extended length, would be too short and too narrow to handle aircraft big enough to carry more than ten passengers.

The one instrument approach procedure for Gnoss (affected by the hills and towers) is dreadfully insufficient to handle airline needs even if the runway and facilities could. When it is cloudy and or foggy, aircraft cannot go below 1,000 feet unless the pilots can see the ground and make a normal landing. The Gnoss landing restriction would be a major factor for any airplane owner/passenger who is on a schedule requiring deadlines, and be especially important to an airline.

2.6

In addition, no economic case can be made for an airline operating out of Gnoss. Given the very limited passenger loads our runway length (even as extended) would allow, and the runway width, there is no way an airline could survive. Gnoss does not have the infrastructure to handle commercial traffic, having no place for waiting rooms, baggage areas, food or adequate restrooms. Surprisingly, Gnoss does not even have a sewer system!

Regarding the potential for increase in jet traffic, GFCA adds the following comments to the Report.

20.13

The few jets Gnoss now hosts are most often flown with less than full fuel or passenger loads due to the short runway. They go elsewhere to refuel, spending money which would otherwise be spent in Marin. For those aircraft based on Gnoss, (we believe there are only 4 or 5), having the longer runway would not mean more flights. It would mean more efficient and safer flights.

The analysis of whether Gnoss would see additional jet traffic should include two scenarios: first, whether any jet owners whose aircraft are of the size we currently have would transfer to Gnoss; second, are any jet aircraft larger than we currently have likely to transfer to Gnoss?

2.1

A review of jet aircraft types, ranging from heavy jet to very-light jet and their runway requirements makes it clear that there are only a few more jets which would be able to land and depart at Gnoss with the longer runway. The attached list of jet aircraft, marked Exhibit B, provides information supportive of our comments herein. When reviewing the list, it is important to remember that for these jets there are takeoff limitations which must be considered when the runway is wet. These jets have to be able to accelerate to a decision

speed and then be able to abort the takeoff and stop within the remaining runway. This requirement would eliminate Gnoss as a viable airport for most jet operations any time the runway was wet.

2.1

As can be seen from the attached list, the jets that would be able to land and depart at Gnoss (with full fuel and passengers) remain in the "very light jet" and "light jet" category. Generally, this means jets with a maximum passenger load of 6-8. There are only two jets, the Cessna Sovereign and the Embraer Legacy 450, which can carry 9-12 passengers and which fall in the mid-size category. By the way, no airline uses those jets because they are simply too small.

Another limiting factor is that Gnoss doesn't have adequate hangar space or "Jet Center" accommodations as do Napa and Santa Rosa, both of which have many more amenities than Gnoss.

22.2

Opponents of the runway extension have expressed concerns that Gnoss would be "expanded" to accommodate jets and businesses supporting them. The opponents note that the idea of a "Jet Center" was explored over a decade ago by a private company. The "Jet Center" idea involved a proposal to connect the airport to approximately 50 acres of neighboring private land. **It is very important for our opponents to know that the runway extension proposal from the County is totally unrelated to the earlier private proposal and does not in any way include the subject private property. Further, any effort to use adjacent land to create a jet center facility (or any other facility) would require an EIR of its own.**

2.1

Jets are a major investment, and without multiple and varied instrument approach options, supporting infrastructure, Gnoss will always have limited appeal to jet traffic. The simple conclusion that a few more jets would have the opportunity to land at Gnoss cannot translate to a statement that they will.

2.1

In quick summary, review of the runway requirements for larger jets makes it abundantly clear even the extended runway is way too short and the width inadequate. There is no credible case to be made for airline operations. Whether any jets are in the area (Napa or Santa Rosa) now and whether they would transfer to Gnoss or land at Gnoss if a longer runway were available is purely speculative.

2.6

4.18

A fact not to be forgotten is that current jet operations will be much quieter for our neighbors if the runway is extended.

SAFETY

Gnoss is noted for its crosswinds. The wind direction, the wind velocity, and the fact that the winds can be different from one end of the runway to the other all combine to create challenging conditions. A longer runway will give all aircraft using the airport more time to stabilize approaches to landing when the crosswinds are blowing. More time to stabilize will result in fewer balked landings from low altitude and at low speeds, a combination which increases risk.

The further aircraft operate from the homes, the less chance of an accident or incident near the homes.

19.4

The runway 13 departures will also keep aircraft further away from the recently completed Marsh Restoration Project which has resulted in increased large bird activity. Birds of all sizes are hazardous to aircraft, and large birds such as the pelicans benefitting from the Marsh Restoration are especially hazardous. Captain Sullenberger and his U.S. Air crew can so testify.

Because birds and aircraft do not mix well, the planned runway extension will reduce the bird strike hazard. Beneficiaries of this result are the aircraft, its passengers, the birds and, potentially, neighbors who might be near an aircraft disabled by a bird strike.

ENVIRONMENTAL BENEFITS FOR THE BIRDS

As noted herein, a large Marsh Restoration Project was completed near the airport over the last several years. The success of the project from a bird population standpoint is obvious. It is equally obvious that the birds would benefit from less noise and from a safety standpoint if aircraft departing Gnoss were further away. The Flight Path diagram clearly demonstrates how runway 31 departures are now very close to the Marsh, and also how departures would be much further away if the runway were extended as proposed.

4.20

FINAL COMMENTS

The inescapable conclusion seems to be that if the aircraft using Gnoss are flying farther away from homes and the Marsh Restoration area, noise will be reduced and safety enhanced. The result is the classic win/win for the airport, for the County of Marin and all the agencies using Gnoss, for the environment and for our neighbors.

4.18

Respectfully Submitted,

Gnoss Field Community Association Board of Directors

451 Airport Road
Novato, Ca 94945
www.gnossfield.org

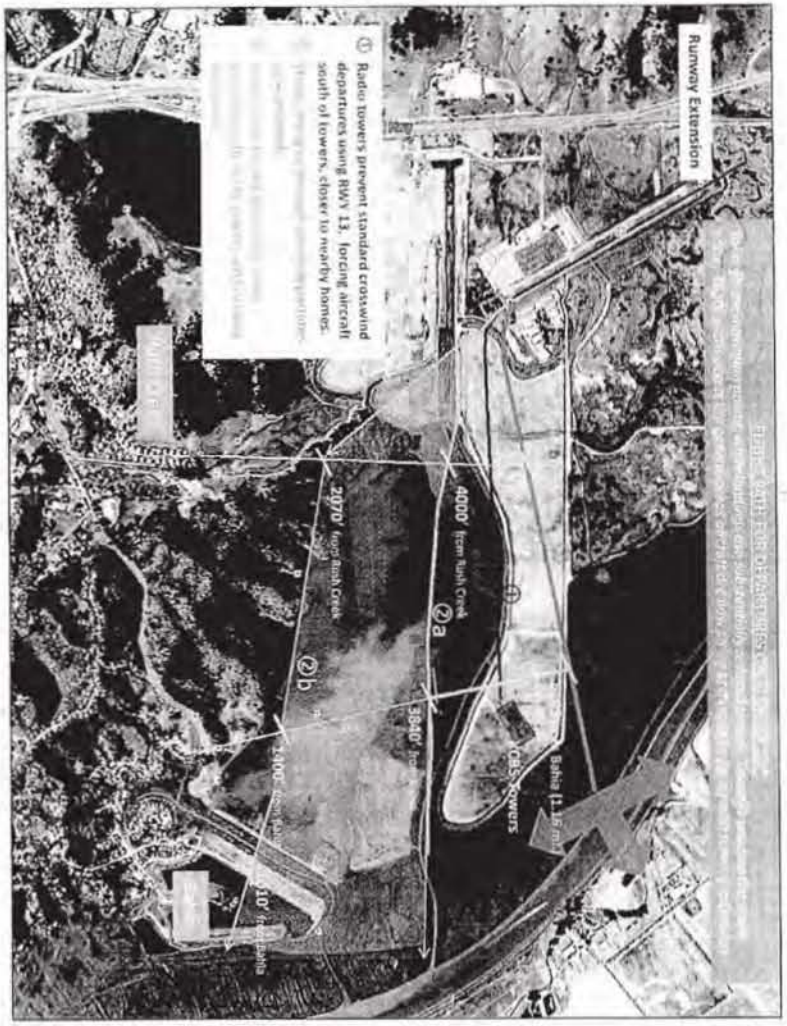


EXHIBIT A

Take off Distances for Most Private/Corporate Jet Categories and Aircraft

No.	Model	Typical # Passengers	Min. Takeoff MTOW
Commercial			
1	Boeing 747-400	524	990Z-10893
2	Boeing 707	180	8300-11000
3	Bombardier Dash 8-400	78	4600
Heavy			
4	Airbus 318 Elite	18-132	5490
5	Airbus A319	19-156	6170
6	Boeing Business Jet	19-149	5950
7	Embraer Lineage 1000	18-19	6135
8	Embraer ERJ 145	50	5643
9	Embraer ERJ 135	37	5419
Large Cabin			
10	Bombadier Challenger 600	9-19	5,700
11	Bombadier Challenger 605	9-19	5,840
12	Bombardier 5000	8-17	5000
13	Bombardier Global Express	11-19	5870
14	Bobsridier 850	27-50	6305
15	Bobardier 870	42-70	5567
16	Bobardier 890	42-70	6808
17	Dassault Falcon 7X	10	5505
18	Dassault Falcon 2000	8-19	5436
19	Gulfstream GII	12-19	5700
20	Gulfstream GIII	14-19	5100
21	Gulfstream G IV	14-19	5280
22	Gulfstream G V	13-19	6110
23	Gulfstream G350	14-19	5050
24	Gulfstream G450	14-19	5450
25	Gulfstream G500	16-19	5150
26	Gulfstream G650	16-19	5910
Super Mid-Size			
27	Bombardier Challenger 300	8-13	4810
28	Cessna Citation X	8-11	5140
29	Dassault Falcon 20-5	8-10	5085
30	Dassault Falcon 50	9	4935
31	Dassault Falcon 200	8-10	5700
32	Dassault Falcon 900	12-19	5110
33	Dassault Falcon 2000	10	4450
34	Embraer Legacy 600	10	4700
35	Embraer Legacy 650	10	4500
36	Galaxy Aerospace	6-18	6083
37	Hawker Beechcraft 1000	8-9	5350
38	Hawker Beechcraft 4000	8-14	5088

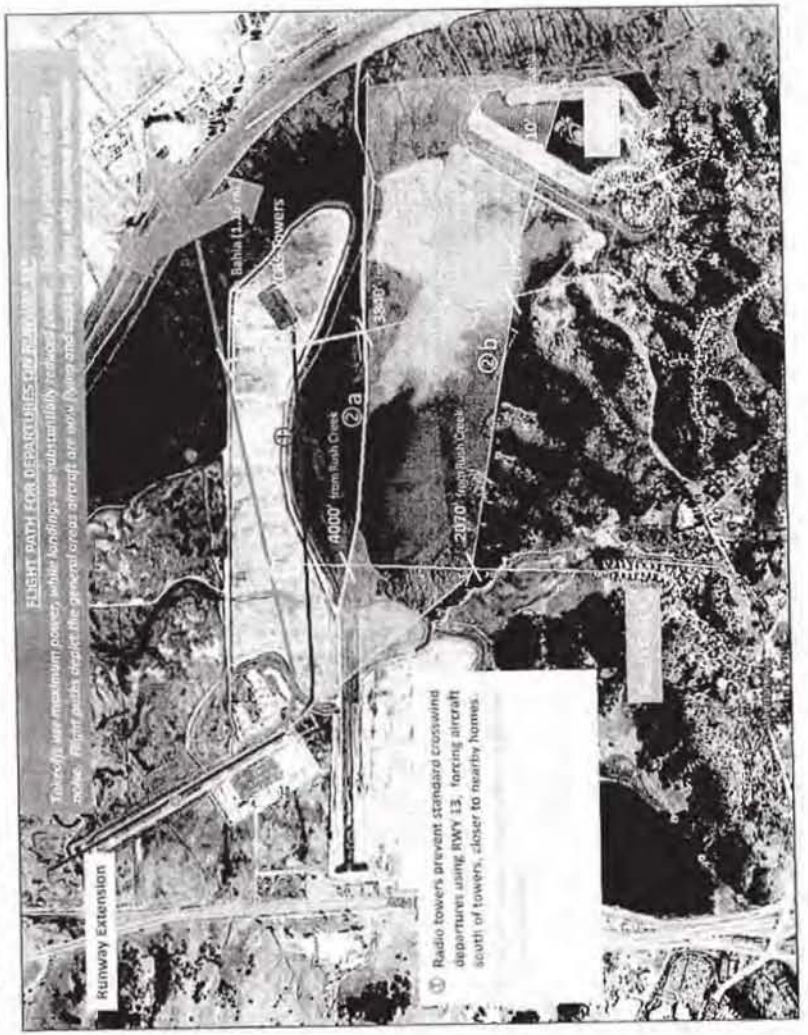
Key
Can Not Depart w/ MTOW
Can Depart if 4400'
Can Land Depart Now

No.	Model	Typical # Passengers	Min. Takeoff MTOW
Mid Size			
39	Bombardier Learjet 55	7-10	5600
40	Bombardier Learjet 60 XR	6-10	5450
41	Bombardier Learjet 85	10	4800
41	Cessna Citation III	7-9	5030
42	Cessna Citation VI	7-13	4850
43	Cessna Citation VII	8-13	4850
44	Cessna Citation Sovereign	9-12	3640 *
45	Dassault Falcon 10	7	4615
46	Embraer Legacy 450	7-10	4000 *
47	Embraer Legacy 500	15	4600
48	Gulfstream 100	6-9	5395
49	Gulfstream 150	7-8	5012
50	Gulfstream 200	6-18	5083
51	Hawker Beechcraft 750	8	4936
52	Hawker 800XP	8-15	5032
53	Hawker Beechcraft 850	8-15	5032
54	Hawker Beechcraft 900	8-15	5032
Light or Superlight			
	Israel Al Astra SP	6-9	5250
	Israel Al Astra SPX	6-9	5395
55	Citation Excel	8	3590 *
56	Cessa Citation XLS	9	3560 *
57	Cessna CJ1	7	3250 *
58	Cessna CJ2	8	3360 *
59	Cessna CJ3	7	3180 *
60	Cessna CJ4	8	3130 *
61	Cessna Citation Jet	6-7	3080 *
62	Cessna Citation Bravo	7	3600 *
63	Cessna Citation Encore	7	3490 *
64	Dassault Falcon 10	7	4615
65	Dassault Falcon 100	6-9	4500
66	Learjet 24	5	3297 *
67	Learjet 25	7-10	3937 *
68	Learjet 31A	6-8	3490 *
69	Learjet 35	6-10	4972
70	Learjet 36	5-10	4972
71	Learjet 40	6	4880
72	Learjet 45	8	5040
73	Hawker Beechcraft 400	7	3950 *
74	Hawker 400XP	7	3950 *
75	Raytheon Premier I & 1A	6-7	3793 *
Very Light			
76	Eclipse A500	5	2342 *
77	Hondajet	5	3120 *
78	Cirrus Vision	4	1500 *
79	Cessna Citation Mustang	5	3110 *
80	Adam A700	4-6	3400 *
81	Embraer Phenom 100	4	3400 *

All distances are based on maximum take off weight of aircraft (MTOW distance). Categories are divided by weight and impact on wake turbulence. Weight categories exceed the weights as follows: Heavy > 255,000 lbs.; Large > 41,000 lbs.; Medium > 12,500 lbs.; Small < 12,500 lbs. Almost exclusively, aircraft landing at Gnoss will be in the 6-10 passenger category. This means "very light", "light", or "mid-size" aircraft of 6-10 passengers.

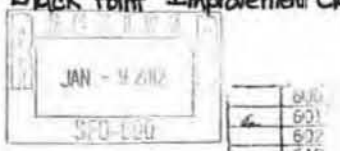
Exhibit B

Gnoss Field Community Association
Public hearing handout



GFCA
Steve Knight

BPIC
Black Point Improvement Club



Black Point Improvement Club
427 Grandview Avenue
Novato, California 94945
January 4, 2012

Doug Pomeroy
Federal Aviation Administration San Francisco Airports District Office
1000 Marina Boulevard, Suite 220
Brisbane, California 94005-1835

Re: Gnoss Field Airport Proposed Runway Extension EIS and EIR

Dear Mr. Pomeroy,

The Black Point Improvement Club has several concerns with the environmental documents for the above noted project, including:

2.3 1. The absence of accurate data for the volume of flight operations at Gnoss Field and therefore the use of general statistics for estimating future volume is troubling. The concern is intensified since Marin is considered to have a relatively high income per capita.

23.5 2. Is there a limit as to number of flight operations the extended runway could support without a control tower? For example, 124,300 operations are projected for 2027. If 88% of those occur during the 7 AM to 7 PM time frame, it would result in an average of 9 operations per hour. Table E-6 shows a dramatic difference in use between day and evening and night hours. If a major cause for the difference is natural light, one could assume that the day volume might be concentrated in those hours when daylight is present resulting in an even higher number of operations per hour during daylight periods. Might there be a similar difference based on time of the year?

2.1 3. The ratio of types of planes that currently use the airport remains fairly constant in the analysis. If the extended runway will permit the larger planes with full loads to land safely, would not the use of those planes increase?

23.6 4. The reports indicate that the extended runway would not support planes larger than those currently using the airport because planes with wing spans of greater than 49 feet require a wider runway. Would this only lead to a proposal, at a later date, to widen the extended runway? Would a mitigation to exhaust future expansion of the runway, either by length or width, be appropriate? What would prevent planes larger than those now using the airport from attempting to use the extended runway, even though it may not meet width requirements? What preventive or punitive measures can be taken to prevent the use by larger planes?

4.5 5. The noise analysis did not seem to take into account those pilots that violate noise abatement routes. While the violations may not be frequent, they may well be the basis for much of the concern about noise. Without a control tower, how can those rogue pilots be identified and penalized?

Thank you for your consideration.

Very truly yours,

C. Henry Barner
President

Bass

COMMENTS

PUBLIC HEARING

GNOSS FIELD AIRPORT - Extend Runway 13/31
ENVIRONMENTAL IMPACT STATEMENT and concurrent
ENVIRONMENTAL IMPACT REPORT
January 10, 2012

FEB - 7 2012
SFO-600

NOISE LEVELS

4.10 Include the actual published noise levels of any jet likely to use a 4,400' runway at Gnoss in the EIR so people can see the real quantities.

New Cessna jets are quieter on departure than their 206 piston model, per Cessna's published specifications. On approach they are not quieter but this can be changed with pilot technique. And since the approach to runway 31 is so steep, I approach at low or idle power settings when flying jets into runway 31.

WET RUNWAY PERFORMANCE

Wet runway performance was never mentioned in the meeting. Some of the jets based at Gnoss can land in the rain but I know of none of them that can legally takeoff when the runway is wet.

20.5 This is because jets have to be able to accelerate to a decision speed and then abort the takeoff and still stop within the remaining runway. Turbo-props and piston twins do not have this legal requirement, but having flown them out of Novato, I'm positive that many of them wouldn't make this requirement on a wet runway either. So wet runway safety needs to be presented with supporting accelerate-stop data for jets, turbo-props, piston twins and even high-performance single-engine airplanes likely to use Gnoss.

4.11 PUBLISH NOISE ABATEMENT PROCEDURES

Post a noise abatement departure diagram near the runup area of runway 13. Publish noise abatement notes in airport directories.

MONITOR NOISE IN THE NEIGHBORHOODS

4.12 I don't know if this is possible because there is no control tower that can record takeoffs and landings. But people who consistently fly over the neighborhood could be handled this way. They do this (somewhat severely) at Santa Monica and have been able to keep their airport for decades in a very airplane-hostile environment. I see a plane doing an overflight of the homes about once or twice a year. I don't think this is that common, such a measure would eliminate the guesswork here.

19.4 EXTRA SAFETY IN GUSTY WIND SITUATIONS

If a pilot has a longer time to get the plane on the ground in gusty conditions they are less likely to panic and make an error. I used to teach at Gnoss and can attest to this. Makes a big difference.

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16.1 AIRPORT LIGHTING

Airport lighting - won't change much for nearby residents - just another 1,100 feet of relatively dim runway lights. This should be shown in the EIR somehow, perhaps by adjusting a photo of the airport with photoshop.

TERRAIN CLEARANCE SAFETY

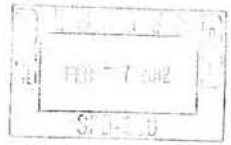
19.4 Pilots departing runway 13 will be in a much safer situation since they will be much higher and better able to maneuver to the Northeast, away from the hills before reaching them. With the current runway, some planes have to start their turns below 250' to avoid overflight of the hills.

Submit comments postmarked by February 6, 2012 to:

Mr. Doug Pomeroy
U.S. Department of Transportation
Federal Aviation Administration
San Francisco Airports District Office
1000 Marina Boulevard, Suite 220
Brisbane, California 94005-1835

From (Please Print):
Name: Wright Bass
Address: 10 Reade Lane, #2
Sausalito, CA 94965

Jackie Bonner
170 Saddle Wood Drive
Novato, CA 94945
February 6, 2012



Mr. Doug Pomeroy
Federal Aviation Administration
San Francisco Airport District Office
1000 Marina Boulevard, Suite 220
Brisbane, CA 94005-1835

Fax: (650) 872-1430

By Fax and US Mail

RE: Gnoss Field Airport – Proposed Extension of Runway 13/31

Dear Mr. Pomeroy:

4.5 I live in the Rush Creek community, just sound of Gnoss Field airport in Marin County. While most of the pilots who use Gnoss Field do follow the Noise Abatement Guidelines, there are numerous planes that fly directly over my house – especially on the weekend. Almost all these over flights occur on landing. My house is located about half way down Saddle Wood Drive, so I am sure the situation is far worse for those living in homes closer to the airport.

3.9 I am aware that the future plan for Gnoss Field calls for a 4,400 foot runway. I am most assuredly in favor of improving the airport's safety by lengthening the runway; however, I also understand that both the Draft EIR and the FAA's Advisory Circular state that a 3,500 foot runway meets the safety requirements of the current objective (i.e. very light planes – B1 planes). The 4,400 ft

3.10 length mentioned in the Master Plan is specifically suitable for 10+ passenger planes - not the types of planes included in the current objective.

2.1 Not only does the Master Plan mention 10+ passenger planes and note possible commercial uses, there is also a letter from Sunset Aviation submitted as Appendix D to the EIR stating that they are hoping to bring in larger planes after the expansion. I and other residents of Rush Creek do not want large, heavy, ten plus passenger jets flying over our homes (which they most assuredly will) – albeit accidentally. Assertions that there will NOT be larger planes using Gnoss Field defies logic. Of course they will!

3.2 Please give your consideration to shortening the proposed length of the runway so that there is safety for B1 planes using the airport, but doesn't allow larger planes to take off and land ***unsafely.*** A shorter runway addresses the concerns of pilots of B1 type aircraft as well as those of local residents.

Thank you for your consideration of this important matter.

J. A. Bonner

Jacqueline A. Bonner

Donadio

COMMENT FORM

PUBLIC HEARING

GNOSS FIELD AIRPORT – Extend Runway 13/31
ENVIRONMENTAL IMPACT STATEMENT *and concurrent*
ENVIRONMENTAL IMPACT REPORT
January 10, 2012

Welcome to the Public Hearing for the Environmental Impact Statement *and concurrent* Environmental Impact Report for Gnoss Field Airport. Public comments are an integral part of the process. This comment form is provided to receive your input and ensure that your concerns are considered. Please use this form to submit written comments, attaching additional pages if necessary. Either place the form in the comment box, provided here at the meeting, or mail to the address below, by February 6, 2012.

2.1 Regardless of what is being said, there is no question, to
4.8 me, that a longer landing strip will lead to more & bigger
planes & that means more noise.
4.5 The current crop of airplanes already improperly fly
down Saddle Wood Dr. & now it will make things unbearable.

Submit comments postmarked by February 6, 2012 to:

Mr. Doug Pomeroy
Federal Aviation Administration
San Francisco Airport District Office
1000 Marina Boulevard, Suite 220
Brisbane, CA 94005-1835
Fax: (650) 872-1430

FROM (Please Print):

Name: David Donadio

Address: 200 Saddle Wood Dr.
Novato, CA 94945

Duckworth

February 3, 2012

Doug Pomeroy
Federal Aviation Administration
San Francisco Airport District Office
1000 Marina Blvd. Suite 220
Brisbane, CA 94005-1835 Re: EIS & EIR for Gnoss Field - Novato, CA

Dear Mr. Pomeroy,

24 As the owner of a small airplane based at Gnoss Field, I strongly favor the runway extension. The issue is not big corporate jets or future commercial jet service. This is a red herring.

This is about safety. The safety of over 200 pilots based at Gnoss Field, and the safety of the pilots' families and the safety of their passengers. One could also make the argument that it is even about the safety of the airports' neighbors.

19.4 The current runway length is not a problem for only a few hot days for a few jets. There is not a single day in the year that my twin engine propeller plane can leave Gnoss Field with a full load of fuel and passengers because of the short runway length. Strong crosswinds are also a sever problem for at least half of the year, which could be reduced by extending the runway.

The runway extension will push airport operations 1100 feet further to the North, and it will:

19.4 a) Keep departing and arriving airplanes 1100 feet further away from the four 500 foot tall KCBS radio towers, which are currently a flight hazard.

20.4 b) Allow our small planes to leave with a full load of fuel and passengers.

19.4 c) Reduce crosswind dangers.

4.9 d) Allow pilots departing to the South to fly higher and turn quicker before impacting the Southern neighbors, significantly reducing noise impacts for those neighbors.

4.9 If the Southern neighbors understood or believed this last point, they would be supporting the runway extension. The EIS/EIR report says there will be no additional noise problems because of the runway extension. I believe there will be less noise.

24 I am told that of the 9300 arrivals and departures last year, the airport received only 25 noise complaints. That is one quarter of one percent, a very good record for any airport. I hope that the runway extension will have your support.

Sincerely,

Jim Duckworth
1555 Indian Valley Road
Novato, CA 94947
j.duckworth@comcast.net

cc Marin board of Supervisors

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Gilkerson

Comments at January 10, 2012 Board of Supervisors Hearing on Gnoss Field Runway Expansion

My name is Christopher Gilkerson, and I live at 220 Saddle Wood Dr. in Novato. I am one of the signers of the Petition & Comment Letter. A number of us will also be submitting a more extensive comment letter by the Feb. 6 deadline.

I would like to elaborate on a few key points in the Petition: (1) the purpose of the expansion and who it will benefit, and (2) the noise impact of the proposed runway extension.

1.6 First, what is the purpose of extending the runway a full 1,100 feet? There is only one cited in the draft EIR: to enable corporate jets to takeoff with full fuel capacity on those few hot days when they plan to travel long distances. That's it. It is not for emergency preparedness. That purpose is not mentioned at all in the draft EIR and really doesn't make sense anyway.

It's also not to enhance the safety for the current users of the airport. The widening of the runway several years ago served that purpose to compensate for the crosswinds there, as will the proposed extension of the runway safety areas at each end of the runway and extending the taxi area, which I support. Now you ask any pilot if they would like a longer runway, and chances are they will say yes. It's like asking taxpayers if they would like to pay lower taxes. But the purpose has to be supported by data.

1.4 Even those very few corporate jets that call Gnoss home don't need an extended runway for safety purposes. Today they simply reduce their fuel weight on a few particularly hot days when they are want to travel a maximum distance, such as to Denver. There is no evidence at all in the draft EIR indicating how many actual takeoffs have been impacted in that manner.

20.1 A key unanswered question is: Who is the 3%? Who owns and uses the dozen or so corporate jets that, according to the draft FEIR, are the 3% who will benefit from the runway extension. How do their interests weigh against the hundreds of home owners to the south of the airport who will be negatively impacted by the noise created by any increase in over-flights? The County -- meaning the Board of Supervisors - should be transparent about the interests it chooses to champion and why or better yet, try to balance those interests.

3.3 One way to balance those interests is by proposing a smaller runway extension. For a B-I general aviation airport, which Gnoss Field is, the recommended length is about 3,500 feet to allow small B-I jets to take off with more fuel. The draft EIR makes a mistake in not considering that alternative.

2.1 As for the interests of Gnoss Field's neighbors to the south of the airport, we accept that from time-to-time there will be occasional over-flights and some noise disturbance. However, our research shows that extending the runway to 1,100 feet will result in a change in the types and sizes of jets that can land at Gnoss that are faster, louder, and need a larger approach to land from the south over our homes. Although extending the runway to the north may help reduce over-flights from takeoffs to the south, it would seem to do little about over-flights from landings from the south.

In terms of the noise impact analysis in the draft EIR, it has 3 fundamental flaws:

4.14 (1) It is based on sketchy radar data from 2007, supplemented by self-serving undocumented "discussions" with local airport staff and users.

4.8/4.13 (2) It is premised on the unsupported assumption that extension of the runway 1,100 feet won't lead to any change in the fleet mix. There is no analysis at all about the fleet mix at existing airports that have a runway between 4,000 – 4,500 feet.

4.5/4.15 (3) Although dozens of over-flights of jets and prop planes disturbing residential areas are documented in the noise analysis, many at above the critical disturbance level of 65 decibel levels, they are summarily dismissed as follows: "The noise generated by pilot over-flights are not a direct impact of airport operations since airport approach and departure protocols are designed to avoid aircraft over-flights of residential communities. Accordingly, noise resulting from aircraft over-flights is directly related to individual pilot behavior and [are not due to the airport and] therefore, the noise impacts of the proposed project is deemed less-than-significant." [4.7-32]

That is like saying a landfill is not responsible for toxic leaks because people throw away things they shouldn't. The airport's noise abatement protocols are not enforceable rules, some pilots do not follow them, larger jets in the future may not be able to follow them, and it is unclear how, exactly, the airport emphasizes them to current or new users of the airport to avoid over-flights. I called the Gnoss Field automated weather observation phone number this morning, and there is no mention or reminder of the approach and departure protocols to avoid disturbing the neighborhoods. When we call the airport to complain, we generally get no response.

I appreciate the opportunity to make these comments, and I hope you will consider the points in the Petition.

Gilkerson

FACSIMILE TRANSMITTAL SHEET

TO:	FROM:
Mr. Doug Pomeroy	Christopher Gilkerson, Susan Mathews, Steven Nebb, and Sharon Nebb
COMPANY:	DATE:
FAA, San Francisco Airport District Office	2/6/2012
FAX NUMBER:	TOTAL NO. OF PAGES, INCLUDING COVER:
650-872-1430	8
PHONE NUMBER:	SENDER'S REFERENCE NUMBER:
RE:	YOUR REFERENCE NUMBER:
Gnoss Field Airport – Proposed Extension of Runway 13/31	

☐ URGENT ☐ FOR REVIEW ☐ PLEASE COMMENT ☐ PLEASE REPLY ☐ PLEASE RECYCLE

NOTES/COMMENTS:

Attached please find our comment letter. The original will be postmarked today, February 6, 2012 and sent via US Mail.

If you need to contact us, please call us at 415-892-3620.

Thank you,

Sharon Nebb

February 6, 2012

Mr. Doug Pomeroy
Federal Aviation Administration
San Francisco Airport District Office
1000 Marina Boulevard, Suite 220
Brisbane, CA 94005-1835

Fax: 650-827-1430

RE: Gnoss Field Airport – Proposed Extension of Runway 13/31

By Fax and US Mail

Dear Mr. Pomeroy:

We are residents of Rush Creek Estates, just south of Gnoss Field. We are submitting this letter to raise questions and concerns about the draft Environmental Impact Statement and concurrent Environmental Impact Report (the "Reports") as prepared by Landrum and Brown, December 2011. The Reports are deficient in a number of critical respects, as outlined below.

1. The stated objective of the project is inconsistent with a 1,100 foot runway extension, whose length is not supported by the rationale or evidence. According to the Reports, the type of plane suitable for Gnoss Field is a B-I, small aircraft with a maximum take-off weight of 12,500 pounds, up to 49 foot wingspan, and approach speed of 91 to 121 knots (page 1-10). The objective of the project is to make the airport compliant for B-I airplanes under most weather conditions. Specifically, the Reports say the purpose is "to accommodate existing aviation and passenger demand." (2.3) The rationale given for extending the runway is that the "existing 3,300 feet of runway is insufficient to serve a majority of the airport's fleet under most conditions." (2.4; emphasis added.) There is no data at all to support that statement.

1.6

The only evidence proffered in Appendix D is a single February 2008 visit to Gnoss in which the environmental consultant "spoke with airport users." Those users are not listed, nor are the planes they fly. This one-time interview with unnamed users leads to a gross exaggeration: "The majority stated that during marginal or unfavorable weather conditions (high temperature or fog) most aircraft must take a considerable weight penalty with the 3,300 foot runway," and that 3,300 feet "severely limits most of the aircraft in the fleet." This is wholly undocumented.

20.1

In fact, only a dozen or so jets even appear to use Gnoss with any frequency, and it is only those planes that occasionally are inconvenienced by taking-off with less than a full tank, and only in extremely hot weather conditions and only if they are heading to certain more remote destinations. As one pilot at the January 10, 2012 hearing stated, the current runway length probably only impacts about 1% of the fleet about 5% of the time, and those pilots can simply wait to takeoff a few hours earlier or later on those few hot days of the year. (Testimony of Robert Pack.) This is far loss than "most of the aircraft in the fleet" as the Reports claim.

1.3

The Reports nonetheless attempt to substantiate the 4,400 feet of runway length to support the deemed Critical Design Plane (the Cessna 525 or CJ1+) (Appendix D, page 3). There are a number of problems with this part of the analysis:

a) The 1,100 feet extension (to a total of 4,400 feet) is based on an outdated objective that is not congruent with the Reports' stated objective. The total length of 4,400 feet originated with the 1989 Airport Master Plan (page 4.16). The intention back then was to accommodate planes with 10 seats or more. The CJ1+ aircraft is not in this category.

b) There is no data presented to support that the CJ1+ meets the requirements of 500 operations annually. Mere declaration and assumption of this important baseline factor is wholly inadequate. Furthermore, the erroneous classification for the Cessna 525A and 525B (both B-II planes) as B-I planes confuses the calculations of required runway length (Appendix D, page 3).

c) Since the proposed expansion is receiving FAA (federal) funding, the project is required to address and use FAA Advisory Circular 150/5325-4B (the "AC") for determining the appropriate length of the runway; there is no mention or consideration of the AC in the Reports.

The AC states that estimating runway length for fields like Gnoss consider a "family grouping of planes." This should be addressed by using the charts in the AC. For the objective of serving aircraft of 12,500 pounds or less, figure 2-1 should be applied since planes with 10 or more passengers would exceed the 12,500 pounds objective. While the AC under certain situations allows for consideration of airplane flight manuals in determining runway length, it cannot be done arbitrarily. Some rationale must be given to stray from the methodology set forth in the AC. Other analyses for similar airport expansions have solely relied on the results from the AC. Without the data required to support the need for specific plane usage, any result other than the AC is not valid.

d) Even if there is justification for designing the runway for a specific plane, the Reports incorrectly state the runway length required for the CJ1+ (Appendix D, page 10). The Reports use 86 degrees Fahrenheit when they should be using 82 degrees Fahrenheit. Making this correction would result in a runway length that is over 200 feet ***shorter***.

e) As stated above, the Cessna 525A and 525B planes have an ARC of B-II, and in order to meet the purpose of the project, should not be considered in the analysis.

f) The Reports' analysis of runway length adds 400 feet for abnormal conditions; however, there is no objective support for this additional distance and the abnormal conditions are not defined (Appendix D, pages 10-11). Without the support or definition for the condition, it is not possible to determine the distance required or the base length to apply the adjustment. Both the public and decision makers must be given adequate information to allow informed comment and judgment.

g) According to the AC the necessary runway length for a B-I, small aircraft with a maximum take-off weight of 12,500 pounds, under hot day conditions at sea level should be 3,500 feet. According to the AC, hot day conditions are defined as the average high temperature of the hottest month of the year. The Report references that 82 degrees Fahrenheit is the correct temperature (Appendix D, page 9) for this airport, not 100 degrees Fahrenheit as used in the 1989 Airport Master Plan (page 4.3). If these corrected assumptions are used and the AC is applied, the overall runway length should be 3,500 feet for 82 degrees Fahrenheit.

h) The 4,400 feet extension would be applicable for 10 passenger aircraft. However, no 10 passenger aircraft meets the objectives of the current project for a small aircraft with a maximum take-off weight of 12,500 pounds or less; nor is the critical design aircraft designed for 10 passengers. Therefore, an alternative using a shorter runway extension should have been considered and it was not.

i) The Reports only address alternatives that consider a total runway length of 4,400 feet or the current 3,300 feet. An alternative of 3,500 or even 3,600 feet should be considered in the Reports. See section 5, below, for additional comments about the failure to consider the reasonable range of alternatives.

2 Failure to support assumption that fleet mix and usage would not change. The draft Reports do not provide any analysis on how the fleet mix and usage would change as a result of the 1,100 foot extension. The Reports state that larger aircraft would not be attracted to the airport and therefore there would be no change in the fleet mix or the usage of the airport (page 2-5). One reason given is the limitation of the strength of the runway pavement. (3.1.4) But the runway gross weight strength is rated at 26,000 pounds (1989 Master Plan at 2.3), which can accommodate planes much larger than the B-I category. Although the fact the runway is built on compacted mud may require more frequent repairs, it does not prevent larger and heavier planes from landing.

The law requires that the analysis be based on facts, or reasonable assumptions predicated on facts. The Reports contain neither on this key point. No review was conducted about the airport fleets of the dozens of other airports in North America that have a runway length of between 4,000 - 4,400 feet. Those facts are easily ascertainable. For example, the Billy Bishop Toronto City Airport, Canada's 14th busiest, with a runway length of 4,000 feet, includes a fleet of Bombardier Q400 turboprop planes owned by Porter Airlines that can carry 70 passengers. This is not to suggest that the Gnoss project will result in scheduled commercial airliner traffic, but only that a runway of over 4,000 feet will change the types and size of planes that can land.

If the runway is lengthened by 1,100 feet, larger non-B-I airplanes could use the airport. The draft Reports provide letters confirming that current tenants at Gnoss Field (Appendix D, pages 21-25) would purchase and operate larger jets at Gnoss Field if the runway was lengthened to 4,400 feet. Sunset Aviation states that they would add a BeechJet 400 (B-I with a maximum take-off weight of 16,100 lbs.) and a LearJet (most are C-I up to D-I airplanes) to Gnoss if the runway was extended to 4,400 feet. None of these aircraft meet the specifications of the proposed project. All of them are larger and louder airplanes. In its testimony at the January 10, 2012 hearing, the Gnoss Field Community Association admitted that there would be an opportunity for an increase in the number and types of jets, including 10 and 12 passenger jets. (Testimony of Steve Knecht.)

Although current economic demand may not immediately result in additional jet traffic, an EIR/EIS must consider foreseeable impacts. Airport users have stated that they can foresee the use of larger airplanes, thus changing the volume and mix of the fleet at Gnoss Field.

As noted above, a total length of 4,400 feet appears to be a vestige from the 1989 Airport Master Plan, which states:

> The runway length recommendation is to initially develop the runway to a 'General Utility, Stage I' length of 3,800 feet but to ultimately extend it to 4,400 feet to more adequately satisfy the accelerate-stop distance requirements for aircraft with 10 seats or more . . . (air taxi and commercial operation).

(1989 Airport Master Plan at 4.16). The need for 4,400 feet – based on air taxi and commercial operation needs – is directly contrary to what the Reports now claim, and what Supervisor Judy Arnold confirmed with staff at the January 10, 2012 hearing. But the Master Plan's own analysis supports the case that the fleet mix and usage would change as a result of the 1,100 foot extension.

Based on a runway length of 4,400 feet and various aircraft flight manuals, the following is a sampling of planes that could reasonably use the expanded runway:

Aircraft	ARC	Maximum Take-Off Weight	Take-Off Length	FAR 36 Noise Level-Approach
CJ1+ Cessna 525	B-I	10,600 pounds	3,250 feet	82 dBA
LearJet 24F/31A/25D/23/40/45	C-I	13,000 – 20,500 pounds	3,300–4,350 feet	90–100+ dBA
Citation II	B-II	13,300 pounds	3,450 feet	80 dBA
Saberliner 60	C-I	20,200 pounds	3,500 feet	95 dBA
Citation XLS+	B-II	20,200 pounds	3,560 feet	93 dBA
BeechJet 400A	B-I	16,100 pounds	3,950 feet	91 dBA
Saberliner 80	C-II	24,500 pounds	4,380 feet	91 dBA

As demonstrated by the above chart, it is clear that larger, louder aircraft could be serviced by the extended runway. Therefore, an appropriate noise level and environmental impact analysis must be done to consider the impact of a fleet mix change.

3. Flaws in the Noise Impact Analysis. The current analysis of noise level and environmental impact is inadequate. It fails to consider the impact of the larger jet usage once the runway is extended. The purpose of the analysis should be to try and determine the worst case scenario so that any noise level disturbances can be appropriately mitigated. Since two current airport users state that they will purchase and use larger airplanes at Gnoss Field with a longer runway, a proper noise analysis must be done.

The noise impact analysis is based on sketchy radar data of takeoffs and landings from 2007 instead of more recent actual data, supplemented by self-serving undocumented "discussions" with local airport staff and users. It is also premised on the unsupported assumption – critiqued above – that extension of the runway to 4,400 feet will not lead to any change in the fleet mix. Even

with the current fleet, the Reports document dozens of over-flights of jets and prop planes disturbing the residential areas to the south of the airport, many at the critical disturbance level of 65 decibels or higher. This is summarily dismissed as follows:

> The noise generated by pilot over-flights is not a direct impact of airport operations since airport approach and departure protocols are designed to avoid aircraft over-flights of residential communities. Accordingly, noise resulting from aircraft over-flights is directly related to individual pilot behavior and [are not due to the airport and] therefore, the noise impacts of the proposed project is deemed less-than-significant. [4.7-32]

This is not well reasoned or supported by the evidence. The Reports document over-flights because there is an airport. As demonstrated above, larger and louder planes will be able to use a longer runway. These larger and louder planes will need to go further out and come in wider on their final approach from the south, especially if another plane is already in the landing pattern. The Reports ignore the significant negative impact of noise, thereby failing to consider necessary mitigation measures. These would include an ordinance that would prohibit approaches to landing from the south which result in noise disturbance in residential areas. This was specifically recommended in the 1989 Master Plan (Exhibit A), and should be considered in any Final EIR/EIS.

4. Failure to consider inappropriate location of the airport. Gnoss Field is located in very close proximity to the Redwood Landfill, wetlands, and a waste water treatment facility. 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 these land uses, in 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 AC in the draft Reports and no consideration is given to the impacts that these land uses might have on an airport extension.

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. Gnoss Field is located on or near all of these undesirable areas. In this circular, the FAA recommends a separation distance of "10,000 feet … for any of the hazardous wildlife attractants." The Gnoss Field expansion would not meet this recommendation as it is less than 5,500 feet from the landfill to the north, and is located on and adjacent to the wetlands and water treatment facilities, respectively. The Reports should address the issue of potential and hazardous air strikes with wildlife.

Additionally, according to the AC, expansions of existing airports into or near wetlands require the preparation of a Wildlife Hazard Management Plan (WHMP).

5. Failure to consider range of reasonable alternatives. Consideration of alternatives is at the core of an EIR/EIS. Under the law, the Reports cannot dismiss readily identifiable alternatives or fail to analyze a reasonable range of alternatives, including those summarized below.

a) A shorter runway extension would meet the stated objective of the project – to better accommodate B-I airplanes - and would substantially lessen the significant environmental impacts of the project compared to Alternative B. A shorter runway extension would reduce noise effects on the surrounding communities and reduce encroachment on surrounding wetlands and wildlife. In fact, Alternative B meets a different objective: to accommodate planes larger than those classified as B-I. It is impermissible to ignore an alternative that better meets the stated objective. In the very least a shorter runway extension would feasibly attain most of the basic objectives of the project and therefore its comparative merits must be evaluated. The conclusory rejection of a shorter runway extension is insupportable.

3.2

b) The 1989 Airport Master Plan itself, as amended by the 1997 update (Appendix K), clearly states that consideration should be given to constructing "a 500 - 1,100 foot extension to Runway 13-31 on the north end." (Resolution No. 97-23, at Exhibit A page 3.) Therefore a runway extension of only 500 feet was within the range of alternatives that the Board of Supervisors itself considered. Instead of considering a shorter runway, which would meet the stated objective of the project, the Reports consider less feasible and more environmentally damaging alternatives of an east-west runway, or extending the existing runway to the south – neither of which was mentioned in the 1997 update to the Master Plan.

3.2

c) The Oakland North Field is not included as an analyzed alternative. A tenant comment letter (Appendix D, page 22) indicates that they utilized the Oakland facility and therefore it is a likely, viable alternative.

3.12

d) Based on the limitations of Gnoss Field being located in numerous Hazardous Wildlife Attractant areas and given its location at sea-level on a flood plain and its susceptibility to future sea-level rise impacts (see below), a runway extension project might be better served at an alternative location. The Petaluma Municipal Airport, located only 10 minutes from Gnoss Field, is likely a better candidate for runway extension due to its existing condition and location. Its current runway length is 3,601 feet. The Reports did not consider extending the runway there to serve the very small percentage of planes that currently use Gnoss and occasionally take off with less than a full tank due to the 3,300 foot runway length – the project's stated objective. The potential benefit derived from investing the proposed amount of money in the Petaluma facility would likely be greater to the regional community than any net benefit (considering all the limitations and wetland impacts) derived from the expansion of Gnoss Field. A true alternative analysis would consider this as an option.

3.13

6. Failure to consider the impact of Global Warming. The Reports are deficient for omitting the impact of impending climate disruption on the proposed project. Sea level rise is already expected to raise SF Bay Area waters at least several feet in coming decades, with even greater rising likely if global carbon emissions from human activities are not curbed or greatly reduced. Gnoss Field, at sea level, is especially vulnerable, and further investment in such a location is arguably unwise. Already documented sea level rise contributes to periodic flooding into parts of the airfield when major storms and high tides coincide.

14.3

Official projections by San Francisco Bay Conservation and Development Council (SFBCDC) and U.S. Geological Survey have documented the extent of expected SF Bay Area sea level rise

owing to climate change; 2009 scenarios range between 16 and 55 inches over the expected lifetime of proposed runway extension. http://www.bcdc.ca.gov/planning/climate_change/index_map.shtml More recent global projections of the onset of global warming indicate that these estimates are conservative and understated. The Reports ignore these data. Governor Brown's 2011 conference on climate change and adaptation explored the anticipated scale of sea level rise and other impacts on the state such as increased frequency and intensity of storms. *See* http://www.gov.ca.gov/ecref.php. *See also* these additional materials that require the need to consider the impact of sea-level rise in the planning process. http://www.scientificamerican.com/article.cfm?id=san-francisco-bay-area-enacts-sea-level-rise-policy; http://baykeeper.org/blog/bcdc-approves-amendment-bay-plan-addressing-sea-level-rise. Impacts of global warming include the future need to build levees, larger dikes, and other engineered structures to protect Gnoss Field. These impacts are reasonably foreseeable and, therefore, must be considered in the EIR/EIS.

14.3

7. Need to Consider Adequately Prior Comments. We submitted letters to the FAA in August 2008 at the scoping stage, requesting that our environmental concerns be addressed in the draft Reports. Our letters, along with many other letters, were included in Appendix B – Public Involvement section of the draft Reports. But none of our concerns from our comment letters to the FAA were addressed in the draft Reports. We request that all the comment letters submitted in 2008 be reviewed and addressed in the Reports as required.

23.4

* * * * *

We respectfully request that you address the above issues before preparing the final draft of the EIR / EIS. Informed public comments and final decisions about the proposed project are not possible because of the deficiencies, missing data, and improper analysis that we have identified.

If you have any questions about this letter, please feel free to call us at 415-892-3620 or 415-209-9616.

Sincerely,

Steven J. Nebb + Sharon L. Nebb

Steven J. Nebb
Sharon L. Nebb
215 Saddle Wood Dr.
Novato, CA 94945

Christopher Gilkerson + Susan M. Mathews

Christopher Gilkerson
Susan Mathews
220 Saddle Wood Dr.
Novato, CA 94945

Gossman

COMMENT FORM

PUBLIC HEARING

GNOSS FIELD AIRPORT – Extend Runway 13/31
ENVIRONMENTAL IMPACT STATEMENT *and concurrent*
ENVIRONMENTAL IMPACT REPORT
January 10, 2012

Welcome to the Public Hearing for the Environmental Impact Statement *and concurrent* Environmental Impact Report for Gnoss Field Airport. Public comments are an integral part of the process. This comment form is provided to receive your input and ensure that your concerns are considered. Please use this form to submit written comments, attaching additional pages if necessary. Either place the form in the comment box, provided here at the meeting, or mail to the address below, by February 6, 2012.

I HAVE BEEN A PRI. PILOT SINCE 1964

EXTENDING THE RUNWAY GREATLY ADD TO SAFETY BECAUSE MOST ENGINE FAILURES OR ~~DEATH~~ OTHER POWER PLANT FAILURES OCCUR DURING TAKE-OFF. IT IS MUCH BETTER TO EMMERGENCY LAND ON THE UNUSED RUNWAY THAN LAND BEYOND IT ~~ON~~ A SURFACE THAT IS ROUGH AND DAMAGES THE AIRCRAFT OR, WORSE, IN WATER.

19.4

Submit comments postmarked by February 6, 2012 to:

Mr. Doug Pomeroy
Federal Aviation Administration
San Francisco Airport District Office
1000 Marina Boulevard, Suite 220
Brisbane, CA 94005-1835
Fax: (650) 872-1430

FROM (Please Print):
Name: SANFORD GOSSMAN
Address: 5 GOLDEN HEIGHTS
APT 208
SAN RAFAEL, CA 94903

415-492-1030
1030

Levy

Facsimile Cover Sheet

To Mr. Doug Pomeroy
Federal Aviation Administration
Fax Phone #(650) 872-1430 Voice Phone #( )

From Dr. Richard Levy

Fax Phone #(415) 899-9769 Voice Phone #(415) 899-9749

Number of Pages Including This Cover Sheet 6 Date 2/6/12
If you do not receive all pages, or need to have document sent again, please call the number indicated above.

Comments

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Thank you.

COMMENT FORM
PUBLIC HEARING
GNOSS FIELD AIRPORT – Extend Runway 13/31
ENVIRONMENTAL IMPACT STATEMENT *and concurrent* ENVIRONMENTAL IMPACT REPORT
January 10, 2012

Welcome to the Public Hearing for the Environmental Impact Statement *and concurrent* Environmental Impact Report for Gnoss Field Airport. Public comments are an integral part of the process. This comment form is provided to receive your input and ensure that your concerns are considered. Please use this form to submit written comments, attaching additional pages if necessary. Either place the form in the comment box, provided here at the meeting, or mail to the address below, by February 6, 2012.

See attached pages:
1) Comments regarding flyovers, noise and lights at Gnoss Field, 2/6/2012 (1 page)
2) Signature Page to "Petition and Comment Letter Regarding Gnoss Field Airport Proposed Extension of Runway and the Project's Draft Environmental Impact Report and Statement" (3 pages)

Submit comments postmarked by February 6, 2012 to:

Mr. Doug Pomeroy
Federal Aviation Administration
San Francisco Airport District Office
1000 Marina Boulevard, Suite 220
Brisbane, CA 94005-1835
Fax: (650) 872-1430

FROM (Please Print):
Name: Dr. Richard Levy
Address: 2516 Laguna Vista Drive
Novato, CA 94945

Comments regarding flyovers, noise and lights at Gnoss Field, 2/6/2012

My name is Dr. Richard Levy. We live at 2516 Laguna Vista Drive in Novato which is just one air mile from the south end of the airport and on the highest ridge near the airport.

4.5 We have lived in the Bahia Ridge area for 14 years and literally made hundreds of phone calls to the airport when an airplane went over our home at a low height and was way off the corridor in which it was supposed to fly. These calls were mostly unanswered or when they were, we were told that the management of the airport would look into this. The flyovers continued, unabated.

Over the years I have become an old man and it is tiring and burdensome to continue making calls that have no beneficial outcome. And yes there are one or two pilots who continuously cut over our home in an effort to decrease flight time by one to two minutes. I cannot see well enough to read any numbers on the planes wings to report some of the infractions.

The Federal Government and the County of Marin have spent a lot of time and energy in trying to redesign the airport. What is missing is any enforcement of standards or policies to stop individuals from flying over our neighborhood.

Volume 2 of the DEIR spends a lot of explanation about Noise and how it will not affect surrounding neighborhoods. That may be true if the planes did not fly over our homes. The point is they do fly over our homes and there is no regulatory control or enforcement over them.

16.2 Our third and last point concerns airport lighting. The beacon lights from the airport do shine in our bedrooms despite what has been written in your proposal alternative B as well as in alternative A. What can you do to abate this nuisance and intrusion?

Thank you for your attention in addressing our concerns.

Petition and Comment Letter Regarding Gnoss Field Airport Proposed Extension of Runway and the Project's Draft Environmental Impact Report and Statement
Signature Page (continued) – Signatures Collected After January 10, 2012

Signature: Richard E. Levy	Signature:
Printed Name: Richard E. Levy	Printed Name: Rosario Carr-Casanova
Street Address: 2516 Laguna Vista Drive	Street Address: 2516 Laguna Vista Drive
City, State, Zip Code: Novato, CA 94945	City, State, Zip Code: Novato, CA 94945
Email Address: drrl@comcast.net	Email Address: drrl@comcast.net
Signature:	Signature:
Printed Name:	Printed Name:
Street Address:	Street Address:
City, State, Zip Code:	City, State, Zip Code:
Email Address:	Email Address:
Signature:	Signature:
Printed Name:	Printed Name:
Street Address:	Street Address:
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Email Address:	Email Address:
Signature:	Signature:
Printed Name:	Printed Name:
Street Address:	Street Address:
City, State, Zip Code:	City, State, Zip Code:
Email Address:	Email Address:

COPY - Petition and Comment Letter Regarding Gnoss Field Airport Proposed Extension of Runway and the Project's Draft Environmental Impact Report and Statement Submitted at the January 10, 2012 Public Hearing

Dear Supervisors Arnold, Adams, Kinsey, Sears, and Rice:

We are residents of the communities just south of Gnoss Field Airport. We petition you as the elected leaders of Marin County, the sponsor of the proposed project to extend the runway at Gnoss. We have significant concerns about the 1,100 foot length of the proposed runway extension. The longer 4,400 foot runway will enable larger jets to land at higher speeds, requiring a more direct landing angle from the south (over our homes), and at higher decibel levels. 2.1

Before we list our specific concerns and requests, we want to make clear that we are not against the airport or our local pilots who, by and large, try to avoid flying over our homes. In fact, we do not oppose 5 of the 6 elements of the proposed project necessary to make the airport safer. This includes extending the runway safety areas to 240 feet on each end, extending the taxiway to the full length of the runway, realigning or extending the drainage channels and levees, and reprogramming the navigational aids. We also would not oppose a shorter extension of the runway itself, with appropriate noise mitigation measures. However, extending the runway a full 1,100 feet will have a significant unavoidable noise impact on our homes and families and affect our quality of life. 1.5 3.2 4.13

Even with the existing 3,300 foot runway, the Draft EIR documents dozens of over-flights of our homes as part of the (we believe inadequate) noise disturbance monitoring study for the report. We can attest that this occurs on a frequent basis, despite the voluntary noise abatement guidelines the airport communicates to pilots. The over-flights occur at low altitude, just a few hundred feet above our roofs. The impact is jarring, creating a disturbance in our lives that can last long after the plane turns north for a landing. It disturbs children playing, babies sleeping, neighbors talking, and people trying to work in their yards or even inside their home offices. When a jet is "cutting the corner" over one of our homes to head to the runway, it seems dangerous. The impact and disturbance also affects our (and many other Marin County residents) use and enjoyment of the open space trails between our homes and the airport. 4.5

This noise disturbance is totally dismissed in the Draft Environmental Impact Report and Study ("EIR") through the use of bad data, unsubstantiated assumptions, and faulty logic. We respectfully ask you to:

- Consider, and direct the environmental consultant to consider, the alternative of a shorter runway extension, one that meets but does not exceed the basic requirements of Gnoss' current and proposed "B- I" general aviation airport classification. After consulting with pilots and aviation experts, we believe that, based on information in the Draft EIR itself and in the FAA's own mandatory Advisory Circular, the necessary runway length to meet the stated purpose of the project is only about 3,500 feet. It is not sufficient for the Draft EIR to claim summarily that "local conditions" require the extra 900 feet without more reasoned analysis. 3.3

- Consider, and direct the environmental consultant to consider, the impact of additional jets that will be able to takeoff at Gnoss if the runway is extended to 4,400 feet, with either a maximum or below maximum takeoff weight (which is how most planes fly anyway). The Draft EIR claims – without any substantiation – that the extra 1,100 feet of runway will not result in any additional or larger jets using Gnoss. This defies logic. In fact, the only two current airport users the Draft EIR notes as needing a runway extension are business jet owners. They themselves claim they want the extension to land bigger jets (including a Lear) at Gnoss. See Draft EIR, Appendix D, Attachment 1. 2.1

- Identify which "current airport tenants" are required to reduce fuel, passengers, or cargo as the result of the 3,300 foot runway, and how often. The Draft EIR states that only a very small percentage of the home fleet is jets. Nonetheless the report claims that the "existing 3,300 foot runway is insufficient to serve a majority of the airport's fleet mix under most conditions," and that 3,300 feet "severely limits most of the aircraft in the fleet." (Draft EIR at 2-2 and Appendix D.) If true, the report should document how many of the approximately 45,000 departures a year were limited in terms of takeoff weight, the type of jet, destination, and where the jet had to stop short to refuel. (The Draft EIR indicates this number may be as low as 3% of all takeoffs, and only on a few particularly hot days a year.) Because this is the County's stated purpose for needing the longer runway and spending tax dollars, and we understand it may be up to $11,000,000, please show the public substantiation for these claims. 20.1

- Consider how the runway extension to 4,400 feet relates to or could facilitate the long-planned "Marin Jet Center" or other potential hangar and business developments at the airport. We are not anti-business, but the Draft EIR is completely silent about this possibility and does not consider those impacts. This seems disingenuous. Because we will be impacted by this project, we have a right to know who the proposed project will benefit and how. 22.2

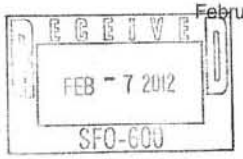
We think the above points properly must be considered in the Draft EIR under California (and Federal) law. But we petition you, as our elected officials and the sponsors of this project, to consider our concerns without regard to only what is necessary to meet bare minimum legal requirements. We ask that you be responsive in the spirit of good, transparent government. Thank you.

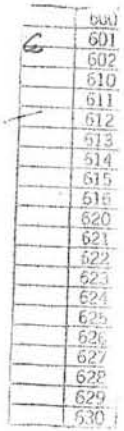
Very truly yours,

See Attached Signature Pages

Mr. Doug Pomeroy
Federal Aviation Administration
San Francisco Airport District Office
1000 Marina Boulevard, Suite 220
Brisbane, CA 94005-1835
Fax: 650-827-1430

February 5, 2012





Re: EIR: Gnoss Field Airport – Proposed Extension of Runway 13/31.

Dear Mr. Pomeroy:

14.3

The referenced draft EIR is deficient for omitting the impact of impending climate disruption on the airfield's runways, expanded or not. Sea level rise is already expected to raise SF Bay Area waters at least several feet in coming decades, with even greater rising likely if global carbon emissions from human activities are not curbed or greatly reduced. Gnoss Field, at or very near sea level now, is especially vulnerable, and further investment in such a location is arguably unwise. Already documented sea level rise has arguably contributed to incursion of sporadic flooding into parts of the airfield when major storms and high tides, particularly king tides, coincide.

Official projections by San Francisco Bay Conservation and Development Council (SFBCDC) and U.S. Geological Survey have documented the extent of expected SF Bay Area sea level rise owing to climate change; 2009 scenarios range between 16 and 55 inches over the expected lifetime of proposed Gnoss Field infrastructure improvements. http://www.bcdc.ca.gov/planning/climate_change/index_map.shtml More recent global projections of the onset of global warming indicate that these estimates are conservative and understated. The DEIR ignores these data. Governor Brown's 2011 conference on climate change and adaptation explored the anticipate scale of sea level rise and other impacts on the state such as increased frequency and intensity of storms http://www.gov.ca.gov/ecrcf.php

Based on these projections, BCDC voted unanimously to propose a development ban on land within 100 feet of the coastline, giving the agency and local jurisdictions a tool to deny permits for development in coastal areas susceptible to flooding. http://www.scientificamerican.com/article.cfm?id=san-francisco-bay-area-enacts-sea-level-rise-policy Rising seas could put as much as 180,000 acres off-limits by 2050, according to state projections. Whether or not Gnoss Field lies within these limits, it is obviously acutely susceptible to flooding and sea level rise. SFBCDC has put Bay Area planners on notice about the need to take climate disruption and sea level rise into account in the planning process, but the DEIR ignores this cautionary notice. http://baykeeper.org/blog/bcdc-approves-amendment-bay-plan-addressing-sea-level-rise

Moreover, expanding Gnoss Field's runway will confirm, promote and likely increase its use by commercial and corporate jet aircraft. Such aircraft are a significant source of carbon emissions, atmospheric carbon and hence contribute to on-going, increasingly severe climate disruption. Fostering more unmitigated development of this significant and increasing carbon source is inconsistent with climate protection and GHG-reduction plans at all levels, including Marin County's own efforts to shrink its carbon footprint. Carbon and other pollution from increasing jet traffic from expanded runways, or simply having more ordinary aircraft engines polluting local airspace and residences, will materially affect Novato's own climate-protection action plan for pollution reduction.

The DEIR should be revised to include consideration of these aspects of carbon-emission-caused climate disruption, present and future; the airport's vulnerability to such impacts; and the inadvisability of funding and building new infrastructure at this location.

/s/

Edward A. Mainland
1017 Bel Marin Keys Blvd.
Novato, Ca 94949
415-902-6365

Mehrten

January 22, 2012

Dear Mr. Pomeroy,

24 I am 100% in favor of the runway extension proposal for Gnoss Field in Novato.

Thank you,

Rod Mehrten

Rod Mehrten
1165 Denlyn St.
Novato, CA 94947

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Nebb

Steven Nebb – Novato, CA 94945
415-892-3620

Introduction

- I have 5 years of experience in providing consulting services to the DOD and FAA
  - project planning and contract strategies,
  - contract negotiation support and
  - Analysis of highly technical engineering change orders in the implementation of various projects.
- I have reviewed the two environmental reports and have concerns about:
  - completeness of the analysis,
  - accuracy of important calculations and lack of support typically provided in similar analysis
- The issues I would like to highlight are:
  - True alternatives not addressed (smaller expansion) 3.2
  - The lack of mandatory FAA procedures (AC 150/5325-4B)
  - Miscalculations of runway length and lack of support for various assumptions 20.9
  - The impact of the extension on fleet mix and usage 2.1

Project Purpose and Needs

- According to the county Master Plan, Gnoss' airport reference code (ARC) is B-I (apx. D page 3); planes that approach at 91 to 121 knots w/ wingspan less than 49' 2.1
  - Objective of the project is to make field compliant with B-I status - 12, 500 lbs.
  - IMPORTANT ; limited to B-I planes lowers length, letters of users to buy bigger planes
- Lack of Data
  - The Cessna CJ1+ (525) is the critical aircraft (not supported with actual data) (apx. D page 3) 20.8
    - Analysis typically using critical design aircraft have supporting data, if not the rely on FAA advisor circular
    - Approximately 3% or 3,000 flights out of 95,000 are weight restricted (page 2-2 of the EIS) 1.3
      - Not necessarily from B-I planes by may include larger planes
      - Weight is an issue for the 525 at the current runway length for temperatures above 78 degrees – 8% of the year
      - Impact on less than 1% of Marin County residents
- With 3,300' no weight restriction for critical aircraft during standard days (apx. D page 15); landing is not an issue either (apx. D page 11) – 1.7
  - For the CJ1+ during hot days planes are restricted by about 680 nm Per Table 8 (apx. D page 16) vs. 776 nm per flight manual; can service entire west coast
  - Average Southwest flight apx. 640 nm

Problems with EIR

- Error in length of runway needed

1. Statement that "based on standard FAA methodology ... length of approximately 4,000 feet" on page 10 of appendix D is incorrect.
   - FAA Advisory Circular (AC) 150/5325-4B – "Runway Length Requirements for Airport Design" is not even considered
   - AC would estimate a 3,500' runway length to accommodate "100 Percent of Fleet"
   - May use airplane flight manuals, but there is no requirement to go beyond AC (page 5 of the AC); Analysis using critical design aircraft are typically done for analysis involving planes greater than 60,000 lbs. or 10 seat+ planes (B-I planes have less) since the circular directs the planner to use the family of planes represented by the graphs provided in the circular document
   - For airport projects receiving Federal funding, the use of this AC is mandatory. David L. Bennett Director, Office of Airport Safety and Standards

20.9 / 3.3 / 20.9

2. Use of larger (B-II) planes in the analysis; 525A and 525B are B-II planes – EIR is in error and classifies these as B-I

20.10

3. Calculation error off by more than 200 feet since the reported figure for the Cessna 525 is for 86 degrees not 82 degrees; 525 – 3,786' vs. 3,990'

20.8

4. Abnormal day which is used to argue for adding 400 more feet, is not defined (and likely negatively correlated with hot days)

20.12

20.12a

To remain within the objectives of the County Master Plan of a filed that services B-I type planes under 12,500lbs. The true alternative of a lesser extension was not appropriately addressed in the reports

3.2

3

Louder and Larger planes

- With 4,400' the following planes could effectively use the facility
  - B-I; BeechJet 400A – Heavier
  - B-II; Cessna 525A, 525B, Citation II, Encore, XLS, V Ultra – Larger
  - C-I; LearJet 23, 24F, 25D, 31A, 40, 45 > Faster & Louder
  - C-II; Sabreliner 80 (60 – C-I)

3.5

- Decibels (approach) FAR 36 noise levels → Louder & More disturbance than Take Off
  - C525 (CJ+) 82 dBA
  - BeechJet dBA 91 dBA
  - LearJets 90-100 dBA
  - Sabreliner 95 dBA

4.17

Feb 4, 2012 **Pack**

Robert Pack
2511 Laguna Vista Dr
Novato CA 94945

Dear Mr. Pomeroy

Re: Gnoss Draft EIR

1.3 Appendix D, page 10 has a serious error in stating "... 3300 ft severely limits most of the aircraft in the fleet departing the airport during standard and hot days...."

This is FALSE.

99% of the aircraft operating out of Gnoss are not limited at ALL, at any time, due to runway length of 3300 ft. Ninety nine percent!

The only aircraft effected are the jets (ie C510, C525). The airplanes make up only 1% (one percent!) of the aircraft based at Gnoss.

All other aircraft (every airplane with a propeller) is not limited by 3300ft under any condition (ie hot day).

2.1 The increase to 4400 ft. will allow many other types of jet aircraft to use Gnoss. There are about 90 different model of business jets, only a handful can use Gnoss now. The increase in jets at Gnoss should be unacceptable to the

19.5 FAA because the FAA's own studies show the most dangerous situation is a mix of jets and general aviation aircraft at an "uncontrolled" (ie no control tower) airport. Gnoss has no control tower.

19.5 The FAA knows the risk of aircraft collisions goes to maximum when jets and general aviation operate in uncontrolled airports.

The runway should NOT be lengthened to 4400' because

1.3 1) It benefits only one percent of the aircraft operation at Gnoss.

20.7 2) Gnoss is primarily used as a student training airport (instructors bring students to Gnoss from all over the area due to its cross winds)

19.6 3) Slow GA and training aircraft are not compatable with jets in an airport environment. The safety of 99% of the aircraft is compromised for a marginal benefit to the 1%

1.3 4) The 1% of the aircraft that will benefit will benefit only a small fraction of the time (Maybe 5%)

1.4 5) When I flew for United Air Lines, we operated from many airports that had lengths limiting over take-off weight under some conditions. You adjust your operation.

3.11 PS Put in the over-run.

Robert Pack

Roell

COMMENT FORM

PUBLIC HEARING

GNOSS FIELD AIRPORT – Extend Runway 13/31
ENVIRONMENTAL IMPACT STATEMENT *and concurrent*
ENVIRONMENTAL IMPACT REPORT
January 10, 2012

Welcome to the Public Hearing for the Environmental Impact Statement *and concurrent* Environmental Impact Report for Gnoss Field Airport. Public comments are an integral part of the process. This comment form is provided to receive your input and ensure that your concerns are considered. Please use this form to submit written comments, attaching additional pages if necessary. Either place the form in the comment box, provided here at the meeting, or mail to the address below, by February 6, 2012.

I am a former military aviator & a Mill Valley resident who keeps a small private aircraft @ Gnoss. My family & I use our aircraft for both business & pleasure.

20.4 Approval of the runway extension project will allow me to operate my aircraft at its maximum (most efficient) range while reducing noise levels to the southern

4.9 neighbors of the airfield by displacing Gnoss operations to the north.

Furthermore, the proposed change would provide an additional

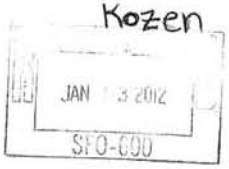
19.4 measure of safety for my wife & twin six year olds who routinely fly with me.

Submit comments postmarked by February 6, 2012 to:

Mr. Doug Pomeroy
Federal Aviation Administration
San Francisco Airport District Office
1000 Marina Boulevard, Suite 220
Brisbane, CA 94005-1835
Fax: (650) 872-1430

FROM (Please Print):
Name: Charles Roell
Address: 33 Birch St
Mill Valley CA 94941

Kozen



Barbara Rozen
10 J. Prandi Way, #1003
San Rafael, CA 94903

January 7, 2012

Doug Pomeroy
FAA
San Francisco Airports District Office
1000 Marina Blvd. Suite 200
Brisbane Ca 94005

Dear Mr. Pomeroy,

13.18 This is re: the proposed expansion of the Gnoss Field. I am concerned about the loss of wetlands and also that low flying planes disturb the migratory birds that over winter at the ponds adjacent to the airfield.

12.4 If the expansion is approved can the pilots be advised to fly in and out on a path that avoids flying directly over the ponds? We are running out of protected areas where these birds can rest and thrive.

10.3 Rush Creek is a popular multi-use path and noise from low flying planes is disturbing to both humans and animals.

Thank you for your consideration of these issues.

Barbara Rozen

Barbara Rozen

CC: Marin County Board of Supervisors

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Silveira Ranches

Anthony F. and Lorraine F. Silveira 2002 Trust
dba SILVEIRA RANCHES
140 Blackstone Drive
San Rafael, CA 94903

Feb 3, 2012

Mr. Doug Pomeroy
FAA San Francisco Airports District Office
1000 Marina Boulevard, Suite 220
Brisbane, California 94005-1835
Sent by Certified Mail and by Fax (650) 872-1430

RE: Impacts of the Gnoss Field Airport Runway Extension on Silveira Ranch Private Property

Dear Mr. Pomeroy,

We are responding to the Draft EIS/EIR for the Proposed Extension of Runway 13/31 at Gnoss Field Airport, Marin County, California.

We own property flanking the 101 Highway north of Novato for several miles. Our most southerly parcels (APNs 125-160-06 and 125-160-12) are bordered on the east by the SMART railroad track, placing them relatively close to the proposed northerly extension of the airport runway.

We are concerned that significant potential environmental impacts to our property have not been adequately addressed and/or mitigated in the Draft EIS/EIR.

4.16

We are particularly disturbed by Exhibits E-8 (INM Flight Tracks – Arrivals) and E-9 (INM Flight Tracks – Departures & Training). Copies of these exhibits are attached. They show a significant concentration of low-elevation flight tracks over our property (parcels 125-160-06 and 125-160-12).

These parcels are used as grazing land for our livestock – meaning that animals are present 24/7 on the property for extended periods of time. (In the future, when some of our land further north is taken by Caltrans for the Marin-Sonoma Narrows project, we will be relying more heavily on these southern parcels.) Cows are easily frightened by dramatic changes in sound or movement; their reaction is to run. The outcome could be devastating from a public

(con't)

4.16

health and safety standpoint if they were to break the pasture fence along Highway 101 and escape onto the roadway. The proposed overflights may also have adverse impacts on the health, well-being and productivity of our dairy herd. This is another potential environmental impact of the Gnoss Field project which is not adequately addressed in the Draft EIS/EIR.

2.1

It appears that the Draft EIS/EIR does not consider the impacts on our livestock with the increased flight tracks over our pasture. It is apparent that flights will be more frequent (due to the projected increase in airport usage by larger aircraft, including noise emanating from new small jet traffic) than what the animals are presently accustomed to.

5.8

Finally, parcels 125-160-06 and 125-160-12 are zoned A2 and can be developed for other, non-grazing uses at some future date. The Draft EIS/EIR also does not adequately evaluate the potential negative impacts of the proposed runway expansion under a future development scenario.

Very truly yours,

Anthony F. Silveira

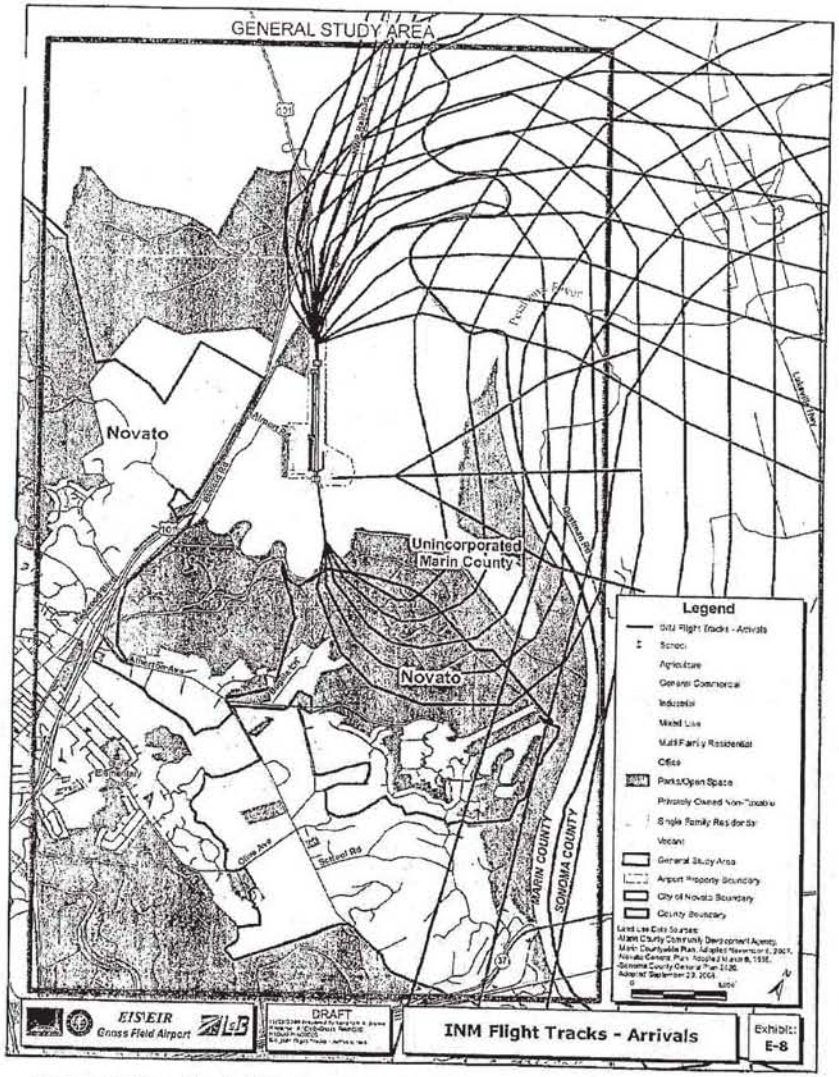
Anthony F. Silveira

Lorraine F. Silveira

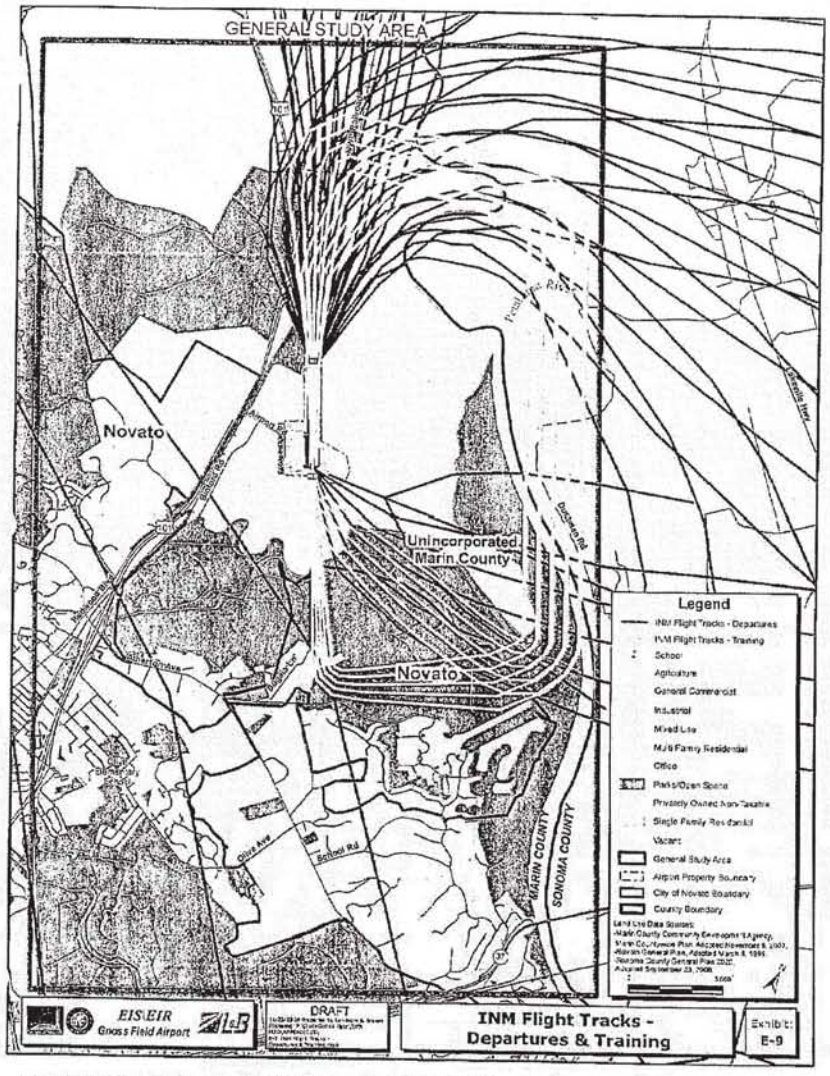
Lorraine F. Silveira

23.7

Please note that our last name is misspelled in the distribution listing on Page 7-19 of Chapter 7 of the EIS: the correct spelling is "Silveira" (not Silvera). The complete name of the trust is "Anthony F. Silveira and Lorraine F. Silveira 2002 Trust."



Attachment to Silveira Ranches Feb 3, 2012 Response to Draft EIS/EIR: page 1 of 2



Attachment to Silveira Ranches Feb 3, 2012 Response to Draft EIS/EIR: page 2 of 2

February 6, 2012

Mr. Doug Pomeroy
Federal Aviation Administration
San Francisco Airport District Office
1000 Marina Boulevard, Suite 220
Brisbane, CA 94005-1835

Fax: (650) 872-1430

By Fax and US Mail

RE: Gnoss Field Airport – Proposed Extension of Runway 13/31

Dear Mr. Pomeroy:

We are residents of the Rush Creek community just south of Gnoss Field Airport. This is a comment letter, based on a petition signed by over 100 residents of Marin County that was sent to the Marin County Board of Supervisors, the sponsor of the proposed project to extend the runway at Gnoss. We have significant concerns about the 1,100 foot length of the proposed runway extension. The longer 4,400 foot runway will enable larger jets to land at higher speeds, requiring a more direct landing angle from the south (over our homes), and at higher decibel levels. The draft EIR/EIS fails to consider this. 2.1

Before we list our specific concerns and requests, we want to make clear that we are not against the airport or our local pilots who, by and large, try to avoid flying over our homes. In fact, we do not oppose 5 of the 6 elements of the proposed project necessary to make the airport safer. This includes extending the runway safety areas to 240 feet on each end, extending the taxiway to the full length of the runway, realigning or extending the drainage channels and levees, and reprogramming the navigational aids. We also would not oppose a shorter extension of the runway itself, with appropriate noise mitigation measures. However, extending the runway a full 1,100 feet will have a significant unavoidable noise impact on our homes and families and affect our quality of life. 1.5 3.2 4.13

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This noise disturbance is totally dismissed in the Draft Environmental Impact Report and Study ("EIR") through the use of bad data, unsubstantiated assumptions, and faulty logic. Under both federal requirements and the California Environmental Quality Act, the EIR/EIS are required to:

- Consider the alternative of a shorter runway extension, one that meets but does not exceed the basic requirements of Gnoss' current and proposed "B- I" general aviation airport classification. After consulting with pilots and aviation experts, we believe that, based on information in the Draft EIR itself and in the FAA's own mandatory Advisory Circular, the necessary runway length to meet the stated purpose of the project is only about 3,500 feet. It is not sufficient for 3.3

the Draft EIR to claim summarily that "local conditions" require the extra 900 feet without more reasoned analysis.

- Consider the impact of additional jets that will be able to takeoff at Gnoss if the runway is extended to 4,400 feet, with either a maximum or below maximum takeoff weight (which is how most planes fly anyway). The Draft EIR claims – without any substantiation – that the extra 1,100 feet of runway will not result in any additional or larger jets using Gnoss. This defies logic. In fact, the only two current airport users the Draft EIR notes as needing a runway extension are business jet owners. They themselves claim they want the extension to land bigger jets (including a Lear) at Gnoss. See Draft EIR, Appendix D, Attachment 1. 2.1

- Identify which "current airport tenants" are required to reduce fuel, passengers, or cargo as the result of the 3,300 foot runway, and how often. The Draft EIR states that only a very small percentage of the home fleet is jets. Nonetheless the report claims that the "existing 3,300 foot runway is insufficient to serve a majority of the airport's fleet mix under most conditions," and that 3,300 feet "severely limits most of the aircraft in the fleet." (Draft EIR at 2-2 and Appendix D.) If true, the report should document how many of the approximately 45,000 departures a year were limited in terms of takeoff weight, the type of jet, destination, and where the jet had to stop short to refuel. (The Draft EIR indicates this number may be as low as 3% of all takeoffs, and only on a few particularly hot days a year.) Because this is the County's stated purpose for needing the longer runway and spending tax dollars, and we understand it may be up to $11,000,000, please show the public substantiation for these claims. 20.1

- Consider how the runway extension to 4,400 feet relates to or could facilitate the long-planned "Marin Jet Center" or other potential hangar and business developments at the airport. We are not anti-business, but the Draft EIR is completely silent about this possibility and does not consider those impacts. This seems disingenuous. Because we will be impacted by this project, we have a right to know who the proposed project will benefit and how. 22.2

The above points properly must be considered in the EIR/EIS under California (and Federal) law.

Very truly yours,

Jeanette Weber
185 Saddle Wood Dr.
Novato, CA 94945

Duncan and Betsy Ross
190 Saddle Wood Dr.
Novato, CA 94945

Leslie Weber
235 Saddle Wood Dr.
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Weber

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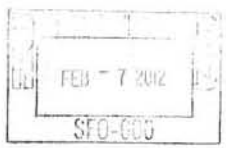

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February 6, 2012

Mr. Doug Pomeroy
Federal Aviation Administration
San Francisco Airport District Office
1000 Marina Boulevard, Suite 220
Brisbane, CA 94005-1835

RE: Gnoss Field Airport

Dear Mr. Pomeroy:

We are residents of Rush Creek, just south of Gnoss Field. We are submitting this letter to raise questions and concerns about the draft Environmental Impact Statement and concurrent Environmental Impact Report (the "Reports") as prepared by Landrum and Brown, December 2011.

After carefully reviewing the reports we have several concerns relating to the completeness and accuracy of the analyses.

According to the Reports, the type of plane suitable for Gnoss Field is a B-I, small aircraft with a maximum take-off weight of 12,500 pounds, up to 49 foot wingspan, and approach speed of 91 to 121 knots. The objective of the project is to make the airport fully compliant for B-I airplanes under all weather conditions.

20.8 The Reports attempt to substantiate the 4,400 feet of runway length as a need to support the deemed Critical Design Plane. The 4,400 feet extension is based on an objective that is not congruent with the current Sponsor's objective and, as indicated in the 1989 Airport Master Plan was for planes with 10 seats or more. The CJ1+ aircraft is not in this category. If the CJ1+ is the

3.3 critical design aircraft, the starting point should have been the lower range of 3,800 feet as stated in the 1989 Airport Master Plan.

3.2 The 4,400 feet extension would be applicable for 10 passenger aircraft. However, no 10 passenger aircraft meets the objectives of the current project objectives of being a small aircraft with a maximum take-off weight of 12,500 pounds or less; nor is the critical design aircraft designed for 10 passengers. Therefore, an alternative using a shorter runway extension should have been considered and it was not.

3.3 The Reports only address alternatives that consider a total runway length of 4,400 feet or the current 3,300 feet. An alternative of 3,500 or even 3,600 feet should be considered in the Reports.

2.1 The draft Reports do not provide any analyses on how the fleet mix and usage would change as a result of the 1,100 foot extension. The Reports state that larger aircraft would not be attracted to the airport and therefore there would be no change in the fleet mix or the usage of the airport (page 2-5).

2.1 This defies logic. If the runway is lengthened by 1,100 feet, larger non-B-1 airplanes could use the airport. Furthermore the draft Reports provide letters confirming that current tenants at Gnoss Field (Appendix D, pages 21-25) would purchase and operate larger jets at Gnoss Field if the runway was

4.8 lengthened to 4,400 feet. Sunset Aviation states that they would add a Beech Jet 400 (B-I with a maximum take-off weight of 16,100 lbs.) and a LearJet (most are C-I up to D-I airplanes) to Gnoss Field if the runway was extended to 4,400 feet. None of these aircraft meet the specifications of the proposed project. All of them are larger and louder airplanes. Airport users have stated that they could use the larger airplanes, thus changing the volume and mix of the fleet at Gnoss Field.

3.10 The 1989 Airport Master Plan states that a 1,100 foot extension is desired to more adequately satisfy requirements for aircraft with 10 seats or more used in air taxi and commercial operations (page 4.16). This further supports the case that the fleet mix and usage would change as a result of the 1,100 foot extension.

4.2 The current analysis of noise level and environmental impact is inadequate. It fails to consider the impact of the larger jet usage once the runway is extended. The purpose of the analysis should be to try and determine the worst case scenario so that any noise level disturbances can be appropriately mitigated. Since two current airport users state that they will purchase and use larger airplanes at Gnoss Field with a longer runway, a proper noise analysis must be done.

23.4 We submitted a letter to the FAA, in August, 2008, requesting that our environmental concerns be addressed in the draft Reports. Our letter, along with many other letters, were included in Appendix B – Public Involvement section of the draft Reports. None of our concerns from our comment letter to the FAA were addressed in the draft Reports. We request that all the comment letters submitted in 2008 be reviewed and addressed in the Reports as required.

4.2 As a homeowner we are very concerned about the possible noise impact due to larger planes using the airport. Already, there are times when the airplanes fly right overhead and you can hear and feel the plane for quite sometime. As stated above, we don't believe the potential for larger planes to use Gnoss Field has been properly addressed, and we have every reason to believe we will be negatively impacted by the increase in the runway length.

We appreciate your prompt attention to our concerns and look forward to hearing from you. If you have any questions or concerns you would like to address with us, please feel free to call us at 415-892-9232.

Sincerely,

Leslie & Chris Weber

Wells

COMMENT FORM

PUBLIC HEARING

GNOSS FIELD AIRPORT – Extend Runway 13/31
ENVIRONMENTAL IMPACT STATEMENT *and concurrent*
ENVIRONMENTAL IMPACT REPORT
January 10, 2012

Welcome to the Public Hearing for the Environmental Impact Statement *and concurrent* Environmental Impact Report for Gnoss Field Airport. Public comments are an integral part of the process. This comment form is provided to receive your input and ensure that your concerns are considered. Please use this form to submit written comments, attaching additional pages if necessary. Either place the form in the comment box, provided here at the meeting, or mail to the address below, by February 6, 2012.

From: Joyce Wells <jflys@earthlink.net>
Subject: **Gnoss Field runway extension**
Date: January 12, 2012 3:20:46 PM PST
To: opinion@marinij.com
re: to Doug Pomeroy - FAA

19.4

The current Gnoss Field has been there since 1968 when there were no home developments South of the field.
I learned to fly there in 1968 and am still at it. As I see it, one of the biggest safety issues for the majority of airplanes flying in and out of Gnoss is the CROSSWINDS that frequently occur and was only briefly mentioned Wednesday. Granted, they probably do not have an environmental impact, but can be a cause for accidents. Extending the runway to the North lessens the severity of the crosswinds, improving safety of take offs and landings, as well as mitigating noise.
The homeowners to the South must also realize that aircraft from other parts of the Bay Area may fly low over the area sightseeing and are never in contact with Gnoss.
Joyce Wells 924-2658
Larkspur

Joyce Wells
N 199KR

Submit comments postmarked by February 6, 2012 to:

Mr. Doug Pomeroy
Federal Aviation Administration
San Francisco Airport District Office
1000 Marina Boulevard, Suite 220
Brisbane, CA 94005-1835
Fax: (650) 872-1430

FROM (Please Print):

Name: Ms. Joyce B. Wells

Address: 21 La Rosa Way
Larkspur, CA 94939-2072

BEFORE THE
MARIN COUNTY BOARD OF SUPERVISORS

Joint Public Hearing with the Federal Aviation Administration on Draft EIS and EIR for Gnoss Field Runway Expansion

MARIN COUNTY CIVIC CENTER
BOARD OF SUPERVISORS CHAMBER
3501 CIVIC CENTER DRIVE
SAN RAFAEL, CALIFORNIA

TUESDAY, JANUARY 10 2012
1:30 P.M.

Reported by:
Michael Connolly

BOARD OF SUPERVISORS

Steve Kinsey, Presiding
Judy Arnold
Kathrin Sears
Katie Rice
Susan Adams (absent)

FEDERAL AVIATION ADMINISTRATION

Douglas Pomeroy, Environmental Protection Specialist

LANDRUM AND BROWN

Rob Adams
Craig Tackabery
John Roberto

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PROCEEDINGS

JANUARY 10, 2012 2:00 P.M.

SUPERVISOR KINSEY: Good afternoon. Our Board of Supervisors is reconvening in open session. We did address three issues in closed session but we have no reportable items.

At this point we are going to take up the matter of the public hearing by the Board of Supervisors and the Federal Aviation Administration as it relates to the Draft Environmental Impact Report and the Draft Environmental Impact Statement for the Gnoss Field proposed 13/31 runway extension. This will be a joint public hearing between our two agencies and we will open our public hearing on the Draft EIR and there will also be an opportunity for the FAA representative, Mr. Pomeroy, to open the public hearing for the Draft EIS.

We will receive the staff report that will benefit all of us and then we will take public comments. And each of our respective agencies will then close the public hearing and give our staff directions to prepare final environmental documents. The FAA will prepare a final Environmental Impact Statement under their protocols, including written responses to both the oral and the written comments that are received during the public comment period and all written responses received during the public review

period.

I'm going to mention that we will keep speaker's comments to three minutes, although we have made arrangements for a group of aviation representatives who have brought several persons to speak to consolidate into one speaker, and that is Mr. Knecht, for five minutes. When that opportunity comes he will be able to speak for five minutes. Three minutes for other speakers. And with that I'm going to ask Mr. Pomeroy if he would like to make any opening comments. Welcome.

MR. POMEROY: Yes, thank you for hosting this joint hearing today. The Federal Aviation Administration appreciates being able to do this in a joint format, both for you and for the public. I just have one brief statement on the commenting style for the FAA, so pardon me while I read this from our guidance documents. But it really does help if you're able to follow this commenting style.

The FAA encourages all interested parties to provide comments concerning the scope and content of the Draft EIS. The comments should be as specific as possible and address the analysis of potential environmental impacts and the adequacy for the proposed action or merits of its alternatives and the mitigation being considered. Reviewers should organize their participation so that it is meaningful and makes the agency aware of the viewer's interest and

concerns using quotations and other specific references to the text of the Draft EIS and related documents. Matters that could have been raised with specificity during the comment period on the draft EIS may not be considered if they are raised for the first time later in the decision process. This commenting period is intended to ensure that substantive comments and concerns are made available to the FAA in a timely manner so that the FAA has an opportunity to address them.

Thanks for bearing with me reading that.

SUPERVISOR KINSEY: Thank you. The speaker cards are available. If you haven't filled out a speaker card, they are available, is that correct?

MR. POMEROY: Yes, just turn them into me.

SUPERVISOR KINSEY: Very good. And then we will take them in the order in which we receive them. At this point I think that we are going to receive our staff report on the expansion of the runway at Gnoss Field.

MR. TACKABERY: Good afternoon, President Kinsey, Members of the Board and Mr. Pomeroy. I'm Craig Tackabery, Assistant Director of Public Works. I'm pleased to be here before you today. It's not often we discuss Gnoss Field at meetings of this type, even though it's been Marin County's airport for 50 years.

The county's interest is in maintaining an

economically sustainable operation at the airport and the airport currently operates with a balanced budget, although there are some areas of deferred maintenance that need to eventually be addressed. From time to time the airport needs to undertake projects to retain current business tenants and users and to attract new tenants and users to remain economically sustainable. The airport serves as an important link in the regional transportation network by providing air travel options for residents and businesses. Extension of the runway has been contemplated in the 1989 airport master plan and the 1997 update. Also included are proposed runway safety area improvements to improve safety at the airport and comply with current FAA standards.

Today's meeting is regarding the Draft EIR and EIS. This work was funded through a grant from the Federal Aviation Administration and the FAA takes the lead in managing most of the process and they have selected Landrum & Brown to prepare the documents for you today. With me today is Rob Adams from Landrum & Brown and Sarah Potter and also our consultant on the county side, John Roberto. And at this time Rob is going use a PowerPoint to give you an overview of the project.

SUPERVISOR KINSEY: Thank you. Rob?

MR. ADAMS: Do you want to dim the lights to make it a little easier to see? Thank you. Okay, so as Craig

mentioned, we have two organizations here and two processes that are occurring. The first is with the County of Marin and there is the preparation of the Environmental Impact Report, which satisfies the state environmental requirements or CEQA. The county is the sponsor of the project as well as in terms of the CEQA sponsor as well. The Federal Aviation Administration are leading the Environmental Impact Statement, which is dealing with federal environmental guidelines and we refer to that as NEPA, those are the federal guidelines.

As Craig mentioned, Landrum & Brown who I represent, we were hired by the FAA to prepare the EIS and also by the county to prepare the Environmental Impact Report. We have been able to run these two different studies along virtually the same process, though deferring to each process where we have needed to. And you can see some of the highlights here. I'm not going to go through each one of these for you but we were able to at the same time issue a Notice of Intent for the NEPA process as well as a Notice of Preparation to satisfy to satisfy the CEQA process. We held a joint scoping meeting for both processes, both of those occurred back in 2008. And then we are here today holding a joint public hearing for both processes.

Once we get past this step in the process things will start to diverge a little more. And, you know, as you

are aware after this meeting today then a final EIR will be prepared. That will be circulated, made available, there will be another hearing that is specific to the project itself, and then the certification step will occur. So the purpose of the public hearing today is really to receive public comments on the adequacy and the completeness of both the Draft EIS as well as the Draft EIR.

So let's get more familiar with the airport. There is one runway at Gnoss Field, it's 3300 feet in length. There are roughly 95,000 takeoffs and landings that occur at the airport each year. Most of the aircraft takeoff towards the north and land from the north and that is done to avoid the residential areas that are located to the south of the airport. There is a system of levees that are around the airport, one of which is very close to the airport and then there are others east of the airport. Their primary function is to protect the airport and the runway from flooding issues from the Petaluma River and the basin area there.

The county identified one primary need for the airport in conducting this study and that was for sufficient runway length. The existing runway at 3300 feet limits the ability of some of the aircraft to operate at what we would call their optimum weight or to get their maximum efficiency. That requires pilots to restrict weight when

they takeoff and how they do that is either they reduce fuel or they reduce passengers or cargo on the aircraft. So from an efficiency standpoint that requires either bringing in multiple aircraft or they may have to make multiple trips to accommodate and fulfill the trip that they would like to have. So with that the county then identified the proposed project.

And I'm going to flip to the next slide just so you can see it graphically, it's probably a little bit easier than seeing it on the text. The primary element is the extension of the runway to the north 1100 feet. It would bring the total length of the runway to 4400 feet. There also would be a taxiway extension that would occur to accommodate aircraft moving to the end of the runway as well as extending the existing levee and drainage ditch system that are currently around the end of the runway, those would also have to be relocated and extended. What is not shown on this exhibit here is there are navigational aids out there which help aircraft land on the airport, it's a lighting system. Those would have to be relocated and reprogrammed as part of the process as well. And then finally, off of each of the ends of the runway there would be an extension and a widening of what is called the runway safety areas. And these are just protective areas in case an aircraft were to roll off the end of the runway, those

would be expanded from the current length today.

We considered a number of alternatives to date as we prepared the draft studies, one of which is shown on here, which we call Alternative A, which is the no action. This essentially is that we leave the airport exactly as it is today. We also have an Alternative B, which is the proposed project. And, again, that's an extension of the runway 1100 feet to the north. We had an Alternative D, which also extended the runway by 1100 feet but it accomplished this by splitting that extension 860 feet to the north and 240 feet to the south. These three alternatives, A, B and D, were carried forward in the Environmental Impact Statement and were fully analyzed in terms of environmental impacts and their operational impacts as well.

There was one alternative that we rejected. We analyzed it at the beginning and then rejected it from further consideration, and that was to extend the runway to the south by 1100 feet. This was not carried forward in either the EIS or the EIR because there were greater wetland impacts. There were some operational issues in terms of aircraft actually being able to use that extension fully, it brought aircraft closer to the residential areas to the south, and there was just a higher cost because of mitigation costs as well as some of the construction issues that exist down to the south of the airport.

At this point I'm going to go through a couple of the categories of environmental impacts that we heard concerns about at the public scoping meetings. There are three of the categories in particular and the first one is noise. The way that we describe noise is called the Community Noise Equivalent Level or CNEL. These are standards that are used throughout the industry for describing specifically aircraft noise. The federal standard is 65 dB of CNEL. If you are exposed to that level of noise or greater than you are considered significantly impacted. The county's threshold is lower than the federal standard and is 60 dB of CNEL. So we looked at both of those, the 65 in the EIS and 60 in the EIR.

Currently there are no homes around Gnoss Field that are exposed to either the federal standard or the county standard of 65 and 60, respectively. What the analysis found when we looked at it was that with the project there would be no homes within the 65 CNEL or the 60 CNEL. So there would be no change in terms of the number of homes that fall within these areas. I think the bottom line is that the project would not specifically change flight paths from what currently exists today. If anything it might actually allow the aircraft to be a little bit higher if they are departing to the south and they may actually be able to turn a little earlier than they currently do. But

in general this really doesn't change where the aircraft are flying today.

The next category was wetlands. And obviously with the no action there would be no wetland impacts. With the proposed project, which again is Alternative B, there would be 11.83 acres of wetlands impacted. With Alternative D there would be 12.73 acres of wetlands impacted. So Alternative B, the proposed project, actually has fewer impacts than the other alternative that we carried forward through both of the studies. But with impacts to wetlands we recognize that there is going to have to be mitigation that would come into play. The Draft EIS and Draft EIR both identified some sites that provided some feasible options for wetland mitigation. And currently there is consultation that is occurring with the FAA and the Corps of Engineers and the county in terms of trying to finalize the wetland plan before the final documents are put together.

Threatened and endangered species, both studies concluded that it was unlikely that there was going to be any taking of threatened and endangered species, meaning no specific species would be directly taken. However, there were habitat impacts that were identified in the study. Again, with the no action, with no changes to the airport there would be no impact. With the sponsor's proposed project we had - and we've divided this into two types of

impacts, permanent and temporary - permanent impacts, which is really the area of where the new pavement would be built, would result in roughly 6.88 acres of wildlife habitat removal. The temporary removal area of 16.05 acres of habitat is the area that we would call construction staging. So where, you know, the bulldozers are parked and they are putting dirt and other materials, those areas we would anticipate would revegetate and come back to their natural state at some point.

But in any case there would be mitigation that would be required - I'm sorry, I skipped over Alternative D. Alternative D's permanent removal area was 8.24 acres and the temporary removal area was 18.43 acres. Again both of those are greater than the proposed project.

Now back to mitigation, there were several options identified in both the Draft EIS and the Draft EIR for mitigation opportunities. And both the FAA and the county are currently working with the Fish and Wildlife Service as well as some state agencies in terms of nailing down the exact mitigation sites and ratios and things of that nature.

So there are a number of other categories that we looked at. There is probably on the order of 18 or so those listed on the screen. And I apologize for the formatting there. But in terms of all of those categories, both documents concluded that there were no significant impacts

for these categories there.

Okay, so the next steps in the process. The documents were published at the same time. They were published in late November and were put into the libraries at the airport and also on the website, there is a website there if people are interested in going to the website, it's listed. There are three ways that people can make comments on the Draft EIS and Draft EIR. First is they can come today obviously and make an oral testimony at the hearing today. They also can use this comment form that was passed out to everyone as they came in. And they have two options, they can either fill out this comment form and leave it in the comment box up here or on the back it has Mr. Pomeroy's address and you can fold this form up and you can mail it or fax it to Mr. Pomeroy before February 6, 2012. For those of you in the audience, Mr. Pomeroy's contact information is there as well if you want to write that down. And I'll leave this up for a few moments while we conclude things. Craig?

MR. TACKABERY: That would be the end of our presentation. We would be glad to answer any questions before you take testimony.

SUPERVISOR KINSEY: Thank you. Are there any questions from board members before we open the public hearing?

(No comment)

If not, we will open the public hearing now. This is your opportunity to make oral comments. The public comment period will extend through February 6th of this year and then there will be written responses generated for all the comments received, both for the environmental document at the state level as well as the federal Environmental Impact Statement. I have speaker cards. I'm going to ask anyone who would like to speak to fill out a card. And I'm going to begin first with Steven Knecht, who is a representative of the Gnoss Field Community Association. Welcome, Mr. Knecht.

MR. KNECHT: Thank you, Mr. Chairman. If I may approach with a diagram that will be relevant –

SUPERVISOR KINSEY: You're welcome to provide that to our clerk and that will be fine.

(Mr. Knecht hands the document to the clerk, who distributes it to the board.)

MR. KNECHT: Also before I start, we have a number of members of GFCA, both pilots and non-pilots, who have taken their time to come today to show support for the EIR's conclusion and the runway extension project. I was wondering of we could take just one second to have them stand and be recognized.

SUPERVISOR KINSEY: Absolutely. Please stand and be

accounted for.

(Several persons in the audience stand up.)

All right.

MR. KNECHT: Thank you.

SUPERVISOR KINSEY: Thank you all for joining us.

MR. KNECHT: My name is Steve Knecht. I am on the board of the GFCA, the Gnoss Field Community Association. This is a non-profit organization with over 100 direct members and another 100 or so Friends of Gnoss Field. The primary focus of our comments today will be on Section 4.7, the noise section of the EIR. And then we would like to close with several general comments.

It probably comes as no surprise that GFCA supports the long-planned runway extension project to bring Gnoss Field airport into compliance with FAA standards for runway overruns. And GFCA appreciates the concerns of some neighbors to the south of the airport regarding noise from aircraft. However, it may be a surprise that we feel this extension will provide a significant noise reduction for neighbors to the south of the airport, specifically in Rush Creek and Bahia. Section 4.7, page 32, states that the proposed project extends the runway to the north away from residential areas and therefore would not change the aircraft patterns to the south of the airport, as we just heard. However, GFCA believes that there can be a

significant and beneficial change, all be it a consensual agreement among pilots, to have the runway 13 departures, which are the most bothersome for the neighbors to the south, and we believe this change in the consensual agreement among pilots to move the departure to the north of the towers, as we will discuss here in a moment, will result in a greatly increased distance from the homes during the runway 13 departure.

So if you look at the diagram you will see that we are assuming that maximum power used at takeoff in fact creates the most noise for the homes and the departure, not from the south to the north but from the north going towards the homes on runway 13, creates the closest operations to those neighbors. The red line in the upper left quadrant shows the airport runway, the blue line above that shows the runway extension as proposed. And today what you have is the red line departing the runway when you're going from north to south you will see a standard crosswind departure would take the aircraft essentially right into the KCBS towers that there are four of and stand at approximately 400 feet to the east of the runway.

Due to that the pilots tend to depart somewhere between the lines 2a and 2b, that's the tan zone below and to the south of the airport. You notice that that takes aircraft between 2000 and 4000 feet close to Rush Creek and

roughly 1400 to 3800 feet away from the Bahia neighborhood. And perhaps sometimes if they are skirting the edge they may come as close as 1000 feet. Our comment is simply that we have met with the pilots at Gnoss Field, we have reached a general consensus and an agreement that, while the FAA may not change traffic advisories or noise abatement procedures, that the pilots feel that that 1100 foot runway extension to the north will allow them to takeoff earlier, achieve a higher elevation, avoid the towers and keep operations to the north in general for those pilots that are conducting themselves with an awareness of the noise abatement procedures. So we feel that this will provide a greatly reduced potential for noise to the neighbors to the south. We can assure you that GFCA will work diligently to educate pilots about how this 1100 foot move to the north can help reduce the noise and make us better neighbors with the neighborhoods to the south.

(con't) 4.19

I have three small comments that may come up today that I just want to briefly explore and say that we know that the idea of a jet center was proposed about a decade ago for Gnoss Field but we want the public to understand that that 50 acre proposal is not this proposal, this is not a jet center proposal, and that the adjacent land, should that ever come forward again, would have to have its own EIR process and it takes a long time, as this process. Will

22.2

there be more and larger jets because of a runway extension? Well, it makes sense that neighbors would be concerned about this and GFCA would like to extend an invitation to the neighbors and interested parties to discuss with them why Gnoss Field will probably never be use for commercial scheduled operations. But we don't have time for that today but we extend that invitation for discussion with the neighbors.

2.6

Regarding increases in charter jet traffic, no matter the length of the runway one can theoretically conclude that there will be an increase in the number of jet types that can land at Gnoss Field with this runway extension. However, jets do not conduct flight operations based on opportunity, rather jet operations are based on economic demand. That is, there is no unmet need today in Marin County and the frequency of operations directly matches and is driven by the current demand. Whether or not the runway is extended, if the demand increases for more charter and jet traffic it will occur even on today's runway. If the demand is there it will increase.

2.7

Will there be an increase in jet size? There is a reason that business jets are designed generally with six to eight passengers. Manufacturers have studied the usage and how many people go on business meetings and the six to eight passenger jet meets most of the private and business user

2.1

needs. It's for this reason that most business delegations traveling into and out of Marin will remain less than eight passengers. With this runway extension they may be able to land jets of 10 or 12 but the need may not be there and probably won't be there.

Last ten second comment, we appreciate the runway extension as pilots because of the increases it will achieve in safety and we believe that the runway extension will clearly provide an increase in safety for all pilots and aircraft using Gnoss Field, providing the FAA compliant overruns, greater runway length will assist pilots with aborted takeoffs, emergency operations, avoidance of bird strikes, and obstacles such as the radio towers near the field. Thank you for this opportunity.

SUPERVISOR KINSEY: Thank you. The next speaker is Susan Stompe, who will be followed by Joyce Wells and then Jackie Bonner.

MS. STOMPE: Thank you. Susan Stompe with the Marin Conservation League. Our comprehensive comments will be in before the 6th. But I had a couple of questions in advance of our sending a formal letter. One has to do with a request that we had made rather strongly in our scoping letter that aircraft be identified by model and make as to the full spectrum of aircraft that could use the field with its longer runway. And that was not done. It was stated

that the probability is that the runway would be used by the current fleet and if the fleet increased in size it would be proportionally the same fleet that is there now. Our understanding of CEQA is that you should be looking at the maximum potential for the changes that are being requested. And we feel that was not addressed and we had some concerns about that.

On the wetlands that will be filled, there was not a very thorough description as to what the complexity of wetlands that will be filled, how they interrelate with each other and how they interrelate with the other wetlands that are around.

And the third deficiency that we noticed was that sea level rise was never mentioned. I did not see those words in there. Now, FEMA and 100 year flood zones were addressed but that's a little different than sea level rise. So we would perhaps get some explanation now, but anyway we will have our more comprehensive submission later. Thank you.

SUPERVISOR KINSEY: Thank you. Joyce Wells, Jackie Bonner and then Christopher Gilkerson.

MS. WELLS: I first started flying in April of 1968. The airport was brand new. I am still flying. And the thing about the runway extension that I appreciate most is Gnoss is known for its crosswinds, it's known as one of the

crosswind capitals of the Bay Area. And extending the runway to the north, oftentimes the crosswinds are less there. So to me it's also a big safety issue. I have had to go and land at other airports at other times when the crosswinds have been too severe for me to land. As I say, I've been flying for quite some time. So that's the big safety issue for me, is the crosswind component. And when this airport was first built there were no houses south of the airport.

SUPERVISOR KINSEY: Thank you. Jackie Bonner followed by Mr. Gilkerson and then Rob Pack.

MS. BONNER: My name is Jackie Bonner and I live in Rush Creek on Saddle Wood Drive south of Gnoss Field. And I've lived in Novato since 1968. We, mostly residents of the communities just south of Gnoss Field, are submitting a petition to the Board of Supervisors today regarding the Draft Environmental Impact Report for the proposed extension of the runway at Gnoss Field. Because of the holiday and lengthy EIR reports we only began collecting signatures on Friday but we already have 80 and most of those people couldn't come because it was such short notice for them. Out petition is clear. We do not oppose the airport nor five of the six elements of the project necessary to make the airport safer.

We do object to the full 1100 foot extension of the

runway, which we believe will have a significant noise impact on our homes, families and quality of life. With the existing 3300 foot runway the Draft EIR documents dozens of overflights over our homes. This occurs frequently despite the voluntary noise abatement guidelines the airport communicates to pilots. The guidelines are just that, guidelines. When residents call the airport manager there is typically no response. And our research indicates that a longer runway will result in more jets and bigger jets and additional noise. This noise disturbance is dismissed in the Draft EIR through what we believe is use of bad data, assumptions and logic.

Out petition requests that you, the Board of Supervisors, direct the environmental consultants to, one, consider a shorter runway extension, one that meets but does not exceed the basic requirements of Gnoss Field's current and proposed B-1 designation. From the Draft EIR and the FAA's advisory circular we believe that a runway of approximately 3500 square feet (sic) would meet this purpose. Two, consider the impact of additional jets that will be able to take off at Gnoss Field if the runway is extended to 4400 feet. The Draft EIR claims that this length of runway will not result in additional or larger jets using Gnoss. We believe that this defies logic and current airport users admit they want the extension so that

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they can land bigger jets, all be it not fully loaded. Three, provide a study showing which current airport tenants are required to reduce fuel, passenger load or cargo as a result of the 3300 foot runway and how frequently. The Draft EIR indicates that only about three percent of takeoffs are so affected and we would like an explanation of the rationale for spending $11 million of taxpayer money to benefit so few. Four, the Draft EIR should address the knock-on effects of future development at the airport as a result of extending the runway. The report is silent on this.

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And we request that you direct the EIR consultant to address these four points and trust that you the Marin County Supervisors will consider our requests and do what is best for all the people of Novato and Marin County. Thank you.

SUPERVISOR KINSEY: Thank you. Okay, Mr. Gilkerson followed by Mr. Pack then Mr. Bracey.

MR. GILKERSON: Thank you. We do have copies of the petition Ms. Bonner mentioned that we can give to you. And we are still collecting signatures. My name is Christopher Gilkerson, I live at 220 Saddle Wood Drive in Novato. A number of us will be submitting a more extensive comment letter by February 6th but I wanted to elaborate on a few of the key points in the petition that was just

mentioned: the purpose of the expansion and who it will benefit and the noise impact of this runway extension.

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First, what's the purpose of extending the runway to the full 1100 feet? Well, there is only one cited in the Draft EIR, it's to enable corporate jets to takeoff with full fuel capacity on those few hot days when they plan to travel a long distance, that's it, that's the purpose in the EIR. It's not for emergency preparedness. It's also not to enhance the safety for the current users of the airport. The widening of the runway several years ago served that purpose to compensate for the crosswinds. And the proposed extension of the runway safety areas at each end of the runway and extending the taxi area, two other aspects of this project will also contribute to the airport safety. Now, if you ask any pilot if they want a longer runway, chances are they're going to say yes. It's like asking taxpayers if they want to pay less taxes. But the purpose of the project has to be supported by data. Even those few corporate jets that call Gnoss Field home don't need an extended runway for safety purposes. Today they simply reduce their fuel weight on a few particularly hot days when they want to travel to places like Denver. There is no evidence at all in the Draft EIR indicating how many actual takeoffs have been impacted in that manner.

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A key unanswered question is: Who is the three

percent? The three percent who actually own and use corporate jets from Gnoss Field today. How do their interests weigh against the hundreds of homeowners to the south of the airport who will be negatively impacted by the noise created by any increase in overflights. So these are the interests that have to be balanced and as members of the Board of Supervisors we hope you will balance those interests. Now, one way to do that is by proposing a smaller runway extension. For a B-1 general aviation airport, which Gnoss Field is, the recommended length is about 35000 feet. The Draft EIR makes a critical mistake in not considering that alternative.

As for the interests of Gnoss Field's neighbors to the south of the airport, we accept that from time to time there will be overflights and some noise disturbance. However, our research shows that extending the runway will result in a change in the types and sizes of the jets that can land at Gnoss Field, faster, louder, and they will need a larger approach to land from the south over our homes. Although extending the runway to the north may help reduce overflights from takeoffs, as we heard, it's not going to do anything about overflights from landings that come from the south, that's what our concern is.

Now, in terms of that noise impact, the EIR makes three fundamental flaws. First, it's based on sketchy radar

data from 2007 supplemented by self-serving undocumented discussions with local airport staff and users. Second, it's premised on unsupported assumptions that extension of the runway 1100 feet won't lead to any change in the fleet mix. There is no analysis at all about the fleet mix at airports that today have a runway between 4000 and 4500 feet. Now, although there have been dozens of overflights of jets and prop planes that disturb residential areas, as documented in the Draft EIR, here is how the Draft EIR dismisses those overflights, and I'm quoting:

"The noise generated by pilot overflights is not a direct impact of airport operations since airport approach and departure protocols are designed to avoid aircraft overflights of residential communities. Accordingly, noise resulting from aircraft overflights is directly related to individual pilot behavior and not due to the airport. Therefore, the noise impact of the proposed project is deemed less than significant."

So that's like saying a landfill is not responsible for toxic leaks because people throw away things they shouldn't. It doesn't make any sense.

SUPERVISOR KINSEY: Time, sir.

MR. GILKERSON: And as I mentioned we will be submitting a longer comment letter and we appreciate you

listening to our comments. Thank you.

SUPERVISOR KINSEY: Thank you. Mr. Pack followed by Mr. Bracey followed by Steven Nebb.

MR. PACK: Hi, I'm Rob Pack. I've lived on Laguna Vista Drive for 35 years. I'm against the runway extension, I am for the safety extensions on the end of the runway. I'm going to limit my comments to the technical section in Volume 3. My background is I have Bachelor's and Master's Degrees in Aeronautical Engineering, a Commercial Pilot's License, engineering flight test experience with the United States Air Force, Lockheed Aircraft Company and United Airlines and I own an airplane, not based at Gnoss.

All the discussions that we've just had from the previous speakers have taken the wind out of my sails. I think I would like to point out that one of the only reasons given for doing this expansion, regardless of all the mitigation to accomplish that, is that this only affects about one percent of the airplanes at Gnoss and it probably only affects that one percent about five percent of the time, on hot days when they are taking off at max takeoff gross weight. Now, if you have a charter operation - some things have been mentioned - but you can always takeoff an hour or two earlier or later when the day is a little cooler.

The FAA's own studies have shown that the most

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dangerous situation at an airport is where you have a combination of high speed and low speed aircraft, jets and training aircraft and no control tower. And that's exactly the situation that is at Gnoss now and will be certainly increased. There are approximately 10,000 commercial business jets in operation in the United States. Only a handful can use Gnoss at 3300 feet. If we extend that it only seems like an extra 1100 feet but it opens Gnoss to a big wide world of commercial jets that just can't operate out of there right now. Right, the Gulfstreams may not be able to come in fully loaded and takeoff fully loaded but they can still operate out of there on normal days at normal weights.

I think the thing that was revealing to me was, for the first time I heard the real reason for this whole process and it's money. The county is not making any money at Gnoss. Business aviation, flying is down, they are probably having a lot lower income. I'm not an accountant so now I'm going beyond my expertise. But it would be my guess that the money that they are getting from fuel tax is way down. And of course one of the big items for the aircraft for the income for the airport is the property tax on the airplanes. Now, if you bring in a $20 million business jet that brings in a heck of a lot of property tax compared to a typical general aviation airplane. So I think

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the thing that bothered me the most about this was nobody came out and said, We want to do this, we're going to make a lot of money doing this and we don't think it's going to be too bad. No one said anything about the money. Thank you.

SUPERVISOR KINSEY: Thank you. Mr. Bracey followed by Mr. Nebb and then Bob Spofford.

MR. BRACEY: Clarence Bracey, a Novato resident, Black Point actually. I've been a resident for 42 years. My opposition to the proposed expansion of the Gnoss Airfield runway is based upon the same concerns that prevailed during the 1997 proposal. The rationale at the time was, number one, basically all aircraft create a disturbing and uncontrollable noise nuisance. More and longer corporate jets exacerbate the nuisance. Number two, there will be an ultimate decline in residential property values within the vicinity of the airport facility. Number three, there would be significant degradation of environmental values including safety concerns, i.e., the runway is located within the Pacific Flyway, the Bay Delta Estuary. Migrating birds using the flyway poses a safety hazard to aircraft in flight. Number four, an extended runway permits and invites extended runway use and larger, noisier corporate jets. A crowded flyway is no safer travel choice than crowded freeway travel choice. Thank you.

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SUPERVISOR KINSEY: Thank you. Mr. Nebb, then Mr.

Spofford, then Patricia Capretta.

MR. NEBB: Good afternoon. My name is Steven Nebb, I live in Novato in Rush Creek as well. Thank you for the time to speak and to get our points across, I appreciate that.

Prior to moving the Marin County I lived in Washington, D.C. and I consulted with the FAA and DOD over various topics, some of them being project planning, contract negotiation-type work, and analysis of engineering change orders, highly technical issues. So I have some of the background in this area. I'm not a pilot but at least I've analyzed things. I have also reviewed both reports and have some concerns about the completeness of the analysis, the accuracy of important calculations and the lack of support typically provided in other similar analysis.

According to the master plan from Marin County, Gnoss Field is designated as a B-1 type airport. That's important. The first letter is for the speed of the plane as it approaches the airfield and the second effectively the size, wing span. And so if the goal of the project is to make it safer to land for those planes, that's great. We don't oppose those aspects of the plan like the taxiway and the safety areas. But it doesn't necessarily support the length. One of the major weaknesses is that for any FAA designated project that receives FAA funding there is

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supposed to be the addressing of an advisory circular, Advisory Circular 150/5325-4B, runway length requirements for airport design. If that was addressed in the EIR and appropriately reviewed the recommended runway length would have been 3500 feet. The use of other planes, critical designated planes, is appropriate; however, they typically have data to support that. The EIR does not have that data. They also use larger planes that B-1s to support their analysis. The Cessna 525A and 525B are not B-1 type planes, they are B-2 type planes.

So there really is a limited need, as was addressed in a few other comments. It's on page 2-2 of the EIS, 3000 flights out of 95,000 are weight-restricted. This number may be a figure involving larger planes as well, not necessarily B-1 planes. The 525, which is the critically designated plane or design plane, only has an issue when the temperature is 78 degrees or hotter. In Marin County at Gnoss Field that only happens eight percent of the time, the rest of the year there is no issue. The EIR says there is no weight restriction for planes during standard days, that's in Appendix D on page 11. The Appendix on page 16 says that when there is weigh restriction the critically designated plane only has 680 nautical miles. The manual for that plane says the maximum distance is 776 nautical miles. So it really only is an issue if you're trying to

fly in between those two distances, which probably is fairly rare. You can go all the way up to Vancouver, Canada, all the way to San Diego, all the way to Grand Junction, Colorado on 680.

SUPERVISOR KINSEY: Your time is up. If you would like to make any closing comment.

MR. NEBB: Closing comment. If the 4400 feet were put in place I did analysis that showed that larger Cessna planes, B-2 category planes, could effectively use the runway, louder and faster planes, Learjet and Sabreliners potentially could use the runway, too. And that's a very significant concern. Thank you.

SUPERVISOR KINSEY: Thank you. Okay, Mr. Spofford and Ms. Capretta followed by Dr. Richard Levy.

MR. SPOFFORD: Hi, I'm Bob Spofford. I sort of have a leg in both camps here. I'm a board member of a number of environmental organizations and I've spoken to the supervisors a number of times on those issues. But I also am an airplane owner and I've kept a plane at Gnoss for the past 15 years.

Clearly the issue that is driving most of the discussion here is this question of will or won't larger, noisier planes start using Gnoss if the runway extension is built. That actually is addressed pretty unequivocally in the EIR. It says no, they will not. The problem is it's

buried in various sections as sort of a naked one sentence assertion and it's never pulled together. Most of the reasons for that are also buried at various parts of the staff report and the EIR itself. And it's not just the runway length but the runway length basically says even at 4400 feet the vast majority of larger jets, the ones that are in use commonly today - and Sabreliners and Learjets, small Learjets aren't - that those planes still wouldn't be able to use that runway at any kind of, you know, commercially usable weight for them.

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But there are other issues above and beyond just the runway length. We've got an instrument approach that only goes down to 1000 feet, which means that no operator coming in there could reliably plan to land there in any weather the way they can at Napa or at Santa Rosa and there is no fixed base operator, there is no infrastructure on the ground for somebody operating a large jet. So basically they are saying, Well, we can take you to a place with a lovely executive terminal at Napa, or actually two of them at Santa Rosa, or we can take you and sort of dump you in the parking lot at Gnoss and you can find a pay phone someplace and call a cab. That's a pretty large, you know - people who fly around in $50 million jets really don't like to be dumped in the parking lot and pointed toward the phone booth.

All those things are in there someplace but my recommendation for the EIR is that you desperately need somewhere in the executive summary calling out that conclusion. What is the conclusion about larger, noisier jets using that airport, about the runway extension causing any increase in traffic, and then pull out and support that with all the various specific points and make that a section of the report that deals with that issue. Because all these issues about noise and air quality and things like that basically just flow from the answer to that question. So thank you.

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SUPERVISOR KINSEY: Thank you. Ms. Capretta, followed by Dr. Levy, followed by Rich Elb.

MS. CAPRETTA: Good afternoon. My name is Patricia Capretta. I am a resident of Bahia, Novato for several years.

I'm bringing to light a little bit of a different focus. My husband and I believe very strongly in environmental issues and we are quite concerned about the number of planes that could thereby come to Gnoss. And, as we all know, December has been the second driest month in history. Let's picture more planes coming in, the impact that it will have on the environment is disastrous. It will impact, it does impact, light hasn't been shed on it fully because it's a big business but it's something that needs to

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be addressed.

A second component is I am also an RN and I have for years - I don't currently do but I was a flight nurse and I had an experience in a flight that I was taking. It wasn't over California, however I flew in a Learjet as a flight nurse and we had a near crash landing. We, thank God, landed at a very small airport but we had no business landing at that type of airport. We basically almost lost our lives and I'm here to say that if I had to do it over again, thank God it was there but it absolutely had no - it should never have happened and we should never have landed at an airport so small. Because we basically ruined the plane, you know, injured ourselves, it's not something I would like to see happen. I have children, there are many children in our neighborhood. We see the planes come and go, we can read the tag numbers on the planes. And it frightens us to think that something coming so low over our neighborhood could, you know, result in a disaster that I experienced.

There was a plane crash years ago in our neighborhood and we certainly don't want to see that happen again. And I know that the planes are supposed to take a current route away from our neighborhood, but they don't. Many, many of them fly overhead. And there is calls made into the management at Gnoss. Nothing happens. And it's a

concern. I would hate to see that happen to anybody in the future. Thank you.

SUPERVISOR KINSEY: Thank you. Dr. Levy, then Rich Elb and that is our final speaker. If anyone else wishes to speak they should fill out a card and get it to our clerk.

DR. LEVY: My name is Dr. Richard Levy. We live at 2516 Laguna Vista Drive in Novato, which is just one air mile from the south end of the airport and on the highest ridge near the airport.

We have lived in the Bahia Ridge area for 14 years and literally I have made hundreds of phone calls to the airport when an airplane went over our home at a low height and was way off the corridor in which it was supposed to fly. These calls were mostly unanswered or when they were we were told that the management of the airport would look into this. There was no change. Over the years I've become an old man and it is tiring and burdensome to continue making calls that have no beneficial outcome. And, yes, there are one or two pilots who continuously cut over our home in an effort to decrease flight time by one to two minutes. I cannot see well enough to read any numbers on the plane's wings to report some of the infractions. Not only are they the consistent pilots but there's new pilots who don't follow the policies.

The federal government and the County of Marin have

spent a lot of time and energy in trying to redesign the airport. What is missing is any enforcement of standards or policies to stop individuals from flying over our neighborhood. Volume 2 of the DEIR spends a lot of explanation about noise and how it will affect surrounding neighborhoods. This may be true if planes did not fly over our homes. The point is, they do fly over our homes and there is no regulatory control or enforcement over them. You have not taken a macrocosmic look but a microcosmic look, just looking at the airport not the other areas when a plane goes off its course, which happens very often.

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Our second and last point concerns airport lighting. I will quote the Environmental Impact Statement about lights.

> "It is possible that the residents at the highest points of the residential area may be able to see the PAPI lights but given the angle and the distance these lights would not be intrusive."

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Well, come to my home, they are intrusive. Not only are those lights intrusive but the beacon lights from the airport do shine into our bedrooms, despite what has been written in your proposal Alternative B as well as in Alternative A, the no impact. What can you do to abate this nuisance and intrusion? Thank you for your attention in addressing our concerns.

SUPERVISOR KINSEY: Thank you, Dr. Levy. Rich Elb and then I believe we did receive one additional speaker card. Thank you, Craig. Mr. Elb followed by Kirk Heiser.

MR. ELB: Good afternoon. My name is Rich Elb, I live at 2304 Laguna Vista and I have been a Bahia resident for 40 years, I own two homes there. I've lived on Laguna Vista for over 20 years. I am also an airplane owner and a pilot that flies out of Gnoss Field. The airplane that I fly is a small airplane, it's not a jet, but I have been a corporate pilot and I've flown small jets in and out of Gnoss Field.

For the most part, all the pilots that fly in and out of Gnoss Field try to adhere to the - or do adhere to the noise abatement procedures. Occasionally when aircraft come from other venues, it could be Half Moon Bay, it could be, you know, from Idaho somewhere, they don't get themselves up to speed possibly as to the flight areas that they should be flying over and occasionally there is an overflight and sometimes it's over my house. And that doesn't make me any happier than any of the other residents that are non-pilots. But basically we formed the Gnoss Field Community Association to try and educate and spread the word so we could be better neighbors with our Bahia and Rush Creek residents. We've only been in existence for about a year and a half now and we're trying to get the word

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out because we want to be good neighbors.

And as far as from the pilot's side of it, I do believe that this runway extension will be a safety feature for us pilots. The crosswinds in the summertime can be quite severe. People still try and maneuver their airplanes and land in these crosswinds. With another thousand feet for the landing aspect of it, it would take us a little bit further away, we could land further down the runway where the crosswinds are less severe and that would be a safety factor. As far as the noise goes, taking off on 13, which is the designated runway to takeoff and to the south, I believe that we would be turning out sooner and bring the noise further to the noise and not bother our neighbors in Rush Creek and Bahia.

So basically that's what I have to say and we'll see how it goes from there. Thank you.

SUPERVISOR KINSEY: Thank you for your comments. This will be our final speaker, Mr. Heiser.

MR. HEISER: Thank you. My name is Kirk Heiser and I am a Novato resident, I'm a pilot, I live out one mile off the end of Runway 31. I've lived there for 22 years.

I just wanted to state that I have never had issues with sound whatsoever. The aircraft have never been a problem. I fly out of Gnoss and with this extension it will improve the overall safety for the residents and I think it

will reduce the sound levels. And I'm out of time for my parking so I will wish everybody good day. Thank you.

SUPERVISOR KINSEY: All right, you've got to fly. Okay, with that I will close the public hearing for this and offer the opportunity for Mr. Pomeroy to make any comments that he may wish to at the end of this, if you choose to. Is there anything you would care to say?

MR. POMEROY: No, nothing further other than closing the federal hearing.

SUPERVISOR KINSEY: Okay, so both the federal hearing and the CEQA hearing for our board have been closed. In terms of next steps, I'm looking if there are any comments that any board members wish to make at this time, beginning with Supervisor Arnold.

SUPERVISOR ARNOLD: Thank you. First, Craig, there was a statement made that said "Ga-Noss" and it is "Ga-Noss", right?

MR. TACKABERY: Yes.

SUPERVISOR ARNOLD: I knew that. Okay. Gnoss will probably never be used, probably never be used for commercial aircraft. I want to ask you to clarify, it's my understanding that commercial aircraft is absolutely not an option, is that correct?

MR. TACKABERY: I will look to somebody else to - that's my understanding but we have some other experts in

the room.

SUPERVISOR ARNOLD: Great.

MR. TACKABERY: Maybe somebody else wants to reply about this.

MR. POMEROY: Are you asking about scheduled commercial service?

SUPERVISOR ARNOLD: Yes.

MR. POMEROY: That would require Marin County to pursue that and seek an Operating Certificate under Part 139 for the airport, of our federal regulations.

SUPERVISOR ARNOLD: Thank you.

Then I just would like to thank everybody who came today to comment on this project. I think a lot of questions were brought up today and many specifics to this project. And I would like to request and have spoken to staff and ask that they come back to the board, to our board, before the final EIR hearing to provide an informational update on the airport. I think as we move through this process it would be beneficial to our board and the public to learn more about Gnoss operations, costs and revenues and the proposed project.

I think it's important also for the public to remember that this hearing today is about the adequacy of the Draft EIR. We are not approving or considering the proposed project at this hearing. And approval of the EIR

is not even an approval of the project. I appreciate all of the people who came here today to comment, all of the concerns and questions that were raised today and that will be responded to in the final EIR.

SUPERVISOR KINSEY: Thank you. There are no other board members who wish to speak. Craig, is there anything that you or Rob or Sarah wish to make any final comments to our board?

MR. TACKABERY: I just want to reiterate that we welcome public written comments through February 6th to Doug's attention.

SUPERVISOR KINSEY: And then it will be perhaps as late as the Fall before we would come back here for final consideration?

MR. TACKABERY: Yes, most likely.

SUPERVISOR KINSEY: Okay, thank you. With that we will conclude the public hearing for both the NEPA and the CEQA process and adjourn. Thank you.

(Hearing adjourned at 3:07 p.m.)