This appendix includes documentation of the public involvement with the general public that was conducted after the publication of the Final Environmental Impact Statement (EIS) and during development of the Supplement to the Final EIS (SEIS).

The FAA prepared a Purpose and Need Working Paper in 2015 and issued that paper for public comment in April 2016. Based on comments received on the April 2016 Purpose and Need Working Paper, the FAA prepared the Updated Purpose and Need Working Paper. A public hearing was held on March 20, 2018 to present the Updated Purpose and Need Working Paper and provide the public and regulatory agencies an opportunity to provide comments on information the FAA is considering as it developed the SEIS. Individual and organization comments on the Updated Purpose and Need Working Paper are provided in this appendix as well as responses to those comments. Comments received on the June 2014 Final EIS as well as responses to those comments are also included in this appendix.

The FAA published and distributed the Draft SEIS for public review in July 2019. A public hearing was held on August 22, 2019 to present the Draft SEIS and provide the public and regulatory agencies an opportunity to provide comments on the document. Comments received on the July 2019 Draft SEIS as well as responses to those comments are included in Appendix P-1, Comments Received on the Draft Supplement to the Final EIS, and Appendix Q-1, FAA Response to Comments on the Draft Supplement to the Final EIS.
Comments Received on the June 2014 Final EIS

Responses to Comments

Comments
1.0 JUNE 2014 FINAL EIS

Public comments were received after the Final EIS was published in June 2014. Two separate comment letters were received regarding the document.

Responses to comment letters received are in Section 1.1, Responses to Comments Received on the June 2014 Final EIS. Comment letters received are in Section 1.2, Comment Letters Received on the June 2014 Final EIS.

1.1 RESPONSES TO COMMENTS RECEIVED ON THE JUNE 2014 FINAL EIS

The comments are organized by seven specific topics used to categorize the public comments. These categories are:

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<th>Description</th>
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<tr>
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<td>Don’t agree with FAA finding</td>
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<tr>
<td>2</td>
<td>Noise</td>
</tr>
<tr>
<td>3</td>
<td>Need</td>
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<td>4</td>
<td>Floodplains</td>
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<td>Land Use</td>
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<td>7</td>
<td>Alternatives</td>
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For example, Comment 1.1 was “FAA guidelines used in calculating an appropriate runway length were used/applied incorrectly.” This issue was commented on by Steven J. Nebb. This comment is identified as Comment 1.1, and the response to this comment is shown in Table 1, in numerical order at Comment 1.1.

Readers interested in all responses to public comments on the Final EIS can review Section 1.1, Responses to Comments Received on the June 2014 Final EIS in its entirety. Readers only interested in responses to specific comment letters or statements can use the listing below to review the Section 1.1, Responses to Comments Received on the June 2014 Final EIS for responses to all comments received from specific commenter in the order they were made in the commenter's letter.
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<tr>
<th>NAME</th>
<th>ORGANIZATION (IF ANY)</th>
<th>DATE</th>
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<tr>
<td>Kathleen Martyn Goforth</td>
<td>USEPA</td>
<td>8/4/2014</td>
<td>3.1, 7.1, 5.1, 4.1, 1.2, 2.1/2.2, 6.1</td>
</tr>
<tr>
<td>Steven J. Nebb</td>
<td>Nebb</td>
<td>8/1/2014</td>
<td>1.1, 6.2</td>
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Table 1
RESPONSE TO COMMENTS RECEIVED ON THE FINAL EIS
Gnoss Field Airport

To ensure there is no misunderstanding by the reader, the general comment numbers by topic are shown consecutively on the left column of this table.

Table begins on next page
### GNOS Field Airport
#### Supplement to the Final Environmental Impact Statement

<table>
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<th>COMMENT/SUBJECT</th>
<th>COMMENTER</th>
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<tr>
<td>1</td>
<td>Don't agree with FAA finding</td>
<td></td>
<td>The FAA prepared a Purpose and Need Working Paper to update the information regarding the forecasted number of operations, identification of the critical aircraft, and the runway length determination. This was done through a Purpose and Need Working Paper published in May 2016 and subsequently through the Updated Purpose and Need Working Paper published in February 2018. The evaluations in the Updated Purpose and Need Working Paper identified a different critical aircraft than was identified in the 2014 Final EIS. The Updated Purpose and Need Working Paper evaluated the necessary runway length for the new critical aircraft to meet the purpose and need for the project identified in the 2014 Final EIS—allow existing aircraft, as represented by the family grouping of critical aircraft at DVO, to operate without operational weight restrictions under hot weather conditions. The Updated Purpose and Need Working Paper concluded that a 300-foot runway extension would meet the purpose and need for the proposed project for the current critical aircraft at DVO. Therefore, the FAA has prepared this Supplement to the Final EIS to provide an environmental impact evaluation of an additional alternative, a 300-foot runway length alternative, not included in the prior 2014 Final EIS. See Appendix D-1 for the updated Runway Length Analysis.</td>
</tr>
<tr>
<td>1.1</td>
<td>FAA guidelines used in calculating an appropriate runway length were used/applied incorrectly</td>
<td>Steven J. Nebb</td>
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<td>COMMENTER</td>
<td>RESPONSE</td>
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</tr>
<tr>
<td>1.2</td>
<td>Determination of critical aircraft (more runway = more larger aircraft)</td>
<td>USEPA</td>
<td>The stated need for the project was to accommodate existing aircraft. As is discussed in Appendix C-1, demand for use of an airport is primarily determined by the local economy rather than by the length of the runway. Therefore, the assertion that a longer runway will automatically result in more use by larger aircraft is inconsistent with what is typically found in aviation activity forecasts.</td>
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<td>Noise</td>
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</tr>
<tr>
<td>2.1</td>
<td>Post-project noise monitoring and evaluation should continue</td>
<td>USEPA</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>2.2</td>
<td>Include stipulation that if noise levels rise above the 65 A-weighted decibel (dBA) significance level, the Airport's voluntary noise abatement program measures would be made requirements for runway use.</td>
<td>USEPA</td>
<td>Comment noted. This Supplement to the Final EIS includes an updated noise analysis for all alternatives evaluated in the 2014 Final EIS as well as an additional alternative, a 300-foot runway length alternative, not included in the prior 2014 Final EIS. This noise analysis used the current FAA methodologies and thresholds for determining impacts, following FAA Orders 1050.F and 5050.4B. However, no significant noise impacts were identified. See Section 5.1 and Appendix E-1, Noise, for discussion on the noise analysis and the resulting noise impacts.</td>
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<tr>
<td>3</td>
<td>Need</td>
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<td></td>
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<tr>
<td>3.1</td>
<td>Project only benefits small percentage of operators under rare conditions</td>
<td>USEPA</td>
<td>The purpose and need for the project is to allow existing aircraft, as represented by the family grouping of critical aircraft at DVO, to operate without operational weight restrictions under hot weather conditions. This is consistent with FAA guidelines for design of airport facilities.</td>
</tr>
<tr>
<td>4</td>
<td>Floodplains</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4.1</td>
<td>Impact to the existing system of ditches and levees that help protect the Airport from flooding should be evaluated and upgraded, as needed</td>
<td>USEPA</td>
<td>Comment noted. Increasing the size of ditches and levees is included as part of Alternatives B, D, and E.</td>
</tr>
</tbody>
</table>
## Wetlands

5.1 The Conceptual Mitigation options included in the Final EIS are too narrow; the project should include a full mitigation project

### RESPONSE

Conceptual mitigation in the 2014 Final EIS was coordinated with the appropriate agencies and complied with all local, state, and Federal requirements, including the Clean Water Act, Endangered Species Act, and the National Historic Preservation Act. See Section 5.10 for discussion on the anticipated wetland impacts associated with the 300-foot runway length alternative, which was not included in the prior 2014 Final EIS. Final mitigation measures associated with a Clean Water Act, Section 404 permit will be prepared when Marin County chooses to complete the Clean Water Act permitting process for the project.

## Land Use

6.1 Discuss/resolve the inconsistency of the proposed action with FAA bird-strike hazard mitigation guidance

### RESPONSE

Section 5.9 of the Supplement to the Final EIS discusses the Redwood Landfill (RLI), FAA guidance on bird strikes, and the measures in place to reduce the potential for bird strikes. The Redwood Landfill (RLI) currently operates under a permit from Marin County Environmental Health Services, which was designated by the California Integrated Waste Management Board as the solid waste Local Enforcement Agency. This permit includes responsibilities of the landfill that include measures to reduce bird attractants. There have been no reported incidents of bird strikes associated with the RLI.
### COMMENT #  COMMENT/SUBJECT  COMMENTER  RESPONSE

<p>| 6.2 | DVO is incompatible with its surrounding environment/land uses | Steven J. Nebb | The commenter suggests that DVO is incompatible with its surrounding environmental features, including wetlands. The 2014 Final EIS disclosed impacts to the surrounding environmental resources and developed a conceptual mitigation program to offset those impacts. The commenter also suggests that DVO is incompatible with surrounding land uses. The existing zoning and land use of the properties adjacent to or in the vicinity of Gnoss Field Airport are compatible with normal airport operations, as described in the 2014 Final EIS Section 5.2 - Compatible Land Use on page 5-17. Furthermore, a land assurance letter provided by the Marin County Community Development Agency states that the existing zoning will be maintained to ensure that land adjacent to or in the vicinity of Gnoss Field Airport in Marin County is compatible with normal airport operations. The land assurance letter remains valid for the purposes of this Supplement to the Final EIS. Therefore, DVO is compatible with surrounding land uses and will continue to be compatible with normal airport operations. |</p>
<table>
<thead>
<tr>
<th>COMMENT #</th>
<th>COMMENT/SUBJECT</th>
<th>COMMENTER</th>
<th>RESPONSE</th>
</tr>
</thead>
<tbody>
<tr>
<td>7</td>
<td>Alternatives</td>
<td>USEPA</td>
<td>Based on this and other comments, the FAA prepared a Purpose and Need Working Paper to update critical information and give the public and agencies an additional opportunity to comment. During this updating process, the FAA determined that the critical aircraft for Gnoss Field Airport had changed to a less demanding aircraft that does not require an 1,100 foot runway extension to meet the purpose and need for the project. As a result, this Supplement to the Final EIS evaluates an additional runway extension alternative, a 300-foot runway length alternative, not included in the prior 2014 Final EIS. See Appendix D-1 for the updated Runway Length Analysis.</td>
</tr>
<tr>
<td>7.1</td>
<td>Recommend evaluating shorter runway extension alternative</td>
<td>USEPA</td>
<td></td>
</tr>
</tbody>
</table>
1.2 COMMENT LETTERS RECEIVED ON THE JUNE 2014 FINAL EIS
August 4, 2014

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

Subject: Final Environmental Impact Statement (FEIS), Gnoss Field Airport Proposed Extension of Runway 13/31, Marin County, California (CEQ # 20140184)

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.

EPA reviewed the Draft Environmental Impact Statement (DEIS) and provided comments to the Federal Aviation Administration on February 6, 2012. We rated the DEIS as Environmental Concerns - Insufficient Information (EC-2) due primarily to the fill of 12 acres of wetlands, the loss of 23 acres of wildlife habitat, and the reduction in floodplain that would result from the runway extension. Because the DEIS indicated the purpose of the runway extension is to accommodate a small percentage of corporate jets that are restricted from operating at full weight on the current runway when under certain weather conditions, we recommended evaluation of a shorter runway extension to reduce the stated impacts while still accommodating all B-1 aircraft landings (DVO is a B-1 airport) in all adverse weather conditions and improving efficiency for some business jets in hot day conditions. The FEIS, which presents the purpose in more general terms, does not evaluate this alternative, stating that only an extension to 4,400 feet will meet the project proponent’s purpose and need. An alternatives analysis is also required for the Clean Water Act Section 404 permit (40 CFR 230.10(a)). EPA will further engage with the project proponent during the 404 permit phase to ensure that all reasonable alternatives have been evaluated as required by the Clean Water Act.

We appreciate the improved discussion of compensatory mitigation options for wetlands impacts in the FEIS in response to our comment. The discussion still incorrectly implies that sufficient mitigation can be obtained solely through payment into a larger restoration effort. The mitigation proposal can fit into a larger plan, but the permittee will need to develop a full mitigation project that includes responsibility for implementation and addresses all the components identified in the Mitigation Rule (40 CFR Part 230, Subpart J). We will work with the project proponent and Army Corps of Engineers to further develop mitigation options during the 404 permit phase.

EPA also commented on the lack of discussion of increased flooding potential from climate change effects, particularly sea level rise, for the airport site, which is located close to sea level within the 100-year floodplain. Since the time EPA reviewed the DEIS in 2012, President Obama signed Executive Order 13653 - Preparing the United States for the Impacts of Climate Change (November 2013). This
E.O. encourages actions by the federal government to enhance climate preparedness and resiliency. The FEIS states that the runway extension project does not include providing flood protection for Gnoss Field Airport in either the short or long term, stating that this is beyond the scope of this EIS and would be handled through other region-wide efforts (p. 5-158). The FEIS adds that “consideration will be given during the impact evaluation to the existing system of ditches and levees that help protect the Airport from flooding” (p. 5-157). This evaluation is not included in the FEIS, and it is unclear when it would be conducted. Without it, the FEIS’s discussion of climate change effects is incomplete. The impact evaluation, once conducted, may reveal that adaptation measures would be needed to improve the project’s preparedness and resilience to the effects of climate change. We recommend that completion of this evaluation be a condition of approval for FAA funding, along with a requirement that the project description be updated to include any necessary upgrades to ditches/levees or other adaptation measures, as necessary to protect the project.

The analysis for induced growth contained the assumption that the runway length extension would not induce an increased percentage of larger aircraft to utilize the airport. The basis for this assumption remains unclear. It also appears to be contradicted by a tenant letter stating that a longer runway would facilitate the tenant’s plans to acquire larger aircraft¹, as well as by a media quote of a pilot stating that an extension would open the airport to some jet aircraft, such as the Learjet and Beechjet lines, that require longer runways. This inconsistency raises questions about the accuracy of the noise analysis. We recommend that the FAA condition its funding to require post-project noise monitoring and an evaluation to confirm the accuracy of noise level predictions, with the stipulation that, should noise levels rise above the 65 A-weighted decibel (dBA) significance level, the Airport’s voluntary noise abatement program measures would be made requirements for runway use. Finally, the FEIS does not resolve our comment regarding the inconsistency of the proposed action with FAA bird-strike hazard mitigation guidance. We recommend this be addressed in the Record of Decision.

EPA appreciates the opportunity to review this FEIS. We would appreciate receiving a copy of the Record of Decision once it has been signed. 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,

[Signature]

Kathleen Martyn Goforth, Manager
Environmental Review Section

¹ The tenant letter stating this is included in Appendix D of the DEIS. It was not found in the FEIS.
August 1, 2014

H. Clayton Foushee
Director, Office of Audit and Evaluation
Federal Aviation Administration
800 Independence Ave., S.W.
Washington, D.C. 20591

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

RE: EIS No. 20140184, Final EIS, FAA, CA, Gnoss Field Airport, Proposed Extension of Runway 13/31,
Review Period Ending: 08/04/2014

Dear Mr. Foushee and Mr. Pomeroy:

Through the acceptance of the Gnoss Field FEIR and EIS No. 20140184, the FAA will confirm a project
that will overspend federal taxpayer dollars and may fund a program that is counter to FAA guidance
provided in its own advisory circulars.

The Gnoss Field proposed extension of Runway 13/31 is to add 1,100 feet (among other safety
modification) to bring the runway to a total of 4,400 feet. However, if appropriate FAA standards are
followed, the calculated runway length for the critical aircraft at Gnoss, the Cessna 525 (type B-I plane),
is much less; approximately 3,850 feet. The FEIR runway length analysis (appendix D), uses a takeoff
field length table that is not completely sourced, and is altered or incorrectly selected to justify the
4,400 feet length. The image of the table does indicate that it is from a wet runway condition, but this is
counter to the FAA requirement to use a dry runway condition (ref. Advisory Circular 150/5325-4C).
Figure 4-330-2 (Sheet 1 of 22) FAA Approved 525FMB-03 provides a length estimate of 3,600 feet at 77
degrees and 4,050 feet at 86 degrees, at the MTOW for the Critical Aircraft of 10,700 lbs. The
appropriate temperature for Gnoss is 82 degrees providing for a required runway length of 3,850 for the
Critical Aircraft. Interestingly enough, the original FEIR utilized the appropriate takeoff field length table,
but rounded the answer up and added 400 feet for unusual weather. When it was pointed out that
rounding up and adding feet for undocumented conditions, was not in accordance with FAA standards,
the FEIR changed the table to again justify the full extension. Based on this set of facts, it appears there
is data manipulation which could affect federal spending, so I thought was appropriate to bring this to
your attention.
Building a runway that is longer than needed or even required following FAA guidelines, is a waste of taxpayers’ money. However, to make matters worse, the circumstances surrounding the G noss Field extension is that a material part of the budgeted $14 to $17 million dollars is for the purpose of wetlands mitigation. In a Board of Supervisors Workshop meeting, it was mentioned by Marin County staff that approximately $8 million is set aside for mitigating the removal of wetlands by the extension. If the extension is rightfully reduced, it stands that taxpayers can save millions of dollars in spending.

Additionally, investing in G noss is a suboptimal project for the FAA to undertake due to the surrounding land at G noss and alternative airport facilities nearby. Petaluma airport is less than a 10 minute drive away and offers much better use of federal money since it doesn’t have issues with the wetlands, water treatment facilities, landfill and strength of soil since it is not built on a marsh. G noss 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 advisory circular 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; G noss 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 G noss 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.

Essentially if G noss was not already existing, it would not qualify for a reasonable location for an air field, according to the above mentioned FAA guidelines. I urge the administration to critically review the accuracy of calculations provided in the runway length analysis, and to consider applying federal funds to a facility that has the ability to truly benefit from the government’s investment and grow as needed. G noss Field is not that asset.

Please respond confirming the points above or provide guidance why they are not correct.

Best regards,

Steven Nebb
Public Hearing
March 20, 2018

Published Notice/Affidavit
Meeting Registration
Presentation
Speaker Registration
Comments/Responses
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BACKGROUND

Port Proposal: Extension of Runway 13/31-

Federal Aviation Administration (FAA)

Environmental Impact Statement and NEPA-

The FAA is proposing to extend the existing runway at Oxnard Airport. The proposed extension would be approximately 1,600 feet long and would accommodate aircraft operations in the vicinity of the airport. The proposed extension would provide additional capacity to accommodate future growth in airport operations.

The FAA is currently seeking public comment on the proposed extension. The public is encouraged to provide feedback on the potential environmental impacts of the proposed extension.

February 13, 2018, for Immediate Release

MEETING NOTICE OF AVAILABILITY AND PUBLIC

STOCKTON COUNTY, CALIFORNIA

GROSS FIELD AIRPORT

EXTENSION OF RUNWAY 13/31

FEDERAL AVIATION ADMINISTRATION

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<tr>
<td>Ken Mercer</td>
<td>23 Calada C. San Rafael</td>
<td>415-378-6504</td>
<td><a href="mailto:mercer.kj@comcast.net">mercer.kj@comcast.net</a></td>
</tr>
<tr>
<td>Ted Pungh</td>
<td>574 Gator Dr Apt 232 - UP</td>
<td>610-714-7161</td>
<td><a href="mailto:Tedpungh@msn.com">Tedpungh@msn.com</a></td>
</tr>
<tr>
<td>Ernie Galatas</td>
<td>998 Bel Marin Keys Plymouth</td>
<td>415-381-4073</td>
<td><a href="mailto:ERNIE_GALAS@GMAIL.COM">ERNIE_GALAS@GMAIL.COM</a></td>
</tr>
<tr>
<td>Tom England</td>
<td>47 Stonegate Ln. Novato CA</td>
<td>408-313-4000</td>
<td><a href="mailto:GORDON.LT@COMCAST.NET">GORDON.LT@COMCAST.NET</a></td>
</tr>
<tr>
<td>William Jablon</td>
<td>28 Panorama Way. A Novato</td>
<td>415-424-2416</td>
<td>BILL.Doolin@Entertainment</td>
</tr>
<tr>
<td>Peter Gruhl</td>
<td>1796 Indianailey Road 94947-</td>
<td>415-898-3928</td>
<td><a href="mailto:GFCAP@Gruhl.com">GFCAP@Gruhl.com</a></td>
</tr>
<tr>
<td>Michael Bozzi</td>
<td>732 Santa Ana Rd</td>
<td>415-892-5926</td>
<td><a href="mailto:mbozzi@keelers.com">mbozzi@keelers.com</a></td>
</tr>
<tr>
<td>Ted Newman</td>
<td>130 Elena Circle San Rafael</td>
<td>415-997-5525</td>
<td><a href="mailto:TALBERT@MARINCOUNTY.COM">TALBERT@MARINCOUNTY.COM</a></td>
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<td>Dennis Rodoni</td>
<td>0251 CA</td>
<td>497-7463</td>
<td><a href="mailto:DROD@MARINCOUNTY.COM">DROD@MARINCOUNTY.COM</a></td>
</tr>
<tr>
<td>David J. Gall</td>
<td>500 Alameda De La Loma Novato</td>
<td>916-852-4476</td>
<td><a href="mailto:DAVID@GALL.COM">DAVID@GALL.COM</a></td>
</tr>
<tr>
<td>Tim Waiden</td>
<td>26 Gopher Ave Dr. San Rafael</td>
<td>458-197-238</td>
<td><a href="mailto:EMMILKERRINE@COMCAST.NET">EMMILKERRINE@COMCAST.NET</a></td>
</tr>
<tr>
<td>Name</td>
<td>Address</td>
<td>Phone Number</td>
<td>E-Mail Address</td>
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<td>-----------------</td>
<td>-----------</td>
<td>--------------</td>
<td>----------------</td>
</tr>
<tr>
<td>RICK BEACH</td>
<td>NOVATO 5A</td>
<td>619 920 2120</td>
<td>on file</td>
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<tr>
<td>Michael Knight</td>
<td>Novato 6A</td>
<td>415-770-4011</td>
<td></td>
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</tbody>
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Page B-1 - 27 Page ___ of ___
<table>
<thead>
<tr>
<th>Name</th>
<th>Address</th>
<th>Phone Number</th>
<th>E-Mail Address</th>
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<tr>
<td>T J. Neff</td>
<td>351 Airport Ln, Novato</td>
<td>415-896-5157</td>
<td><a href="mailto:Nefftj3@att.com">Nefftj3@att.com</a></td>
</tr>
<tr>
<td>Steve Neff</td>
<td>215 Saddlebrook Dr</td>
<td>415-892-3620</td>
<td><a href="mailto:stevenebo@hotmail.com">stevenebo@hotmail.com</a></td>
</tr>
</tbody>
</table>

Gnoss Field Airport
EIS Public Hearing
March 20, 2018
SIGN IN SHEET - PLEASE PRINT
Public Meeting

Environmental Impact Statement

Updated Purpose and Need Working Paper

Extend Runway 13/31
Gnoss Field Airport

Date: March 20, 2018
I. Introductions/Roles

- County of Marin:
  - Airport Project Sponsor

- Federal Aviation Administration
  - Approve/Disapprove Airport Layout Plan Change
  - NEPA Lead Agency – Approve EIS

- Landrum & Brown
  - Environmental Consultant for EIS
II. Purpose of Public Meeting

• Update the public on the status of the Environmental Impact Statement (EIS)

• Describe the process used and results obtained in Updated Purpose and Need Working Paper

• Advise the public of next steps on the project

• Receive public comments on the Updated Purpose and Need Working Paper
III. EIS & EIR Processing

- Project Identification
- Baseline Data Collection
- Identify Purpose & Need
- Develop Preliminary Range of Alternatives

ISSUE NOTICE OF INTENT & NOTICE OF PREPARATION

CONDUCT SCOPING
- CONDUCT PUBLIC HEARING
- Respond to Agency/Public Comments

Agency/Public Circulation
- Notice of Availability of Draft EIS/EIR & Public Hearing
- Prepare Draft EIS & EIR
- Detailed Environmental Analysis

Marin County Prepares Final EIR
- Final EIR Availability Nov 2013
- Marin County Certifies EIR Feb 2014
- Marin County Updates Final EIR (if needed)
- Marin County Project Decision

FAA Prepares Final EIS
- Final EIS Availability June 2014

FAA Determines Supplement to the Final EIS is Required

Marin County is Here
III. EIS & EIR Processing

- FAA Determines Supplement to the Final EIS is Required
  - Prepare Purpose and Need Working Paper
  - Circulate Purpose and Need Working Paper for Agency/Public Comment
  - CONDUCT PUBLIC MEETING
  - Consider Agency/Public Comments
  - Prepare Updated Purpose and Need Working Paper
  - Circulate Updated Working Paper for Agency/Public Comment

- Agency/Public Circulation
  - Prepare Draft Supplement to the Final EIS
  - CONDUCT PUBLIC MEETING
  - Consider Agency/Public Comments
  - CONDUCT PUBLIC HEARING
  - Respond to Agency/Public Comments

- Notice of Availability of Final Supplement to the Final EIS
- FAA Issues Final Supplement to the Final EIS
  - FAA Signs/Issues Record of Decision

**FAA is here**
IV. Status of the EIS

• FAA released the Final EIS in June 2014, but did not issue a Record of Decision

• FAA notified Marin County in January 2015 that an updated aviation forecast and Supplement to Final EIS are needed

• FAA published the Purpose and Need Working Paper in April 2016 for public review and comment

• Commenters stated that additional investigation of Visual Flight Rules flights and fuel receipts would show additional activity of jet aircraft

• Marin County and FAA agreed to review additional data
IV. Status of the EIS

• FAA published the Updated Purpose and Need Working Paper in February 2018 for review and comment

• FAA preparing Supplement to Final EIS
  • Review Comments on Updated Purpose and Need Working Paper
  • Publish Public Review Draft Supplement to Final EIS
  • Receive Comments
  • Publish Final Supplement to Final EIS
  • Issue Record of Decision
V. Existing Airport

Gnoss Field

- One Runway (13/31) - 3,300 Feet
- 82,500 Takeoff/Landing a Year
- Single and Twin Engine Propeller Aircraft, Small Business Jets
- System of Levees Protect Runway from Flooding
- Airport has operational noise abatement procedures
V. Existing Airport-Noise Abatement

- Extend Runway 13/31
- Use standard 15-pattern entry for Runway 13 & Runway 31
- Traffic pattern 1000 MSL
- Helicopter arrivals 600 MSL (use helipad)
- Helicopter departures 500 MSL
- KCBS towers EL. 520 MSL
- 84-foot departure turnout (Runway 13) heading of 060
- Avoid overflight of all hills and homes south of airport for noise abatement

 GNOS Field Noise Abatement Procedures

*OLompali State Park 624'*
VI. Purpose and Need

• The existing runway is 3,300 feet long and as a result cannot fully accommodate the operations of the family grouping of the critical aircraft at the airport.

• The purpose of the proposed runway extension project is to allow existing aircraft, as represented by the family grouping of critical aircraft at Gnoss Field Airport, to operate without operational weight restrictions under hot weather conditions.
VI. Purpose and Need

Aviation Forecasts

- Critical aircraft is defined as the most demanding aircraft or family of aircraft with at least 500 annual operations (operation = takeoff or landing) at airport
  - September 2009 Aviation Forecast and June 2014 Final EIS identified Cessna 525 business jet as the critical aircraft
  - April 2016 Aviation Forecast determined that Cessna 525 no longer had 500 annual operations at DVO
    - Family of B-II Turboprop aircraft identified as the new critical aircraft
  - Public comments suggested there were operations missing from the data that would add to Cessna 525 operations
  - FAA agreed to update the forecast and review additional data including pilot supplied data and fuel receipts
VI. Purpose and Need

Updated Aviation Forecast – February 2018

Reevaluated aviation activity level at Gnoss Field

- Updated socioeconomic factors and incorporated latest trends in General Aviation activity
- Gnoss-based C525 pilot/owner/fuel vendor (FBO) interviews
  - Individual interviews conducted
  - Collected information from flight logs/fuel sales
  - Identified an additional 48 C525 operations in 2016
- Cessna 525 had 295 total operations documented in 2016 (C525 = 90 operations; C525A/B/C = 205 operations)
- Cessna 525 does not qualify as critical aircraft for DVO as it has <500 annual operations at airport
VI. Purpose and Need

Updated Runway Length Analysis

• Runway length determined from FAA Advisory Circular (AC) 150/5325-4B *Runway Length Requirements for Airport Design*

• Two allowable methods to determine runway length
  • Derive runway length from Aircraft Performance Manuals for an individual aircraft (method used for Cessna 525 jet in June 2014 Final EIS); or
  • Derive runway length from AC tables for a family of aircraft (method used in Purpose and Need Working Paper for family of B-II Turboprop aircraft)

• Updated runway length analysis resulted in a required total runway length of 3,600 feet (300-foot extension)
VII. 300-ft Runway Extension Alternative

- Shift Runway 13/31 106 feet to the north and extend Runway 13/31 300 feet to the northwest
  - Shift allows increase in Runway Safety Area within existing airport property to FAA B-II airport design standards. 300-ft extension for greater payload.
- Relocate existing taxiways accessing south end of Runway 13/31 to new runway end
- Extend the parallel taxiway to the full length of the runway maintaining the existing runway to taxiway separation distance of 155 feet
- Widen and extend the existing Runway Safety Area along the sides of Runway 13/31 to meet current FAA B-II airport design standards;
- Levee extension and realignment of drainage
- Relocate existing Precision Approach Path Indicators (PAPI) navigational aids that pilots use to land at DVO to reflect extended runway
VII. Proposed Runway Improvements

- Extend Runway 13/31
- Construct 300-Foot x 150-Foot Safety Area
- 406-Foot Runway Construction (106-Foot Shift plus 300-Foot Extension)
- Taxiway Construction
- Taxiway Demolition
- Shift Runway 106-Feet Northwest
- Construct 300-Foot x 150-Foot Safety Area
- Extend Levee and Drainage Ditch
VIII. Next Steps and Schedule

• March – June 2018 Evaluate public comments
• July 2018 – Marin County issues new contract task order to EIS consultant to prepare Draft Supplement to the Final EIS
• August 2018 to April 2019 – Development and internal review of Draft Supplement to the Final EIS
• April to June 2019 – Public Review of Draft Supplement to the Final EIS including Public Hearing
• July 2019 to January 2020 – Development and internal review of Final Supplement to the Final EIS including comments on the Draft Supplement to the Final EIS
• February 2020 – Issue Final Supplement to the Final EIS
• April 2020 – FAA issues Record of Decision on Final EIS
IX. Commenting on Working Paper

• Document available at www.gnossfielddeis-eir.com

• Three ways to comment on the Purpose and Need Working Paper:
  - Make a comment at Public Meeting today
  - Write a comment and leave it in the comment box
  - Send a comment to Doug Pomeroy, FAA on or before April 6, 2018

Mr. Doug Pomeroy
Federal Aviation Administration
San Francisco Airport District Office
1000 Marina Boulevard, Suite 220
Brisbane, CA 94005-1835
Fax: (650) 872-1430   Email: douglas.pomeroy@faa.gov
Welcome to the Public Hearing for the Federal Aviation Administration’s (FAA) Environmental Impact Statement (EIS) for the G noss Field Airport. This comment form is provided to receive your input and ensure that your comments are considered. Please use this form to submit written comments. Either place the form in the comment box at the meeting, or mail to the address below by April 6, 2018.

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Federal Aviation Administration
San Francisco Airports District Office
1000 Marina Boulevard, Suite 220
Brisbane, California 94005-1835
Telephone 650-827-7612
FAX: 650-872-1430
EMAIL: douglas.pomeroy@faa.gov

FROM (Please Print): GANAS
Name: ERNIE GANAS
Address: 608 Balmoral Ave, Key West, FL 33040

Please note: Before including your name, address and telephone number, email or other personal identifying information in your comment, be advised that your entire comment – including your personal identifying information - may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.
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EIS PURPOSE AND NEED WORKING PAPER
March 20, 2018

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EMAIL: douglas.pomeroy@faa.gov

FROM (Please Print):
Name: Ken Mccar
Address: 33 Calafia G.
San Rafael, CA 94903

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Telephone 650-827-7612
FAX: 650-872-1430
EMAIL: douglas.pomeroy@faa.gov

FROM (Please Print):
Name: PETER GRUHL
Address: 1736 INOVAH VALLEY ROAD
NOVATO, CA 94947

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Telephone 650-827-7612
FAX: 650-872-1430
EMAIL: douglas.pomeroy@faa.gov

FROM (Please Print):
Name: T. J. Neff
Address:

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Brisbane, California 94005-1835
Telephone 650-827-7612
FAX: 650-872-1430
EMAIL: douglas.pomeroy@faa.gov

FROM (Please Print):
Name: STEVE ISAACS
Address: ____________________________

Please note: Before including your name, address and telephone number, email or other personal identifying information in your comment, be advised that your entire comment – including your personal identifying information - may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.
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Brisbane, California 94005-1835
Telephone 650-827-7612
FAX: 650-872-1430
EMAIL: douglas.pomeroy@faa.gov

FROM (Please Print):
Name: David J. Gall
Address: ________________________________

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Telephone 650-827-7612
FAX: 650-872-1430
EMAIL: douglas.pomeroy@faa.gov

FROM (Please Print):
Name: **TED NEWMAN**
Address: **SAN RAFAEL**

Please note: Before including your name, address and telephone number, email or other personal identifying information in your comment, be advised that your entire comment – including your personal identifying information - may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.
SUMMARY OF COMMENTS RECEIVED ON THE UPDATED PURPOSE AND NEED WORKING PAPER

Public comments were received on the Updated Purpose and Need Working Paper published in February 2018. A total of six separate comment letters were received during the public comment period from February 16, 2018 to April 6, 2018. The total number of commenters was more than six as one written comment letter was signed by several commenters. Additionally, a public hearing was held on March 20, 2018 at which the public was given the opportunity to comment on the Updated Purpose and Need Working Paper. Seven members of the public made oral statements during the hearing.

Responses to all comments received are in Section 1.0, Responses to Comments Received on the Updated Purpose & Need Working Paper. Oral statements and comment letters received are in Section 2.0, Comment Letters Received on the Updated Purpose & Need Working Paper.

1.0 RESPONSES TO COMMENTS RECEIVED ON THE UPDATED PURPOSE & NEED WORKING PAPER

The comments are organized by the eight specific topics used to categorize the public comments. These categories are:

<table>
<thead>
<tr>
<th>Comment Topic</th>
<th>Description</th>
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<tbody>
<tr>
<td>1</td>
<td>Don’t agree with FAA finding</td>
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<td>2</td>
<td>General Support of the Sponsor’s Proposed Project</td>
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<td>3</td>
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<td>Land Use</td>
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<td>Floodplains</td>
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For example, Comment 1.1 was “Gnoss Field Airport is known for extremely severe crosswinds, and therefore safety would benefit from a longer runway at Gnoss Field.” The issue was commented on by several individuals, including Gruhl (1), Newman (1), Newman (2), and Gruhl (2). In every letter, this comment is identified as Comment 1.1 and the response to this comment is shown in Table 2, in numerical order at Comment 1.1.

Readers interested in all responses to public comments can review Section 1.0, Responses to Comments Received on the Updated Purpose & Need Working Paper in its entirety. Readers only interested in responses to specific comment letters or statements can use the listing below to review the Section 2.0, Responses to Comments Received on the Updated Purpose & Need Working Paper for responses
to all comments received from specific commenter in the order they were made in the commenter’s letter.
<table>
<thead>
<tr>
<th>NAME</th>
<th>ORGANIZATION (IF ANY)</th>
<th>DATE</th>
<th>COMMENT NUMBER</th>
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<tr>
<td>Ernie Ganas</td>
<td>Ganas (1)</td>
<td>3/20/2018</td>
<td>1.2, 1.3</td>
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<td>Ken Mercer</td>
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<td>Peter Gruhl</td>
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<td>Steve Issac</td>
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<td>T.J. Neff</td>
<td>Neff</td>
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<td>David Gall</td>
<td>Gall</td>
<td>3/20/2018</td>
<td>1.3, 4.1</td>
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<td>Ted Newman</td>
<td>Newman (1)</td>
<td>3/20/2018</td>
<td>5.3, 1.3, 1.1, 3.1</td>
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<td>Ganas (2)</td>
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<td>Peter Gruhl (1)</td>
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<td>Marin Conservation League</td>
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<td>Ted Newman (1)</td>
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<td>Soluri Meserve</td>
<td>Redwood Landfill and Recycling Center</td>
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<td>2.3, 7.1</td>
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### Table 1
INDEX OF COMMENTS RECEIVED ON THE UPDATED purpose & NEED working paper
Gnoss Field Airport

<table>
<thead>
<tr>
<th>Name</th>
<th>Comments</th>
<th>Date</th>
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<td>Vickie Hecht; Duncan and Betsy Ross;</td>
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<td>Michael and Susan Parnes; Susan and</td>
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<td>Richard Markx; Jory Bergman; Robert and</td>
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<td>Georgina Shaw; Eric and Heather Gahan;</td>
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<td>Lisa and Terry Tuscher; Chris and Lisa</td>
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<td>Free; Michael F. Ring and Jacqueline A.</td>
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<td>Bonner; Catherine and John Yee; Dave and</td>
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<td>Kris Donadio; Russell and Lisa Helfond;</td>
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<td>Katherine Walker; Melanie and Rob Walker;</td>
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<td>Frank Cioffi and Leza Danly; John Conway;</td>
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<td>Bob and Patty Hewett; John and Bambi</td>
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<td>Mengarelli; Sandy and Ed Hoeffer; Wanda</td>
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<td>Sarti; Matthew and Trisha Mauer; Matt and</td>
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<tr>
<td>Jan Lennon</td>
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</tbody>
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Gilkerson and Mathews / Nebb / Morris and Hecht / Ross / Parnes / Markx / Bergman / Shaw / Gahan / Tuscher / Free / Ring and Bonner / Yee / Donadio / Helfond / Walker / Walker / Cioffi and Danly / Conway / Hewett / Mengarelli / Hoeffer / Sarti / Mauer / Lennon
Table 2
RESPONSE TO COMMENTS RECEIVED ON THE UPDATED PURPOSE & NEED WORKING PAPER
Gnoss Field Airport

To ensure there is no misunderstanding by the reader, the general comment numbers by topic are shown consecutively on the left column of this table.

Table begins on next page
<table>
<thead>
<tr>
<th>COMMENT #</th>
<th>COMMENT/SUBJECT</th>
<th>COMMENTER</th>
<th>RESPONSE</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Don’t agree with FAA finding</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.1</td>
<td>300' extension would not improve the existing safety deficiencies/operational use at DVO for all aircraft</td>
<td>Gruhl (1), Newman (1), Newman (2), Gruhl (2)</td>
<td>The need for 300 feet of additional runway length is based on FAA guidance designed to ensure the safe and efficient operation of the airport.</td>
</tr>
<tr>
<td>1.2</td>
<td>FAA guidelines used in calculating an appropriate runway length were used/applied incorrectly</td>
<td>Ganas (1), Gruhl (2), Ganas (2)</td>
<td>All FAA guidelines for calculating runway length were followed correctly. The use of Figure 2-2, Small Airplanes Having 10 or More Passenger Seats, is not applicable for three reasons. First, the referenced guidance is referring the designer to take into account the airport’s ultimate development plan to identify if other development at the airport, beyond the runway project being analyzed, would encourage or support larger aircraft. For DVO, the future Airport Layout Plan was reviewed and no other development projects were found that would encourage or support regular use by aircraft with a maximum takeoff weight of more than 12,500 pounds, and/or more than 10 passenger seats. Second, the aviation activity forecast for the airport shows that jet activity has been declining for over a decade, while turboprop activity has been steadily rebounding since the recession. Accordingly, the forecast does not project an increase in aircraft larger than B-II, to more than 500+ annual operations, that would warrant the use of Figure 2-2 or Chapter 3 for a longer runway length. Third, it is acknowledged that there are variants of certain B-II aircraft that have 10 or more passenger seats. However, there is no evidence that those variants currently operate with regular use at DVO. The number of small airplanes with 10 or more passenger seats operating at DVO is less than the 500 annual operations to meet the criteria for being the critical aircraft. Furthermore, the airport has no future development plans to encourage or support aircraft with 10 or more passengers. Therefore, applying Chapter 2, Paragraph 205b of the FAA Advisory Circular 150-5325-4B results in no change to the selection of the critical aircraft and subsequent runway length chart.</td>
</tr>
</tbody>
</table>
## Determination of critical aircraft (forecast calculations and assumptions are flawed; more runway = more/larger aircraft = more fuel; revert back to Cessna as the critical aircraft)

<table>
<thead>
<tr>
<th>COMMENT #</th>
<th>COMMENT/SUBJECT</th>
<th>COMMENTER</th>
<th>RESPONSE</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.3</td>
<td>Determination of critical aircraft</td>
<td>Ganas (1), Gruhl (1), Neff, Gall, Newman (1), Newman (2)</td>
<td>Based on public comments received on the April 2016 Purpose &amp; Need Working Paper, the forecast was updated to reflect fuel sales at DVO. The Fixed Base Operator provided fuel logs for an entire year and the fuel consumption during peak months of aviation activity at DVO was evaluated – the summer months of June and July 2016. The review of fuel records in the months with the highest fuel sales did not identify any additional operations of C525 or other jet aircraft not already accounted for by other data sources such as TFMSC radar data and pilot/aircraft owner interviews. Therefore, no change in the determination of annual operations at DVO by the C525 was necessary. The Updated Purpose &amp; Need Working Paper and this Supplement to the Final EIS used this revised forecast that was approved by the FAA in February 2018 to conduct the impact analysis.</td>
</tr>
</tbody>
</table>

| 1.4       | General support of a runway extension longer than 300 feet | Mercer, Newman (2) | The need for 300 feet of additional runway length is based on FAA guidance designed to ensure the safe and efficient operation of the airport. |

## General Support of the Sponsor’s Proposed Project

<table>
<thead>
<tr>
<th>2.1</th>
<th>Shorter runway would reduce noise in neighborhoods south of the airport</th>
<th>Newman (2)</th>
<th>Comment noted. The Supplement to the Final EIS discloses the environmental impacts of the Sponsor’s Proposed Project in Chapter 5, <em>Environmental Consequence</em>, Section 5.1, <em>Noise</em>.</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.2</td>
<td>Increased Safety/Operational Use</td>
<td>Newman (2)</td>
<td>Comment noted.</td>
</tr>
</tbody>
</table>

<p>| 2.3       | Stated general support of Sponsor’s Proposed Project | Marin Conservation League, Redwood Landfill, Gilkerson and Mathews; Nebb; Morris and Hecht; Ross; Parnes; Markx; Bergman; Shaw; Gahan; Tusch; Free; Ring and Bonner; Yee; Donadio; Helfond; Walker; Walker; Cioffi and Danly; Conway; Hewett; Mengarelli; Hoeffer; Sarti; Mauer; Lennon | Comment noted. |</p>
<table>
<thead>
<tr>
<th>COMMENT #</th>
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<th>COMMENTER</th>
<th>RESPONSE</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.4</td>
<td>Stated general support of Runway Safety Areas that met B-II airport reference code requirements</td>
<td>Mercer</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>3</td>
<td>Noise</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.1</td>
<td>Shorter 300’ extension will provide little noise benefits compared to the 1,100’ extension</td>
<td>Newman (1)</td>
<td>The Supplement to the Final EIS includes an updated noise analysis using FAA methodologies and thresholds for determining impacts, including FAA Orders 1050.F and 5050.4B. Any significant noise impacts are addressed in Chapter 5, Environmental Consequence, Section 5.1, Noise.</td>
</tr>
<tr>
<td>4</td>
<td>Need</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4.1</td>
<td>Runway length should accommodate the variety of aircraft needed for public services (police, fire, search and rescue) and those needed in the event of a natural disaster</td>
<td>Gruhl (1), Gall, Gruhl (2)</td>
<td>The FAA recognizes the importance of an Airport’s ability to sustain the variety of aircraft needed for public services and those needed in the event of a natural disaster. Furthermore, the Sponsor’s purpose and need for the project is to allow existing aircraft, as represented by the family grouping of critical aircraft at DVO, to operate without operational weight restrictions under hot weather conditions. An aircraft or family of aircraft is called the “critical aircraft” because it is the most “demanding” aircraft in terms of the physical dimensions of the airport such as the length and width of the runways and taxiways, and separation distance between runways and taxiways required for that aircraft to operate at the airport. FAA AC 150/5000-17 defines the critical aircraft as the most demanding aircraft type, or grouping of aircraft with similar characteristics, that make regular use of the airport. Regular use is 500 annual operations, including both itinerant and local operations but excluding touch-and-go operations. According to Marin County, existing aircraft operating at DVO includes those used for medical, law enforcement, fire-fighting support, and Civil Air Patrol flights[1]. Within the current fleet mix at DVO, the existing critical aircraft is the family of B-II Turboprop aircraft. This is the most demanding aircraft grouping for runway length with regular use (see Appendix A, Section 6). Therefore, the ability for emergency aircraft to use the Airport would not be limited due to the Sponsor’s Proposed Project.</td>
</tr>
</tbody>
</table>
## General

<table>
<thead>
<tr>
<th>COMMENT #</th>
<th>COMMENT/SUBJECT</th>
<th>COMMENTER</th>
<th>RESPONSE</th>
</tr>
</thead>
<tbody>
<tr>
<td>5.1</td>
<td>Discuss contention between the FAA's Working Paper and commenters</td>
<td>Issac</td>
<td>All FAA guidelines for determining the critical aircraft and calculating the runway length were followed correctly. While commenters may disagree, all appropriate guidelines established by the FAA were followed, including FAA AC 150/5000-17 and FAA AC 150/5325-4B.</td>
</tr>
<tr>
<td>5.2</td>
<td>Clarify seeming contradiction in the Response to Comments 1.1 and 1.2 in the April 2016 Purpose and Need Working Paper</td>
<td>Newman (2)</td>
<td>The objective of the forecast was to determine the existing aviation demand and identify the critical aircraft operating at DVO. The forecast was then applied to future years in order to estimate the potential impacts to noise and air quality in the future. Specifically, the critical aircraft was identified using the estimated existing aviation demand. The forecast of future years was only utilized to identify potential impacts to noise and air quality.</td>
</tr>
<tr>
<td>5.3</td>
<td>Comment 5.4 received on the April 2016 Purpose &amp; Need Working Paper was not addressed</td>
<td>Newman (1), Newman (2)</td>
<td>The commenter is correct in stating that Comment 5.4 identified in the Updated Purpose &amp; Need Working Paper was not addressed. However, after further review, the FAA has determined that the inclusion of Healdsburg Municipal Airport (HES) and San Carlos Airport (SQL) in the February 2018 Forecast would not have changed the outcome of the critical aircraft and the resulting runway length determination.</td>
</tr>
</tbody>
</table>

## Wetlands

| 6.1       | On-site mitigation should be at a 2:1 replacement ratio and off-site at 3:1       | Marin Conservation League | The compensatory mitigation ratio for environmental impact evaluation are identified in the Supplement to the Final EIS. The final mitigation requirements for wetlands and waters in the CWA jurisdiction will be established during the CWA Section 404 permit process. |
### Land Use

<table>
<thead>
<tr>
<th>COMMENT #</th>
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<th>COMMENTER</th>
<th>RESPONSE</th>
</tr>
</thead>
<tbody>
<tr>
<td>7.1</td>
<td>Suggested specific mitigation language to address the potential need for any changes in bird control measures required to maintain airport safety</td>
<td>Redwood Landfill</td>
<td>Discussion of the Redwood Landfill is included in Section 5.9 of the Supplement to the Final EIS. Redwood Landfill (RLI) currently operates under a permit from Marin County Environmental Health Services, which was designated by the California Integrated Waste Management Board as the solid waste Local Enforcement Agency. This permit includes responsibilities of the landfill that include measures to reduce bird attractants. No significant impacts associated with increased bird strikes on aircraft from the Sponsor’s Proposed Project, were identified in the Supplement to the Final EIS, particularly in light of these on-going bird strike mitigation measures in place at RLI. Therefore, no mitigation was suggested above the continuance of the measures already identified and required in RLI’s operating permit. Implementation of the measures, required by RLI’s permit to operate the landfill, are the responsibility of RLI, not DVO.</td>
</tr>
</tbody>
</table>

### Floodplains

| 8.1       | Address sea level rise                                                          | Marin Conservation League | The Supplement to the Final EIS discusses sea level rise in Section 5.11, Floodplains.                                                                                                                         |
2.0 COMMENT LETTERS RECEIVED ON THE UPDATED PURPOSE & NEED WORKING PAPER
Summary of comments received at March 20, 2018 comment meeting for Updated Purpose and Need Working Paper for the Extension of Runway 13/31, Gnoss Field Airport.

Meeting attendance: 18 members of the public signed in at the meeting (see attached sign-in sheets). Also in attendance were Jenney Callaway-District Director for Congressman Jared Huffman; Marin County Board of Supervisors, District 5 Supervisor Judy Arnold, whose district includes the airport; Marin County Board of Supervisors, District 4 Supervisor Dennis Rodoni (signed in); and Marin County Department of Public Works staff including Craig Tackabery – Marin County Chief Assistant Director for Public Works and Assistant Director for the Transportation Division; Marin County Assistant Director for Public Works Capital Projects – Eric Steger; Reuel Brady-Marin County transportation staff, John Neville-Marin County transportation staff; and Dan Jensen-airport manager. FAA participants Laurie Suttmeier-Assistant Manager-San Francisco Airports District Office; Doug Pomroy SFO ADO Environmental Protection Specialist; and Katherine Kennedy-SFO ADO Airport Planner. Rob Adams-EIS project manager from Landrum & Brown was the consultant representative.

The FAA and EIS consultant made a public presentation, which was followed by a comment period. Commenters and their main points were as follows:

Ernie Ganas:

Comment 1:
Commented that the FAA should use FAA AC 150/5325-4B Runway Length Requirements for Airport Design, Figure 2-2, Small Airplanes Having 10 or More Passenger Seats (Excludes Pilot and Co-pilot), Runway Length Curves, to determine the runway length at Gnoss Field Airport instead of the Figure 2-1, Small Airplanes with Fewer than 10 Passenger Seats (Excludes Pilot and Co-pilot), Runway Length Curves, and that by doing so the necessary runway length would be determined to be several hundred feet longer. He suggested that the most popular turboprop (King Air) can be configured for 12-13 seats.

Comment 2:
Commented that FAA should consider the safety requirements that Part 135 operators must consider as part of the determination of the necessary runway length at Gnoss Field Airport.

Comment 3:
Commented that he was surprised the forecast did not show additional turboprop activity in the future.
Ken Mercer:

Comment 4:
Encouraged and supported that proposed revised project would include Runway Safety Areas that met B-II airport reference code requirements.

Comment 5:
Still believes that airport would benefit by having a runway extension that was longer than 300 feet.

Peter Gruhl:

Comment 6:
Stated that a different time frame was more appropriate for the analysis of annual operations and fuel receipts at Gnoss Field Airport.

Comment 7:
Commented that FAA should have analyzed the full 12 months of fuel receipts.

Comment 8:
Commented that fuel sales from December were higher than for June and July, and therefore should have been considered.

Comment 9:
Commented that as the only public airport in Marin County Gnoss Field Airport should be improved as much as possible. Commented that this is particularly important to support emergency response activity.

Comment 10:
Gnoss Field Airport is known for extremely severe crosswinds, and therefore safety would benefit from a longer runway at Gnoss Field.

Steve Issac:

Comment 11:
This project needs to explain who is accurately describing the aviation activity and needs at Gnoss Field Airport. Is it the FAA’s working paper or the commenters on the document who are correct?
T.J. Neff: Neff

Comment 12:
Very few charter aircraft purchase fuel at Gnoss Field Airport due to the limited runway length, but that more fuel would be purchased if the runway was longer.

David Gall: Gall

Comment 13:
Commented that the FAA should have considered when using fuel sales as evidence of operations that fuel sales were being lost to other airports due to the limited runway length at Gnoss Field Airport.

Comment 14:
Jet aircraft are going elsewhere due to the limited runway length at Gnoss Field Airport. Says that the conclusion that there is not a sufficient basis for a longer runway length is circular logic and specious because more demanding aircraft would have more operations at the airport if the runway was longer, but they cannot because the runway is too short.

Comment 15:
Operations at Gnoss Field Airport are outpacing operations at other airports. Need airport improvements as Gnoss Field is the only public airport in Marin County as it may need to serve emergency response aircraft.

Ted Newman: Newman

Comment 16:
Response to comment 5.1 is incorrect as Exhibit 5-1 in the Aviation Forecast has not been updated.

Comment 17:
Why are you considering forecasted jet operations to remain at the same level over time, when nationally jet operations are increasing? This is a very affluent area which would have the financial resources for business jet operations. Shouldn’t the national estimates of increasing jet operations over time be applied to this airport?

Comment 18:
The operations levels for jet aircraft must be wrong because these jets are so expensive they must be used more frequently than what has been identified in the working paper.
Ernie Ganas  
998 Bel Marin Keys Blvd  
Novato, CA 94949  
ernie_ganas@msn.com (415)883-9213

March 23, 2018

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


Dear Mr. Pomeroy,

I am writing to provide comments on the Updated Purpose and Need Working Paper for the Runway Extension at Gnoss Field, dated Feb 20,2018. I believe that the selection of the specific chart used to determine the needed runway length used did not take into consideration the provisions of Chapter 2 paragraph 205 b. Future Airport Expansion Considerations

b. Future Airport Expansion Considerations. Airports serving small airplanes remain fairly constant in terms of the types of small airplane using the airport and their associated operational requirements. However, it is recommended that the airport designer assess and verify the airport’s ultimate development plan for realistic changes that, if overlooked, could result in future operational limitations to customers. The airport designer should at least assess and verify the impacts of:

(1) Expansions to accommodate airplanes of more than 12,500 pounds (5,670 kg). Failure to consider this change during an initial development phase may lead to the additional expense of reconstructing or relocating facilities in the future.

In using the selection of Figure 2-1 Small Airplane with Fewer than 10 Passenger Seats, the fact that the selected family grouping of critical aircraft, B-II Turboprop aircraft has aircraft within that family grouping that have more than 10 seats excluding the Pilot and Copilot (as an example the King Air 200-300 series both have High Capacity seating options available) was not considered. It would appear that using figure 2-2 in chapter 2 Small Airplane Having 10 or More Passenger Seats would take in to consideration the provisions of Paragraph 205 b. allowing for expansion considerations of the aircraft type using the airport. Since the original study states on page A-13, sections 4.8 and 4.9, that jet traffic is increasing rapidly, allowing that “business jets have been the fastest growing segment”, and giving growth percentages of 2.8% to 4.1% annually. That the study did not apply that growth to the jet operations at Gnoss in your latest consideration of growth at the airport is puzzling. Since there are a large number of high Per Capita Personal Income households in Marin as you mentioned in your Aviation Activity Forecast it seems logical to make the assumption that a higher number than the average growth of jet traffic would be drawn to the airport were the runway length determined by Fig 2-2 in Chapter 2 of AC 150 5325-4b. I believe that the reason para 205 b. was included in Chapter 2 of the Advisory Circular was for the specific purpose of allowing some growth in the airports mix of aircraft without having to
complete a detailed re-analysis for runway length requirements. This use of the Fig 2-2 chart would also be of
great assistance to the many Part 135 operators who commonly use accelerate-stop distance parameter in their
airport use calculations when deciding on which airport to use for passenger operations.

Using the runway length chart in Fig 2-2 allows for a runway length approximately twelve percent longer than
the runway length using Fig 2-1 4030 ft. vs 3600 ft. While this was not the amount (4400 ft) that the sponsor
requested in the initial study, it would allow for some future expansion considerations with having to go through
the 10-year process that the airport has gone thru for this study.

As a former eighteen-year (1997-2015) member of the Marin County Airport Commission and active pilot with
my own aircraft hangered at Gnoss Field, I spent one or two days a week at Gnoss Field either involved in my
personal aviation activities or spending time discussing airport issues with airport managers and multiple pilots.

I have not kept detailed record of aircraft arrivals and departures, but have noticed a decrease in Turbojet
operations in the last few years as the runway conditions have deteriorated. Talking to transient pilots led me to
believe that the runway conditions were a large factor in this decrease and as one Learjet 35 pilot told me they
really have a problem with the runway undulations when taking off on runway 31. He also mentioned that they
do drop offs at Gnoss, but very few pickups due to the length of the runway.

With the recent runway resurfacing project completed I would expect that the number of larger turboprops and
turbojets will return to normal and probably increase somewhat as the word gets around to the Part 135 operator
community about the improved runway conditions.

Ernie Ganas

Encl: fig 2-2 AC150-5325-4B using Gnoss parameters

By email CC: Supervisor Judy Arnold District 5 Novato
3501 Civic Center Drive Room 329
San Rafael, CA 94903

Josh Fryday, Mayor Pro Tem City of Novato
City of Novato
922 Machin Avenue
Novato, CA 94945

Assemblyman Marc Levine
3501 Civic Center Drive, Room 412
San Rafael, CA 94903

Eric Steger, Asst Dir Public Works
3501 Civic Center Drive
San Rafael, CA 94903

Congressman Jared Huffman
999 Fifth Ave Ste 200
San Rafael, CA 94901
Figure 2-2. Small Airplanes Having 10 or More Passenger Seats  
(Excludes Pilot and Co-pilot)

<table>
<thead>
<tr>
<th>Representative Airplanes</th>
<th>Runway Length Curves</th>
</tr>
</thead>
<tbody>
<tr>
<td>Raytheon B80 Queen Air</td>
<td>Example:</td>
</tr>
<tr>
<td>Raytheon E90 King Air</td>
<td>Temperature (mean day max hot month) 90° F (32° C)</td>
</tr>
<tr>
<td>Raytheon B99 Airliner</td>
<td>Airport Elevation (msl) 1,000 feet (328 m)</td>
</tr>
<tr>
<td>Raytheon A100 King Air</td>
<td>Recommended Runway Length 4,400 feet (1,341 m)</td>
</tr>
<tr>
<td>(Raytheon formerly Beech Aircraft)</td>
<td>Note: For airport elevations above 3,000 feet (915 m), use the 100 percent of fleet grouping in figure 2-1.</td>
</tr>
<tr>
<td>Britten-Norman Mark III-1 Trilander</td>
<td></td>
</tr>
<tr>
<td>Mitsubishi MU-2L</td>
<td></td>
</tr>
<tr>
<td>Swearigen Merlin III-A</td>
<td></td>
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<tr>
<td>Swearigen Merlin IV-A</td>
<td></td>
</tr>
<tr>
<td>Swearigen Metro II</td>
<td></td>
</tr>
</tbody>
</table>

![Runway Length Curves Diagram](image)
March 22, 2018

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

RE: Gnoss Airport, Public Comments on Purpose & Need Working Paper, by L&B, 2/20/18

Dear Mr. Doug Pomeroy,

Thank you for taking public written comments into account regarding the current update to the Gnoss Field Extension project. From the updated working papers referenced above, it looks like the selection of Critical Aircraft will remain the same, despite previous rebuttals, and previous history that the Citation Jets had over 500 operations per year.

If that is the case, then the key part of the analysis turns to how to calculate the correct runway length. The current paper uses one, hand-drawn, graphical technique, to arrive at a 300 foot extension length. During public comments, it was documented by Ernie Ganas, and others, that the FAA’s own procedures call for the use of the Part 135 “accelerate \ stop” distance, as an alternative to calculating runway length. With the current 300 foot extension, some aircraft in the critical category will not have enough room to stop before the end of the runway, in the event of an aborted takeoff.

We appeal upon the FAA to provide the maximum extension possible for safety. There are several facts that distinguish Marin County Airport, aka Gnoss Field, from conventional airports in the same category, and warrant special consideration.

For starters, Marin County Airport is in the top 1% nationally in having the worst cross winds in the nation. When pilots are confronted with opposing winds at either end of the runway, and opposite perpendicular gusts in the center, they need extra runway to land safely.

Marin County Airport is the ONLY public airport in the entire County of Marin. Comparatively, Sonoma County, just to the North has less than twice Marin’s population (2015 population Marin, 261,221; Sonoma 502,146), yet it has SEVEN public airports, including the Commercial Santa Rosa Airport. In other words, Sonoma County has about four times the number of public airports per capita!
Why does that matter? In time of disaster, Gnoss Field is the only public airport for the entire county. Any emergency supplies and evacuations will need to be based here. This has been recently tragically empathized by the recent Wildfires, when many aircraft needed to refuel and take on fire retardant chemicals. One such wildfire occurred within a mere seven miles of my home in Novato.

In summary, it is critical that the FAA utilize whatever discretionary power it has available to maximize the final length of the extension.

Thank you in advance for your consideration in this matter.

Sincerely,

Peter Gruhl

Cc: Supervisor Damon Connolly  dconnolly@marincounty.org District 1 San Rafael
    Supervisor Katie Rice  krice@marincounty.org District 2 Greenbrae, Kensfield, San Anselmo
    Supervisor Kate Sears  ksears@marincounty.org District 3 Mill Valley, Sausalito, GGNRA
    Supervisor Steve Kinsey  skinsey@marincounty.org District 4 West Marin Bolinas, Stinson, W. Novato
    Supervisor Judy Arnold  jarnold@marincounty.org District 5 Novato

    Pat Eklund, Mayor Pro Tem City of Novato  peklund@novato.org City of Novato

    Assemblyman Marc Levine  matthew.zweier@asm.ca.gov
6. The non-scientific approach(es) used to-date in the Paper to arrive at the determination that the runway only requires ("merits") a 300-foot extension will continue to cost the airport, the county, and even the state and federal governments lost revenue, wasted spending and lost opportunity (that on top of the recent Runway Rehabilitation fiasco) should the 300-foot extension be the final determinant. That coupled with the additional duplicative cost (more/future poorly constructed/questionable studies?), more repeated delays, and additional inconvenience to the airport’s activities and beyond its fence, when the issue would need to be revisited again in another 5 or 10 years. There is a real and serious problem by too many in government today: The inability (or unwillingness) to properly consider the future; how to correctly plan for it now. Politicians and persons in positions of responsibility who take the “not on my watch” approach to the deferment of difficult and challenging decisions.

7. The government entities and consultants party to the process of studying and reviewing the runway extension have stalled (delayed) the project time and again. I predicted nearly four years ago that such behavior would continue; sadly my prediction has proven correct. The FAA itself has been confused as to when the process first began, that having been represented at the hearing in 2016. As for the confusion, perhaps that is due to too much time having passed and too many involved in the process having moved on. Far too many years have passed to now arrive (again) at a questionable finding, thus requiring MORE delay to AGAIN study. This behavior by citizens of a nation that less than 80 years ago rallied; ramped up and took on enemies on two war fronts, achieving victory in far, far less time. Regarding the work product presented in the Runway Extension and the Working Papers, to quote our much beloved President Trump: “SAD.”

8. Under an (the) assumption that it is political pressure that is guiding the finding that the critical aircraft only requires a 300-foot extension, no doubt it is that pressure that is causing real vision to be myopic by means of skewed data. And myopia cannot see the future. The key to real forecasting the future is to fit the need, not the bias. And the need for the additional 1,100 feet goes beyond the critical aircraft. It includes safety and noise issues that can/should be improved and lessened, respectively; issues that are of concern to both those who operate in and out of Gnoss Field, including its neighbors, issues that the FAA (and others?) apparently does not care about.

9. On a most serious note, Landrum & Brown intentionally misrepresented in the Updated Paper and publicly at the public hearing, held March 20, 2018, some of their research (data), which is critical to their flawed findings. They have been caught (at the last hearing); their work/representation is criminal in nature. Landrum & Brown has effectively defrauded government and the people of its funds and trust. That Landrum & Brown continues to be employed (and paid) by airports to conduct such work is in itself wrong and must cease. I believe the term is a needed/deserved “black listing.” Real professionals would not compromise the truth under any circumstance. One’s reputation is all that matters. Once the reputation is gone it cannot be recovered, as is the case here.

10. I and others look forward to the additional delay while the parties who are controlling the process spend more time (and money?) to again “massage the numbers.” But next time they will ultimately arrive at the factual truth and final conclusion: The critical aircraft is the C-575, thus
April 4, 2018

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

Re: Updated Purpose and Need Working Paper: Extension of Runway 13/31 for Gnoss Field Airport, Marin County, California  

Dear Mr. Pomeroy:

The Marin Conservation League (MCL) supports the Updated FAA Purpose and Need Working Paper: Extension of Runway 13/31 for Gnoss Field Airport. The information distributed is very important for the decision to extend the runway 13/31.

The alternative suggested in the Updated Purpose and Need Working Paper is to extend the runway 300 feet, instead of the 1,100 feet addressed in the EIR/EIS. We concur with the analysis that a 300 foot extension would address the projected need for the current fleet and for the probable future fleet based at Gnoss Field.

A 300 foot extension will still require wetland mitigation, for the full amount of wetlands lost which includes the 106 feet ‘shifted’ from the south end of the runway and for the Safety Zone at 300 feet. MCL encourages local mitigation consistent with Marin County wetland mitigation at 2:1, or 3:1 if not in kind.

The Gnoss Field location makes it highly vulnerable to Sea Level Rise (SLR). It is identified as being inundated even the more conservative mapping for SLR. We question whether it is a good investment to expand an airport that will need to be abandoned in 50 years?

Yours truly,

Kate Powers  
President  

cc: Supervisor Judy Arnold
April 1, 2018

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

This letter was also emailed to: douglas.pomeroy@faa.gov

Re: Gnoss Field, Novato, California - Proposed Extension of Runway 13/31, Updated Purpose and Need Working Paper, Revised, February 20, 2018

Mr. Pomeroy,

The following are just some of the relevant points to be made in response to the revised (Updated) Paper.

1. Table 2 - RESPONSE TO COMMENTS RECEIVED ON THE APRIL 2016 PURPOSE & NEED WORKING PAPER - Gnoss Field Airport

Regarding Comment 5.1 - Though it may seem petty, the 5.0 OVERVIEW OF SAN FRANCISCO BAY AREA’S GA AIRPORTS (page 17) and Exhibit 5-1 (page 18) were NOT updated per representation (see FAA Response to Comments, Comment 5.4, page 28).

The FAA delayed the release of Landrum & Brown’s revised work by a few months in order for new staff at the local FAA office to review/ become familiar with the matter and the findings. How much time and how many eyes (including those at the most incompetent Landrum & Brown) have reviewed the paper before its delayed release? If minor issues that were wrong in the initial working paper have not been corrected in the updated paper, that shortfall might call into question the relevant/important findings of what is the critical aircraft, the subject of the paper?

2. Per various tables provided in the paper, though Marin County is forecast to grow at a slower pace than California and the nation; per the data, Marin County’s income is far higher than the national average and that of all of California. Therefore, the summary logic that the future
demand for jet aircraft for Gnoss Field will be in line with the state and national trends does not hold correct weight and balance. In other words there is no evidence of that extrapolation; it is conjecture at best, just wrong at worst.

3. TABLE 6-5, OPERATIONAL FLEET MIX FORECAST

The small jet operations data for Gnoss Field shows NO increase in operations for future years 2020 - 2035. Though the population of Marin and beyond will continue to grow, is one supposed to assume/believe that the jet operations are forecast to remain stagnant for Gnoss Field over the next 19 years? Again, there is no basis for that conjecture, and worse does not encourage in any way the possibility of C-575 operations due to an insufficient-length runway (per the 300-foot proposed extension).

4. Table 1 - RESPONSE TO COMMENTS RECEIVED ON THE FINAL EIS

Comment 1.1 (page 5) - Response: “The FAA prepared a Purpose and Need Working Paper to update the information regarding the forecasted number of operations, identification of the critical aircraft, and thus the runway length determination.”

Comment 1.2 (page 5) - Response: “The stated need for the project was to accommodate existing aircraft.”

The responses in Comments 1.1 and 1.2 contradict each other, thus demonstrate an inconsistency of purpose of the paper/project. So which goal is it, “forecasted” or “existing aircraft” to be served? Those comments were reviewed by whom?

5. 6.4 CRITICAL AIRCRAFT DETERMINATION

As I previously stated in my letter dated June 14, 2016, in response to the first draft of the paper, (and again now), the updated data in this paper now claims just 295 total operations by B-I and B-II aircraft of the C-575 variety at Gnoss Field. If applying that figure ONLY to the five jets based at Gnoss Field (and no transient traffic), that represents 4.92 or (rounded to) just five operations per month; the equivalent of less than three departures and three arrivals per month per aircraft based at Gnoss Field. I cannot accept that data as accurate due to the cost of owning and operating an aircraft of that category. Therefore, the data “collected” and thus used regarding solely the aircraft based at Gnoss Field cannot be accurate.

Consideration of transient aircraft operations of the C-575 model is not addressed here (which does significantly increase to the total operations). As noted by others at the public hearing on March 20, 2018, Landrum & Brown falsely claimed that they reviewed the fuel records for the entire 2016, when in fact they only looked at June and July. Further, they assumed that June (and July) was (were) the most representative of the busiest months at Gnoss Field, when in fact it was December 2016 that was the peak of activity. That Landrum & Brown was ever engaged
to undertake the runway extension study (and was retained for the Update) is a sad commentary on the decision-making process by those who did so. That Landrum & Brown perjured themselves in the March 20, 2018, further throws their findings into serious doubt.

Conclusions

1. There are (and will be) others who will address in writing other data issues and logic factors that were either ignored or not correctly presented in the Updated Paper, including issues surrounding the safe operation of aircraft at Gnoss Field.

2. Not only is it wrong in logic to ONLY consider what is the critical aircraft based on operations (still incorrectly “determined” by Landrum & Brown), but Landrum & Brown presents a variety of data in the Paper (both versions) that seems irrelevant to the study/issue (including its flawed comparative analysis of similar airports within 60 miles of Gnoss Field). It is foolish to not consider the economic impact (revenue, including taxes and jobs) that Gnoss Field has suffered with its current-length runway by underserving the C-575 (in fact the critical aircraft) that has used the airport for years, but also what will be the ongoing economic impact should the runway only be lengthened by 300 feet.

3. There are ONLY three possibilities as to how/why Landrum & Brown has (again) come to its faulty conclusion that the runway only merits a 300-foot extension:

   A. Political forces directing Landrum & Brown to bias (in part by changing the targeted data - year studied/time of year, and other “supportive” data), thus determining (massaging) the data to fit the goal: That the C-575 is not the critical aircraft.

   B. Sheer and Complete incompetence by the consultant, Landrum & Brown, and lack of proper and thorough oversight by those in the FAA who are tasked with supervising the process; ultimately that which was presented in the Updated Paper.

   C. Both A and B.

4. Additionally, for the FAA’s role in this matter, where has the FAA been in thorough oversight of the findings presented by Landrum & Brown, including comments by me and others after the initial Paper’s release?

5. To all who should read this critique, it must be noted that Landrum & Brown and those at the FAA who are tasked with this project are paid for their time. I am not certain what their interest (if any) may be beyond their financial compensation (their jobs). I, as a member of the public, am not paid for my time; however I (and others) have spent much time addressing in detail obvious shortcomings in both versions of the Paper, including shortcomings that should have been observed and corrected by those whose job it is to see that the Paper (the Updated version, the second effort) is a professional work product. One might therefore conclude that members of the public should have been engaged and compensated for the task in lieu of those who were paid. There has been more than ample time for proper review and corrections by those responsible before the release of both versions, yet sadly that has not been the case.
the runway is to be lengthened by 1,100 feet (plus the Runway Safety Areas extensions that are also needed).

The current determination that the runway only requires a 300-foot extension is flatly unacceptable. The data is there to show otherwise; it is just a matter of applying it.

With continued disappointment and annoyance with the unacceptable work product presented, furthered by excessive delays, my comments are most sincerely submitted,

Ted Newman

Cc: Eric Steger, Assistant Director, Marin County Department of Public Works
    Raul Rojas, Director, Marin County Department of Public Works
    Marin County Supervisor Damon Connolly
    Marin County Supervisor Judy Arnold
    California Assemblyman Marc Levine
    U.S. Congressman Jared Huffman
    U.S. Senator Diane Feinstein
    U.S. Senator Kamala Harris
April 6, 2018

SENT VIA EMAIL (douglas.pomeroy@faa.gov)

Doug Pomeroy
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
Updated Purpose and Need Working Paper (February 2018)

Dear Mr. Pomeroy:

This letter is written on behalf of the Redwood Landfill and Recycling Center ("Redwood") regarding the February 2018 Gnoss Field Airport Proposed Extension of Runway 13/31 Updated Purpose and Need Working Paper ("2018 Working Paper"). Redwood has participated in the environmental review and planning process for the Runway Extension project since 2008, and provided several comment letters addressing compatibility and mitigation concerns. Redwood generally supports the proposal to extend Runway 13/31 by 300 feet rather than the initially proposed 1,100 feet; a shorter runway should reduce the potential for incompatibilities with Redwood’s existing landfill, recycling and composting uses north of the Runway Extension project.

Currently, Redwood successfully implements a County-approved bird control program and poses no wildlife hazard to the airport flight operations. We continue to be concerned, however, that should any additional bird control measures be necessary due to the Runway Extension project and operational changes at Gnoss Field, Gnoss Field must be responsible for those additional bird control measures, not Redwood. While we see that Redwood’s May 12, 2017 Comments on the Public Meeting Held May 18, 2017 are included in Appendix C of the 2018 Working Paper, no response is provided. (See Working Paper, Appendix C, pdf pp. 240–42; attached hereto as Exhibit A.) In those comments, Redwood suggested specific mitigation language to address the potential need for any changes in bird control measures required to maintain airport safety.⁴ We note that the USEPA 2014 comments also relate to bird strike issues:

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¹ Redwood has submitted numerous other comments to the FAA and/or the County of Marin on the project, including letters dated August 7, 2014, November 25, 2013, and
Section 5.9 of the Final EIS discusses the Redwood Landfill (RLI). FAA guidance on bird strikes, and the measures in place to reduce the potential for bird strikes. The Redwood Landfill (RLI) currently operates under a permit from Marin County Environmental Health Services, which was designated by the California Integrated Waste Management Board as the solid waste Local Enforcement Agency. This permit includes responsibilities of the landfill that include measures to reduce bird attractants. There have been no reported incidents of bird strikes associated with the RLI. This issue will be discussed in more detail in the Supplement to the Final EIS.


We request that our May 12, 2017 comments and suggestions regarding appropriate language for mitigation of any increase in bird strike hazards as a result of the project be incorporated into the Supplement to the Final EIS, and that Mitigation Measure 3.6.2d (or its successor) be appropriately modified.

Thank you for your attention to these comments; if you have any questions about these comments please do not hesitate to contact my office.

Very truly yours,

SOLURI MESERVE
A Law Corporation

By: [Signature]

Osha R. Meserve

ORM/mre

Attachment: Exhibit A, May 12, 2017 Comment Letter

February 6, 2012. These comments focus on the issue of responsibility for mitigation of any increases in bird strike hazards caused by the project.
EXHIBIT A
May 12, 2017

SENT VIA FAX (650-872-1430)

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

RE: Comments on the Status of the Federal Aviation Administration’s Supplement to the June 2014 Final Environmental Impact Statement and the Updated Purpose and Need Working Paper for the Extension of Runway 13/31, Gnoss Field Airport, Novato, California

Dear Mr. Pomeroy:

This letter is written on behalf of the Redwood Landfill and Recycling Center (“Redwood”) regarding the upcoming public workshop to update the public on the status of the Federal Aviation Administration’s (“FAA’s”) Supplement to the June 2014 Final Environmental Impact Statement (“FEIS”) for the Marin County Airport Gnoss Field Proposed Extension of Runway 13/31 (“Runway Extension project”). Redwood has participated in the environmental review and planning process for the Runway Extension project since 2008, and provided written comment letters regarding compatibility and mitigation concerns.

Redwood has reviewed the 2016 Purpose and Need Working Paper and generally supports the proposal to extend Runway 13/31 by 300 feet rather than the initially proposed 1,100 feet. Generally, a shorter runway should reduce the potential for incompatibilities with ongoing operations at Redwood. As the FAA refines its analysis in advance of issuing a Record of Decision for the Runway Extension project, however, the issue of responsibility for mitigation—should the need arise—has still not been resolved in the FEIS.

As explained below, should any additional bird control measures be necessary due to operational changes at Gnoss Field, Gnoss Field would be responsible for those additional bird control measures, not Redwood. The FEIS unfortunately continues to take the opposite approach.
Doug Pomeroy
Federal Aviation Administration
San Francisco Airports District Office
May 12, 2017
Page 2 of 3

The FEIS relies solely on mitigation to be *implemented by Redwood* to address potential increases in bird strike hazards *caused by the Runway Extension project*. Specifically, the FEIS relies on Mitigation Measure 3.6.2d “to prevent [Redwood] from becoming an incompatible land use.” (FEIS, p. 4.2-12; see also FEIS, Appendix Q, p. Q-40 (Response to Comment 5.2).) This mitigation measure, however, related to Gnoss Field Airport as it existed at that time and does not include a duty to mitigate for future impacts caused by proposed changes at Gnoss Field Airport.

According to Mitigation Measure 3.6.2d:

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

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

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

Doug Pomeroy  
Federal Aviation Administration  
San Francisco Airports District Office  
May 12, 2017  
Page 3 of 3

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

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

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

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

Thank you for your attention to this issue; if you have any questions about these comments please do not hesitate to contact my office.

Very truly yours,

SOLURI MESERVE  
A Law Corporation

By: [Signature]

Osha R. Meserve

ORM/mre
March 20, 2018

Mr. Doug Pomeroy
Federal Aviation Administration
San Francisco Airports District Office
1000 Marina Boulevard, Suite 220
Brisbane, California 94005-1835
Via email: douglas.pomeroy@faa.gov

Re: GNOS Field Airport Proposed Extension of Runway 13/31 Updated Purpose and Need Working Paper

Dear Mr. Pomeroy:

We are residents of the Rush Creek neighborhood and other nearby communities located south of the airport who have been following the plans to expand Gnos Field airport over the last 14 years. We write in general support of the determination to affirm the 2016 analysis that the proper runway length extension should be 300 feet instead of the originally contemplated 1,100 feet.

Our past efforts included a January 10, 2012 petition that we submitted to the Marin County Board of Supervisors signed by about 90 Marin residents urging the Board to consider and direct the environmental consultant to consider the alternative of a shorter runway extension instead of the initially proposed 1,100 foot extension. We were pleased when you and the environmental consultant updated the runway length analysis in 2016 to arrive at a more modest 300 foot extension after reconsideration based on the properly determined “critical aircraft” for Gnos Field — the most demanding aircraft that has at least 500 annual operations at the airport. We said so in our comment letter dated June 17, 2016.

When pilots objected to the 2016 critical aircraft analysis that resulted in a 300 foot extension calculation, at additional cost to the taxpayers you re-opened the fact-finding as to what the critical aircraft is. Your research was thorough, as documented in the revised Working Paper, including evaluation of fuel logs with cross-referencing of aircraft, re-analysis of radar data, and interviews with users of the airport. Two times should be enough.

Although some business owners and pilots will continue to argue that 300 feet is too short, they misunderstand the nature of the project. Advocates for an even longer runway (including some Supervisors in the past) have said that the project is about “safety.” That is not true. Instead, the new Runway Safety Areas or “RSAs” at each end of the runway - which we support and will be built as a part of this project no matter what - take care of safety concerns. Some people say that the project should be about building a bigger and busier airport to accommodate more and larger corporate and luxury jets and sell more jet fuel to earn tax dollars. That also is not the stated purpose of the project, and we neighbors of the airport will continue to object to that type of expansion which would benefit so few, increase the jet traffic and noise over our homes, and be a waste of taxpayer dollars.

Instead, the purpose is about efficiency given current airport use. Per FAA regulations for development grants, the goal is to make sure the length of the runway can accommodate the most demanding aircraft...
that has at least 500 operations a year so that on the hottest time of day during the hottest month (July) that “critical aircraft” can take-off at full weight without one or two fewer passengers or a less than full gas tank. That’s it. A different purpose than that and the FAA’s grant program would not be available to Marin County to help pay for the expansion project. Given the cost over-runs of the recent upgrade of the existing runway, it just wouldn’t make sense for the County to go beyond what is necessary.

To help make sure all the decision-makers stick to this limited purpose instead of something more grandiose, it is instructive to recall what the Marin Grand Jury Report titled “Gnoss Field, Yeah, But It’s Our Airport” (May 23, 2014) concluded just a few years ago:

While our study convinced us that the airport certainly serves a portion of Marin’s citizens, whether it serves many vital functions is questionable. We note that the latest prior Grand Jury review of the airport was 16 years ago in 1997 and the report before that had been 16 years earlier in 1981. In reading the 1997 report, we found that some of the concerns then are still valid today. The 1997 report stated, in reference to cost-benefit issues, “Clearly, the Gnoss Field operations have proven to be primarily for the convenience and benefit of so few (less than 1/10 of 1% of the Marin population) whose needs in this regards can hardly be considered an overwhelming public necessity or overriding consideration.” This is still true today.

Almost everyone we spoke to used essentially the same wording in telling us that the airport produces revenue, provides emergency support, supports life-saving flights, and would provide transportation or evacuation in the case of a countywide disaster. In fact, most of these long-held assumptions are, at best, marginally true. The airport is barely self-sufficient, even with ongoing federal aid. There are relatively few medical flights into or out of Gnoss. However, volunteer pilots at Gnoss provide non-urgent flights, at no cost, for people in need. In a large-scale emergency there is no assurance the airport would remain operative.

We appreciate your fact-based approach which has resulted in recommending the smaller alternative project with a runway length of 300 feet.

Very truly yours,

The undersigned residents of Rush Creek

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<th>Christopher Gilkerson and Susan Mathews</th>
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<td>Michael Morris and Vickie Hecht</td>
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Cc: Supervisor Judy Arnold  
    Supervisor Damon Connolly  
    Supervisor Katie Rice  
    Supervisor Dennis Rodoni  
    Supervisor Kate Sears  
    Raul Rojas, Director of Public Works
Public Hearing
August 22, 2019

Published Notice/Affidavit
Meeting Registration
Presentation
Speaker Registration
LANDRUM & BROWN
4445 LAKE FOREST PARK DR
SUITE 700
CINCINNATI, OH  45242

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Account Number: 3794664
Ad Order Number: 0006368785

Customer’s Reference
/ PO Number:

Publication: Marin Independent Journal
Publication Dates: 07/19/2019
Amount: $534.62
In accordance with the National Environmental Policy Act (NEPA), the Federal Aviation Administration (FAA) is announcing the availability of the Draft Supplement to the Final Environmental Impact Statement (SEIS) for the Proposed Extension of Runway 13/31 at Gnoss Field Airport (DVO), Novato, Marin County, California. The Draft SEIS was prepared to disclose the potential environmental impacts resulting from the proposed project at DVO.

The document was prepared in response to a proposal presented by Marin County, the owner and operator of DVO and identified in the Draft SEIS as the Airport Sponsor, for environmental review. Several Federal actions would be necessary to approve the airfield development prior to its implementation. Proposed improvements include extension of Runway 13/31 and other airfield projects (see below).

The Draft SEIS presents the purpose and need for the proposed Federal action, analysis of reasonable alternatives, including the No Action alternative, discussion of impacts for each reasonable alternative, and supporting appendices. These alternatives include Alternative B (Sponsor’s Proposed Project) - extend Runway 12/31 1,100 feet to the north; Alternative D - extend the runway by 860 feet to the north and 240 feet to the south; and a new FAA Preferred Alternative E (FAA’s Preferred Alternative) not evaluated in the June 2014 Final Environmental Impact Statement (EIS) - shift the runway 106 feet to the north and extend the runway 300 feet to the north. The existing parallel taxiway would be extended to the full length of the extended runway under Alternatives B, D, or E while maintaining the existing runway-to-taxiway separation distance of 155 feet. Under Alternatives B, D, or E, drainage channels would be extended to drain the additional runway and taxiway pavement, and existing levees would be extended to protect the longer runway and taxiway from flooding. Under Alternatives B, D, or E the existing Precision Approach Path Indicator (PAPI) navigational aids would be relocated to appropriate locations to function with the longer runway. This Draft SEIS also evaluates an Alternative A - No Action Alternative as required by the NEPA. An Alternative C - extend the runway by 1,100 feet to the south - was initially considered but not evaluated in detail as explained in the Draft SEIS.

Pursuant to the Endangered Species Act, 16 U.S.C. § 1536, the FAA gives notice that the FAA has determined the FAA’s Preferred Alternative would adversely affect the salt marsh harvest mouse (Reithrodontomys raviventris) and the California clapper rail (Rallus longirostris obsoletus) recently renamed Ridgeway’s rail (Rallus obsoletus). Habitat for both of these species is present within the Detailed Study Area, as described in the Draft SEIS. The losses of habitat under the FAA’s Preferred Alternative is considered significant, but mitigatable to a not significant level. Protective and habitat compensation measures are identified in the Draft SEIS. The FAA completed Section 7 consultations with the U.S. Fish and Wildlife Service during preparation of the draft June 2014 Final EIS regarding endangered and threatened species that could be affected by the Sponsor’s Proposed Project. The USFWS issued a no-jeopardy Biological Opinion for the Sponsor’s Proposed Project, which includes habitat compensation ratios to address impacts to threatened or endangered species impacted by implementation of Alternative B. The Biological Opinion also requires that a habitat compensation plan be submitted to the USFWS for review and approval. Marin County, the Airport Sponsor, would be responsible for preparing the habitat compensation plan. As USFWS approval of a specific habitat compensation plan is already required as part of the previously completed Section 7 consultation, no additional consultation is required.

FAA provides notice pursuant to 36 C.F.R.§ 800.8(c) that it is using the NEPA process to notify the public of FAA’s finding that the proposed undertaking will not affect any properties listed or eligible for listing on the National Register of Historic Places.

FAA provides notice pursuant to Executive Order 11990, Protection of Wetlands, that the FAA’s Preferred Alternative will affect approximately 7.27 acres of Waters of the U.S., of which 1.11 acres are also regulated under the Rivers and Harbors Act. The wetland and aquatic habitat losses are considered significant, but mitigatable to a not significant level. With implementation of a mitigation plan to compensate for the losses of wetland and aquatic habitat resulting from the construction of the FAA’s Preferred Alternative, the environmental impact would not be significant. The wetland and aquatic habitat losses as well as compensatory mitigation options are identified in the Draft SEIS.

FAA provides notice pursuant to Executive Order 11998, Floodplain Management, that the FAA’s Preferred Alternative will enclose approximately 4.8 acres of additional land in the within the DVO levees that are within the 100-year floodplain. The size of the contiguous 100-year floodplain in the vicinity of the airport is approximately 3.875 acres. Implementation of the FAA’s Preferred Alternative would not cause notable adverse impacts on natural and beneficial floodplain values on the existing 100-year floodplain. Therefore, implementation of the FAA’s Preferred Alternative would not result in a significant impact on the 100-year floodplain.

The public comment period on the Draft SEIS started on July 19, 2019 and ends on September 6, 2019. As part of the EIS public participation process, the FAA will hold a public hearing from 7:00 p.m. to 8:45 p.m. Thursday, August 22, 2019 in the Marin Humane Society Auditorium, 171 Bel Marin Keys Blvd, Novato, California. Oral and written comments on the Draft SEIS may be presented at the hearing. Written comments on the Draft SEIS may be submitted to the following address.

Mr. Doug Pomeroy,
San Francisco Airports District Office,
Federal Aviation Administration, 1000 Marina Boulevard, Suite 220, Brisbane, California 94005-1853
All comments must be accepted no later than 5:00 p.m. Pacific Daylight Time, Friday, September 6, 2019.

Comments on the Draft SEIS will help the FAA arrive at the best possible informed decision about the proposal. By including your name, address and telephone number, email or other personal identifying information in your comment, be advised that your entire comment including your personal identifying information - may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

Copies of the Draft SEIS are available for public review at the following locations during normal business hours:

- U.S. Department of Transportation, Federal Aviation Administration, 1000 Marina Boulevard, Suite 220, Brisbane, CA 94005-1835
- U.S. Department of Transportation, Federal Aviation Administration, 777 South Aviation Boulevard, Suite 150, El Segundo, CA 90245
- Marin County Department of Public Works, 3501 Civic Center Drive, Room 304, San Rafael, CA, 94903
- Gnoss Field Airport, 451-A Airport Road, Novato, CA 94945
- Marin County Library, Novato Branch, 1720 Novato Blvd, Novato, CA 94947
- Marin County Library, South Novato Branch, 931 C St, Novato, CA 94949
- San Rafael Public Library, 1100 E Street, San Rafael, CA 94901
- Marin County Library, Civic Center Branch, 3501 Civic Center Drive # 427, San Rafael, CA 94903
- Marin County Library, Bolinas Branch, 14 Wharf Road, Bolinas, CA 94924
- Marin County Library, Corte Madera Branch, 707 Meadowsweet Drive, Corte Madera, CA 94925
- Marin County Library, Fairfax Branch, 2097 Sir Francis Drake Blvd., Fairfax, CA 94930
- Marin County Library, Inverness Branch, 15 Park Avenue, Inverness CA, 94937
- Marin County Library, Marin City Branch, 164 Donahue St., Marin City, CA 94965
- Marin County Library, Point Reyes Branch, 11431 State Route One, Point Reyes Station, CA 94956
- Marin County Library, Stinson Beach Branch, 3521 Shoreline Highway, Stinson Beach CA 94970
- Sonoma County Library, Petaluma Branch, 100 Fairgrounds Drive, Petaluma, CA 94952
- San Anselmo Public Library, 110 Tunstead Avenue, San Anselmo, CA 94960
- Tiburon - Belvedere Library, 1501 Tiburon Blvd, Tiburon, CA 94920-2530
- Mill Valley Public Library, 375 Throckmorton Ave, Mill Valley, CA 94941
- Larkspur Public Library, 400 Magnolia Ave, Larkspur, CA 94939-2035
- Sausalito Public Library, 420 Litho Street, Sausalito, CA 94965
- Gnoss Field (DVO) EIS/EIR Website, http://www.gnossfieldeis-eir.com/

SUPPLEMENTARY INFORMATION: The FAA encourages all interested parties to provide comments concerning the scope and content of the Draft SEIS. Comments should be as specific as possible and address the analysis of potential environmental impacts and the adequacy for the FAA’s Preferred Alternative 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 viewers’ interests and concerns using quotations and other specific references to the text of the Draft SEIS and related documents. Matters that could have been raised with specificity during the comment period on the Draft SEIS may not be considered if they are raised for the first time later in the decision process. This commenting procedure 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.

Following the public comment period, the FAA will prepare a Final SEIS and Record of Decision pursuant to 40 C.F.R. § 1503.4(c) [CEQ Regulations], and FAA Orders 1050.1F and 5050.4B.

No. 926 July 19, 2019
PROOF OF PUBLICATION
(2015.5 C.C.P.)

STATE OF CALIFORNIA
County of Marin

I am a citizen of the United States and a resident of the County aforesaid: I am over the age of eighteen years, and not a party to or interested in the above matter. I am the principal clerk of the printer of the MARIN INDEPENDENT JOURNAL, a newspaper of general circulation, printed and published daily in the County of Marin, and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of Marin, State of California, under date of FEBRUARY 7, 1955, CASE NUMBER 25566; that the notice, of which the annexed is a printed copy (set in type not smaller than nonpareil), has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to-wit:

07/19/2019

I certify (or declare) under the penalty of perjury that the foregoing is true and correct.

Dated this 19th day of July, 2019.

Donna Lajunes
Signature

PROOF OF PUBLICATION
SUPPLEMENTARY INFORMATION: The FAA encourages all interested parties to provide comments concerning the scope and content of the Draft SEIS. Comments should be as specific as possible and address the analysis of potential environmental impacts and the adequacy for the FAA’s Preferred Alternative 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 viewers’ interests and concerns using quotations and other specific references to the text of the Draft SEIS and related documents. Matters that could have been raised with specificity during the comment period on the Draft SEIS may not be considered if they are raised for the first time later in the decision process. This commenting procedure 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.

Following the public comment period, the FAA will prepare a Final SEIS and Record of Decision pursuant to 40 C.F.R. § 1506.4(c) [EQ Regulations], and FAA Orders 1569.1F and 0900.4B.

No. 926  July 19, 2019
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## DRAFT SUPPLEMENT TO THE FINAL ENVIRONMENTAL IMPACT STATEMENT

### PUBLIC HEARING

GNOS Field Airport - Extend Runway 13/31

### Sign-In Sheet

August 22, 2019

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Public Hearing

Draft
Supplement to the Final Environmental Impact Statement

Extend Runway 13/31
Gnoss Field Airport

Date: August 22, 2019
I. Introduction

• County of Marin:
  – Airport Project Sponsor

• Federal Aviation Administration:
  – Approve/Disapprove Airport Layout Plan Change
  – NEPA Lead Agency – Approve EIS

• Landrum & Brown:
  – Environmental Consultant for EIS
II. Purpose of Public Meeting

• Update the public on the status of the Environmental Impact Statement (EIS)

• Receive public comments on the Draft Supplement to the Final EIS (SEIS)
EIS/EIR Processing and Status Update

Marin County is Here
Gnoss Field Airport
Supplement to the Final EIS – Public Hearing
Extend Runway 13/31
August 22, 2019

Federal Aviation Administration

EIS Processing and Status Update

FAA Determines Supplement to the Final EIS is Required 2015

Prepare Purpose and Need Working Paper

Circulate Purpose and Need Working Paper for Agency/Public Comment 2016

CONDUCT PUBLIC MEETING 2016

Consider Agency/Public Comments

Prepare Updated Purpose and Need Working Paper 2018

Circulate Updated Working Paper for Agency/Public Comment

CONDUCT PUBLIC MEETING 2018

Consider Agency/Public Comments

Prepare Draft Supplement to the Final EIS 2018 - 2019

Agency/Public Circulation 2019

CONDUCT PUBLIC HEARING 2019

Respond to Agency/Public Comments

Notice of Availability of Final Supplement to the Final EIS Goal - Fall 2019

FAA Issues Final Supplement to the Final EIS Goal - Fall 2019

FAA Signs/Issues Record of Decision Goal – Fall 2019

2015

2016

2016

2018

2018 - 2019

2019

2019
III. Status of the EIS

• FAA released the Final EIS in June 2014, but did not issue a Record of Decision

• FAA notified Marin County in January 2015 that an updated aviation forecast and Supplement to the Final EIS were needed
III. Status of the EIS

- FAA published the Purpose and Need Working Paper in April 2016 for public review and comment.
- Identified a different, less demanding, critical aircraft, and identified needed runway extension as 300 feet instead of 1,100 feet.
- Commenters stated that additional investigation of Visual Flight Rules flights and fuel receipts would show additional activity of jet aircraft with longer runway length requirement.
- Marin County and FAA agreed to review additional data.
III. Status of the EIS

- FAA published the Updated Purpose and Need Working Paper in February 2018 for review and comment
  - 300’ runway extension justified for current critical aircraft
    - Family of turboprop aircraft with wingspan at least 49 feet but <79 feet
    - approach speed < 121 knots, (airport reference code B-II)

- FAA prepares and publishes the Draft Supplement to the Final EIS (SEIS)
  - Receive and Review Comments
  - Publish Final SEIS
  - Issue Record of Decision
IV. Existing Airport

Gnoss Field

• One Runway (13/31) - 3,300 Feet
• 82,730 Takeoff/Landing a Year
• Single and Twin Engine Propeller Aircraft, Small Business Jets
• System of Levees Protect Runway from Flooding
• Airport has operational noise abatement procedures
IV. Existing Airport-Noise Abatement
## IV. Existing Airport

### Gnoss Field

- Typical Aircraft that use Gnoss Field Airport - Single and Twin Engine Propeller Aircraft, Small Business Jets

<table>
<thead>
<tr>
<th>AIRPORT REFERENCE CODE</th>
<th>AIRCRAFT CHARACTERISTICS</th>
<th>EXAMPLE AIRCRAFT TYPE</th>
</tr>
</thead>
</table>
| A-I                    | Approach Speed: Less than 91 knots  
Wingspan: Less than 49 feet | Cessna 172 |
| B-I                    | Approach Speed: 91 knots or greater, but less than 121 knots  
Wingspan: Less than 49 feet | Cessna 525 |
| B-II                   | Approach Speed: 91 knots or greater, but less than 121 knots  
Wingspan: 49 feet or greater, but less than 79 feet | Beechcraft Super King Air 200  
(family grouping of critical aircraft) |

1 Source: FAA Advisory Circular 150/5300-13A “Airport Design”
V. Purpose and Need

Need for Sufficient Runway Length

• Existing runway length (3,300 feet) cannot fully accommodate the existing aviation activity, as represented by the family grouping of critical aircraft that regularly uses the Airport under hot weather conditions (Turboprop aircraft with wingspan at least 49 feet but <79 feet, approach speed < 121 knots, airport reference code B-II)

• The purpose of the proposed runway extension project is to: allow existing aircraft, as represented by the family grouping of critical aircraft at Gnoss Field Airport, to operate without operational weight restrictions under hot weather conditions
V. Purpose and Need

Need for Sufficient Runway Length

• The “critical aircraft” is the most demanding aircraft in terms of the physical dimensions of the airport such as the length and width of runways and taxiways, that regularly uses an airport*

• Regular use of an airport is defined as 500 or more itinerant operations (takeoffs and landings) of the critical aircraft*

• Runway length determination is based on the requirements of the critical aircraft

*Definitions based on FAA Order 5090.3C Field Formulation of the National Plan of Integrated Airport Systems (NPIAS) and FAA Advisory Circular 150/5000-17 Critical Aircraft and Regular Use Determination
V. Purpose and Need

Need for Sufficient Runway Length

• For FAA runway length calculation purposes, hot weather is defined as the mean daily maximum temperature of the hottest month

• Mean daily maximum of hottest month = 82 degrees F in July, August, and September per National Oceanic & Atmospheric Administration data

• Existing runway length (3,300 feet) can result in operational weight restrictions for some more demanding aircraft in hot weather

• Aircraft must either reduce fuel or reduce the passengers and/or cargo
VI. FAA’s Preferred Alternative

• Shift Runway 13/31 106 feet to the north and extend the runway 300 feet to the north
  • Shifting runway keeps entire project within current airport property boundary
• Extend the corresponding taxiway to the full length of the runway
• Construct standard Runway Safety Areas for B-II aircraft
• Levee extension and realignment of drainage
• Re-program the navigational aids that pilots use to land at the Airport to reflect the extended runway
VII. Proposed Runway Improvements

- Extend Levee and Drainage Ditch
- 406-Foot Runway Construction (300-Foot Runway Extension Plus 106-Foot Runway Shift)
- Extend Taxiway
- Construct 300-Foot x 150-Foot Safety Area
- Extend Drainage Ditch
- Taxiway Construction
- Taxiway Demolition
- Construct 300-Foot x 150-Foot Safety Area
VIII. Alternatives Considered

- **Alternative A**: No Action
- **Alternative B (Sponsor’s Proposed Project)**: Extend runway to the northwest by 1,100 feet
- **Alternative D**: Extend runway to the southeast by 240 feet and to the northwest by 860 feet
- **Alternative E (FAA’s Preferred Alternative)**: Shift Runway northwest by 106 feet and extend runway to the northwest by 300 feet
**Alternative B**

- Construct 240-Foot x 120-Foot Safety Area
- Extend Levee and Drainage Ditch
- 1,100-Foot Runway Extension

**Alternative D**

- Construct 240-Foot x 120-Foot Safety Area
- Extend Levee and Drainage Ditch
- 860-Foot Runway Extension
- Extend Taxiways

Legend:
- Proposed Runway Extension
- Proposed Taxiway and Safety Area
- Proposed Land Acquisition
- Proposed Roadway Relocation
- Proposed Drainage Ditch
- Proposed Levee
- Existing Runway
- Existing Buildings
- Airport Property Boundary

Extensions:
- **Extended Runway 13/31 4,400'**
- **240-Foot Runway Extension**
- **240-Foot x 120-Foot Safety Area**
- **Acquire 3.7 Acres of Land**
Alternative E

Extend Levee and Drainage Ditch

406-Foot Runway Construction
(300-Foot Runway Extension
Plus 106-Foot Runway Shift)

Extend Taxiway

Construct
300-Foot x 150-Foot
Safety Area

Extend Drainage Ditch

Taxiway Construction

Taxiway Demolition

Construct
300-Foot x 150-Foot
Safety Area

Legend

Proposed Runway Extension
Proposed Taxiway and Safety Areas
Proposed Runway Relocation
Proposed Drainage Ditch
Proposed Levee
Existing Runway
Existing Buildings
Airport Property Boundary

Gnoss Field Airport
Supplement to the Final EIS – Public Hearing
Extend Runway 13/31
August 22, 2019

Federal Aviation Administration
IX. Alternative Rejected

**Alternative C:** Extend runway southeast by 1,100 feet

Not carried forward for further analysis in EIS because:

- Greater wetland impacts
- Operational Difficulties
- Closer to Residential Areas
- Higher Cost including off-airport property acquisition
X. Environmental Consequences

Noise

• Federal significant noise threshold in decibels Community Noise Equivalent Level (dB CNEL) is 65 dB CNEL
• No homes currently exposed to 65 dB CNEL
• No significant noise impact under Alternative B, Alternative D, or Alternative E
• No existing homes or planned residential areas exposed to 65 dB CNEL under any alternative
X. Environmental Consequences

Wetlands

• **No Action** - No wetlands impact
• **Alternative B (Sponsor’s Proposed Project)** - Impact 11.83 acres of wetlands
• **Alternative D** - Impact 12.73 acres of wetlands
• **Alternative E (FAA’s Preferred Alternative)** - Impact 7.27 acres of wetlands

Wetland Mitigation:

• Feasible wetlands mitigation sites identified in Draft SEIS
• Consultation between County and Federal Agencies may identify other mitigation options
X. Environmental Consequences

Threatened and Endangered Species

• Salt Marsh Harvest Mouse & California Clapper Rail (Ridgeway’s Rail)

• Habitat Impacts
  – **No Action**: No Impact
  – **Alternative B (Sponsor’s Proposed Project)**: Permanent removal of 6.88 acres of wildlife habitat and temporary removal of 16.05 acres of habitat.

• Habitat Mitigation
  – Mitigation options identified in Draft SEIS
  – Consultation between County and Federal Agencies may identify other mitigation options
X. Environmental Consequences

Areas of No Significant Environmental Impact

- Air Quality
- Water Quality
- Floodplains
- Farmlands
- Energy Supply & Natural Resources
- Compatible Land Use
- Socioeconomic Impacts
- Visual Resources (Including Light Emissions & Visual Impacts)

- Hazardous Materials
- Coastal Resources
- Wild and Scenic Rivers
- Construction Impacts
- Secondary Impacts
- Cumulative Impacts
XI. Next Steps

• Document available at www.gnossfieldeis-eir.com

• Three ways to comment on the Draft SEIS:
  - Make a comment at Public Hearing today
  - Write a comment and leave it in the comment box
  - Send a comment to Doug Pomeroy, FAA on or before September 6, 2019

Mr. Doug Pomeroy
Federal Aviation Administration
San Francisco Airport District Office
1000 Marina Boulevard, Suite 220
Brisbane, CA 94005-1835
Telephone: 650-827-7612 Fax: (650) 827-7635
(PLEASE PRINT LEGIBLY) Date: 8/22/19

Project EIS: Gnoss Field Airport – Runway 13/31 Extension

FAA – DRAFT SUPPLEMENT TO THE FINAL EIS
PUBLIC HEARING SESSION
PUBLIC TESTIMONY SIGN-IN CARD

Name: Larry Kivett

Address: 1038 Bel Marin Keys

Representing: 

- Please submit this card to staff; and
- LIMIT YOUR COMMENTS TO 3 MINUTES MAXIMUM.

(PLEASE PRINT LEGIBLY) Date: 8/22/2019

Project EIS: Gnoss Field Airport – Runway 13/31 Extension

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Name: Susan Stompe

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Representing: Marin Conservation League

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(PLEASE PRINT LEGIBLY) Date: 8/22/19

Project EIS: Gnoss Field Airport – Runway 13/31 Extension

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Project EIS: Gnoss Field Airport – Runway 13/31 Extension

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Representing: Resident

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Project EIS: Gnoss Field Airport – Runway 13/31 Extension

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Representing: Black Point Environmental Action Committee

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Project EIS: Gnoss Field Airport – Runway 13/31 Extension

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